

Pollution Incident Response Management Plan

Visy Pulp & Paper Tumut Mill

Issued By: HSE Manager
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Pollution Incident Response Management Plan

Licence Number: 10232

Position/Title: HSE Manager

Date: 15 March 2024

PURPOSE:

Visy Pulp and Paper Pty Ltd (Visy) holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Visy Pulp and Paper Mill, Tumut, NSW. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), Visy must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act.

If a pollution incident occurs in the course of our activities so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, Visy will **immediately** implement this plan as required by Part 5.7A of the POEO Act.

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

Parts of this plan are also available on the Visy website as set out in section 74 of the Protection of the Environment Operations (General) Regulation 2022.

Note: This plan has been developed in accordance with the *Protection of the Environment Operations Act 1997* and the Protection of the Environment Operations (General) Regulation 2022.

NOTIFICATION OF A POLLUTION INCIDENT:

Notification of a pollution incident that causes or threatens to cause 'material harm to the environment', is required. Material harm is defined as per section 147 of the POEO Act, below:

- a) harm to the environment is material if–
 - (i) It involves actual or potential harm to the health or safety of human being 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 measure to prevent, mitigate or make good harm to the environment

Notification is required even where 'harm to the environment is caused only in the premises where the pollution incident occurs', as specified in section 147(2) of the POEO Act.

Environment Protection Licence (EPL) Details

Name of licensee: Visy Pulp and Paper Pty Ltd

ABN: 30 086 513 144

EPL number: 10232

Premises name and address: Visy Pulp and Paper Pty Ltd, 1302 Snowy Mountains Highway, Tumut NSW, 2720

Website address: <https://www.visy.com.au/create-a-better-world>

Scheduled activity/activities on EPL: Paper or pulp production

Fee-based activity/activities on EPL: Paper or pulp production

Notification of Relevant Authorities

See below for persons and/or **any relevant authorities requiring to be notified as per Part 5.7A of the POEO Act** in the case of a pollution incident that causes or threatens to cause material harm to the environment.

The following information must be noted and forwarded to the authorities when they are notified of the incident:

- Time, date and current weather conditions (temperature, rainfall, wind speed and direction)
- Nature and location of the incident
- Duration of the incident (including estimated quantity / volume discharged if applicable)
- Location of areas that may be affected by incident
- Circumstances in which the incident occurred
- The proposed action to be taken in dealing with the incident

| | | |
|---|---------------------------------------|---|
| Fire and Rescue NSW / Rural Fire Service | Contact number/s: | Emergency 000 (112 from mobile phones) Tumut Fire & Rescue 02 6947 1202 NSW Rural Fire Service 02 6981 4229 |
| NSW EPA | Contact number/s: | 131 555 |
| NSW Health | Relevant Area Health Service: | Albury Public Health Unit (Murrumbidgee and Southern NSW LHD) |
| | Business hours contact number: | 02 6053 4800 |
| | After hours contact numbers: | 02 6053 4800/1300 066 055 |
| SafeWork NSW | Contact number/s: | 131 050 |

Notification of Relevant Authorities, Continued

See below for persons and/or authorities that also **may** need to be notified in the case of a pollution incident that causes or threatens to cause material harm to the environment.

| | | |
|--------------------------------|--------------------------------|--------------|
| Snowy Valleys Council | Business hours contact number: | 02 6941 2555 |
| | After hours contact number: | 1300 275 782 |
| Dam Safety NSW | Contact number: | 02 9842 8073 |
| State Emergency Services (SES) | Duty Officer contact number: | 132 500 |
| WaterNSW | Contact number: | 1300 662 077 |
| | Emergency Reporting (24hrs): | 1800 061 069 |

Notification of Neighbours and the Local Community

Visy Tumut will attempt to provide early warning to directly affected surround farms and the Tumut and Adelong Communities. Depending on the severity of the incident and the likelihood of impact to the local communities, a range of communication methods can be deployed during and after an incident.

These include:

- Site visitors/door knocking
- Phone calls
- SMS messages
- Email (internal and external)
- Letter drop
- Warning signs
- Depending on the incident; WaterNSW has an early warning system to alert Water Licence Holders. WaterNSW can be contacted and a request can be made to them to send an alert out.

Communicating with Neighbours and the Local Community

Visy Tumut will attempt to provide early warning to directly affected surround farms and the Tumut and Adelong Communities. Depending on the severity of the incident and the likelihood of impact to the local communities, a range of communication methods can be deployed during and after an incident. These include:

- Site visitors/door knocking
- Phone calls
- SMS messages
- Email (internal and external)
- Letter drop
- Warning signs
- Depending on the incident; WaterNSW has an early warning system to alert Water Licence Holders. WaterNSW can be contacted and a request can be made to them to send an alert out.

