

Pollution Incident Response Management Plan



MARCH 2023

Hilltop Meats Pty Ltd



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1. Purpose and Objective

This Pollution Incident Response Management Plan (PIRMP) has been compiled for Hilltop Meats Pty Ltd (HTM) to satisfy the Licensee's obligations under the Protection of the Environment Operations Act 1999 (POEO Act) and associated Acts and Regulations.

The purpose of this Pollution Incident Management Plan is to:

- Provide directions to HTM and related staff in responding to pollution incidents at the premises.
- Ensure timely communication about a pollution incident is provided to staff at the premise, the Environment Protection Authority (EPA), other relevant authorities specified in the Protection of the Environment Legislation Amendment Act (POELA Act) (including Hilltop Shire Council, NSW Ministry of Health, SafeWork NSW AND Fire and Rescue NSW) and any persons outside the operations who may be affected by the impacts of a pollution incident.
- Minimise and control the risk of a pollution incident at HTM by identifying the key risks and planning actions to minimize and manage those risks.
- Detail the training requirements for this plan, including identifying people responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency, and suitability.

This PIRMP covers two activities conducted on-site:

- **meat processing and**
- **rendering of animal fats.**

2. Site Information

Hilltop Meats (HTM) is located in the township of Young at 13 Scenic Rd, Young NSW 2594. This site is predominantly a meat processing plant with a global clientele range. Below is the location of HTM.



3. Overview of the PIRMP

The diagram below summaries the actions to be undertaken by HTM should a pollution incident occur or to be suspected to have occurred. This PIRMP contains the necessary details and information to effectively manage a pollution incident as timely as possible.



4. Legislative Requirements

The specific requirements for a Pollution Incident Response Management Plan (PIRMP) are set out in Part 5.7A of the POEO Act. In summary, the requirements are:

- All holders of environment protection licenses must prepare a PIRMP (section 153A)
- The plan must be in the form required by the regulations and must include the information detailed in the POEO Act (section 153C) and the General Regulation (section 72 and section 73).
- Licensees must keep the PIRMP at the premises of the environmental protection license relates (section 153D of the POEO Act) and make certain parts of the PIRMP available on a publicly accessible website of the licensee.
- Licensees must test their PIRMP in accordance with the regulations (section 153E of the POEO Act and section 75 of the General Regulation).
- Licensees must implement their PIRMP immediately if a pollution incident occurs that causes or threatens material harm to the environment.

5. Definition of Pollution Incident

“Pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.”

Dictionary of the POEO Act

6. Scope

This Pollution Incident Response Management Plan must be followed by all HTM employees, contractors, and visitors in the early response to and reporting of a pollution incident and applies to all activities, products and services on the Hilltop site.

7. Notification of Pollution Incident

7.1 Notification

Notification is required if a pollution incident causes or threatens to cause 'material harm to the environment'. Material harm is defined in Section 147 of the POEO Act as:

- a) harm to the environment is material if:
 - i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations) and,
- b) loss includes the reasonable costs and expenses that would be incurred by taking all the reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

7.2 Penalties

It is an offence to not comply with the notification requirements of Part 5.7 of the POEO Act. The maximum penalties for this offence are:

- For corporations
 - \$2,000,000
 - And for continuing offences a further penalty of \$120,000 per day the offence continues.
- For individuals
 - \$500,000
 - And for continuing offences a further penalty of \$120,000 per day the offence continues.

7.3 Responsible Key Personnel(s)

Name	Contact Details	Position	Responsibility
Casey Smith	Phone: 0438 747 163 Email: casey@hilltopmeats.com.au	General Manager	Responsible for undertaking notification as defined in this PIRMP
			Responsible for managing and coordinating the response to a pollution incident
			Responsible for communication PIRMP to site personnel
			Responsible for coordinating communications with affected community members
			Ensure site personnel are aware of this PIRMP
			Responsible for ensuring notification and training of PIRMP
Seraphine O'Brien	Phone: 02 6574 7763 Email: seraphine@ecthrosby.com.au	Environmental Officer	Responsible for undertaking notification as defined in this PIRMP
			Responsible for managing and coordinating the response to a pollution incident
			Responsible for authorising the PIRMP and all subsequent updates
			Responsible for arranging testing and updating of the PIRMP

7.4 Notification to Relevant Authorities

When the pollution incident causes or threatens material harm to the environment or human health, all the following authorities must be notified by the General Manager or the Environmental Officer:

