



ABN: 66 008 709 608

**Pollution Incident Response Management Plan
(PIRMP)**

DSRRC Rosehill

11 Devon Street Rosehill NSW 2142

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1 PURPOSE AND SCOPE

The purpose of this plan is to ensure that systems are in place at the site to minimise the potential impacts associated with pollution incidents events. In order the streamline the processes onsite, the term “*pollution incident*” is considered an emergency event.

If an emergency event occurs the priorities must be:

1. The safety of all persons on site (including visitors and contractors).
2. The safety of nearby residents.
3. Minimum impact on the environment.
4. Normal business operations are returned to normal as soon as possible.

The scope of activities conducted at this site includes, but not necessarily be limited to work relating to the following activities:

1. Asphalt Production
2. Recycled Asphalt Repurposing (RAP)
3. Quality Testing (Laboratory)
4. Reconomy Resource Recovery Facility (Reconomy)

As an Environmental Protection Licence has been granted to the site, a Pollution Incident Response Management Plan (PIRMP) has been developed to meet the conditions to comply with Part 5.7A of the *Protection of the Environment Operations (POEO) Act 1997*.

In order to meet this requirement, the following document had been developed for implementation at the Licenced site for the activities carried out on the site.

2 SITE EMERGENCY PROFILE

2.1 Site Details

Site Name:	Sustainable Road Resource Centre
Owner/ Occupier:	Downer
Address:	Lot 6, 9 Devon Street, Rosehill NSW 2142
Phone Number:	1300 366 538
Email Address:	Paul.Sherry@downergroup.com



Buildings and Structures:	<ul style="list-style-type: none"> ▪ Security Hut ▪ Single Floor Production Office and Laboratory Building ▪ Dangerous goods containers ▪ Laboratory Storage container ▪ Drivers Hut ▪ Diesel Tank ▪ Rotary Drier / Mixer ▪ Cold Feed Bins and Conveyors ▪ Fly Ash/Lime/Silos ▪ Asphalt Plant Electrical Control Room ▪ Bitumen Tank Storage ▪ Vertical Bunkers Structure ▪ Toner Liquid Additive Store Shed ▪ IBC Storage Shed ▪ Detritus Recycling (Reconomy) Structure ▪ Reconomy Amenities ▪ RAP Structure & Asphalt Laydown Annex ▪ Emulsion Tank Storage 		
Hours of Occupancy:	24hour Operation		
Shift Details	Shift Name	Hours	No. of People
	All	24/7	Approx 25-30
Security Service Provider:	NCI Security – 1300132256		
Fire and Emergency Equipment Contact:	Wormald - 1300303473		
Legislative requirements	Australia: <input type="checkbox"/> Compliance with AS 3745 Planning for emergencies in facilities <input type="checkbox"/> Manifest of hazardous chemicals exceeding trigger levels, as required by Work Health and Safety Regulations <input type="checkbox"/> Pollution Incident Response Management Plan (PIRMP) as required by Protection of the Environment Operations Act (NSW)		
Person(s) Responsible for Carrying out Evacuation Coordination Procedures	Name	Phone Number	Email Address
	Gordon McLisky		
	Paul Sherry		



2.2 Site Location



The Downer site is within an industrial area of Rosehill and Camelia

2.3 Site Environmental Protection License

The site has an EPL Licence No. 21611 and is listed for the following scheduled activities.

Scheduled Activity	Fee Based Activity	Scale
Chemical production	Petrochemical production	> 10000 - 30000 T annual production capacity
Resource recovery	Recovery of general waste	Any general waste recovered
Waste storage	Waste storage - other types of waste	Any other types of waste stored
Waste storage	Waste storage - waste tyres	> tyres stored
Ancillary Activity		
Asphalt Production		

While the site is listed for the activity of Chemical Production, this activity is not conducted on the Devon Street Site, as a result no products are stored in the Emulsion Tank Farm or Emulsion Additive and Liquid additive Store shown on 2.4 Site Layout. Also refer to **Section 6** Inventory of Pollutants.

FRNSW guidelines

The Reconomy Facility is licensed to store and process up to 250 m³ of organics waste and up to 300 tonnes of incoming street sweeping waste, both considered combustible.



Combustible Waste Materials means any solid waste material that can readily ignite and burn under normal conditions.

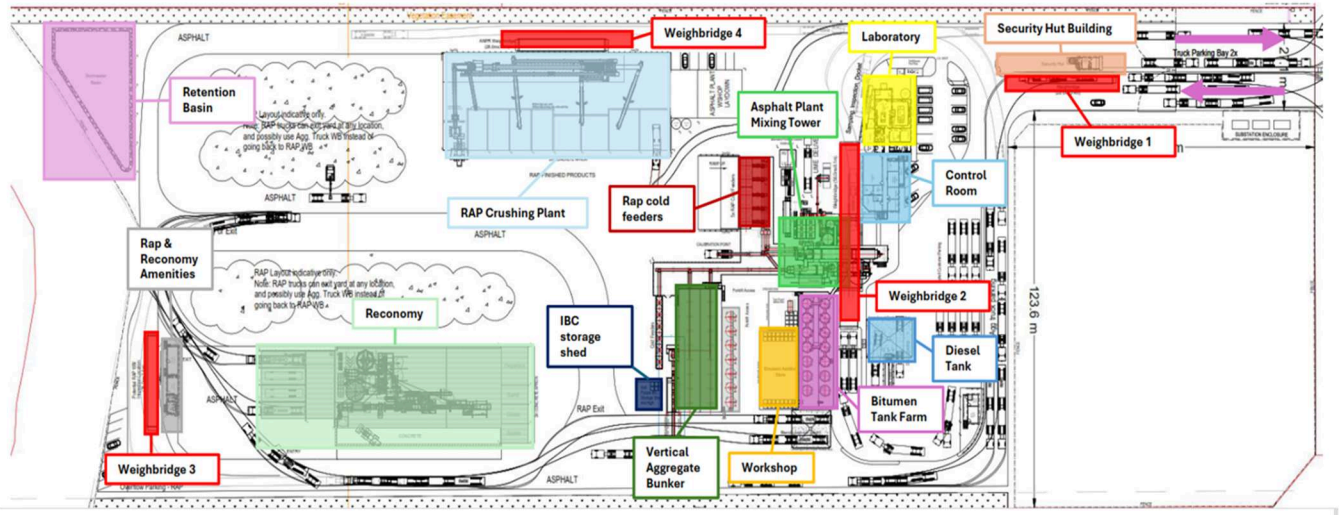
Which include:

- Paper and cardboard
- Wood and wood-based products
- Plastic
- Rubber – (Up to 10 tonnes of Crumbed Rubber is stored on site).
- Metals with combustible contaminants, and
- Any other waste material which poses a notable fire risk.

2.4 Site Layout

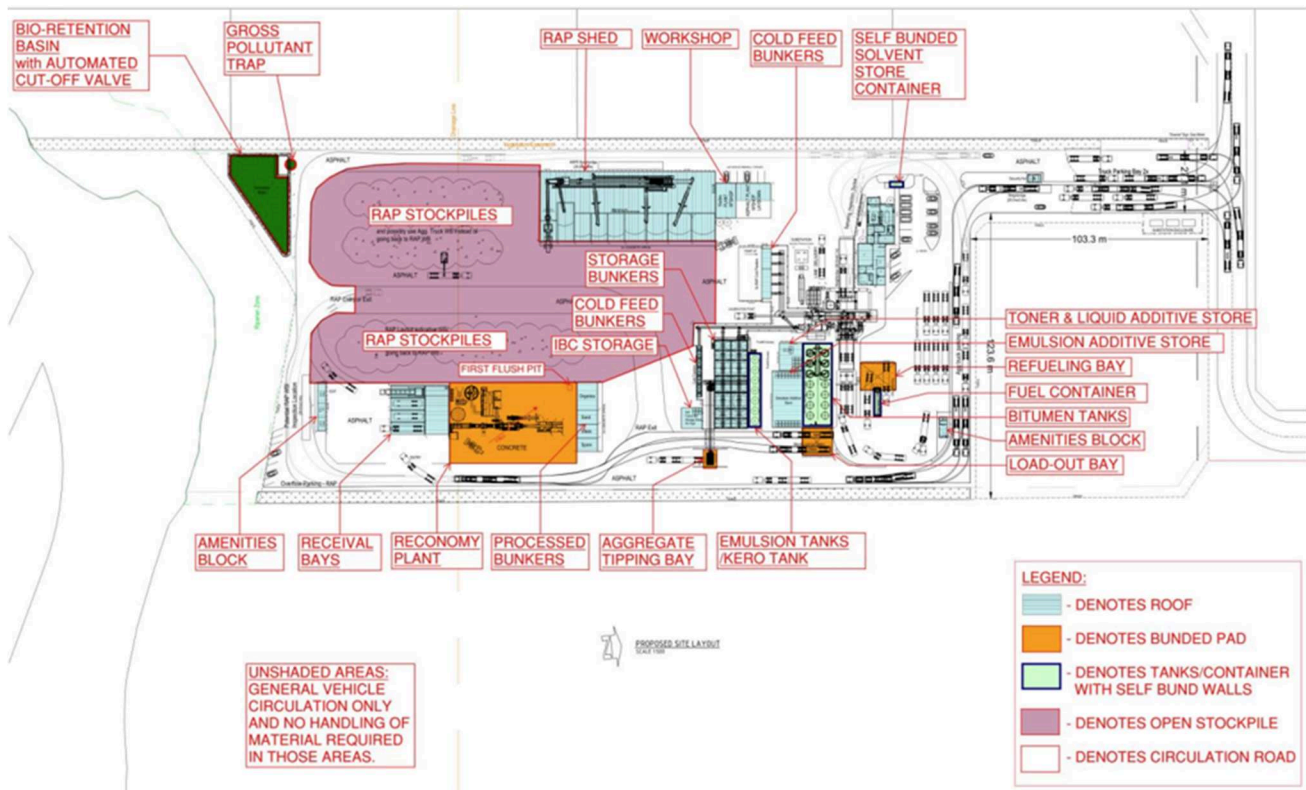
Site Layout

Updated 10.09.2025





Site Stormwater System Map



A cut-off valve at the furthest downstream drainage pit also forms part of the drainage network. This provides an automated emergency cut-off to contain any potential contaminants or firewater in the basin and mitigate the risk of polluted waters entering the downstream receiving waters.