Depending on the nature of the incident, Visy will liaise with relevant regulatory and government bodies to ensure the best advice is given to the community. The advice will be given to the surrounding farms either by door knocking, phone call, SMS messages or email; or by phone call, SMS messages or email to the Tumut and Adelong Communities. Community will be regularly updated by the same mediums as the situation evolves. Depending on the incidents, specific warning signs may be erected near incident sites or near affected area.

Minimising Harm to Persons on the Premises

The following are in place to minimise the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried out:

- Operators are trained and qualified to undertake the work
- Operators in training are actively supervised by qualified operators
- Contractors have completed the Visy inductions and site specific induction
- Visitors are to sign in and out of the site and are accompanied by Visy staff at all times
- PPE is supplied and kept in good condition
- Gas monitors are available to operators, contractors and visitors

Maps

A map is presented in Appendix B which includes the following:

- Location of the premises to which the licence relates
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Actions to be Taken During or Immediately After a Pollution Incident

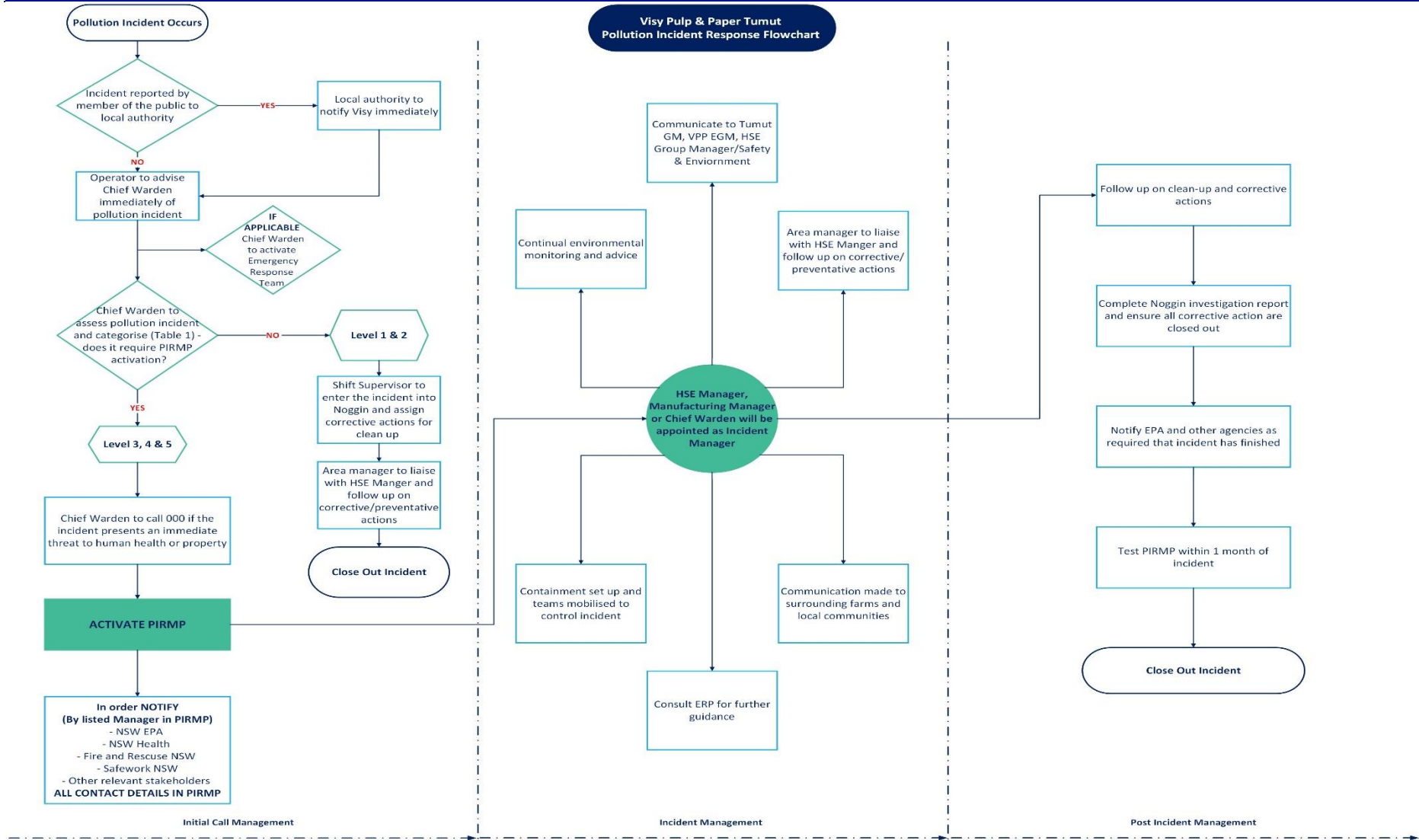


Figure 1: Pollution Incident Response Flowchart

Detailed Description of Actions in Figure 1

Initial Call Management

If there is an **immediate threat to human health or properties, call triple zero (000 or 112 if using a mobile phone)** and follow the emergency response plan as required.