	Relevant Authority	Contact Number
1	Emergency Call Services • Emergency Hotline Number (24 hours) (*The site supervisor should call 000 if the incident presents an immediate threat to human health and/or property and a combat agency is required (i.e., NSW Fire and Rescue, NSW Ambulance Service, NSW Police Force) and then notify all other parties below including NSW Fire Rescue via a local telephone number)	000
2	Hilltops Shire Council	6380 1200
	Environmental Protection Authority	131 555
3	Murrumbidgee & Southern Public Health Unit	6080 8900
	SafeWork NSW	13 10 50
(**If there is no immediate threat to human health and/or property i.e., a combat agency is not required, then the General Manager is still required to follow the outlined above except for dialling 000)		

7.5 Information to be Notified

Under section 150 of the POEO Act 1997, the information about a pollution incident that must be notified is:

- The time, date, nature, duration and location of the incident.
- The location of the place where pollution is occurring or likely to occur.
- The nature, the estimated quantity or volume and the concentration of any pollution or threatened pollution (if known).
- Other information prescribed by the regulations.

Immediately after a pollution incident becomes known, the QA/Safety Manager is required to notify the above information. Any information required that is not known at the time the incident is notified must be provided when it becomes known.

8. Community Notification

Notification of the nearby residents is an important aspect of the Plan to ensure that they are safe and kept informed throughout the management of the pollution incident.

8.1 Who will be notified?

All community stakeholders that may be affected by an incident will be notified. These include:

- Neighbouring residential property owners
- Neighbouring commercial properties
- The general public within the vicinity of the site, including pedestrians and motorists.

8.2 When will the Community be notified?

The type of community notification will depend on the type of incident, its magnitude, potential for harm, appropriate management actions, duration of remediation's actions.

If an incident presents a significant risk of causing material harm to persons, property, and/or the environment to an area that is not trivial, any community stakeholder within these areas will be notified at the earliest convenience.

8.3 How will the Community be notified?

When it has been established that any community stakeholder is at risk from the spill that has the potential to cause material harm, the following process will be implemented:

1. Community stakeholders will be contacted immediately after the relevant authorities have been contacted by telephone or in person.
2. Stakeholders will be advised of recommended actions that can be taken to prevent or minimise material harm (e.g., evacuation, shutting all doors and windows).
3. After the incident has been contained and managed by key personnel and authorities, subsequent communication will be undertaken by the General Manager and relevant environmental/health advisors. These may include:
 - Follow up calls and/or in person contact.
 - Meetings with stakeholders.
 - Written correspondence detailing updates regarding safety and environmental concerns associated with the pollution incident.

The General Manager has the responsibility to ensure all residents are contacted and kept advised. This person is also to act as the Hilltop Meats contact for any resident communications in regards to the incident.

Information to be provided to the community will include the following:

- That an incident has occurred and what it is
- Potential impacts
- Advice or recommendations based on the incident type and scale
- Site contact details and
- Communication protocols

The General Manager will liaise with the Local Authority(s)/Council to communicate with the residents.

8.4 Communication with the Media

Only the Senior Leadership Team (CEO, Directors) has the authority to communicate with the media in regard to any environmental (or other) incidents.

No member of the media or members of the community will be allowed to enter the site in an emergency. HTM Management has the authority and responsibility to ensure that this requirement is adhered to.

9. Environmental Hazards/Pollutants

The potential chemical hazards which have been identified for HTM have the relevant Material Safety Data Sheets (SDS) as required by work, health and safety regulations. These are located secured in the Chemical Storage Area and the chemicals are approved for the use in the food industry.

Pesticides used and stored onsite also have the relevant Material Safety Data Sheets (SDS). They are stored in a secured chemical storage area in small quantities. Only trained personnel have access and use these pesticides.

In addition to these chemicals hazards, other hazards that could impact the environment is accidental discharge of untreated water due to failure of the on-site treatment plant.

A few wastewater streams are generated at the site, including:

- Wash water from cleaning the plant.
- Wash water form production process.
- Wash water from stock yards and livestock.

Water from these areas is treated through the water treatment plant and reused for irrigation on-site.

10. Pre-Emptive Management

The following are the actions and equipment that have been implemented to prevent any pollution incident and/or minimise the impact of the incident:

1. Spill kit, personnel protective equipment and firefighting equipment locations are in the appropriate designated areas free of any obstructions.
2. Bunding for chemical and fuel storage containers.
3. All chemical and liquid materials that have potential to cause environmental pollution are located in a secure designated bunded areas. Chemicals are only kept on-site in small quantities.
4. If the site is required to be evacuated as a result of a pollution event, evacuation procedures and muster points are detailed in the Emergency Preparedness Response Plan.

