HSE MANAGEMENT PROCEDURE

Pollution Incident Response Plan Liverpool Procedure

Procedure EP-01-02LP

Revision No.10

Edition No.2

Date	Compilation	Verification	Approval
11/07/2023	Mauricio Herrera HSE Compliance Coordinator	Rami Elazzi Production Director Energy	Kristina Misevska HSE Director OSEA
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Important!

If there is a threat to human health or property, Ring 000 and ask for the Fire Brigade to notify of the incident. Then contact below people until you get an answer.

In the event of a serious Environmental Incident requiring notification to the authorities, contact below people, until you get an answer.

AFTER HOURS & PERSONS AUTHORISED TO NOTIFY AUTHORITIES

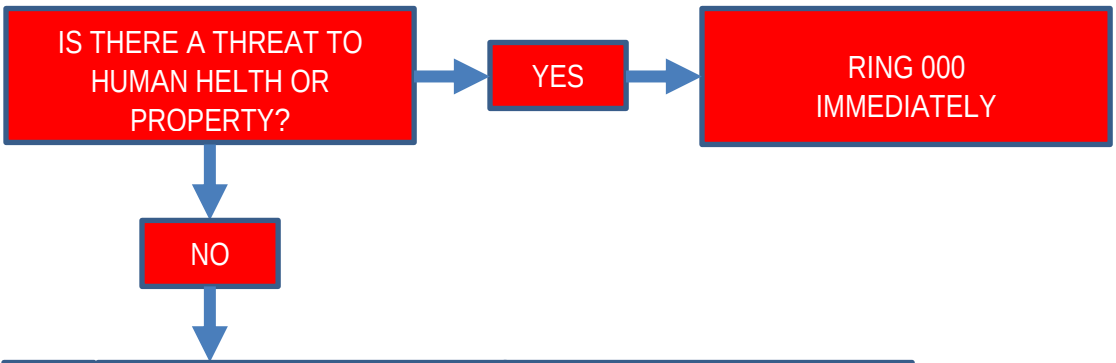
(1) Kristina Misevska
HSE Director OSEA
0429 986 109

(1) Rami Elazzi
Production Director Energy
0413 564 964

SERIOUS ENVIRONMENTAL INCIDENT NOTIFICATION CHECKLIST

This checklist is to be used in the case of a significant environmental incident:

1. Major fire
2. Major gas leak
3. Loss of material into stormwater
4. Loss of material into Sydney Water sewer
5. Loss of material into drains



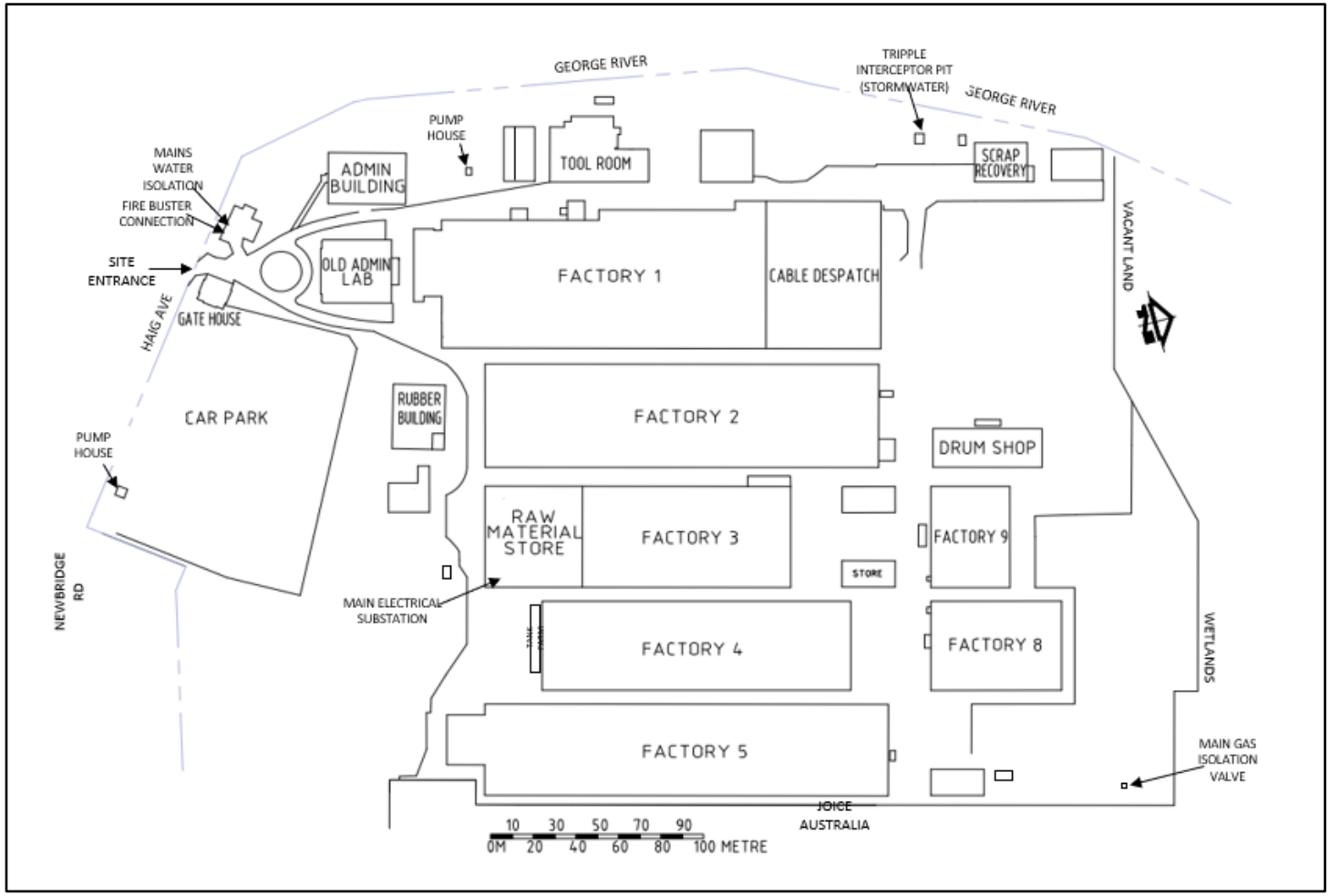
1	RING EPA	Environmental Line 131 555
2	RING PUBLIC HEALTH UNIT	During office hours 02 9515 9420 After hours 02 9515 6111
3	RING SAFEWORK	Advise SafeWork that there is a serious environmental incident 131 050
4	RING LIVERPOOL COUNCIL	Customer contact Centre 1300 36 2170
5	RING FIRE AND RESCUE NSW	Advise Fire and Rescue NSW that there is a serious environmental incident 000

EMERGENCY CONTACTS

EMERGENCY CONTACT NUMBERS (LIVERPOOL)

FIRE/AMBULANCE/POLICE	**(02) 9600 0977 or 6666**
Security	**(02) 9600 0977**
Medical Edge	**0475 166 851**
Kristina Misevska (HSE Director OSEA)	**0429 986 109**
Lisa Matovinovic (HSE Business Partner)	**0403 201 179**
Karren Piper (RTW Officer)	**0427 481 381**
Rami Elazzi (Production Director Energy)	**0413 564 964**
Shane Middleton (Maintenance Manager)	**0427 314 848**
Samarth Minocha (Production Manager)	**0481 057383**
Voeun Ny (Site Services Manager)	**0409 454032**
Kim Harrison (Maintenance Projects Manager)	**0428 848 047**
David Worden (Regional Warehouse & Distribution)	**0412 275 726**
Stefano Sibarani (Supply Chain Manager Australia)	**0479 176 369**
Phill Eves (IT Manager Oceania)	**0412 257 273**
I.T Help Desk	**(02) 9600 0200**
Therese Rydholm (HR Director Oceania)	**0455 680 972**
Jaydee Herrmannsen (HR Business Partner)	**0403 114 633**
Hamavand Shroff (CEO Oceania)	**0418 961 566**
Liverpool Fire Station	**(02) 9824 0521**
Busby Fire Station	**(02) 9607 6270**
Cabramatta Fire Station	**(02) 9726 5940**
National Coronavirus Helpline	**1800 020 080**
Poison Information Hotline	**131 126**
Work Recover Medical Centre	**(02) 9600 7778**
Liverpool Hospital	**(02) 8738 3000**
Campbelltown Hospital	**(02) 4634 3000**
Liverpool Police Station	**(02) 9765 9499**
Sydney Water	**132 090**
Endeavour Energy (Distributor for Energy Australia)	**131 003 / 133 718**
Jemena Gas (Distributor for Origin)	**131 909 / 1300 137 078**
Redmen	**1300 725 594**