2.5 Details of Neighbouring Facilities

Neighbouring Facilities	Contact Person & Phone number	Mechanism for Raising the Alarm and Ongoing Communication	Circumstance for Raising the Alarm
Rosehill Gardens	Mostyn Copper 1300 729 668	Phone	Emergency, Smoke, Fire, Bomb & Armed Threat, Spill
Rosehill Distribution Centre	Peter Small (Charter Hall) 02 8651 9481	Phone	Emergency, Smoke, Fire, Bomb & Armed Threat, Spill
James Hardie	Grant Overton 13 11 03	Phone	Emergency, Smoke, Fire, Bomb & Armed Threat, Spill
VIVA Energy	Adam Speers 0400 214 857	Phone	Emergency, Smoke, Fire, Bomb & Armed Threat, Spill
Goodman	Brendon Quinn 02 9230 7400	Phone	Emergency, Smoke, Fire, Bomb & Armed Threat, Spill



3 COMMUNICATION OF THIS PLAN

This PIRMP shall be communicated to personnel through site inductions and will be displayed on site and contained within the Downer Site Zero Harm Management Plan (ZHMP) documentation. Site specific evacuation procedures (incl. muster points and the identities of ERT personnel) will be displayed on noticeboards and in prominent positions throughout the site/buildings.

As required by the POEO Act, and to allow appropriate communication of the plan, a current copy of this plan is to be located on premises at all times and able to be provided to an authorised EPA officer on request.

In addition to having an onsite copy, the PIRMP will also have a copy be sent to the nearest FRNSW brigade office as well as made publicly available on the [Downer Group Website](#).

This PIRMP shall be communicated to personnel through site induction, at Toolbox and Pre-Start meetings and will be displayed on site and contained within the Project Zero Harm Management Plan (ZHMP). Site specific evacuation procedures (incl. muster points and the identities of ERT personnel) will be displayed on noticeboards and in prominent positions throughout the site/buildings. Emergency Organisation & Responsibilities

3.1 Site and Production Managers

General Requirements

Be fully conversant with the requirements of this Plan.

Ensure the PIRMP is fully implemented, monitored and adjusted to suit the requirements of the operations system and the client's requirements.

Ensure the requirements of the Management System are fully complied with when administering the PIRMP.

Ensure all employees are conversant with their responsibilities and duties under the PIRMP.

Communication

Ensure any bulletin or information pertaining to emergency plans and management is placed on the Zero Harm Notice Board and other noticeboards.

Maintain lists of employees' and contractors' emergency contacts/next of kin either on site or via the HR system. Ensure that relevant emergency contacts are notified in case of an pollution incident.

Notify senior management of any pollution incident in accordance with [DA-ZH-PR006 Incident Reporting and Investigation](#). Only authorised spokespeople may liaise with the Media (refer [DA-ZH-PR013 Communication and Consultation](#) and the Downer Group Media Policy).

Training

Educate supervisory personnel in accordance with plan requirements, statutory obligations, and relevant procedures contained in the Integrated Management System (IMS).

Have been inducted into Downer Australia safety and environmental management systems and procedures.



3.2 Production Supervisors

Being familiar with the requirements of this PIRMP.

Ensuring incidents are managed and strictly supervised in accordance with the PIRMP, company policies and procedures.

Being familiar with legislation and codes of practice relevant to this role and ensuring the requirements of the same are brought to the attention of interested parties and implemented as is practicable across the project site.

Communication

Ensuring the requirements of the PIRMP are communicated to all personnel, subcontractors and where appropriate, visitors to site through on-site daily Pre-Start meetings, Site Inductions, weekly Toolbox Meetings and Safe Work Method Statement (SWMS) review on commencement of new works with the potential to impact personnel and the environment.

Any external contact will be communicated to the client via the Project Manager or their delegate.

3.3 Employees, Contractors and Visitors

On identification of a situation requiring emergency response each employee has the responsibility to immediately notify the site supervisor or delegate. In the event of a serious situation, or a situation requiring immediate medical response, the employee shall utilise this “Plan” to make direct contact with the closest medical facility.

When directed by the Chief Warden or his/her delegate, it is the responsibility of each person to evacuate the workplace via the nearest safe exit/route, after turning off any machinery in use and proceed to the designated external muster point and stay there until given further instruction.

3.4 Pollution Incident Response Team

The emergency team is tasked with co-ordination and control of the response to a pollution incident. Where an evacuation is required, the team will be responsible for accounting for all personnel and for any actions deemed necessary to limit the impact of the emergency on the site and its personnel.

Members of the emergency team assume authority over all personnel within the scope of their responsibilities. They are accountable to other members of the team within the hierarchy and to members of the Emergency Services (Ambulance, Fire, Police, etc.).

In the absence of a member of the Emergency team, the Site Manager will appoint the next most senior member of the team to assume the role of the absent member. In the absence of the Site Manager, the Warden whose area of responsibility encompasses the emergency location shall assume the role of Emergency Controller.

Emergency Team members shall report planned absences (i.e. annual leave, sick leave) to that position. In cases where only one or two wardens are on site, such as back shifts or weekends, the warden/s will be required, in addition to their role, to ensure that appropriate emergency services are contacted.

For additional information please refer to **Section 7** of this document.

4 LEGISLATIVE REQUIREMENTS

The specific requirements for pollution incident response management plans are set out in Part 5.7A of the *POEO Act* and Clauses 131 of the *Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation)*.

In summary, this provision requires the following:

- All holders of environment protection licences must prepare a pollution incident response management plan.



- The plan must include the information detailed in the POEO Act and be in the form required by the POEO(G) Regulation.
- Licensees must keep the plan at the premises to which the environment protection licence relates.
- Licensees must test the plan in accordance with the POEO(G) Regulation.
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan.

5 DEFINITION OF POLLUTION INCIDENT AND NOTIFICATION REQUIREMENTS

The definition of a *pollution incident* is:

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.

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as:

(1) For the purposes of this Part--

- 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 \$50,000 (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.

2) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

Notification responsibilities for incidents that have caused or threaten to cause material harm to the environment are detailed in Section 148 of the POEO Act. In summary, these are broadly categorised as:

5.1.1.1 Pollution incidents causing or threatening material harm to be notified:

(1) Kinds of incidents to be notified This Part applies where a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened.

(2) Duty of person carrying on activity to notify A person carrying on the activity must, immediately after the person becomes aware of the incident, notify each relevant authority of the incident and all relevant information about it.

(3) Duty of employee engaged in carrying on activity to notify A person engaged as an employee in carrying on an activity must, immediately after the person becomes aware of the incident, notify the employer of the incident and all relevant information about it. If the employer cannot be contacted, the person is required to notify each relevant authority.

(3A) Duty of employer to notify Without limiting subsection (2), an employer who is notified of an incident under subsection (3) or who otherwise becomes aware of a pollution incident which is related to an activity of the employer, must, immediately after being notified or otherwise becoming aware of the incident, notify each relevant authority of the incident and all relevant information about it.



(4) Duty of occupier of premises to notify the occupier of the premises on which the incident occurs must, immediately after the occupier becomes aware of the incident, notify each relevant authority of the incident and all relevant information about it.

(5) Duty on employer and occupier to ensure notification An employer or an occupier of premises must take all reasonable steps to ensure that, if a pollution incident occurs in carrying on the activity of the employer or occurs on the premises, as the case may be, the persons engaged by the employer or occupier will, immediately, notify the employer or occupier of the incident and all relevant information about it.

(6) Extension of duty to agents and principals This section extends to a person engaged in carrying on an activity as an agent for another. In that case, a reference in this section to an employee extends to such an agent and a reference to an employer extends to the principal.

5.1.1.2 Manner and form of notification:

Notification responsibilities for incidents that have caused or threaten to cause material harm to the environment are detailed in Section 149 of the POEO Act. In summary, these are broadly categorised as:

(1) If the regulations prescribe the manner or form of notifying pollution incidents under section 148, the notification is to conform to the requirements of the regulations.

(2) Without limiting subsection (1), the regulations--

(a) may require that verbal notification be followed by written notification, and

(b) may provide that notification to a designated person or authority is taken to be notification to the relevant person or authority under section 148.

The employer or occupier of the premises (in this case, the Production Manager) on which the incident occurred, who is notified (or otherwise becomes aware of) of the incident, will immediately notify the relevant authorities about the incident and all relevant information.

Under the POEO Act (Section 153B) requirements the owners or occupiers of a premises in the vicinity of the premises to which the environment protection licence relates to, must notify a pollution incident and the local authority for the area (Parramatta Council) in which the premises to which the environment protection licence is located. In addition, the owners or occupiers of a premises to which the environment protection licence relates to, must notify;

- any area affected, or potentially affected, by the pollution, and
- any persons or authorities required to be notified by Part 5.7,

Furthermore, the POEO Act, 'relevant authority' means any of the following:

- appropriate regulatory authority (ARA) (i.e. Parramatta Council/Sydney Water).
- Environment Protection Authority (EPA) if they are not the ARA
- Ministry of Health
- SafeWork NSW (formerly WorkCover)
- local authority, if they are not the ARA
- Fire and Rescue NSW

Section 7 of the PIRMP lists the emergency response team details for these authorities relevant to this site.

Notification responsibilities for incidents that have caused or threaten to cause material harm to the environment are detailed in Section 150 of the POEO Act. The Relevant information to be given is as follows:

(1) The relevant information about a pollution incident required under section 148 consists of the following--

(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.

(2) The information required by this section is the information known to the person notifying the incident when the notification is required to be given.