An important component of HTM actions to prevent the potential for an environmental incident to occur and/or reduce the impacts should such incident occur is to utilise the following:

1. That provision of equipment should be focused around minimising the risk of harm to people and the environment as result of a pollution incident, and for containing or controlling a pollution incident.
2. Implementation of Emergency Response Plan.
3. Provision of appropriate and sufficient Personnel Protective Equipment.
4. Onsite inductions for employees, contractors, and suppliers.
5. Staff are trained in managing hazards that could result in an environmental incident as well as managing such incidents.
6. Regular environmental inspections.

11. Training and Testing

It is the priority to ensure that all HTM staff and contractors are aware of both responsibilities and protecting the environment as well as responding appropriately to any incident. To achieve these objectives, training in the PIRMP will occur via the following process:

1. All staff and contractors working at the site would be briefed on the PIRMP as part of their induction and briefing on emergency procedures.
2. PIRMP training would occur as part of regularly scheduled maintenance toolbox talks.

The induction program would include details as to the HTM's environmental commitments, preventing pollution events and reporting of incidents. In addition, procedures to be followed to report and during an environmental incident would be detailed.

Additional scheduled training would be undertaken should a change in the contents of the PIRMP be made and/or following the outcomes of the review into the causation and responses to an environmental incidents.

The testing of the PIRMP will be undertaken to check that the information is accurate and current that the plan is capable of being implemented in a workplace and effective manner. Testing shall be undertaken in the following ways:

- Assessing and reviewing. Make any necessary changes as identified.
- Testing is taken to the combination of desktop review and environmental emergency drill procedures. This will include all components of the plan, including training requirements.
- Testing of the plan will be integrated into other emergency and incident testing and training programs where possible.

The PIRMP will be updated depending on the results and outcomes of the testing procedures (as described above) as well as following reviews of any environmental incident. A review of the PIRMP will occur every 12 months commencing from the date of authorisation by HTM. Contact details in this document must be kept current at all times.

12. Risk Analysis

Description	Risk	Event Possibility	Contributing Circumstances	Circumstances Possibility	Probability	Consequences	Risk Ranking
Chemical spill	Escape to the environment	Broken storage container	Poor handling or faulty containers	Escape to the environment	D	4	Low
Pesticide spill	Escape to the environment	Broken storage container	Poor handling or faulty containers	Escape to the environment	D	4	Low
Fuels and oil spill	1. Fire	1. Broken or incorrectly sealed container	1. Contact with naked flame	1. Potential fire	D	3	Medium
	2. Escape to the environment	2. Broken or spillage of container	2. Poor handling	2. Spillage into bunded area			
Wastewater	Surface Water Contamination	Contaminated water off site	1. Excessive rainfall	Untreated waste water can enter water ways	C	3	Medium
			2. Broken pipes				
			3. System breakdown				

13. Risk Assessment Matrix

The following risk assessment matrix (**Table 1**) is used to determine the risk of each environmental hazard at HTM.

Table 1 – Risk Assessment Matrix

		Probability				
Consequences		A	B	C	D	E
	1	High	High	High	High	Medium
	2	High	High	High	Medium	Medium
	3	High	High	Medium	Medium	Low
	4	Medium	Medium	Medium	Low	Low
	5	Medium	Low	Low	Low	Low

Explanatory notes on the selection of the consequences and probability for each issue are presented in **Table 2**.

Table 2 – Risk Matrix Explanation

Probability			Consequences		
A	Almost Certain	Expected to occur, quite common	1	Severe	<ul style="list-style-type: none"> • Severe environmental harm • Fines and prosecution • Require great effort to remediate if possible at all
B	Likely	Will probably occur	2	Major	<ul style="list-style-type: none"> • Long term or serious environmental impact • Numerous complaints • Potential for prosecution • Loss of reputation
C	Possible	Might occur at some time	3	Moderate	<ul style="list-style-type: none"> • Moderate environmental impact • Will cause complaints • Possible fines • Require specialist intervention (possible EPA notification)
D	Unlikely	Could occur at some time though unlikely	4	Minor	<ul style="list-style-type: none"> • Minor environmental harm • Potential complaints • Fine unlikely • Easy remediation
E	Rare	Might occur at some time in exceptional circumstances	5	Insignificant	<ul style="list-style-type: none"> • Minimal or no environmental harm • Minimal potential for fines and complaints • No remediation required