Site Map


GEORGE RIVER
TRIPPLE INTERCEPTOR PIT (STORMWATER)
GEORGE RIVER
PUMP HOUSE
TOOL ROOM
SCRAP RECOVERY
MAINS WATER ISOLATION
FIRE BLISTER CONNECTION
ADMIN BUILDING
VACANT LAND
SITE ENTRANCE
OLD ADMIN LAB
FACTORY 1
CABLE DESPATCH
HAIG AVE
GATE HOUSE
CAR PARK
RUBBER BUILDING
FACTORY 2
PUMP HOUSE
DRUM SHOP
RAW MATERIAL STORE
FACTORY 3
FACTORY 9
STORE
NEWBRIDGE RD
MAIN ELECTRICAL SUBSTATION
FACTORY 4
FACTORY 8
WETLANDS
FACTORY 5
MAIN GAS ISOLATION VALVE
JOICE AUSTRALIA
10 30 50 70 90
0M 20 40 60 80 100 METRE

1. DEFINITIONS

Appropriate regulatory authority	Generally, the appropriate regulatory authority is the EPA for licensed premises and local Council for non-licensed premises. There are exceptions to this definition as stated in Clause 6 of the POEO Act.
Dangerous goods	Substances that are listed in The Australian Dangerous Goods (ADG) Code or that meet the classification criteria specified in that Code.
Environment	As defined in the POEO Act, *"environment" means components of the earth, including:* *(a) land, air and water, and* *(b) any layer of the atmosphere, and* *(c) any organic or inorganic matter and any living organism, and* *(d) human-made or modified structures and areas,* *and includes interacting natural ecosystems that include components referred to in paragraphs (a)-(c).*
Harm	As defined in the POEO Act, *"harm" to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.*
Immediately	Promptly and without delay
Material risk of harm	"Material risk of harm to the environment" is defined under 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 in taking all reasonable*

	and practicable measures to prevent, mitigate or make good harm to the environment.
Material Safety Data Sheet (MSDS)	A Material Safety Data Sheet (MSDS,) also referred to as a Safety Data Sheet (SDS), is a document that describes the chemical and physical properties of a material and provides advice on its safe storage, handling and use. (www.safeworkaustralia.gov.au)
Non-scheduled activity	Under the POEO Act, a *"non-scheduled activity" means an activity that is not a scheduled activity and is not scheduled development work.*
Occupier	As defined under the POEO Act, *"occupier" of premises means the person who has the management or control of the premises.*
POEO Act	*Protection of the Environment Operations Act, 1997*
Pollution	As defined under the POEO Act*, "pollution" means:* *(a) water pollution, or* *(b) air pollution, or* *(c) noise pollution, or* *(d) Land pollution.*
Pollution Incident	The *Environmental Guidelines: Preparation of pollution incident response management plans* defines a pollution incident as: "...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."
Pre-emptive action	Actions taken as a measure against possible or anticipated harm such as use of spill containment kits, installation of stormwater cut-off valves and installation of fire-containment water tanks.

Premises	As defined under the POEO Act*, "premises" includes:* *(a) a building or structure, or* *(b) land or a place (whether enclosed or built on or not), or* *(c) A mobile plant, vehicle, vessel or aircraft.*
Prevention of pollution	Use of processes, practices, materials or products that avoid, reduce or control pollution, which may include recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution. Note: The potential benefits of prevention of pollution include the reduction of adverse environmental impacts, improved efficiency and reduced costs.
Scheduled activity	"Scheduled activity" means an activity listed in Schedule 1 of the POEO Act. Scheduled activities must be licensed under the POEO Act.
Spill kit	A set of equipment used to isolate or control an accidental overflow or release of a substance or material.

2. EXECUTIVE SUMMARY

The purpose of this document is to detail the pollution incident response management plan for Prysmian Australia Liverpool plant, to comply with Section 5.7A of the Protection of the Environment Operations (POEO) Act 1997.

Offences are associated with not preparing the plans or not keeping plans at the premises, not testing a plan in accordance with the regulation and not implementing a plan when an incident occurs apply.

Prysmian Liverpool site holds environmental protection licence No 818 under the POEO Act to undertake

a) The processing, handling, movement and storage of materials and substances used to carry out the activity; and

b) The treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

At their site located at 1 Heathcote Road Liverpool 2170 NSW in the Liverpool Council.

Prysmian therefore has an obligation to prepare a pollution incident response management plan (PIRMP) under the POEO Act.

The objectives of the PIRMP are threefold:

- To ensure timely and comprehensive communication of a pollution incident to staff, relevant authorities and all other stakeholders affected by the impacts of the pollution incident;
- To identify risks and develop actions to minimise and manage these risks; and
- To ensure the plan is implemented by trained staff and regularly tested for accuracy, currency and suitability.

Requirements for pollution incident response management plans are stipulated in the *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2021* and Part 5.7A of the POEO Act. Part 5.7A of the POEO Act specifies:

- Information to be included in the plan (Clause 153C) including the procedures to be followed in notifying a pollution incident to the relevant people and authorities, a detailed description of action to be taken immediately after a pollution incident to reduce or control any pollution and procedures to be followed;
- The plan must be kept at the premises to which the relevant environmental protection licence relates (Clause 153D);
- Licensees must test the plan in accordance with Clause 153E; and
- Licensees must immediately implement the plan if a pollution incident occurs in the course of an activity so that material harm to the environment is caused (Clause 153F).

The NSW EPA has also prepared *Environmental Guidelines: Preparation of Pollution Incident Response Plans.* This Pollution Incident Response Management Plan has been prepared in accordance with the POEO Act, Regulation and the guidelines. Requirements included are:

a) a description of the hazards to human health or the environment associated with the activity to which the licence relates,

b) the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,

c) details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity,

d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity,

e) the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates,

f) a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident,

g) the names, positions and 24-hour contact details of those key individuals who:

(i) are responsible for activating the plan, and

(ii) are authorised to notify relevant authorities under section 148 of the Act, and

(iii) are responsible for managing the response to a pollution incident,

h) the contact details of each relevant authority referred to in section 148 of the Act,

i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on,

j) the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on,

k) a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises,

l) a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk,

m) the nature and objectives of any staff training program in relation to the plan,

o) the dates on which the plan is updated,

p) the manner in which the plan is to be tested and maintained.

Reference to existing site emergency and incident response plans has been made throughout.

3. INTRODUCTION

Under Part 5.7A of the POEO Act Prysmian is required to prepare a Pollution Incident Response Management Plan. Prysmian Liverpool holds an environmental protection licence (EPL) No 818 for metallurgical activities, resource recovery and waste storage that are undertaken at 1 Heathcote Road Liverpool 2170 NSW in the Liverpool Council.

To undertake the activities at the site, a number of dangerous goods are required to be stored and used at the site. Dangerous goods of classes 2.1, 2.2, 3, 5.1, 5.2 and 8 are stored on site. The storage and use of these dangerous goods present numerous risks. The emergency plans explain in simple terms the main risks to fire officers and the means on site that are available to manage these risks.

The POEO Act stipulates specific requirements to be included in such plans. In addition, the NSW EPA developed the *Guidelines: Pollution Incident Response Management Plans.* This plan has been prepared following the regulation and guidelines.