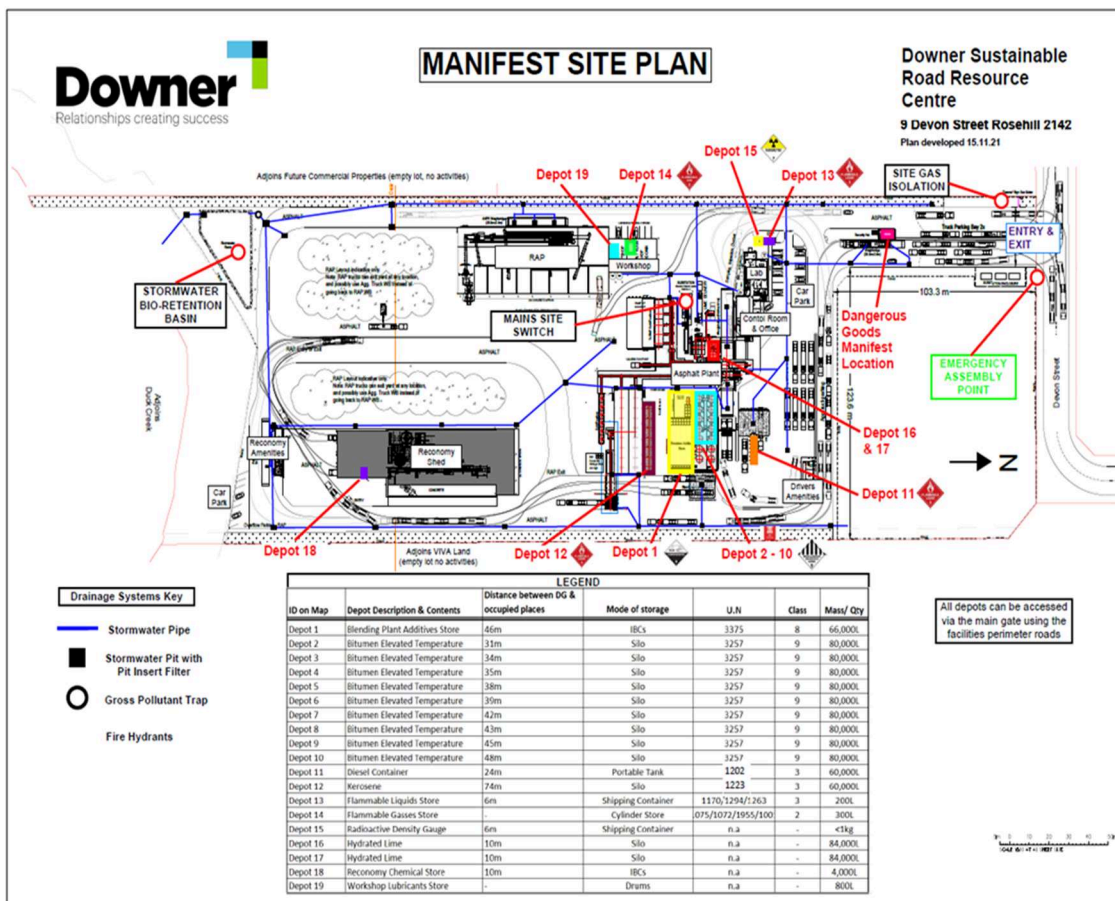
(3) If the information required to be included in a notice of a pollution incident by subsection (1) (c), (d) or (e) is not known to that person when the initial notification is made but becomes known afterwards, that information must be notified in accordance with section 148 immediately after it becomes known.

Notification responsibilities for incidents that have caused or threaten to cause material harm to the environment are detailed in Section 151 of the POEO Act. Incidents not required to be reported.

(1) A person is not required to notify a pollution incident under section 148 if the person is aware that the incident has already come to the notice of each person or authority required to be notified.

(2) A person is not required to notify a pollution incident under section 148 if the incident is an ordinary result of action required to be taken to comply with an environment protection licence, an environment protection notice or other requirement of or made under this Act.

6 INVENTORY OF POLLUTANTS



Depot 14

Crumbed Rubber while not considered a Dangerous Goods is a combustible and poses risks of spontaneous combustion, especially in large stockpiles. Only 500 tonnes per annum of crumbed rubber is allowed under the EPL with less than 10 tonnes stored onsite in a dedicated storage area, shown on Dangerous Goods Plan in Depot 14.



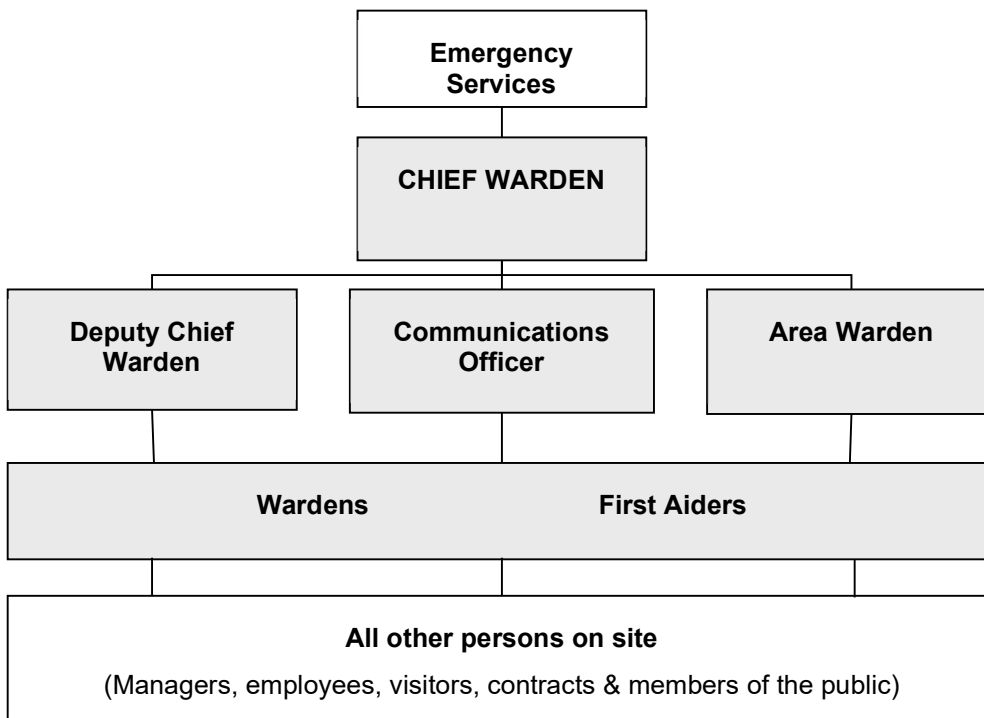
7 EMERGENCY RESPONSE TEAM (ERT)

The Emergency Response Team (ERT) is responsible for taking control of the site after the occurrence of a pollution event until such time either:

- external emergency services (e.g. police, fire services or Workplace health and safety authority) take control of the site; or
- the event subsides.

Roles and Reporting Structure

The following figure illustrates the roles of the ERT and the reporting structure that exists in the event of an emergency.



Selection Criteria for Team Members

Persons appointed to roles on the ERT will be:

- physically capable of performing their duties
- have leadership qualities and command authority
- have maturity of judgement, good decision-making skills and capable of remaining calm under pressure
- be available to undertake their duties; and
- be willing to undertake routine training

Authority

During emergencies, instructions given by the ERT personnel takes precedence over the normal management authority structure.

The ERT will act to make sure that the health and safety of people takes precedence over the protection of assets, environmental considerations, production operations and business continuity.

ERT Members

The following personnel make up the emergency response team.



Shift Day			
Area	Role	Name	Contact
X	Chief Warden	Gordon McLisky	Phone no.
X	Deputy Chief Warden	Glenn Dobbie	Phone no.
Production	Warden	Paul Sherry	Phone no.
Reconomy	Warden	Shane Foxwell	Phone no.
Weighbridge	Warden	Jas Dhillion	Phone no.
	First Aider	Mark Gill	Phone no.

Shift Night			
Area	Role	Name	Contact
X	Chief Warden	Harry Papaeleou	Phone no.
X	Deputy Chief Warden	Josh Ible	Phone no.
Reconomy	Warden	Nakita Powell	Phone no.
Reconomy	Warden	Shane Foxwell	Phone no.
Weighbridge	Warden	Kylie Bigeni	Phone no.
Area	First Aider	Harry Papaeleou	Phone no.

8 ROLES AND RESPONSIBILITIES

Everyone in NSW has a duty to notify the EPA of Material Environmental Harm (if the employer fails to do it then the employee must act).

If a person wilfully or negligently causes any substance to leak or spill in a manner that harms or is likely to harm the environment that person... [is] guilty of the offence.

If a person wilfully or negligently, contributed to the conditions that gave rise to the commission of the offence that person is guilty of an offence.

Liability

Directors and managers can be held responsible at the same level as the corporation.

Employees: EPA considers if acting under orders from employer or following procedures. All employees have an obligation to protect the environment irrespective of their employers' attitudes.

Role	General Responsibilities
Chief Warden/ Deputy Chief Warden	<ul style="list-style-type: none"> ▪ Lead and coordinate response to an emergency or pollution incident. ▪ Effectively communicate with personnel and external parties. ▪ Be familiar with the site/ operation/ project.



Role	General Responsibilities
Communications Officer	<ul style="list-style-type: none"> ▪ Effectively communicate with personnel and external parties as directed.
Area Warden	<ul style="list-style-type: none"> ▪ Assist the Chief Warden and direct emergency procedures within a defined area of the operation.
Operations Manager	<ul style="list-style-type: none"> ▪ Provide site/ operation/ project information to the ERT.
Site / Operations Manager and/or Environmental & Sustainability Advisor / Zero Harm Advisor and/or Environmental & Sustainability Manager / Zero Harm Manager	<ul style="list-style-type: none"> ▪ Provide site/ operation/ project information to the ERT. ▪ Authorisation, administration, maintenance and implementation of the PIRMP ▪ Assessing whether the incident has caused or threatens “material environmental harm” and communicate details to management. ▪ Make a determination as to whether the incident (as defined in section 147 of the POEO Act) is reportable to external agencies ▪ Responsible for taking control of the site after the occurrence of a Pollution event and activating the implementation of this PIRMP until such time either: <ul style="list-style-type: none"> ○ external emergency services (e.g. police, fire services or Workplace health and safety authority) take control of the site; or ○ the event subsides ▪ Coordinate communication to neighbours ▪ Ensuring that investigations are undertaken to a level corresponding to the level of risk and impact. ▪ Inform the Senior Leadership Management Team / Group Management and Notification to External Agencies ▪ Undertake notifications as defined in PIRMP
Supervisor	<ul style="list-style-type: none"> ▪ Notify of an emergency or pollution incident and/ or initiate emergency response. ▪ Assist with coordinating response to an emergency as directed. ▪ Following the procedures outlined in the PIRMP and DG-ZH-PR006 Incident Management Procedure. ▪ Immediately alerting Site Manager or, in case of their unavailability, Environmental Representative or Environment Manager of any potentially material environmental incidents or near-misses. ▪ Assist in conducting incident investigations.
Workers	<ul style="list-style-type: none"> ▪ Notify of an emergency. ▪ Follow instructions provided by the ERT. ▪ Following the procedures outlined in this plan and related documents ▪ Immediately alerting Site Manager or Team Leader of any environmental incidents or near-misses.



9 EMERGENCY TRAINING AND AWARENESS

All Personnel shall be provided with general Emergency Management Training as part of the site induction training process, and such training shall cover as a minimum:

- the locations of all emergency equipment and the correct method for its use.
- Risk awareness training to encourage awareness of the dangers presented by the site and the means for preventing it.

Personnel who have assigned responsibilities in an emergency situation (i.e. ERT, Fire Wardens, Evacuation Wardens, Site Management and ZH Team) shall be inducted into the PIRMP and provided with appropriate training.

Refer to the Facilities specific Training Needs Analysis/ Skills matrix for training schedule and completed training. This is to include emergency pollution response.

Requirements	Who Should Attend	Frequency	Training Provider
Site emergency systems: <ul style="list-style-type: none"> ▪ Alarms ▪ Communications ▪ Fire detection ▪ Fire suppression 	<ul style="list-style-type: none"> ▪ Spotless 	As per systems frequency	Newcastle Fire Extinguisher Service
Site/ area evacuation drills	<ul style="list-style-type: none"> ▪ All persons on site 	Annually	Downer, Futura Fire
Emergency Response Training	<ul style="list-style-type: none"> ▪ All Production Personnel 	Bi-Annually	Futura Fire
Fire Warden	<ul style="list-style-type: none"> ▪ All Production Personnel 	Yearly	Futura Fire

Incident and Emergency Preparedness includes all activities that focus on essential emergency response capabilities through the development of plans, procedures, the organisation and management of resources, and associated training and education.

