Snackbrands
Australia

Pollution Incident Response Management Plan Public Version

Orchard Hills

14, Distribution Drive,
Orchard Hills, NSW 2748

Environment Protection License (EPL) Details	
Name of licensee	SNACK BRANDS AUSTRALIA PTY LTD ABN 38 424 554 643
EPL	21202
Scheduled activities EPL	General Agricultural Processing
Location	Snackbrands Orchard Hills Manufacturing Site 14 distribution Drive, Orchard Hills, NSW 2748 Lot 1 DP 597082
Geo-position	**Latitude**: 33°45'16"S **Longitude:** 150°54'28"E
Principle Contact	Head of Health Safety and Environment Jackie Vrljicak 0427 003 513
Company website	https://www.snackbrands.com.au

Contents

1. Introduction

SNACK BRANDS AUSTRALIA ABN 38 424 554 643 holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Orchard Hills Manufacturing Site 14, Distribution Drive, Orchard Hills, NSW 2748.

As per the Protection of the Environment Operations Act 1997 (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs during an activity where material harm to the environment is caused or threatened, the person carrying out the activity must **immediately implement this plan** in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, and/or by providing a copy of the plan to any person who makes a written request. The sections of the plan required to be publicly available are set out in clause 98D of the (General) Regulation 2009.

This plan is developed in accordance with the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Regulation 2009 and EPA's Guideline: Pollution incident response management plans.

Duty to notify of a pollution incident:

There is a duty to notify 'relevant authorities' as specified in section 148(8) of the POEO Act **(the EPA, local authority, Ministry of Health, SafeWork NSW (formerly Workcover) and Fire and Rescue NSW)** of any pollution incidents where material harm (see definitions below) is caused or threatened.

Definitions:

Pollution Incident*:* An incident or set of circumstances during or because 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 a premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

Material Harm: includes actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial or that results in actual or potential **Loss** or property damage of an amount over $10,000.

Loss*:* the reasonable cost and expenses that would be incurred in taking all reasonably practicable measures to prevent, mitigate or prevent harm to the environment.

Relationship with other Emergency Plans:
The PIRMP must be review and read in conjunction with:
WHS_PR_07_004 Emergency Procedures Manual _Orchard Hills
To remain compliant, the **following information must be publicly available**:

- Procedures for contacting relevant authorities including the EPA, local council, NSW Health, Safe work NSW, Fire and Rescue NSW and contact details

- Procedures for contacting owners/occupiers of premises in vicinity

- Procedures for communicating with the community

- Early warning mechanisms and regular updates to premises in vicinity

2.Initial Response to Pollution Incident

IMMEDIATE ACTIONS

Immediately engage in harm minimisation/spill containment as per procedures in Site Emergency Response Plan (ERP), or Pollution Incident Response Management Plan (PIRMP).

1. If incident immediate threat to human health or property, immediately contact 000 Emergency Services
2. Assess the level of actual or potential pollution and decide whether the incident is a 'notifiable' incident.
3. If the incident is considered 'notifiable' the agencies in the Communication Plan must be notified immediately.
4. Notifying neighbours and the local community

If the incident impacts the community undertake telephone contact as outlined below

MINIMISING HARM TO PEOPLE ON PREMISES

- Activation of evacuation procedures, including the activation of audible alarms to notify the evacuation of personnel to assembly areas. These clearly communicated to site personnel via signage which is reinforced during induction and simulated evacuation training.
- The availability and use of PPE.
- Availability and use of Spill kits.
- Requirement for contractors to complete OH&SE sign-on and inductions.
- All Persons to complete formal Covid declarations & acknowledge site requirements to mitigate.
- Contractors/Site personnel complete risk assessments / JSA (job safety analysis) & hot work permits before undertaking works.

ACTIONS TO BE TAKEN

1. If the situation poses immediate threat, call emergency services, and activate evacuation plans.
2. If the situation does not pose an immediate threat shutdown, any relevant equipment and if safe to do start attending clean up and remediation measures.
3. Create an incident Management Team and Emergency Coordinator to delegate tasks.
4. Site Operations manager or Environment Manager should coordinate response.

