

Pollution Incident Response Management Plan

06/05/2019



POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

DDBC Sydney

111-113 Quarry Road, Erskine Park

Environment Protection Licence No. 20402

Version 2.3

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Glossary

This document uses the following terms and acronyms:

Term/Acronym	Description
PIRMP	Pollution Incident Response Management Plan
POEO Act	<i>Protection of Environment Operations Act 1997</i>
POEO (G) Regulation	<i>Protection of Environment Operations (General) Regulation 2009</i>
SDA	Saputo Dairy Australia

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Document Control

Version	Issue Date	Description update	Author Document Owner Business Unit	Approver
1.0	7/5/2015	Issued for internal MGC review	Kit Sleeman Artimus Hart Manufacturing & Technical Excellence	Artimus Hart
2.0	26/5/2015	Issued for display on MGC website	Kit Sleeman Artimus Hart Manufacturing & Technical Excellence	Artimus Hart
2.1	27/06/2017	Annual review of document.	Carmel Hall Anshu Lal Manufacturing & Supply Chain	Anshu Lal
2.2	01/05/2018	Update following annual testing of PIRMP and to reflect new company ownership.	Carmel Hall Anshu Lal Manufacturing & Technical Excellence	Anshu Lal
2.3	06/05/2019	Update following annual testing of PIRMP and to reflect changes to SDA personnel.	Carmel Hall David Courtney Operations & Environment	David Courtney
Next Review Due By:		01 May 2020		

1 Introduction

Saputo Dairy Australia (SDA) Pty Ltd holds Environment Protection Licence No. 20402 for the site located at 111–113 Quarry Road, Erskine Park (Erskine Park site). The Scheduled Activity undertaken at the Erskine Park site is agricultural processing, under the subcategory of dairy processing. The Erskine Park site is capable of processing up to 150 megalitres (ML) of raw milk per year, sourced from dairy farms in NSW. Milk is pasteurised and homogenised at the site before being bottled into 2 and 3 litre plastic bottles for distribution throughout NSW.

Licensees under the *Protection of the Environment Operations Act 1997 (POEO Act)* are required to prepare a Pollution Incident Response Management Plan (PIRMP) for each licensed activity, in accordance with the requirements set out in Part 5.7A of the *POEO Act* and in Chapter 7 Part 3A of the *Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation)*.

Clause 98D (2) and (3) of the *POEO(G) Regulation* requires that the PIMRP must be made available via a publicly accessible website or by providing a copy of the plan, without charge, to any person who makes a written request for a copy.

Saputo Dairy Australia Pty Ltd has developed a PIRMP to meet their legislative requirements. They have also developed this abridged version of the PIRMP to meet the requirements for public availability of the plan.

2 Legislative Context

Section 153C (a) of the *POEO Act* requires a PIRMP must include the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to:

- i. The owners or occupiers of premises in the vicinity of the premises to which the environment protection licence relates, and
- ii. The local authority for the area in which the premises to which the environment protection licence is located and any area affected, or potentially affected, by the pollution, and
- iii. Any persons or authorities required to be notified

Furthermore, Clause 98C (1) of the *POEO(G) Regulation* requires that the PIMRP must include:

- The contact details of each relevant authority

- Details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises

Section 148 of the *POEO Act* requires anyone carrying out an activity or occupying a premises who becomes aware of a pollution incident where 'material harm' to the environment is caused or threatened to immediately report the pollution incident.

'Material harm' to the environment is defined under the *POEO Act* as:

- Actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- Actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 – where loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment
- 'Material harm' includes on-site harm, as well as harm to the environment beyond the premises where the pollution incident occurred.

3 Incident Response

Saputo Dairy Australia Pty Ltd has a company-wide incident management procedure which defines the performance requirements for identifying, responding, reporting, resolving and mitigating workplace incidents.

The Incident Response Manager is the key individual who is responsible for activating the PIRMP. They are authorised to notify relevant authorities and they have responsibility for managing the response to a pollution incident.

The process for activation and implementation of the PIRMP at the Erskine Park site is given in Figure 1.

If the incident is determined as a pollution incident that causes or threatens to cause material harm to the environment, the Incident Response Manager will notify authorities in the order set out in Figure 2.

Communicating with neighbours and the local community is an important element in managing the response to any incident which may impact them.