Information in the plan that must be made publicly available includes:

- Procedures for contacting relevant regulatory authorities including the EPA, local council, NSW Ministry of Health, SafeWork NSW, and Fire and Rescue NSW; and
- Procedures for communicating with the community.

This information will be made readily available as follows:

- At the site where the activities are carried out; and

On the company website:

http://www.prysmiancable.com.au/about/environmental-sustainability/

Any personal information in the plan within the meaning of the *Privacy and Personal Information Protection Act 1998* may be excluded from public exhibition.

3.1. INTERNAL MANAGEMENT SYSTEM

Prysmian has an internal management system for their emergency preparedness that consists of several individual procedures that are stored under:

- Emergency Management Plan.
    - Evacuation
    - Fire or explosion
    - Liquid spill
    - Flooding
    - Natural gas
    - Bomb threat
    - Air pollution
    - Asbestos damage

Hardcopies are available at relevant locations around the site. Manuals are kept at the Security Gatehouse.

This PIRMP has been prepared so that it is easily integrated into this system. At the time of writing, the existing site procedures were reviewed and updated to ensure they comply with the current POEO legislation. The PIRMP can also be read as a standalone document as references to relevant manuals, procedures and work instructions have been provided throughout.

4. HAZARDS & RISKS

4.1 INVENTORY OF POTENTIAL POLLUTANTS

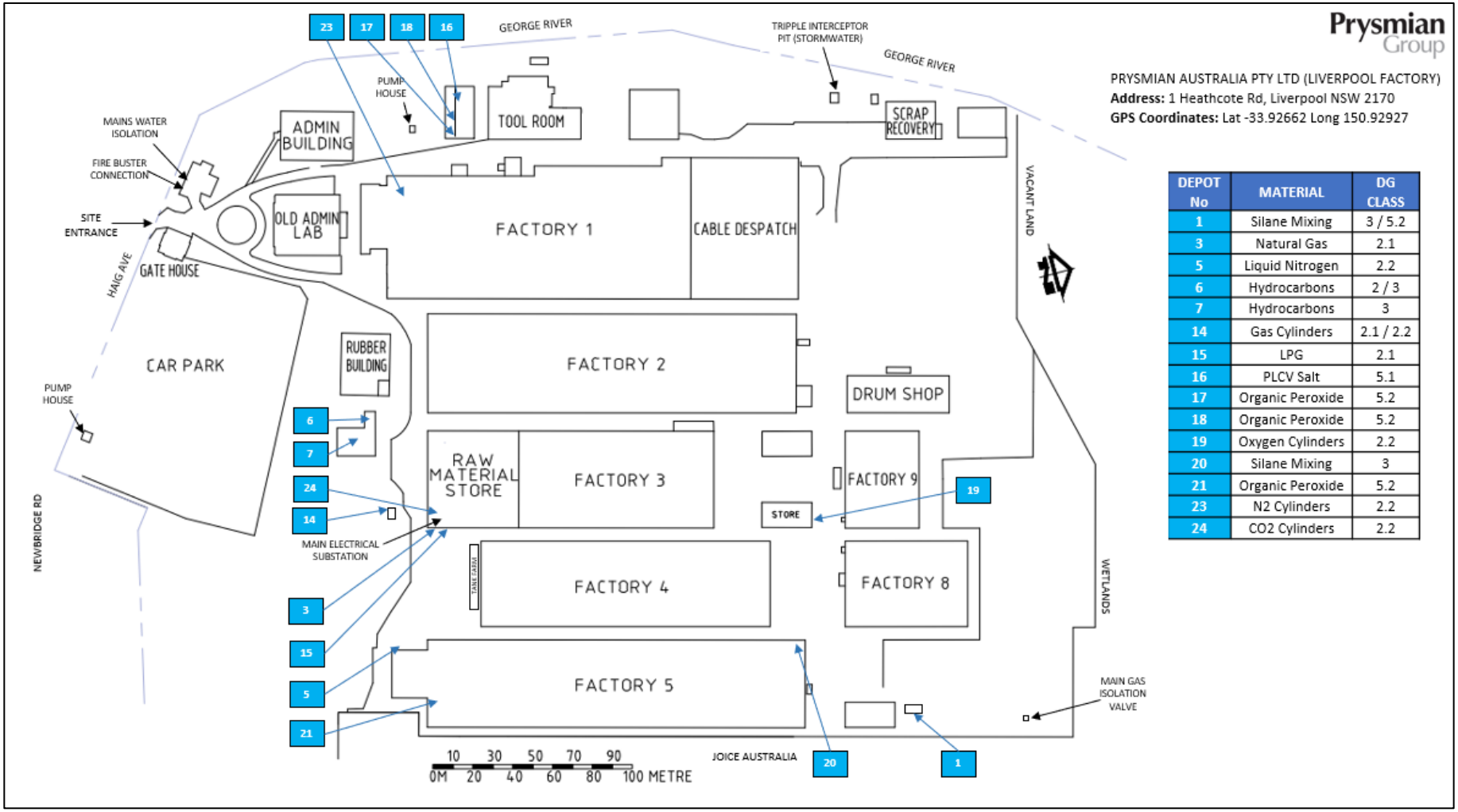
Table 4-1 below provides a list of dangerous goods used and stored on site and the maximum quantities likely to be stored at particular locations.

Table 4-1: Dangerous Goods on Premises

DEPOT No	MATERIAL	UN NUMBER	UN DESCRIPTION	CLASS / DIVISION	PACKING GROUP	STORAGE TYPE	LOCATION	AVERAGE QUANTITY	LARGEST QUANTITY
1	Silane Mixing	1993	FLAMMABLE LIQUID, N.O.S.	3	II	Roofed Storage / Process Vessel	Back of Creep Shed	400L	600L
		3109	ORGANIC PEROXIDE TYPE F, LIQUID	5.2				50L	150L
3	Natural Gas	1971	METHANE, COMPRESSED or NATURAL GAS, COMPRESSED WITH HIGH METHANE CONTENT	2.1		Above Ground Tank	F2 SE outside	700L	800L
5	Liquid Nitrogen	1977	NITROGEN, REFRIGERATED LIQUID	2.2		Above Ground Tank	F5 SW outside	14000L	15000L
6	Hydrocarbons	1950	AEROSOLS	2		Roofed Storage	DG STORE	200L	500L
		1210	PRINTING INK, flammable or PRINTING INK RELATED MATERIAL (including printing ink thinning or reducing compound), flammable	3	III			250L	500L
		1300	TURPENTINE SUBSTITUTE	3	III			10L	50L
		1993	FLAMMABLE LIQUID, N.O.S.	3	II			100L	100L
7	Hydrocarbons / Corrosive	1090	ACETONE	3	II	Roofed Storage	DG STORE	50L	100L
		1223	KEROSENE	3	III			800L	1000L
		1193	ETHYL METHYL KETONE (METHYL ETHYL KETONE)	3	II			200L	500L
		1202	GAS OIL or DIESEL FUEL or HEATING OIL, LIGHT	3	III			3200L	3200L