10 FIRE AND SPILL EMERGENCY EQUIPMENT

NSW EPA released the Fire safety in waste facilities in January 2020. The fire safety guideline outlines standard approaches for fire risk management, fire safety systems, storage, stockpiles and planning at waste facilities. It can be found on the Fire and Rescue NSW website, www.fire.nsw.gov.au.

The guideline applies to any premises (existing or proposed) used for the storage, treatment, processing, sorting or resource recovery of combustible waste material. This includes unlicensed sites and those with an environment protection licence from the EPA. At this facility, and in compliance:

- No Smoke control systems are in place. Fire Control system operated by Portable Fire Extinguishers
- Dry chemical powder AB(E) fire extinguishers are used throughout the site. Other types of fire extinguishers may be used where fit for purpose, e.g. a foam extinguisher at fuel cells.
- All fire protection, including the installation, maintenance, and use of fire protection devices, is in accordance with *AS/NZS 1841.1:2007 Portable Fire Extinguishers – General Requirements*.
- Inductions include basic training and instruction on the safe use of portable fire extinguishers.
- Fire extinguishers are checked, retested, and tagged every six months in accordance with *AS 1851-2012 Routine Service of Fire Protection Systems and Equipment* and as defined in section 11.1 *Inspection & Audit Timing*.



- **Hydrant Booster Pumps and Hose Rells located various location throughout site are shown on page 20.**

Spill Containment Systems

Spill kits are located throughout the site and adjacent to areas of spill potential e.g diesel tank, laboratory, workshop. Spill kits are serviced regularly to ensure they remain well stocked and adequate in the event of a spill.

Components within the plant are all located within bunded areas (e.g bitumen tanks) or are self-bunded (e.g diesel tank). The loading areas for the bulk delivery of bitumen and diesel are also on small bunded concrete areas to allow the quick clean-up of any potential leaks or small spills that may occur in the unloading process.

The bitumen tank is fitted only with a blind sump which requires a submersible pump to be manually operated following the inspection of the bund water to release any rainwater captured eliminating any potential for contaminated water or products from inadvertently spilling as a result of a drain valve being left open.

Firewater Containment

Firewater refers to water used in firefighting operations that becomes contaminated with various substances. It carries a mix of chemicals, oils, soot, and other hazardous materials from the fire site. Containment of this water will depend on the location and size of the fire. Capture of the water by blocking the outlet of the drainage basin prior to the discharge point into the quarry or temporary storage within the tank bunds are the most effective controls.

Spill Equipment, and Fire Services Locations are shown on the following diagram on page 20.

11 EMERGENCY WARNING AND INTERCOMMUNICATION SYSTEM (EWIS)

The site EWIS details are as follows:

- alarm tone description – fire bell.
- activation mechanism and location; and Detectors, system in admin office and in lunchroom/toilets section of workshop
- power supply (particularly back-up in the event of power failure). – battery backed up

12 EVACUATION PROCEDURE

Emergency Evacuation Guide (Standard)

All attempts to respond to an emergency situation should at all times ensure personal safety and only be attempted if within the capabilities of the individual.

If an Emergency situation arises...

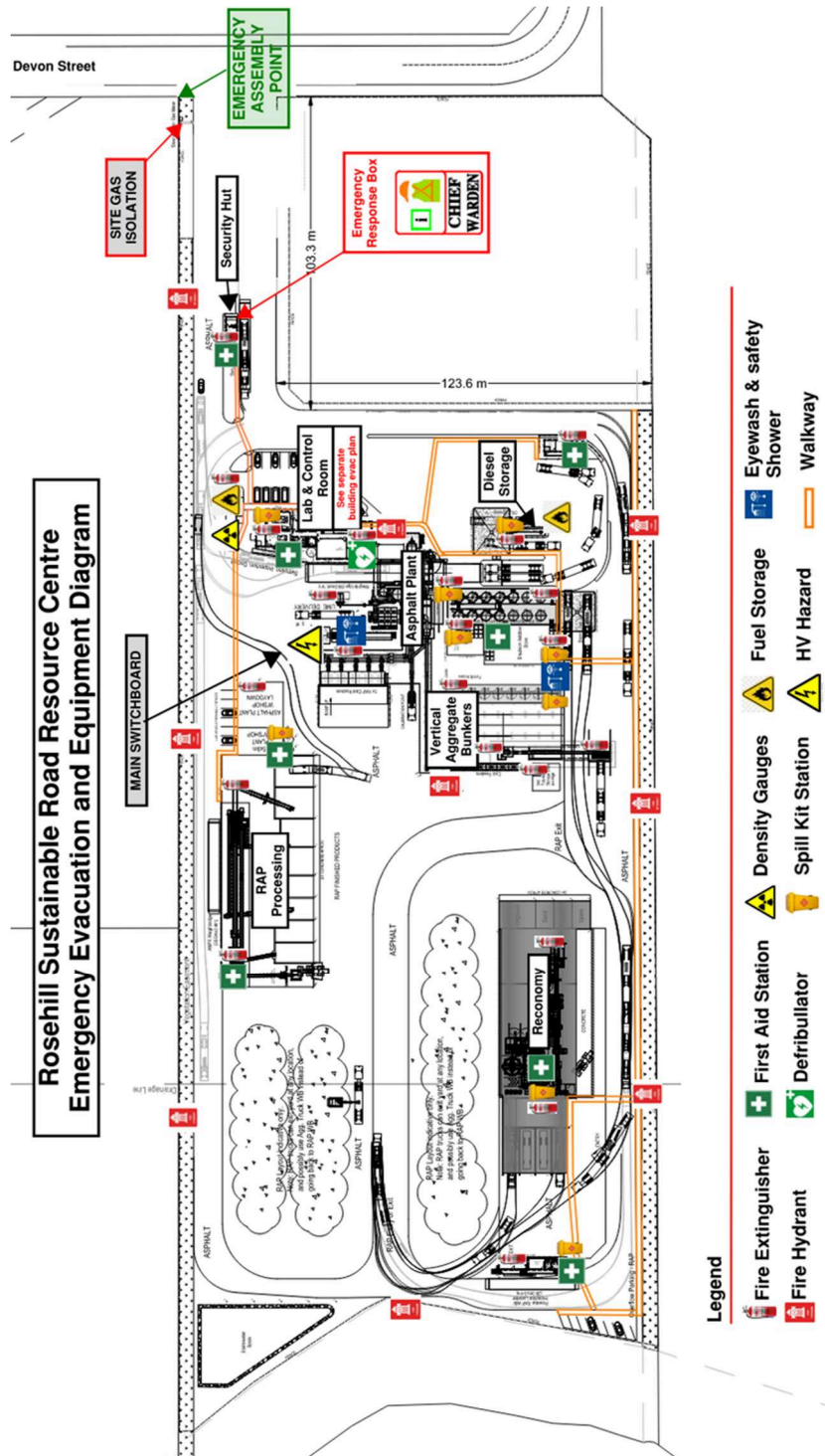
- Alarm is raised by either the First responder or Emergency Response Personnel (eg activate emergency alarm, radio or contact the emergency channel/line).
- Personnel are to prepare for Evacuation (shutdown plant and equipment if safe to do so) and await further instruction.
- Chief Warden determines appropriate action in line with nature of emergency & initiates evacuation procedure.
- Deputy Chief Warden or Area Warden responds to emergency.
- Area Warden commences immediate evacuation and directs personnel to nearest exit point.
- Warden to take Visitors book & Site Register of workers and contractors on site to Emergency Assembly / Muster Point



- Area Warden checks all areas clear of personnel.
- Area Warden directs and follows all personnel to Emergency Assembly / Muster point.
- Area Warden advises Chief Warden all areas are clear.
- Chief Warden and Area Warden hold personnel in muster area until directed by the Site Supervisor or Emergency Services Personnel.

Note: Emergency Evacuation Drills shall be evaluated and recorded using [DA-ZH-FM015.5 Emergency Drill Observer's Checklist](#)

Emergency Assembly Points, Safety/Spill Equipment, and Fire Services Locations are shown on the following diagram.





13 LOCK-DOWN PROCEDURES

In the event of a lockdown being required, all personnel are to remain at the emergency assembly point (or other designated areas if the emergency assembly point is not suitable) and await further instruction.

14 LIKELIHOOD AND RISKS OF A POLLUTION INCIDENT

14.1 Risks to Surrounding Environment

The risk to the surrounding industries is limited primarily to air in the form of steam, dust and chemical discharge to air and water.

- Steam associated with the Asphalt Production burner is monitored, and heat-controlled via the computerised Amman Plant and poses minimal risk to the surrounding environment and properties. The risk is further reduced due to the Plant using the latest technology and ongoing maintenance schedule,
- Dust is controlled onsite with the use of dust suppression sprinklers, site owned water cart and street sweeper as part of the Dust Management of the Environmental Management Plan. Bag house dust associated with the Asphalt production is monitored and controlled via the computerised Amman Plant as well as regular physical checks of the bag house.

Chemical Discharge to Air

- Refer to **Section 6.2**. Bitumen tanks are fitted with a charcoal filter to prevent uncontrolled discharge to air limiting the risk to human health.

Chemical Discharge to Water

- Duck River and the adjoining riparian reserve and the Duck River Flood Zone are located adjoin the rear of the site. A purpose-built bio basin was designed and built to treat all surface water (see stormwater system layout Section 2.4). The bio-basin discharge point has an Electronic Discharge (knife) valve gate that can isolate the site from Duck River, effectively acting as a retention point for any accidental discharges or on-site spills.
- Refer to **Section 6.1**. Controls and Pre-empted Actions to prevent uncontrolled discharge to water and to limit the risk to human health are identified in the Environmental Management Plan
- For water pollution incidents that may affect neighbours who could access the impacted water, those neighbours will be asked to avoid use of the water until further notice.

Extreme Rainfall/Flooding.

- Extreme rainfall can cause localised flooding across the site. Discharge is limited to the outfall pipe, that discharges into Duck River. Discharge is controlled by a number of management measures, including a knife valve, and no discharge occurs until water quality sampling has been complete, or authorisation for the EPA is granted. **Refer to Annex C for Flood Management Plan.**

Electronic Discharge Valve

- An electronically controlled submersible Actuator Valve with manual override and jammed valve protection is located between the bio retention basin and the site's discharge point. In the case of a major incident occurring onsite, this valve can be actuated from the Main Control Room preventing any fluids from leaving site.
- Default in case of power failure is closed to prevent offsite discharge.