Operator to advise Chief Warden immediately if a pollution incident occurs and must begin to contain the incident and prevent it from spreading, without putting any personnel in danger. If toxic vapour, fumes or smoke is produced from the incident remove all personnel from the area to a safe distance and remain upwind of the incident.

Chief Warden/HSE Manager/Manufacturing Manager will assess the incident and decide if it poses a risk of material harm to the environment as defined in section 147 of the POEO Act, material harm is defined as:

- a) harm to the environment is material if–
 - (i) It involves actual or potential harm to the health or safety of human being 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 measure to prevent, mitigate or make good harm to the environment

The incident will be categorised as per the Visy Incident Classification table, this will help to determine if the incident requires the PIRMP to be activated.

If applicable the Chief Warden will activate the Emergency Response Team.

If the incident is categorised as **NOT** posing a risk of material harm, contain the incident, ensure the area is cleaned up and prepare a Noggin Incident Investigation. For this type of incident, the PIRMP does not need to be activated.

If the incident is categorised as **POSING A RISK** of material harm, the PIRMP will be activated immediately by either the HSE Manager or the Manufacturing Manager as nominated in this PIRMP. These managers will contact the relevant authorities as required once the PIRMP is activated.

Further authorities may need to be contacted as required see page 5 (notification of authorities, continued).

Detailed Description of Actions in Figure 1; Continued

Incident Management

HSE Manager, Manufacturing Manager or Chief Warden will be appointed as the incident manager to control and contain the incident.

The HSE Manager or Manufacturing Manager will notify the relevant authorities and ensure the surrounding farms and local communities are aware of the incident if it poses a risk to their properties or cause any potential harm to human health. These managers will regularly review the need for communication updates to the relevant individuals/communities/authorities.

The HSE Manager or Manufacturing Manager will notify the Visy Tumut General Manager, VPP Executive General Manager and Visy Group Manager Safety & Environment.

The incident manager will liaise with both internal and external personnel/authorities to create a course of action for the containment, repair and clean-up of the affected area. Incident manager will allocate resources (ERT Team, additional staff, equipment etc.) required to be able to deal with the incident in a timely manner. For specific pollution incidents the incident manager will consult the Emergency Response Plan and additional procedures as required listed in Appendix C.

In the event that external signage is required this will be placed in prominent and/or high use areas to warn the public of the contamination/incident and advise them to avoid using the area until the contamination/incident has been cleared.

Incident manager to organise sampling as required, when samples are taken the date, time and location is to be recorded. The HSE Manager is to be advised these samples have been taken.

Incident manager is to ensure a timeline is kept and record all actions taken during the incident.

Post Incident

Incident manager is satisfied that the incident is under control, repairs have been completed if required and clean-up is completed.

EPA and other agencies have been notified the incident has been completed as required.

Incident manager to ensure a Noggin Incident Investigation has been commenced and assigned to the relevant personnel on site. This investigation will include any corrective actions that have been assigned during the incident or any that need to be assigned post initial clean-up.

PIRMP is to be tested within 1 month of the incident occurring and the PIRMP will be amended as required.

Testing and Updating of the PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident that caused or threatened material harm to the environment.

PIRMP Testing

| Date tested | Tested by | Details of test | Finding of test, including issues identified | Next scheduled testing date (must be within 12 months from current test) |
|---------------|---|--|--|---|
| 26 June 2023 | HSE Manager Environmental Officer Safety Coordinator Chief Warden (C Shift) | Desktop simulation – environmental spill | Testing of the PIRMP was successful. Training and knowledge surrounding the PIRMP needs to be improved with Chief Wardens. It was noted the PIRMP needed to be updated to a more user friendly template. | 26 June 2024 |
| 07 March 2024 | HSE Manager Environmental Officer Safety Coordinator Chief Warden (A Shift) Emergency Response Team | Physical drill – chemical spill into stormwater system | Testing of the PIRMP was successful. It was noted there was no prompt to activate the Emergency Response Team. | 07 March 2025 |