DEPOT No	MATERIAL	UN NUMBER	UN DESCRIPTION	CLASS / DIVISION	PACKING GROUP	STORAGE TYPE	LOCATION	AVERAGE QUANTITY	LARGEST QUANTITY
		1263	PAINT (including paint, lacquer, enamel, stain, shellac, varnish, polish, liquid filler and liquid lacquer base) or PAINT RELATED MATERIAL (including paint thinning and reducing compound)	3	III			250L	500L
		1993	FLAMMABLE LIQUID, N.O.S.	3	II			2000L	3000L
		3265	CORROSIVE LIQUID, ACIDIC, ORGANIC, N.O.S.	8	III			20L	75L
		1760	CORROSIVE LIQUID, N.O.S.	8	III			40L	120L
		1789	HYDROCHLORIC ACID	8	III			40L	120L
14	GAS CYLINDERS	1075	PETROLEUM GASES, LIQUEFIED	2.1		Roofed Storage	F2 SE outside	180L	300L
		1049	HYDROGEN, COMPRESSED	2.1				200L	300L
		1956	COMPRESSED GAS, N.O.S.	2.2				200L	300L
		1006	ARGON, COMPRESSED	2.2				100L	200L
		1066	NITROGEN, COMPRESSED	2.2				600L	600L
		1001	ACETYLENE, DISSOLVED	2.1				200L	300L
15	LPG	1075	PETROLEUM GASES, LIQUEFIED	2.1		Above Ground Tank	F2 SE outside	400L	450L
16	PLCV Salt	1487	POTASSIUM NITRATE AND SODIUM NITRITE MIXTURE	5.1	II	Roofed Storage	Service Building	1000KG	5000KG
17	Organic Peroxide	3109	ORGANIC PEROXIDE TYPE F, LIQUID	5.2		Roofed Storage	Service Building	75L	100L
18	Organic Peroxide	3109	ORGANIC PEROXIDE TYPE F, LIQUID	5.2		Roofed Storage	Service Building	75L	100L
19	Oxygen Cylinders	1072	OXYGEN, COMPRESSED	2.2		Outside Storage	Garage Building	400L	600L
20	Silane Mixing	1993	FLAMMABLE LIQUID, N.O.S.	3	II	Roofed Storage / Process Vessel	F5 NW inside	200L	400L
21	Organic Peroxide	3109	ORGANIC PEROXIDE TYPE F, LIQUID	5.2		Roofed Storage	F5 SE inside	25L	50L
23	N2 Cylinders	1066	NITROGEN, COMPRESSED	2.2		Roofed Storage / Process PLCV Line	F1 SW inside	600L	600L
24	CO2 Cylinders	1013	CARBON DIOXIDE	2.2		Roofed Storage / Process HV switch room	F2 SE HV switch room	400L	400L

Figure 4-1: Site Map / Dangerous Goods Depots Location



Classes of Dangerous goods are described in Table 4-2. The shaded cells indicate these dangerous goods classes are stored at 1 Heathcote Road Liverpool 2170 NSW site.

Table 4-2: Dangerous Goods Description and Hazards

Class	Description	Hazards
1	Explosives	Explosives are capable by chemical reaction of producing gases at temperatures, pressures and speeds as to cause catastrophic damage through force and/or of producing otherwise hazardous amounts of heat, light, sound, gas or smoke
2.1	Flammable Gases	Gases are capable of posing serious hazards due to their flammability, potential as asphyxiates, ability to oxidize and/or their toxicity or corrosiveness to humans
2.2	Non-flammable, Nontoxic gases	
2.3	Toxic Gases	
3	Flammable Liquids	Flammable liquids are capable of posing serious hazards due to their volatility, combustibility and potential in causing or propagating severe conflagrations
4.1	Flammable Solids	Flammable solids are capable of posing serious hazards due to their volatility, combustibility and potential in causing or propagating severe conflagrations. Also included are substances which are liable to spontaneous heating under normal transport conditions, or to heating up in contact with air, and are consequently liable to catch fire and substances which emit flammable gases or become spontaneously flammable when in contact with water.
4.2	Spontaneously Combustible	
4.3	Dangerous when wet	
5.1	Oxidising Substances	Oxidizers, although not necessarily combustible in themselves, can yield oxygen and in so doing cause or contribute to the combustion of other materials. Organic peroxides are thermally unstable and may exude heat whilst undergoing exothermic autocatalytic decomposition. Additionally, organic peroxides may be liable to explosive decomposition, burn rapidly, be sensitive to impact or friction, react dangerously with other substances or cause damage to eyes
5.2	Organic Peroxides	

Class	Description	Hazards
6.1	Infectious Substances	Toxic and infectious substances can pose significant risks to human and animal health upon contact
6.2	Toxic Substances	
7	Radioactive Substances	Whilst undergoing radioactive decay radionuclides emit ionizing radiation, which presents potentially severe risks to human health
8	Corrosives	Corrosives cause severe damage when in contact with living tissue or, in the case of leakage, damage or destroy surrounding materials
9	Miscellaneous dangerous goods	Miscellaneous dangerous goods present a wide array of potential hazards to human health and safety, infrastructure and/ or their means of transport

Table 4-3 presents the potential pollutants on the site that are not dangerous goods, their location, source and approximate quantity if relevant.

Table 4-3: Other Potential Pollutants

Potential Pollutant	Source/s	Location	Approximate Quantity
Wire drawing solutions	Machines	F2	10, 000L
Wire drawing solutions	Underground tank	F2	68, 000L
Wire drawing solutions	Above ground tank	F2	17,000L
Wire drawing solutions	Machines	F3	2, 000L
Wire drawing solutions	Underground tank	F3	8, 000L
Waste water sump pit	Drains around the site	South	8000
Waste water	Above ground tank	South	10, 000

4.2 HAZARDS TO HUMAN HEALTH AND THE ENVIRONMENT

The main hazards associated with the activities at the site include:

- Spills
  - Chemical spills could occur during handling activities or through damaged equipment. This could lead to the pollution of nearest waterways.
  - Chemical spills can cause storm water contamination if not mitigated. Storm water impacts could cause introduction of chemicals into waterways, which could potentially cause some ecological impacts. The nearest waterway affected by a storm water contamination event is Stimson's Creek, which connects to the Georges River.
- Fire
  - The site holds a number of combustible liquids and flammable gas which may ignite accidentally during site activities. Smoking (if procedures on site are not followed with regards to smoking) can also initiate a fire on site.
  - Fire can cause high releases of toxic combustion products from the site, if not mitigated. If the atmospheric/weather condition does not allow dispersion of fire combustion emissions, then it is possible for these emission clouds to be brought down to ground level and cause potential health effects to the nearest premises occupied by persons. No storm water contamination events are anticipated, provided that the site would have fire fighting water contained through the use of appropriate controls and procedures (e.g. storm water shutoff valve is used during a fire incident).
- LPG leak or fire
  - Releases and fires related to the storage of LPG may occur due to damaged cylinder or valves.
  - LPG leaks will provide detection of the leak by employees on site; however undetected leaks can lead to an explosion if it is caught by an ignition source on-site or off-site.
  - Explosions can cause physical impact to persons affected by the shockwave released from this event. The severity of the shockwave is dependent upon the amount of materials involved in causing the explosion.
  - If the leaked gas is not enclosed, then a flash fire would occur, which is an instantaneous combustion of the leaked gas and would not cause any shockwaves. However, this can become and initiator of a fire event.
  - Minimal toxic combustion emissions are released from a fire event involving LPG, given the isolation requirements for LPG that need to be complied with.

- Natural gas leak or fire
  - Releases and fires related to the storage of natural gas may occur due to damaged tanks or valves.
  - This may happen during a fire or explosion at the production centre or faulty safety devices etc.
  - Natural gas leaks will provide detection of the leak by employees on site, however undetected leaks can lead to an explosion if it is caught by an ignition source on-site or off-site.
  - If not detected, given the right meteorological conditions (or if natural gas cloud is contained in an enclosed area or a semi-enclosed area), and caught by an ignition source, an explosion can possibly occur. The severity of the explosion would depend on the amount of gas leaked and the weather condition or the extent of enclosure provided to the gas cloud.
  - If the leaked gas is not enclosed, then a flash fire would occur, which is an instantaneous combustion of the leaked gas and would not cause any shockwaves. However, this can become an initiator of a fire event.
  - Minimal toxic combustion emissions are released from a fire event involving natural gas, depending on the amount of other combustible products that are burned along with the combusted natural gas.