Also refer to **ANNEX B Environmental Impact and Consequence Classification Table Adapted from DG-ZH-PR006 Incident Management Procedure.**



In accordance with the Site Risk Assessment outcomes, it has been identified that the key applicable risks to human health, property and the environment identified for the site are as follows. These have been risk rated in accordance with [DG-ZH-PR006 Incident Management Procedure](#):

Risk	Likelihood x Consequence Risk Rating
Dangerous and/or Hazardous materials spillage and discharge to environment (including contaminant discharge and tank failure)	C
Discharge of airborne emissions/contaminants off site	C
Extreme Rainfall Events	C

The likelihood of occurrence is to be reviewed regularly, following events, and in light of adverse weather conditions.

14.1 Polluting Substance Risk Analysis

List Of Polluting Substance Storages/Uses At Site Initial Assessment - Chemical Use and Storage							
Name/description	Hazardous Chemical	Amount Stored (tonnes)	Location (refer page 14)	Need for early warning to neighbours	Pre-Empted Actions	Reference to Safety	Ref to ANNEX B – Environmental Impact and Consequence Classification
Bitumen Storage Tanks x6	C9	780	Depot 2-10	Only in significant off-site emissions – fire, major spill	Secondary Containment AS1940 designed bunds	See DG licence/ AS 1940 comp	2
Bitumen Class 170/320	C9	160	Depot 2-10	Only in significant off-site emissions – fire, major spill	Secondary Containment AS1940 designed bunds	See DG licence/ AS 1940 comp	2
Bitumen Storage Refilling	C9		Depot 2-10	Only in significant off-site emissions – fire, major spill	Secondary Containment Refilling bunded	Purpose built Refilling area	1
Diesel fuel tank	C1	45	Depot 11 - North of asphalt truck spray gantry	Only in significant off-site emissions – fire, major spill	Self-bunded tank to AS Standard	See DG licence/ AS 1940 comp	1
Diesel fuel – refuelling	C1		Depot 11 - North of asphalt truck spray gantry	Only in significant off-site emissions - fire	Secondary Containment refuelling bund, see refuelling procedure	See refuelling tank filling procedure	1
Packaged/Container Misc Gases	C2	0.027	Depot 1 - Dangerous Goods Store in Workshop	Only in significant off-site emissions - fire	Self-bunded Dangerous Goods Store	See DG licence/ AS 1940 comp	1



Unleaded Fuel	C3	0.016	Depot 1 - Dangerous Goods Store on SE corner of asphalt plant workshop	Only in significant off-site emissions - fire	Self-bunded Dangerous Goods Store	See DG licence/ AS 1940 comp	1
LPG Oxygen Acetylene	C2	<0.126	Depot 14 - Gas Cage on SE corner of asphalt plant workshop	Only in significant off-site emissions - fire	DG Cage	See DG licence/ AS 1940 comp	1
Toluene Ethanol	C3	1.6	Depot 13 - Lab DG Chemical Store on western side of Lab	Only in significant off-site emissions – fire, major spill	Self-bunded Dangerous Goods Store	See DG licence/ AS 1940 comp	1
Crumbed Rubber	Combustible waste	10	Depot 19	Only in significant off-site emissions – fire	FRNSW Guidelines for storing Combustibles	FRNSW Guidelines for storing Combustibles	1
Organics	Combustible waste	1540	Reconomy	Only in significant off-site emissions – fire, major spill	FRNSW Guidelines for storing Combustibles	FRNSW Guidelines for storing Combustibles	2
Failure of Liquid Containment	Bunds or Bio Basin	-	Site	Secondary containment Failure/Flood/Extreme weather	AS1940 designed bunds	As Built Design, Management Plans	2

14.2 Pre-emptive Actions

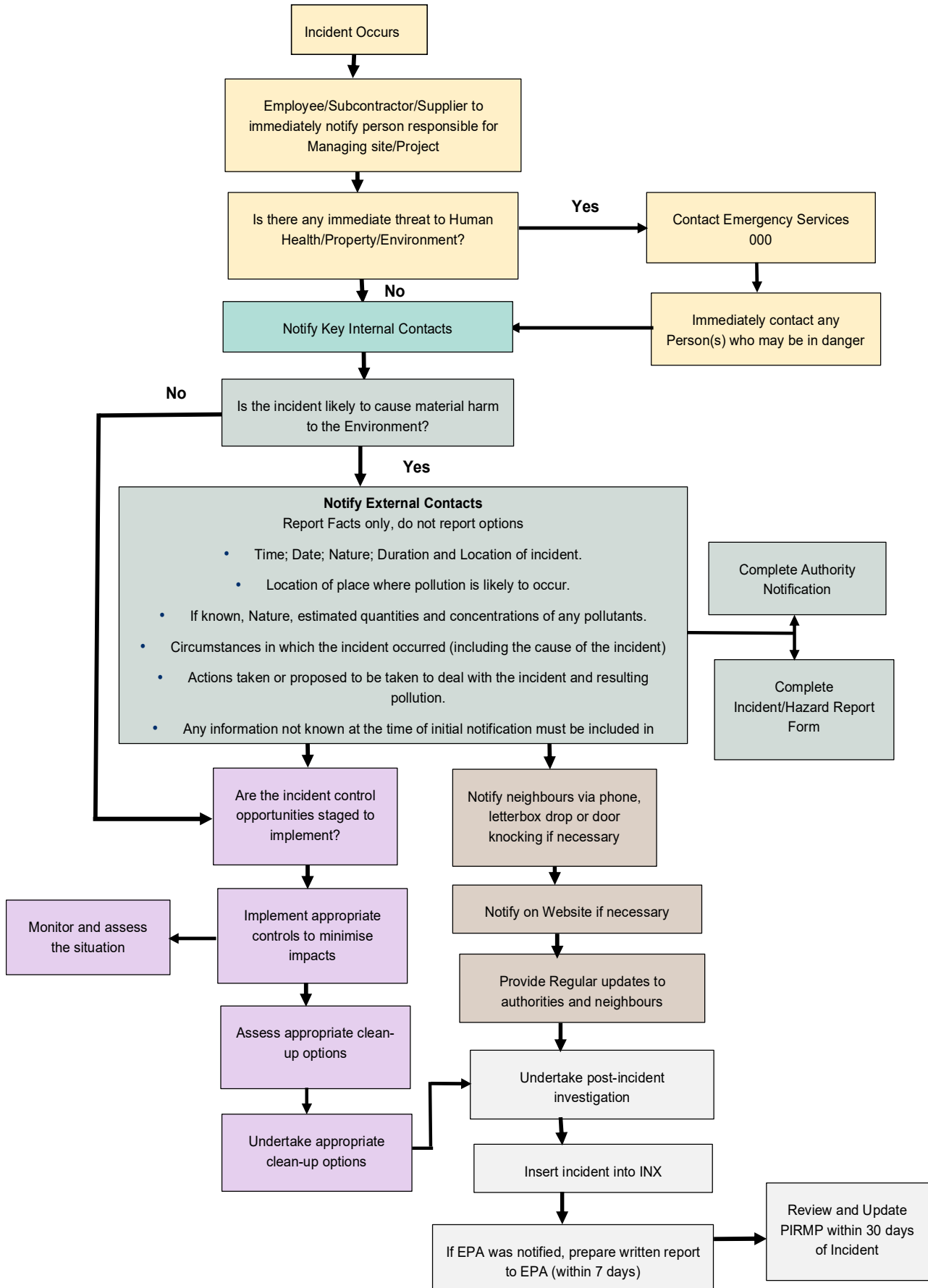
Table 7.2 in the [Operational Environmental Management Plan \(OEMP\)](#) provides measures to avoid, mitigate and manage the potential environmental impacts identified through the environmental impact assessment of the site. These measures are considered pre-emptive actions and the minimal accepted standard of care and aim to ensure any identified risk of harm is reduced.

Any identified hazards and/ or risks for the site, Downer has developed a standard set of objectives and targets that are applicable to all sites, as per The Downer Standard (TDS). These objectives and targets are managed to ensure that all identified, as well as potential environmental impacts that could reasonably be expected to occur during the works, fall within acceptable and agreed limits. This is achieved through proactive environmental management planning prior to carrying out elements of work.

14.3 Incident Response Plans

If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, the management of these events is to be in accordance with [DG-ZH-PR006 Incident Management Procedure](#). The following flow chart should be used to identify the appropriate course of action.

Site specific emergency and pollution incident response procedures are contained and located in the emergency information box on front lawn.





15 RESPONSE PROCEDURES

Similar to Safety responsibilities, a PIRMP event should use the practise of **STOP** and **ACT** and Evacuation is always to be considered if fire or explosion potential exists.

General Steps for Combating Emergencies

1. Alarm raising – consideration of Material Harm + EC?
2. Rescue, first aid then Safety check - PPE, is it safe?
3. Stop the hazard spreading, stop the leak, minimise fire threat or other actions
4. Isolate the hazard - Contain the leak, isolate the fire area and other hazards
5. Clean up
6. End of Emergency - Waste management, reporting etc

15.1 Response Protocols

The notification of an incident is the responsibility of all site and contractor personnel. In the event of an incident, the response protocol must be implemented.

Actual or potential emergency situations will vary in type and severity. The required level of response and notification will be at the discretion of the Site Manager or Project Manager.

- An Incident is an event which causes minor harm to a worker or environment or short-term disruption that can be dealt with by available resources (On site personnel or emergency services).

Levels of Incidents and notifications

1. **Minor:** Can be cleaned up by person who made the spill without any further harm (non-reportable)
2. **Notifiable Internally:** where a person requires help to clean up the spill
3. **Possible EPL report:** sub-material harm, but may wish to report it to the EPA only as a licence condition (Site Manger)
4. **Material Harm Level 2;** Reportable as a material harm but does not require a fire unit on site and generally able to manage incident with staff on site.
5. **Material Harm Level 1;** Requires fire unit. May require evacuation form site.

The EPA can force you to implement your PIRMP, even if you consider is less than a Material Harm level.

- An emergency requires immediate action to be taken to preserve life, property or the environment, may include situations that require an evacuation. Examples include situations where there are multiple injuries, threats to a person(s) life, significant damage to the environment, potential for significant impacts to the public.
- Crisis, an event which could cause major disruption to a business with significant impacts. It may be considered a crisis when there is a fatality or immediate danger of loss of life, major workplace health issues, and serious public safety issues likely to attract significant media attention, long term media scrutiny, and catastrophic failure of constructed assets causing injury or disruption to services.