PIRMP Updates

| Date update occurred | Reason for update | Details of updates | Date the updated version uploaded to website | Date of completion |
|----------------------|--|--|--|--------------------|
| 02 August 2023 | Compliance Audit Report – Liquid chemical storage and handling | Updated to EPA template and amended areas outlined | 01 September 2023 | 28 August 2023 |
| 14 March 2024 | Emergency Response Team/PIRMP Test Drill | Added activation of the Emergency Response Team to Figure 1.0 and Detailed Description of Action in Figure 1.0 – Initial Call Management | 15 March 2023 | 14 March 2024 |

Appendix B: Map Relevant to Visy Tumut

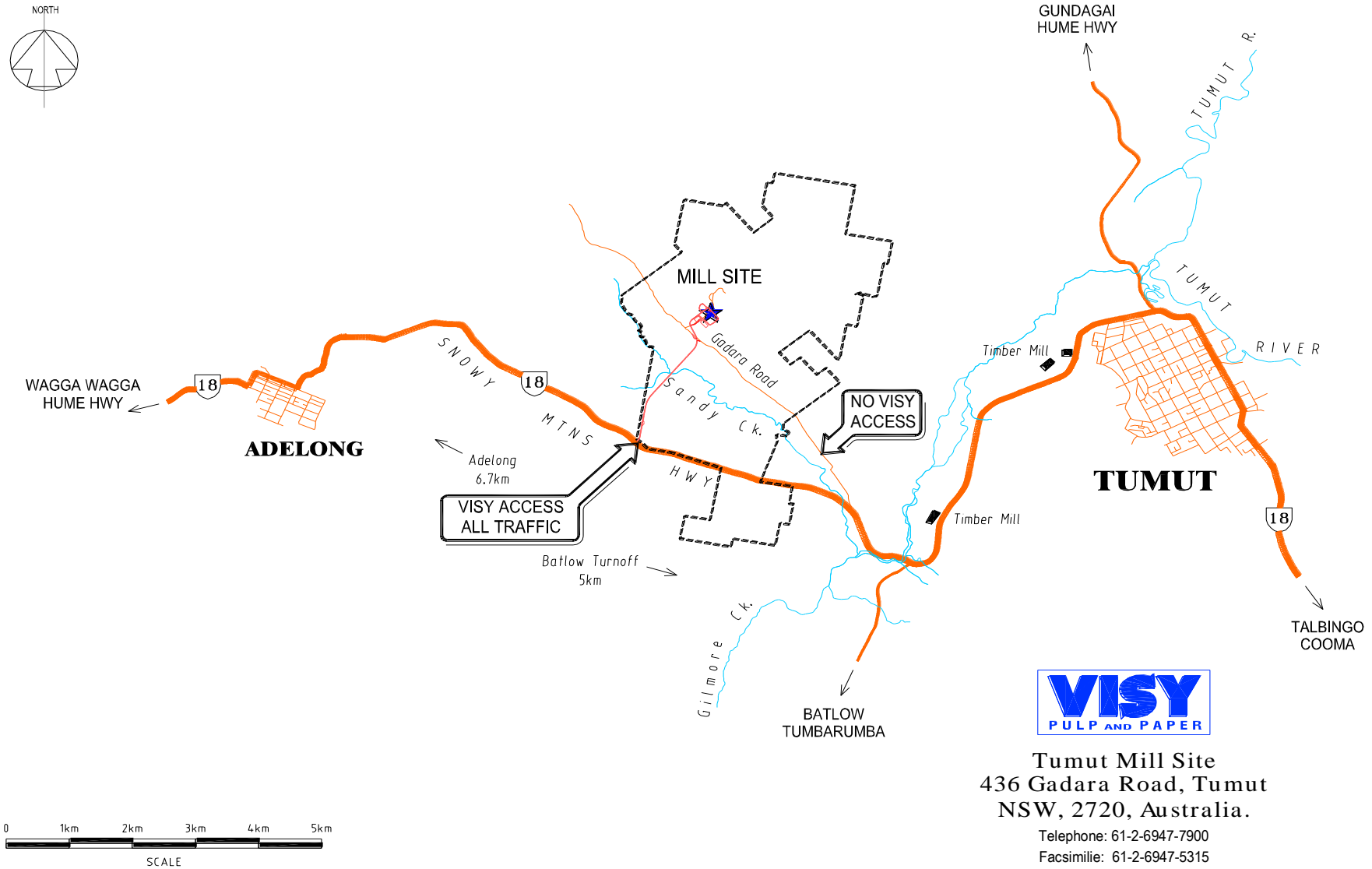


Figure 2: Visy Tumut Mill site location compared to local communities Tumut and Adelong. The green circle defines the area in which would be affected by a pollution incident.