4.3 Risk Assessment

The likelihood of the main hazards listed in the previous section occurring is assessed using the Risk Analysis Matrix:

Figure 4-2: Likelihood of Environmental Harm Occurring / Risk Matrix

			Likelihood of Occurrence			
	Safety & Health	Environment	Very Likely (A)	Likely (B)	Unlikely (C)	Very Unlikely (D)
			Several times/ month	Once per month	Once per year	Once every 10 years or greater
CONSEQUENCES Catastrophic (1)	**Fatality. Serious permanently debilitating injury or health issue (e.g. amputation, silicosis, paralysed).**	**Off-site release with potential for environmental or material environmental harm and/or potential for lasting detrimental effects. State or national media coverage. Prosecution expected.**	1A	1B	1C	1D
Major (2)	Long Term Illness or Serious Injury: Includes injuries would require a person to lose time from work. E.g. permanent damage (e.g. hearing loss, severe back injury).	Moderate non-compliance (infringement notice, on-the-spot fine). Repetitive or on- or off-site release contained without outside assistance &/or having potential for short-term, off-site environmental harm.	2A	2B	2C	2D
Moderate (3)	Medical treatment injury, but no days off work: includes injuries where a doctor is required (e.g. stitches, minor fracture, manual handling injuries, etc)	Minor (e.g. administrative) non-compliance. Minor one-off, on-site release contained by available control measures and having no lasting impact.	3A	3B	3C	3D
Minor (4)	First aid injury, Injuries where medical attention is not required. E.g. sprains, minor bruise.	Short duration (< 5 minutes), minor, one-off, on-site release immediately contained/cleaned-up.	4A	4B	4C	4D

Table 4-4 provides a risk assessment of the potential hazards that could occur at the site using the above figures.

Table 4-4: Hazard and Likelihood Risk Assessment and Control Measures

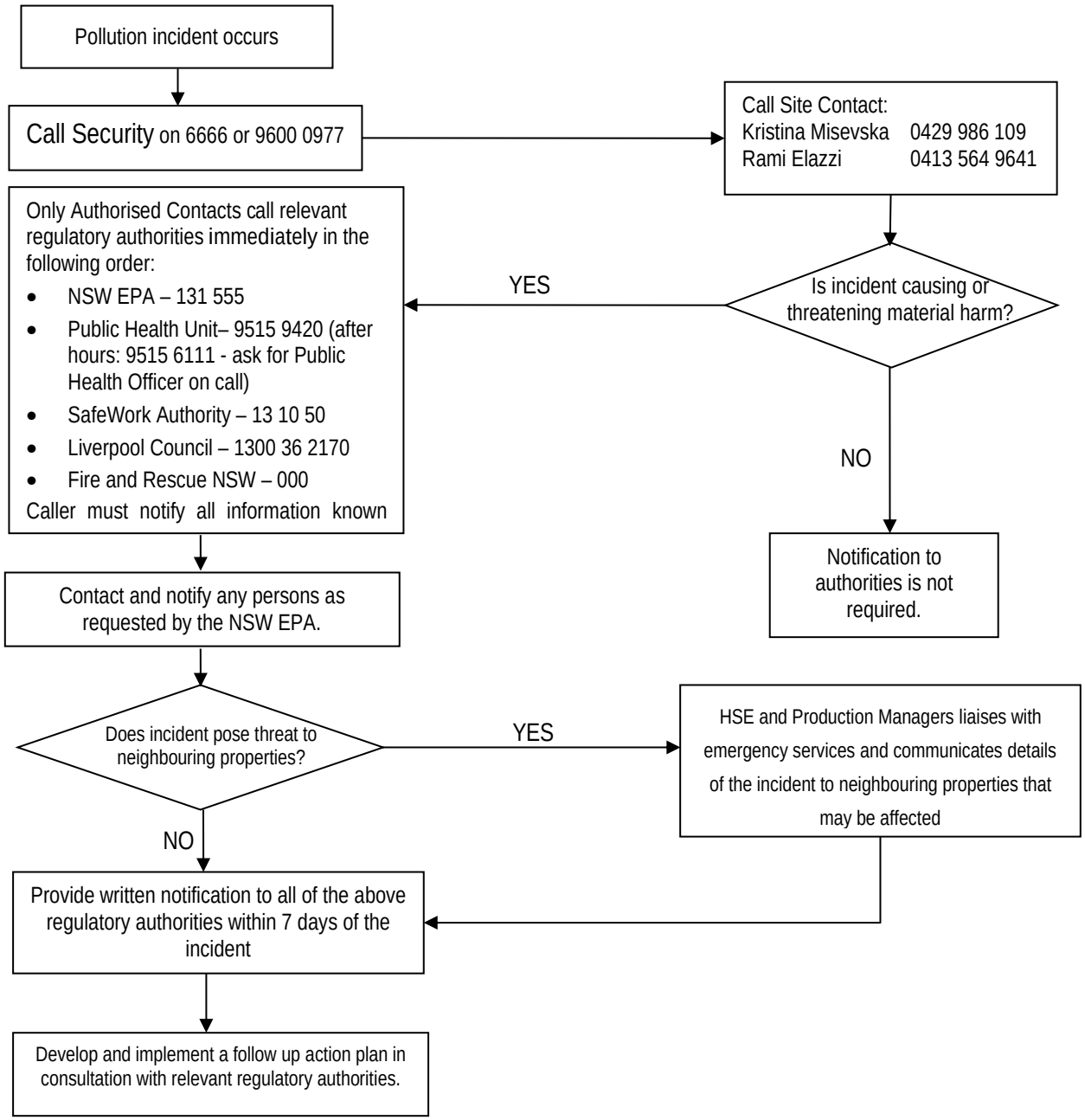
Hazard / Incident	Description of Hazard / Incident leading to hazard	Level of impact	Likelihood	Priority	Impact on Neighbours	Control Measures / Corrective Action	Responsible Person
Drains to Georges river	Spill, Contamination	2	B	2B	Severe	Training, Spill kits, Signs Ensure metal concentrations comply with ANZ Guidelines for fresh and marine water quality	Production Manager
Waste	Contamination	2	B	2B	Severe	Waste management plan Training inspection	HSE Manager
Copper wire drawing fluid and waste	Contamination	2	B	2B	Severe	Concentration analysis NPI reporting	HSE Manager
Chemical storage	Possible spill Lack of awareness	2	B	2B	Minor	Training Monthly inspection Use bunded pallets	HSE Manager
Spills	Contamination fines	2	B	2B	Minor	Training Service spill kits Bunding Drains Covers Monthly inspection	HSE Manager

5. NOTIFICATION OF POLLUTION INCIDENTS

A pollution incident that occurs in the course of an activity so that material harm to the environment is caused or threatened must be notified. This section details how, when and who needs to be notified. The Pollution Incident Response Procedure provides a step by step of how to notify a pollution incident and provides relevant documentation that needs to be maintained by the relevant person/s.

The following is a simple flowchart detailing how to respond to a pollution incident:

Figure 5-1: Notification of a Pollution Incident



5.1. WHEN TO NOTIFY?

Under Section 148 of the POEO Act, holders of environmental protection licences and anyone carrying on an activity or occupying a licensed premise that becomes aware of a pollution incident are required to report it immediately.

5.2. HOW TO NOTIFY

If the incident presents an immediate threat to human health or property:

CALL 000

Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service

If the incident does not present an immediate threat, or once the initial 000 call has been made:

Notify the relevant authorities in the following order:

NSW EPA – Environment Line 131 555

Public Health Unit 9515 9420

(After hours: 9515 6111 - ask for Public Health Officer on call)

SafeWork on 13 10 50 (SafeWork will ask for the ABN)

Liverpool Council – 1300 36 2170

Fire and Rescue NSW – 000

Notify other persons as required by the EPA.

5.3. WHAT TO NOTIFY?

Section 150 of the POEO Act specifies relevant information about a pollution incident to be given as follows:

a) The time, date, nature, duration and location of the incident,

b) The location of the place where pollution is occurring or is likely to occur,

c) The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,

d) The circumstances in which the incident occurred (including the cause of the incident, if known),

e) The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,

f) Other information prescribed by the regulations.

The above information is that known to the informant notifying the incident at the time it is notified. If further information becomes known after notification, this information needs to be notified immediately after it becomes known.