16 HUMAN HEALTH CONSIDERATIONS

16.1 Hazardous Substances & Other Substances/ Materials

All hazardous substances in use on the Site are managed in accordance with Downers processes and procedures for hazardous chemicals and dangerous goods, which considers the following:

- Corrosive and hazardous materials are stored and handled in accordance with the standard and any local requirements.
- Fuel, oils, and substances in containers of 200 litres or more are stored in a bunded area with a capacity of at least 110% of the largest container/ tank.
- All fuel, oils, and substances are clearly labelled.
- Spill clean-up kits, including absorbent materials, are kept at each storage facility.
- Surface mobile equipment carries a 25-litre spill kit as an immediate environmental response to an oil leak (e.g. blown hydraulic oil hose).

The SDS Register of all chemicals, hazardous substances, and dangerous goods, including the related SDSs, and controls for high-risk substances are maintained throughout the operation of the facility. The SDS Register is filed in accordance with the Document Control Plan, and a controlled hard copy stored in the site office.

Site Specific Requirements

The hazardous chemicals and dangerous goods protocols and SDS'S are available in the Dangerous Goods Manifest at front of Weighbridge.

The Environmental Management Plan for the site is [DSRRC-DOW-PLA-ENV-0001-OEMP rev8.0.pdf](#)

16.2 Airborne Chemical Hazards

Exposure to any airborne fibres, dust or chemical hazards is considered when undertaking all activities. Refer to [DG-ZH-PR081 Occupational Health and Hygiene Management Procedure](#) or [DG-ZH-ST086 Asbestos Management Standard](#) for further information.

The sites operational team implements a program for the management of exposure to airborne chemical hazards which includes, but is not limited to:

- respirable dust
- respirable fibres
- fumes; and
- gases and vapours.
- Management of identified risks must consider:
 - exposure standards and workplace and/ or health monitoring where applicable
 - access to the required expertise to read and understand test results, and advise on risk mitigation measures; and
 - review of controls for the purposes of assessing their effectiveness.

Refer the sites Environmental Management Plan for detailed air quality management strategies.

Some of these strategies include, but are not limited to:

Early warnings for affected or potentially affected community members for a pollution incident are to be communicated.

For air pollution incidents that may affect neighbours, those neighbours will be asked to close their doors and windows and stay indoors until further notice.

Regular updates of any pollution incidents will be via letterbox drop to the local community, notices in local papers or via door knocks as required.



Site Specific Requirements

The Environmental Management Plan for the site [DSRRRC-DOW-PLA-ENV-0001-OEMP rev8.0.pdf](#)

16.3 Office Safety

As per national office health and safety guidelines a risk management approach to office health and safety is adopted and implemented prevent illness and injuries (including musculoskeletal conditions). All offices comply must ensure the office work environment is maintained in a clean and safe condition.

Chemicals and/ or substances required for office use are managed in accordance with the Sites processes and procedures for hazardous chemicals and dangerous goods.

16.4 Fire Safety

Dry chemical powder AB(E) fire extinguishers are used throughout the site. Other types of fire extinguishers may be used where fit for purpose, e.g. a foam extinguisher at fuel cells.

All fire protection, including the installation, maintenance, and use of fire protection devices, is in accordance with *AS/NZS 1841.1:2007 Portable Fire Extinguishers – General Requirements*.

Inductions include basic training and instruction on the safe use of portable fire extinguishers.

Fire extinguishers are checked, retested, and tagged every six months in accordance with *AS 1851-2012 Routine Service of Fire Protection Systems and Equipment* and as defined in section 11.1 *Inspection & Audit Timing*.

Site Specific Requirements

- An external contractor is utilised to check, re-test and tag every six months – Wormald
- The site is licensed to store 500 tonnes per annum of this waste. A dedicated storage area has been assessed by Fire and Rescue NSW as an appropriate location, meeting the requirements expressed in the *Fire in Waste Facilities and Bulk Storage of Rubber Tyre Guidelines*. The location was chosen due to the distance from other combustibles, including vegetation, and the sites drainage catchment.

17 EVENT HAZARD RESPONSE PROTOCOL

The following table provides a list of potential foreseeable emergency events and the response/ rescue method and equipment required for each. Refer to the operation’s risk register for the risk rating/ level for each event.

Evacuation is always to be considered if fire or explosion potential exists.

Emergency Event	Response/ Rescue Method
Receiver of alarm calls	<ol style="list-style-type: none"> 1. Identify as best can the type and scale of the incident/emergency, may require an ongoing assessment. 2. Assemble the Emergency Team - Warden to clearly take over where appropriate. 3. Consider outside assistance required – fire, ambulance will determine Material harm. 4. Manager to consider if a reportable incident (Is it Material Harm or a (WHS) Notifiable Incident) 5. Emergency Team Response with Emergency Controller/Chief Warden leading 6. Manager to consider if there is a probability that neighbours will be affected (air borne mainly) then they may need to be contacted



Emergency Event	Response/ Rescue Method
<p>Discharge of substance to drains</p>	<ol style="list-style-type: none"> 7. Identify the substance if possible 8. Wear appropriate PPE 9. Follow emergency procedure as per SDS sheets which are in the batch office 10. Contain the substance 11. Where discharge has occurred, and liquids have been retained within the bio basin must be drained 12. Bund the area with equipment from the spill kit (check site map for location) 13. Block off or barricade area 14. Ensure appropriate fire extinguishers are nearby in case fire breaks out 15. Advise site manager 16. Alert neighbours, EPA and Downer ZH manager as required, and if material harm has occurred. Contact Environmental & Sustainability Advisor and notify that a Pollution Incident has occurred.
<p>Incidents from unknown liquids and flowable solids</p>	<ol style="list-style-type: none"> 1. Assess safety of situation for yourself and others 2. If you cannot reasonably identify the substance, evacuate immediately 3. If there is a high risk of fire or explosion, evacuate immediately 4. Shut off ignition source(s) if safe to do so. 5. Put on appropriate PPE 6. Trace the source of the spill/leak and where it is going to 7. Determine if spill is continuing to flow 8. Stop or control the leakage by shutting valves, plugging holes, moving mobile equipment – only if it is safe to do so 9. Access is a key issue to get to the critical areas for damming etc. Do you have permission to neighbours' land?
<p>Fire (inside facilities)</p>	<ol style="list-style-type: none"> 1. Assist any person in immediate danger or who is injured (Call ambulance if anybody is injured) 2. If the fire is small attempt to put fire out with fire extinguisher (familiarize yourself with the location of fire extinguishers) 3. If the fire is too large activate the fire alarm system by pushing the button on 2 of the signed manual call points throughout the plant. One at the control room and the other inside the main office entry, 4. If the fire is in a building close all doors as everybody is evacuated to stop the fire from spreading 5. Call the fire brigade. 6. Alert neighbours and Downer ZH manager as required
<p>Combustible Storage (crumbed rubber) Fire</p>	<ol style="list-style-type: none"> 1. Contact Plant Supervisor and raise alarm via UHF and ensure that the discharge point at the basin has been closed to retain any firewater within the basin 2. Assist any person in immediate danger or who is injured (Call ambulance if anybody is injured) 3. If the fire is small attempt to put fire out with fire hose (familiarize yourself with the location of fire hoses) 4. Using the loader, move smouldering or ignited material away from other flammable material to contain the spread of the fire. 5. Using the loader, spread ignited material to breakdown and extinguish the stockpile within the banded area. 6. Where the fire is considered too large to contain, raise the fire alarm and call the fire brigade and ensure access for Fire and Rescue implements (minimum 10m clearance) is maintained. 7. Use available spill kit materials to direct firewater to stormwater drains. 8. If directed by FRNSW provide all assistance 9. Alert neighbours and Downer ZH manager as required



Emergency Event	Response/ Rescue Method
Fire (Reconomy)	<ol style="list-style-type: none"> 1. Contact Plant Supervisor and raise alarm via UHF79 and ensure that the Discharge Valve at Bioretention basin has been closed to retain any firewater within the Bio Basin 2. Assist any person in immediate danger or who is injured (Call ambulance if anybody is injured) 3. If the fire is small attempt to put fire out with fire hose (familiarize yourself with the location of fire hoses) 4. Using the loader, move smouldering or ignited material away from other flammable material to contain the spread of the fire. 5. Using the loader, spread ignited material to breakdown and extinguish the stockpile within the bunded area. 6. Where the fire is considered too large to contain, raise the fire alarm and call the fire brigade and ensure access for Fire and Rescue implements (minimum 10m clearance) is maintained. 7. Use available spill kit materials to direct firewater to stormwater drains. 8. If directed by FRNSW provide all assistance 9. Alert neighbours and Downer ZH manager as required
Discharge of substance to Duck River (including Firewater)	<ol style="list-style-type: none"> 1. 1. If required, activate Discharge Valve at Bioretention basin to contain any liquids being discharged from site. Where discharge has occurred, and liquids have been retained within the bio basin. 2. 2. Do not discharge the water to Duck Creek until sampling results indicate that no material harm to the receiving environment has been confirmed. Contamination of water includes anything that alters the physical, chemical or biological properties of the receiving waters. 3. 3. Contact Environmental & Sustainability Advisor and notify that a Pollution Incident has occurred. 4. The Environmental & Sustainability Advisor will advise what samples are to be collected (from next to the discharge grate within the bio basin) and directions on how to prepare the samples bottles (on ice/ice bricks in an esky), fill out the Chain of Custody, Turnaround Times (24hr TAT) and organise the samples to be sent/delivered to Laboratory (Eurofins Girraween). 5. Where there is a possibility of Blackwater (Sewer) inclusion; The median bacterial content in samples of fresh or marine waters should not exceed: <ul style="list-style-type: none"> • 150 faecal coliform organisms/100 MI • 35 enterococci organisms/100 MI 6. Pathogenic free-living protozoans should be absent from bodies of fresh water. (It is not necessary to analyse water for these pathogens unless the temperature is greater than 24°C.) 7. Secondary contact: The median bacterial content in fresh and marine waters should not exceed: <ul style="list-style-type: none"> • 1000 faecal coliform organisms/100 MI; • 230 enterococci organisms/100 MI.
Loss of Product / Tank Failure	<ol style="list-style-type: none"> 1. Shutdown of processes and equipment associated with the spill if safe to do so 2. Wear appropriate PPE 3. Follow emergency procedure as per SDS sheets which are in the batch office 4. Activation of any associated sump pumps or shut-off valves to contain and isolate 5. Contact Cleanaway of similar service provider to pump out bund contents 6. Ensure spill kit available for any release from containment Advise site manager 7. Alert neighbours, EPA and Downer ZH manager as required, and if material harm has occurred. 8. Repair / Replace Tank 9. Refill Tank