INCIDENT MANAGEMENT TEAM CREATION

The following individuals form the incident management team.

Team Member	Role
Emergency Coordinator	Delegate below actors
Safety Controller	Ensure appropriate PPE, manage any traffic, watch for any further risks, hazards, injury
Information Controller	Relay information, get SDS and communicate information, Gofer where required, Report
Combat Assistant(s):	Deploy stormwater isolation valve, get spill kit, get other combat materials, determine where spill has gone and where the spill is going
Other Support Members	Cleanup and Waste Management: Waste storage and pump out truck contractors.
Additional Support	- Logistics - Operations (technical assistance); - Support and admin (post urgency actions)

3.Communication Plan

EXTERNAL NOTIFICATIONS
The following external authorities need to be contacted based on immediate threats and no immediate threat.

IMMEDIATE THREAT

If incident poses immediate threat to human health or property:

Organisation	Contact	Number
Emergency Services NSW Police/Fire/Ambulance	Emergency Services	000
Fire & Rescue NSW / Rural Fire Service Fire & Rescue NSW- to inform but does not require fire unit on site	Switchboard	000 1300 729 579
EPA (Environment Line for pollution and environment incident reports)	Switchboard	131555
SafeWork NSW	Switchboard	131-050
Penrith Local Council (Compliance Department)	Switchboard	0247-327-777

SBA RESPONSIBLE PERSON(S)

Contact
Orchard Hills Site Operations Manager
Operations Lead
Environment Manager 0410 515 252
Senior Engineering and Maintenance Manager
Manufacturing Manager

SBA MANAGING RESPONSE

Managing Response to Incident
Site Operation Manager
Operations Lead
Environment Manager
Senior Engineering and Maintenance Manager

PERSONS RESPONSIBLE TO NOTIFY AUTHORITIES

Notification should be made by a person with an appropriate level of authority within the company. Details are provided in company version of PIRMP,

Persons to Notify to Authorities
Head of Health, Safety and Environment
Site Operations Manager
Environmental Manager 0410 515 252
Operations Lead

RESPONSIBLE REGULATORY AUTHORITIES

If incident is determined a notifiable pollution Incident, the responsible persons will contact the required authorities below

Relevant Authority contact numbers	
Fire and Rescue NSW-	1300 729 579
EPA – General Contact	EPA Enviro Line 131 555 131-555 (02) 9995 5555 info@epa.nsw.gov.au
SafeWork NSW	131-050
NSW Health- Nepean Blue Mountains Local Health District (NBMLHD) NBMLHD Environmental Health, Public Health Unit	1300-066-055 02 4734 2022
Penrith Council	0247-327-777

4. Community Notification

Neighbours must be informed by phone of incidents that may impact them, including early warnings and regular updates.

Actions to be taken:

Step 1: The Site Manager upon becoming aware of a notifiable pollution incident assesses the severity of the incident and the impact on neighbouring properties by considering the following:

- Does the pollution incident have the potential to affect one or more neighbouring properties.
- How will the incident affect them (including long- and short-term effects).
- What actions do neighbours take to protect themselves from harm and minimise property risk?

Step 2: Site Manager contacts the Environmental Manager within one hour of the incident occurring to inform about the incident and possible impacts on neighbouring properties.

Step 3: Site Manager or designated person contacts neighbouring properties deemed necessary to provide the following information relevant to the pollution incident:

Step 4: The Environmental Manager liaises with the Supply Chain Director and provides the Site Manager with the communication strategies to be employed. The Site Manager will use this direction to inform nearby properties and the wider community of important information related to the environmental incident.

The information in the following table is made available in the on-site PIRMP to assist with notifying community.

Distance	Neighbour	Address	Contact	Map ID

5. Spill Clean-up

PUMPOUT SERVICES

In event of a major spill, provide the following Information to truck/spill services over the phone.

1. Location of spill.
2. Access to spill site.
3. Type of chemical – get from SDS.
4. Name of chemical – get from SDS.
5. Quantity (estimate) of spill.
6. Type of exposure e.g. inhalation, dermal, ingestion, ocular and/or environmental (enter soil, water, air or impact biota).
7. H&S- Number of casualties (if any), state of consciousness and treatment being provided.