5.4. CONTACTS

Site personnel with specific responsibilities for incident response and management need to be contacted in the event of an incident. This section also provides the full contact details of the relevant regulatory authorities.

5.4.1. Site Contacts

This section contains the names, positions and 24-hour contact details of those key individuals who:

(i) are responsible for activating the plan, and

(ii) are authorized to notify relevant authorities under section 148 of the Act, and

(iii) Are responsible for managing the response to a pollution incident.

The following table lists the key individuals and their responsibilities. These key individuals are listed in order of who to contact in the event of a pollution incident at the site.

Table 5-1: Site Contacts

Contact Name	Telephone	Responsibilities
Kristina Misevska	0429 986 109	HSE Director OSEA
Rami Elazzi	0413 564 964	Production Director Energy

A full list of emergency contacts is provided on each department notice boards.

5.4.2. Regulatory Authority Contacts

The contact details of each relevant authority referred to in section 148 of the Act that are relevant to this site include:

NSW EPA – Environment Line 131 555

Public Health Unit 9515 9420

(After hours: 9515 6111 - ask for Public Health Officer on call)

SafeWork on 131 050 (SafeWork will ask for the ABN)

Liverpool Council – 1300 36 2170

Fire and Rescue NSW – 000

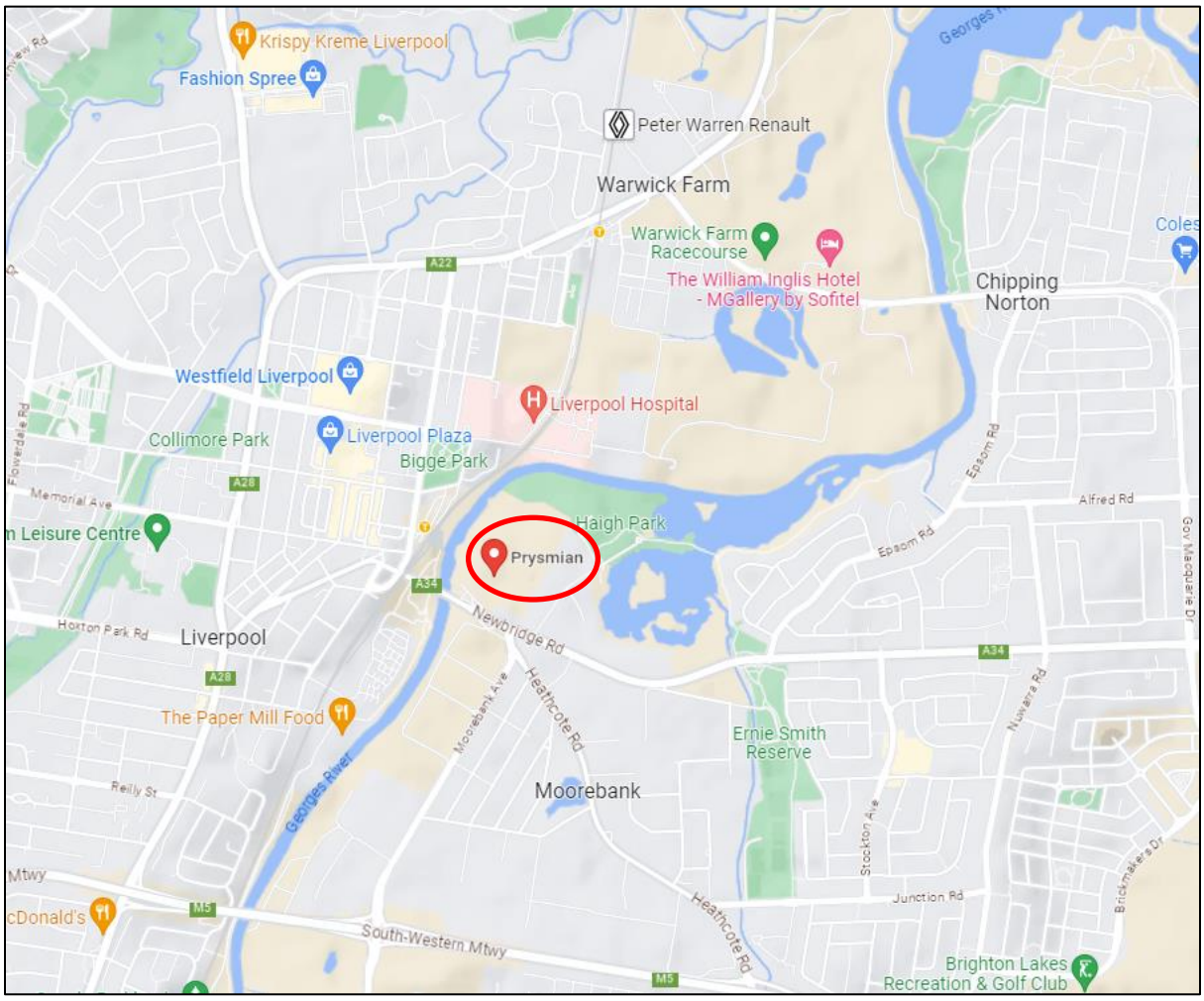
5.4.3. Surrounding Area Receptors

The nearest sensitive receptors and neighbouring facilities have been identified in the following Table 5-2 and are shown in Figure 5-2.

Table 5-2: Surrounding Area Receptors

Receptor	Nature of Occupancy / Sensitivity	Approximate Distance	Contact Details	Address
North – Joyce	Manufacturing	<500m	1800 021 304 www.joyce.com.au/contact-us	5 – 9 Bridge Road Moore bank NSW 2170
East –	North Bridge Road	<500m	N/A	N/A
South –	Georges River	<500m	N/A	N/A
West –	Georges River	<500m	N/A	N/A

Figure 5-2: Surrounding Area Receptors



6. MINIMISING RISK OF HARM

This section details the actions to be taken immediately following a pollution incident including pre-emptive actions, use of safety equipment, early warning mechanisms and reducing the risk of harm.

6.1. PRE-EMPTIVE ACTION

Prysmian would implement a number of pre-emptive actions to prevent or minimise any risk of harm to human health or the environment depending on the type, nature and scale of the incident.

Pre-emptive actions include but are not limited to the following:

- Provision and use of spill containment kits and spill response equipment,
- Use of storm water isolation valves where these exist,
- Use of fire-safety equipment,
- Switch off all ignition sources.

6.2. SAFETY EQUIPMENT

Procedures and plans relating to safety, emergency response and spill response equipment include emergency and spill safety equipment at a number of strategic locations on site.

6.2.1. Alarm System

There are Emergency Communications Stations located in each department at the Prysmian Liverpool site. Each station has an emergency alarm system that can be activated from the station and silenced from the Security Gatehouse Station. All persons are required to evacuate upon activation of the alarm.

6.3. EARLY WARNING MECHANISMS

For any incident that has a risk on human health or the environment external to the site, early warnings and regular updates will be provided to any premises or neighbouring facility or resident likely to be affected. This would be undertaken by key individuals.

A variety of communication mechanisms are available to provide early warnings and regular updates depending on the type, scale and nature of the incident, including:

- Telephone calls and emails – list of neighbouring premises contact details need to be kept on site.
- Community
- Letterbox drops
- Door knocking
- Other

Specific information would be provided to potentially affected premises via the above avenues to minimize the risk of harm as appropriate to the circumstances.