Emergency Event	Response/ Rescue Method
Extreme Rainfall Events	<ol style="list-style-type: none"> 1. If safe to do so shut down plant as per shutdown procedure and isolate any other power, water sources. 2. Consider contingency measures for increased surface water and wastewater volumes. 3. Ensure all sediment and erosion controls for unsealed or exposed bunds/stockpiles are in good working order. 4. Keep bunds empty and take all measures to prevent them being filled with stormwater. 5. Keep chemicals stored above areas that are prone to inundation. 6. Secure all loose items to prevent them encountering floodwater. 7. Reduce any wastewater storage etc. on the site and consider the capacity of any effluent irrigation areas to manage your effluent under prolonged wet conditions. 8. Refer to Discharge of substance to drains (above) and consult Natural Events section of the site Emergency Management Plan.
Toxic emission to atmosphere	<ol style="list-style-type: none"> 1. Identify the substance if possible 2. Notify Management and Zero Harm 3. Follow emergency procedure as per SDS sheets which are located in the batch office. 4. Contain the substance, if possible. 5. Alert neighbours, EPA and SafeWork NSW
Dust Emissions from Site	<ol style="list-style-type: none"> 1. Determine the cause of the dust emissions and if possible, immediately address the cause (i.e. turn off plant/equipment). 2. Wear correct PPE for task 3. Implement most suitable management measure for task. Management measures for this may include: <ol style="list-style-type: none"> a. sweep roadways and hardstand b. Turn on sprinkler/water systems to wet down source. Ensure there is no excess runoff into storm water system. c. Cover stockpiles d. Turn off asphalt plant and inspect baghouse or plant for potential cause of emission 4. Clean PPE and wash hands thoroughly following task. 5. Advise site manager 6. Alert neighbours, EPA and Downer ZH manager as required, and if material harm has occurred. 7. Investigate Incident

A 'minor environmental incident' is where there has been no potential or actual material harm to the environment. Examples are excessive dust sighted by the site team or a small, contained hydrocarbon spill that does not leave a site boundary and are cleaned up without residual on-site environmental harm.

Minor environmental incidents will still be handled under the process outlined except there will be no requirement for government notification.

17.1 Product Spills

In the event where of a Product Spill or Minor Environmental incident:

1. Incident Identified

It is the responsibility of each Downer or Subcontract employee to be vigilant in the recognition of potential environmental conditions that may lead to environmental incidents. On identification;



2. Can the Incident be contained locally?

In determining whether the incident can be contained locally, employees involved must consider the risks to personal health and safety, protection of plant and property and protection of the environment including blocking drains, covering pits etc. If there is any doubt as to local containment, the appropriate Emergency Services must be called.

3. Call Emergency Services

In the event of an incident that is beyond local containment capability, notify the emergency services.

If required by legislation, Downer (through Regional Zero Harm Manager) will notify the relevant government authorities of the incident, including how the incident occurred, measures that have been undertaken to rectify the situation and any impacts that the incident has had on the environment.

4. Employ Containment Procedures

Once an incident has been identified, all efforts must be undertaken to contain and minimise the effect of the incident on the environment. This can be achieved by isolating the cause and erecting suitable barriers to prevent the spread or flow of the particular incident.

5. Notify the Responsible Manager

Every environmental incident must be reported to the Responsible Manager as soon as is practically feasible; no matter how insignificant the incident may appear. The Responsible Manager is required to contact & liaise with the nominated Downer Zero Harm Manager.

6. Reporting within INX

The Responsible Manager must be notified of every single environmental incident as soon as practically feasible. He/she shall co-ordinate the cleanup and rehabilitation. The Responsible Manager shall detail and record the events within **INX**, which encompasses the following:

- Location of incident;
- Nature of incident;
- Time of incident;
- Duration of release;
- Environmental damage caused, threatened or suspected.
- Immediate control action;
- Sequence of Events and Root Cause;
- Follow up controls to prevent further harm to the environment.

7. Instigate Clean up and Rehabilitation

The Responsible Manager has the responsibility of co-ordinating the clean-up and rehabilitation of the affected site to an acceptable standard.

All minor or major incidents will be recorded in **Downers INX system** as outlined in **Section 16.1**.

17.2 Duty to notify

Under the provisions of the POEO Act, there is a duty to notify any incident that has caused or threatens to cause material harm to the environment and all relevant information about the incident. For example, where an Incident has occurred and retained onsite, there is no duty to notify, until a release results in a receiving environment may be harmed.

When notifying relevant Authorities, EPA and other relevant authorities be provided with a written incident notification via the Major Projects website within 24 hours after the incident.

A written notification will:

- Identify the development and application number.



- Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident).
- Identify how the incident was detected.
- Identify when the Applicant became aware of the incident.
- Identify any actual or potential non-compliance with conditions of consent.
- Describe what immediate steps were taken in relation to the incident.
- Identify further action(s) that will be taken in relation to the incident.
- Identify a site contact for further communication regarding the incident.

17.3 Occurrence Investigation and Incident Reporting

Occurrences shall be notified and investigated. Notifications will be made in accordance [DG-ZH-PR006 Incident Management Procedure](#) and all occurrences, incidents and near misses will be recorded on the INX InControl online database.

At the first opportunity following any occurrence, the Zero Harm Team should be advised.

Team will be notified. This notification provides some initial details of the occurrence and also initial actions taken following the occurrence. The Occurrence will be documented as per [DG-ZH-PR006 Incident Management Procedure](#).

Following the completion of the Incident/Hazard Report form it will be used to record the occurrence in the INX InControl System.

The Environmental Manager is responsible for the investigation and notification of all environmental occurrences.

The Occurrence Report will be registered and tracked internally with Actions arising from the INX InControl System for tracking and close out.

Occurrences with significant consequence or potential may be subject to investigation of greater depth and may take the form of a Downer ICAM investigation. The Zero Harm Manager will make the determination on the level of investigation required.

17.4 Preservation of the Scene

In any situation where there is the possibility of a statutory investigation or coronial inquiry, the Emergency Response Team must ensure that all evidence relating to the incident is preserved and not interfered with.

In addition, that any cleaning up, recovery, repair apart from that necessary to bring the emergency under control, does not occur without approval of investigating officers. Ideally, measures should be taken to barricade off the immediate area to ensure that there is as little disturbance as possible at the scene so as to keep the area as non-disturbed as possible.

In the event that a non-disturbance notice is issued the receiver of this notice must notify the Zero Harm Safety Advisor or Site Manager immediately.

17.5 Post-incident notification procedures

The following general clean up procedure is to be followed:

- Assessment - assess best clean up procedures for each incident based on the pollutant and site issues;
- Remedial Action - remove contaminated soil, wastewater and used spill equipment to an appropriate place within the licensed premises for licensed waste disposal and/or remediation;
- Ongoing Actions - following an incident the following must be undertaken:
 - undertake further monitoring/ testing if required;
 - be documented as per [DG-ZH-PR006 Incident Management Procedure](#) (within 48 hours of incident);



- organise restocking of spill equipment;
- complete reports to Authorities, as necessary;
- implement corrective actions to avoid reoccurrence.

17.6 Management of Injuries

After initial attendance at hospital, if injuries will require ongoing treatment or check-ups, a local medical practitioner will be utilised for return-to-work requirements.

17.7 Recovery

Recovery activities are primarily concerned with restoring the work site/ environment to its pre-emergency condition. Depending on the nature/effect of the emergency, this may include reconstruction of the physical infrastructure, restoration of the emotional, social, economic and physical well-being of the workforce/workplace. During recovery operations, actions are taken to minimise the recurrence of the hazard and/or lessen its effects.

Post Emergency Activities

The debriefing shall review (but not be limited to) the following;

- Staffing
- Plant and equipment
- Processes and procedures
- Material inventories
- Difficulties encountered
- Access to any Employee Assistance Programs

18 TESTING EMERGENCY RESPONSE PROCEDURES

Emergency evacuation and pollution incident response drills will be conducted at regular intervals to verify the effectiveness of response arrangements and refresh emergency responders in requirements and their functions.

As a minimum:

- evacuation drills will be conducted Annually at each Building and department.
- response procedures for Pollution scenarios with a high likelihood of occurring, as identified in the Emergency Management Plan and PIRMP, will be tested Annually (minimum), and within one month of any pollution incident occurring.
- records of emergency evacuation and pollution incident response drills will be maintained and stored within INX.
- evacuation and pollution incident response drills will be assessed by the Supervisor to identify any deficiencies or improvements required and the assessment documented; and
- where deficiencies or improvements are identified, the Supervisor/Manager will generate an action plan and monitor progress to completion.

Testing is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date, and that each plan is capable of being implemented in a workable and effective manner.

The two usual methods of testing are undertaking desktop simulations and practical exercises or drills. Testing must cover all components of the plan, including the effectiveness of training.

Drills are conducted then evaluated and recorded using [DA-ZH-FM015.5 Emergency Drill Observers Checklist](#). Records shall be kept within INX and sent to the Site Manager / Zero Harm Team for performance review.

A summary of Emergency Drills undertaken is shown in the table below:



Test Date	Version of PIRMP Tested	Incident Type Drilled	Emergency Drill Lead
21.02.2023	1.1	Fire in DG container	Haralampos Papaaeleou
06.03.2024	1.2	Hydrocarbon Spill	Mark Connor
09.10.2024	1.4	Tanker Spill	Paul Sherry
08.10.2025	1.4	Chemical (nitric acid) spill	Paul Sherry
20/11/2025	1.4	Reconomy Fire Drill and Fire Water Containment - Desk top.	Nakita Powell

19 EMERGENCY CONTACTS

Downer Australia Internal Emergency Contacts			
24-Hour Emergency Number 1300 366 538			
Administration (contact number and hours): 02 9897 4333 between 7am and 5pm			
Downer Rosehill contacts	Contact No.	After Hours No.	Details
Sydney / Newcastle Surfacing Manager - Darren Prosser			
Production Manager – Paul Sherry			Additional 24-hour contact
Recycling / Maintenance Manager – Roy Stiff			
Reconomy Manager - TBA			
Chief Fire Warden – Gordon Mclisky (day) Harry Papaeleou(night)			All Incidences and Emergencies
Emergency Response Team (ERT)			All Incidences and Emergencies
First Aid Officer (Day Shift) – Mark Gill First Aid Officer (Night Shift) – Harry Papaeleou			First Aid
Downer Australia External Emergency Contacts			
Ambulance, Fire, Police	000 Mobile: 112		Life Threatening Emergencies



Fire Brigade - Silverwater 122 Adderley Street Silverwater	02 9647 1246	02 9647 1246	Fire and Chemical spills
Police - Granville 2 Carlton Street Granville	02 9897 4199	02 9897 4199	Security matters
Medical			
Public Hospital - Westmead Hawkesbury Rd & Darcy Road, Westmead	02 9845 5555	02 9845 5555	Serious Injury
Medical Centre – Merrylands Family Practice 189 Merrylands Road Merrylands	1300 637 000	1300 637 000	Injury
Poisons Information Centre	13 11 26	13 11 26	Poisons Information
Other Authorities as required by legislation			
Reportable following instruction with Regional Zero Harm Manager / Environmental Manager / Site Manager or delegate			
State Emergency Services	13 25 00	13 25 00	Notifiable incidents immediately
Local Council - Parramatta	1300 617 058	1300 617 058	Notifiable incidents immediately
Department of Public Health	02 9845 5555	02 9845 5555	Notifiable incidents immediately
Workplace Safety Regulatory Body (eg WorkSafe)	13 10 50	13 10 50	Notifiable incidents immediately
Environment Protection Authority	131 555	131 555	Notifiable incidents immediately
Supply Authorities:			Supply Issues
Electricity - Endeavour	131 003	131 003	Electricity
Gas - Jemena	131 009	131 009	Gas
Water – Sydney Water	13 20 92	13 20 92	Water

19.1 Community Notifications and Communication

Communicating with neighbours and the local community is an important element in managing the response to any pollution incident. Downer will provide accurate communications information to relevant stakeholders and the community regarding operational activities and environmental matters, including:

- Prior to commencement of operations: a program of commencement and details of mitigation measures to minimise community impacts.
- During and/or following Significant Environmental incidents where applicable, including any associated community impacts and mitigation measures.