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In the event of a pollution incident occurring which might impact neighbouring premises or the broader local community, there are range of communication methods that would be used to provide early warnings and regular updates to the owners and occupiers of premises who may be affected by the incident. These methods include:

- Door knocking
- Letterbox drops
- Direct phone calls
- Local media
- Signage

The Incident Response Manager will determine the most appropriate means of contacting potentially affected community members depending on the scale and severity of the incident.

Figure 1: PIRMP Activation and Implementation Process

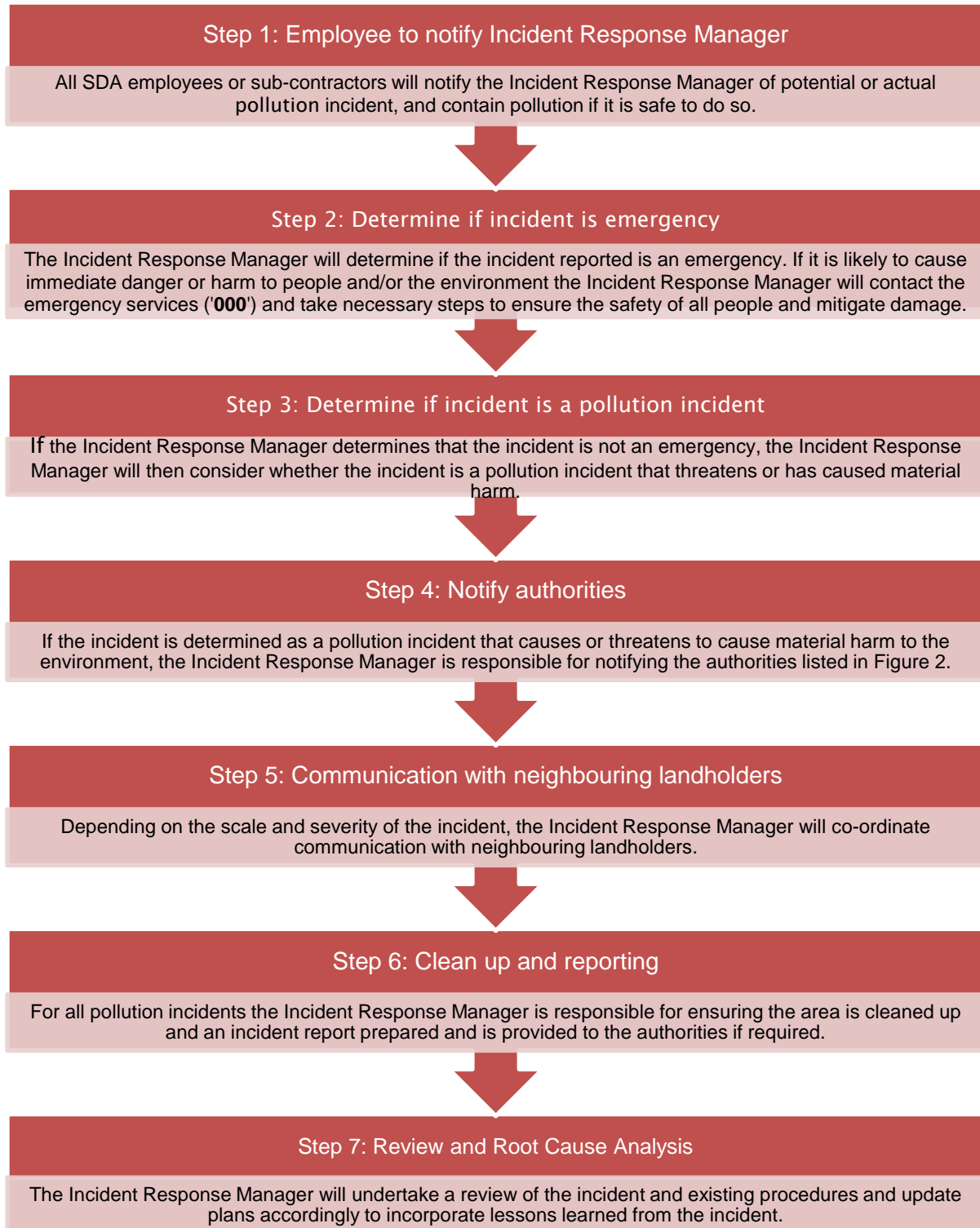


Figure 2: Authority Notification Details