Table 6-1: Early Warnings and Pre-emptive Actions

Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
Chemical Spill	Waterways	Typically negligible offsite, however major spills can impact Stimson's Creek and the Georges River.	Hazard/incident is instantaneous if it occurs. Communication and early warnings can only be established after the incident has occurred and would be conducted via telephone to NSW appropriate authority. Premises adjacent to the site would also be alerted via visits by Prysmian employees or by the police.	Pre-emptive actions undertaken include: • Site induction with competency test. • Contractors are required to provide their Safe Work Method Statements before commencing any work on site. Physical controls and measures in place include: • Early detection by operators and staff. • Spill kits in areas where spills have been determined to be present. • Danger tags. • Locking system. • Out-of-service tags. • Storm water Shutoff Valve. Corrective actions conducted upon the initiation of the incident are in the following order: • Staff or persons upon detecting the hazard/incident report to any

Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
				available site management employee for immediate response. If safe, alerted employees will utilise their training and the corresponding procedure for spill kit use to minimise impact of spill. • Relevant persons on site adhere to the site's 'Spill Kit and Spill Response procedures' during the event. • Site management initiates the Emergency Response Plan. Upon initiation, all persons on site adhere to this plan. • Assigned Prysmian staff contact the fire brigade, police and/or NSW EPA, depending on magnitude of spill. If required, the nearest affected premises are also alerted by Prysmian and/or by the police. If storm-water system is affected the arrestor pit will be shut off. • Prysmian would issue letterbox drops to make the nearest

Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
				potentially affected premises aware of the spillage incident. • Incident is recorded, documented, reviewed, and procedures would be generated if necessary to account for the cause that has been identified from the experience.
Fire (Developing or Uncontrolled)	Air, waterways	Depend on size of incident. Major fires would impact on the adjacent properties.	For developing fires, telephone to fire brigade, NSW EPA and police. If required, visits to potentially affected residences would be conducted by the police or by Prysmian employees to provide necessary warnings. For instantaneous and uncontrolled fires, communication and early warnings can only be established during the incident, and would be	Pre-emptive actions undertaken include: • Site induction with competency test. • Contractors are required to provide their Safe Work Method Statements before commencing any work on site. Physical controls and measures in place include: • Early detection by operators and staff. • Fire alarms in buildings • Danger tags. • Locking system. • Out-of-service tags. • Designated smoking areas.

Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
			conducted via telephone to fire brigade, NSW EPA, and police. Premises adjacent to the site would also be alerted via visits by Prysmian employees or by the police.	• Storm water Shutoff Valve (for firewater). Corrective actions conducted upon the initiation of the incident are in the following order: • Staff or persons upon detecting the hazard/incident report to any available site management employee for immediate response. • Site management initiates the Emergency Response Plan. This includes the use of the siren to initiate the evacuation. • All persons on site adhere to the site's 'Fire Extinguishers, Storm water Shutoff Valves, and Fire procedures' during the event. • Assigned Prysmian staff contact the fire brigade, police and/or NSW EPA, depending on magnitude. If required, the nearest affected premises are also alerted by Prysmian or by the police.

Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
				• Incident is recorded, documented, reviewed, and procedures would be generated if necessary to account for the cause that has been identified from the experience.
LPG Leak, Fire or Explosion	Air, Waterways	Depend on size of incident. Projectiles can fly up to a few kilometres from the site. Explosion overpressure distances are anticipated to be between 500 metres to a few kilometres, depending on size of explosive cloud.	Hazard/incident is instantaneous if it occurs. Communication and early warnings can only be established after the hazard/incident has occurred, and would be conducted via telephone to fire brigade, NSW EPA, and police. Premises adjacent to the site would also be alerted via visits by Prysmian employees or by the police.	Pre-emptive actions undertaken include: • Site induction with competency test. • Contractors are required to provide their Safe Work Method Statements before commencing any work on site. Physical controls and measures in place include: • Early detection by operators and staff. • Cages and physical impact structures for protection of LPG and gas cylinders on site. • Danger tags. • Locking system. • Out-of-service tags.

Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
				• Storm water Shutoff Valve (for firewater). Corrective actions conducted upon the initiation of the incident are in the following order: • Staff or persons upon detecting the leak or events that could lead to this incident would report to any available site management employee for immediate response. • Site management initiates the Emergency Response Plan. This includes the use of the siren to initiate the evacuation, if necessary (depending on the size of leak). • All persons on site adhere to the site's 'Fire Extinguishers, Storm water Shutoff Valves, and Fire procedures' during the event. • Assigned Prysmian staff contact the fire brigade, police and/or NSW EPA, depending on the size of release. If required, the

Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
				nearest affected premises are also alerted by Prysmian or by the police. • Incident is recorded, documented, reviewed, and procedures would be generated if necessary to account for the cause that has been identified from the experience.
Radiation Release	Air, Waterways (For Contaminated Waters)	Depend on size of incident. May affect large proportions of surrounding area, depending on the size of release.	Hazard/incident is instantaneous if it occurs. Communication and early warnings can only be established after the hazard/incident has occurred, and would be conducted via telephone to fire brigade, NSW EPA, and police. Premises adjacent to the site would also be alerted via visits by Prysmian	Pre-emptive actions undertaken include: • Site induction with competency test. • Contractors are required to provide their Safe Work Method Statements before commencing any work on site. Physical controls and measures in place include: • Early detection by operators and staff. • Radiation enclosures and safety locks. • Danger tags.

Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
			employees or by the police.	• Locking system. • Out-of-service tags. • Storm water Shutoff Valve at each of 5 arrestor pits located at the outlets to Georges River (for contaminated waters). Corrective actions conducted upon the initiation of the incident are in the following order: • Staff or persons upon detecting the leak or events that provides symptoms that could lead to this incident would report to any available site management employee for immediate response. • Site management initiates the Emergency Response Plan. This includes the use of the siren to initiate the evacuation. • All persons on site adhere to the site's 'Radiation release procedures' during the event. • Assigned Prysmian staff contact the fire brigade, police and/or

Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
				NSW EPA, depending on the size of release. If required, the nearest affected premises are also alerted by Prysmian or by the police. • Prysmian would issue letterbox drops to make the nearest potentially affected premises aware of the radiation release incident. • Incident is recorded, documented, reviewed, and procedures would be generated if necessary to account for the cause that has been identified from the experience.
Natural Gas Leak or Fire	Air, Waterways	Depend on size of incident. Possible impact on adjacent properties, depending on the size of the leak.	For minor leaks detected, internal communications are established to stop, minimise and isolate the natural gas leak whilst evacuation is also established.	Pre-emptive actions undertaken include: • Site induction with competency test. • Contractors are required to provide their Safe Work Method Statements before commencing any work on site.

Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
			For leaks that lead to a flash fire and then a developing fire, communication and early warnings can only be established during the incident, and would be conducted via telephone to fire brigade, NSW EPA, and police. Premises adjacent to the site would also be alerted via visits by Prysmian employees or by the police.	Physical controls and measures in place include: • Early detection by operators and staff. • Danger tags. • Locking system. • Out-of-service tags. • Storm water Shutoff Valve (for firewater). Corrective actions conducted during the incident are in the following order: • Staff or persons upon detecting the leak or events that could lead to this incident would report to any available site management employee for immediate response. • For events that lead to incident (which can readily be mitigated), site management would apply corrective actions to stop the incident from occurring. • If incident persists, site management initiates the Emergency Response Plan. This

Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
				includes the use of the siren to initiate the evacuation, if necessary (depending on the size of leak). • All persons on site adhere to the site's 'Fire Extinguishers, Storm water Shutoff Valves, and Fire procedures' during the event. • Assigned Prysmian staff contact the fire brigade, police and/or NSW EPA, depending on the size of release. If required, the nearest affected premises are also alerted by Prysmian or by the police. • Incident is recorded, documented, reviewed, and procedures would be generated if necessary to account for the cause that has been identified from the experience.
Explosion (from Process)	Air	Depend on size of incident. Possible impact on adjacent properties. Projectiles can fly up to a	Hazard/incident is instantaneous. Communication and early warnings can	Only pre-emptive actions can be undertaken, given the instantaneous nature and the high consequence

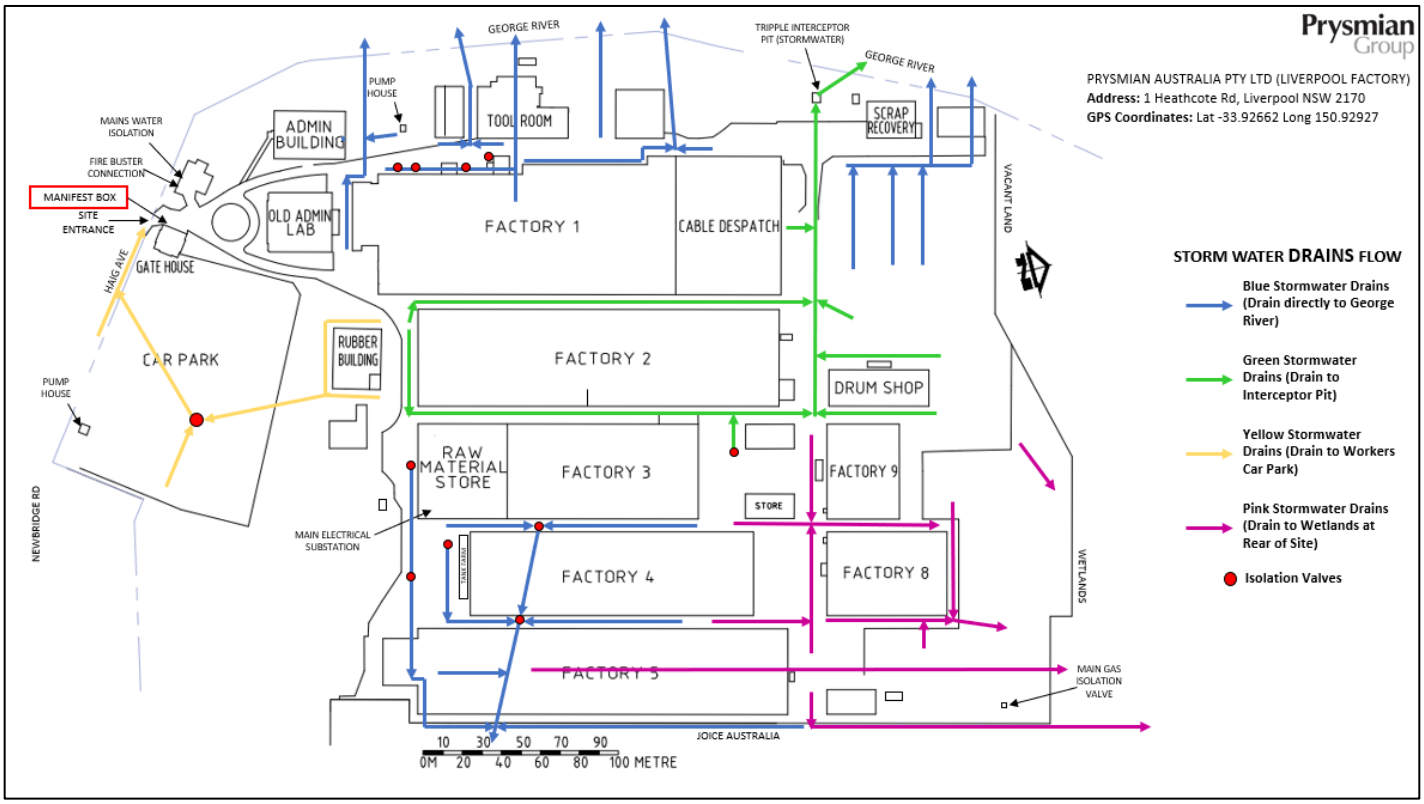
Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
		few kilometres from the site. Explosion overpressure distances are anticipated to be between 500 metres to a few kilometres, depending on size of explosive cloud generated.	only be conducted after this incident has occurred, which would be via telephone to fire brigade, and police.	associated with this incident. This includes the following: • Site induction with competency test. • Contractors are required to provide their Safe Work Method Statements before commencing any work on site. Physical controls and measures in place include: • Danger tags. • Locking system. • Out-of-service tags. Corrective actions carried out aftermath would include: • Fire brigade and police alert the nearest affected premises. • Assigned Prysmian staff contact the fire brigade, police and/or NSW EPA, depending on magnitude. If required, the nearest affected premises are also alerted by Prysmian or by the police.

Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
				• Incident is recorded, documented, reviewed, and procedures would be generated if necessary to account for the cause that has been identified from the experience.

7. MAPS & PLANS

A detailed set of maps showing the location of the premises, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises, the location of any storm water drains on the premises, and the discharge locations of the storm water drains to the nearest watercourse or water body are available at the gatehouse.

Figure 7-1: Stormwater Drains and Isolation Valves Layout



8. STAFF TRAINING

Prysmian employees and contractors must complete many training inductions in order to undertake work on site. Each department has additional inductions that must be completed by relevant employees.

The induction covers information on the company and its activities, dangers and safety, rules and procedures, and emergency plans.

Additional training to be undertaken in addition to the induction includes the following:

- Response actions for dealing with a spill or pollution incident – specifically for anyone discovering a spill who and when to notify site contacts.
- Individual responsibilities and the responsibilities of key site contacts in relation to the PIRMP.

Specific training on the procedures regarding Notification of a Pollution Incident has been undertaken by staff members with key responsibilities including:

- Site Security
- All Site Contacts listed in Section 5.4.1.
- Maintenance managers
- Process owners and team leaders

9. TESTING OF PLAN

Pollution Incident Response Management Plans must be tested routinely every 12 months and within one month of any pollution incident that warrants reporting.

Testing of the PIRMP would be incorporated with the testing of the existing emergency plan and needs to ensure:

- Information in the plan is accurate and up to date; and
- The plan is capable of being implemented in a workable and effective manner.

Testing must cover all components of the plan including the effectiveness of staff training.

This is undertaken as follows:

- Annual review of PIRMP and emergency plan standard procedures to ensure all information is accurate and up to date;
- Regular drills

Records of drills and reviews are maintained including:

- The dates on which the plan has been tested and updated;
- The name of the person/s who carried out the test/drill/review;
- If a drill is undertaken, the details of what was tested, how effective the drill was and any changes required to the plan / procedures.

Table 9-1: PIRP testing records

Reason for Testing	Type of Test	Date of Test	Tested by	Finding of test
Annual Test	Desktop	09/02/2023	Lisa Matovinovic (HSE) Sam Finocchiaro (HSE) Rami Elazzi (Production) Faanush Ali (Logistic) Erwin Casper (Logistic) Shane Middleton (Maintenance) Rodney Kingston (Maintenance) Jason Shang (Production) Michael Ng (Production) Voeun Ny (Production) Amir Soleymani (Production) Karren Piper (HSE) Ali Sayadi (Production) Mauricio Herrera (HSE)	Contact details and emergency number are accurate. No changes required.
Annual Test	Desktop	16/02/2022	Rami Elazzi (Production) Shane Middleton (Maintenance) Rodney Kingston (Maintenance) Marcela Campos (Production) Michael Ng (Production) Rabeh Shaddad (Production) Mauricio Herrera (HSE)	Contact details and emergency number are accurate. No changes required.
Annual Test	Desktop	19/02/2021	Karren Piper (HSE) Helen Curl (HSE) Rami Elazzi (Production) Rodney Kingston (Maintenance) Mauricio Herrera (HSE)	Contact details and emergency number are accurate. No changes required.

10. REVISIONS HISTORY

Ed.	Rev.	Date	Description of modifications
2	10	11/07/2023	Updated authorized persons, Emergency Contact List and Dangerous Goods Manifest and maps. General review.
2	9	08/02/2022	Updated Emergency Contact List and Dangerous Goods Information. General review
2	8	05/02/2021	Updated Emergency Contact List and general review
2	7	28/07/2020	Document Review and updated signatories
2	6	Feb 2019	Updated Management and contact numbers
2	5	Nov 2018	Updated contacts, DG map
2	4	March 2017	Updated site contacts p3, p5, p25, updated page numbering
2	3	Aug 2014	Added latest standard cover page, list of contents and supplied controlled document address in footer.
1	2	24/3/2014	Change Prysmian three contacts Delete Fairfield fire station contact no. Add Busby and Cabramatta fire stations contact no.
1	1	1/3/2013	Review of Procedure adding more Prysmian contacts
1	0	1/9/2012	New Issue