In the event of a media or government representative approaching site or contacting workers:



- The immediate response is to tell them “I’m not the best person to talk too about the works”. Do not give them any information, photos or materials.
 - Immediately notify your Works Supervisor / Site / Operations Manager.
 - Ensure no statement (oral, written or photos) is made to media or government representative.

19.2 Media Requirements

Detail of any media or similar communication requirements. All requirements must be consistent with Downer’s Communication and Media processes.

Do not make any comments or liaise about any incidences to the media – this will be dealt with internally by authorised personnel as per the Downer Group standards and policies; [DG-ZH-ST014 Zero Harm Communication Standard](#), [DG-CA-PO002 Media Policy](#) and [DG-CA-PO001 Communication Policy](#).

20 EMERGENCY EVENT PUBLIC INFORMATION SOURCES

Organisation	Medium	Contact
NSW Ministry for Police and Emergency Services	Website	www.nsw.gov.au
NSW State Emergency Service (SES)	Website	www.ses.nsw.gov.au
NSW Rural Fire Service	Website	www.rfs.nsw.gov.au
NSW Police Force	Website	www.police.nsw.gov.au
NSW Ambulance	Website	www.ambulance.nsw.gov.au
Bureau of Meteorology	Website	www.bom.gov.au

20.1 Monitor and Review

At a minimum, all Emergency Plans shall be reviewed and updated annually and within 1 month of any emergency or in line with changing business needs, changing environment, and emergency risks (whichever is sooner).



ANNEX A HAZARDOUS MATERIAL SCREENING THRESHOLDS FOR STORAGE



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APPENDIX B. HAZARDOUS MATERIAL SCREENING THRESHOLDS FOR STORAGE

Classification	Class	Sub	PG	Material	Storage location	Mode of storage	Storage quantity (tonnes)	Total quantity (tonnes)	SEPP 33 Threshold	SEPP 33 determination	Threshold exceeded?	Inclusion in PHA?	SDS Reference
Gases	2	2.1	-	Acetylene	Gas Cage (SE corner of asphalt plant workshop)	Cylinders	0.008	0.035	Class 2.1 Flammable gases - Pressurised (excluding LPG): Table 1, screening threshold is 100kg (0.1 tonnes).	Total Class 2.1 - Pressurised (excluding LPG) does not exceed SEPP 33 threshold.	No	No	Typical properties - information provided by client.
				Belt Grip	DG Store (SE corner of asphalt plant workshop)	Packages	0.005						
				Galmet Cold Galv	DG Store (SE corner of asphalt plant workshop)	Containers	0.012						
				WD40	DG Store (SE corner of asphalt plant workshop)	Packages	0.01						
	2.1	-	LPG gas	Gas Cage (SE corner of asphalt plant workshop)	Cylinders	0.018	0.018	Class 2.1 - LPG Aboveground: Table 1, screening threshold is 10 tonnes.	Total Class 2.1 - LPG Aboveground does not exceed SEPP 33 threshold.	No	No		
2.2 SR 5.1	-	Oxygen	Gas Cage (SE corner of asphalt plant workshop)	Cylinders	< 0.1	5	No threshold for Class 2.2 (non-hazardous) based on SEPP 33 Class 5.1 has a screening threshold, so use sub risk.	Does not exceed SEPP 33 threshold.	No	No			
Flammable liquid	3	-	II	Unleaded Petrol	DG Store (SE corner of asphalt plant workshop)	Containers	0.016	1.6	Class 3PGII: Table 1, minimum quantity for further evaluation is 5 tonnes More than 50 m from kerosene Class 3 PGIII, not cumulated – treat as separate storages.	Total Class 3PGII does not exceed SEPP 33 minimum threshold and does not require assessment.	No	No	Typical properties - information provided by client.
				Toluene	Chemical storage (Lab store)	IBC	0.8						
				Ethanol	Chemical storage (Lab store)	IBC	0.8						
3	-	III	Kerosene	Blending Plant Additive Store (see 'Emulsion Additive Store')	Fuel Tank (self banded)	48	48	Class 3PGIII: Table 1, quantity greater than 5 tonnes, requires use of Figure 9 to evaluate. 65kL kerosene tank	Total Class 3PGIII exceeds SEPP 33 threshold for evaluation however is separated by more than 8 m from boundary as per Figure 9 so not potentially hazardous.	No	No		
Corrosive	8	-	II	Cationic Emulsifier - polyamine	Blending Plant Additive Store (see 'Emulsion Additive Store')	IBC	15	62	Class 8 PGII: Table 3, screening threshold is 25 tonnes. Note: Class 8 PGIII is stored in the same area as PGII and therefore falls under that threshold.	Total Class 8 does exceed SEPP 33 threshold.	Yes	Yes	Chemwatch : 23-0489 Issue date: 23/09/2017
				Cationic Emulsifier - tallow triethylenedia	Blending Plant Additive Store (see 'Emulsion Additive Store')	IBC	34						Chemwatch : 84-3402 Issue date: 01/11/2019



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Classification	Class	Sub	PG	Material	Storage location	Mode of storage	Storage quantity (tonnes)	Total quantity (tonnes)	SEPP 33 Threshold	SEPP 33 determination	Threshold exceeded?	Inclusion in PHA?	SDS Reference					
				mines ethoxylated														
				Hydrochloric Acid	Blending Plant Additive Store (see 'Emulsion Additive Store)	IBC	8						Chemwatch : 6095-44 Issue date: 01/11/2019					
			III	Ceca Base	Blending Plant Additive Store (see 'Emulsion Additive Store)	IBC	5						Chemwatch : 23-0487 Issue date: 01/11/2019					
Miscellaneous dangerous substances and articles, including environmentally hazardous substances	9	Combustible		Diesel	Immediately north of asphalt truck spray gantry	Fuel Tank	45	985	No threshold for Class 9 based on SEPP 33. Note for diesel and bitumen: Page 16 'If combustible liquids of class C1 are present on site and are stored in a separate bund or within a storage area where there are no flammable materials stored they are not considered to be potentially hazardous. If, however, they are stored with other flammable liquids, that is, class 3PGI, II or III, then they are to be treated as class 3PGIII, because under these circumstances they may contribute fuel to a fire'.	Diesel in separate self-bunded tank 60kL, immediately north of asphalt truck spray gantry. Diesel therefore not cumulated with kerosene inventory. Bitumen in bulk tanks in separate bund, not cumulated with kerosene inventory.	No	No	Typical properties - information provided by client					
				Bitumen	Bitumen Tanks (6 x western tanks labelled PMB and C450 in the bitumen tank farm).	Tank	780							Not within same area/bund as Class 3. No threshold.	In process circuit only. Not cumulated with kerosene inventory.	No	No	Typical properties - information provided by client
				Bitumen Class 170 or 320	Blending Plant Tank Farm.	Bulk tank	160											
					Delvac 1330	DG Store (SE corner of asphalt plant workshop).	Containers		< 5	No threshold for Class 9 based on SEPP 33 - excluded from Screening.	Screening not required. Class 9 — are miscellaneous dangerous goods, which pose little threat to people or property. They may be substances which pose an environmental hazard.	No	No	Typical properties - information provided by client				
					Mobilith SHC 220	DG Store (SE corner of asphalt plant workshop).	Containers											



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Classification	Class	Sub	PG	Material	Storage location	Mode of storage	Storage quantity (tonnes)	Total quantity (tonnes)	SEPP 33 Threshold	SEPP 33 determination	Threshold exceeded?	Inclusion in PHA?	SDS Reference
Not classified as DG	n/a	-		Caesium 137 (Nuclear gauge) * 5	Stored in cabinet complying with relevant standards next to Lab store.	Yellow case inside storage cage	No thresholds.						
				Cationic Emulsifier - tall-oil maleated amidoamines	Blending Plant Additive Store (see 'Emulsion Additive Store').	IBC							
				Calcium Chloride	Blending Plant Additive Store (see 'Emulsion Additive Store').	IBC							
				Non Ionic Asphalt Emulsifier	Blending Plant Additive Store (see 'Emulsion Additive Store').	IBC							
				Cationic Styrene Butadiene Rubber Latex	Blending Plant Additive Store (see 'Emulsion Additive Store').	IBC							
				Polyfloculant	Reconomy Chemical Storage.	IBC							
				AntiFoam	Reconomy Chemical Storage.	IBC							
				Coagulant	Reconomy Chemical Storage.	IBC							
				Lubricants	Reconomy Chemical Storage.	packaged <5L							
				Hydrated Lime	Lime Silos (round circle with two squares on to east of lime delivery).	Bulk silos							



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APPENDIX C. TRANSPORTATION SCREENING THRESHOLDS

Trip Type (Receipt of Goods by Truck)	Average Traffic Generation (indicative)		Average Annual Delivery (tonne)	DG Class	Load per quantity	SEPP 33 Threshold Vehicle Movements (Table 2)		Minimum Quantity ^{Note 1} per Load (tonne)		Threshold Exceeded?
	Annually	Peak Weekly				Annually	Peak Weekly	Bulk	Package	
Acetylene	2	-	0.008	Class 2.1	1 x 7.0m3	>500	>30	2	5	No
Belt Grip	1	-	0.005		12 x 750g cans					
Galmet Cold Galv	1	-	0.012		12 x 750g cans					
WD40	2	-	0.010		12 x 750g cans					
LPG gas	8	-	0.018		2 X 9kg					
Unleaded Petrol	-	1	0.016	Class 3 PG II	20L	>750	>45	3	10	No
Toluene	26	-	0.8		1000L					
Ethanol	26	-	0.8		1000L					
Kerosene	26	1	48	Class 3 PG III	35000L	>1000	>60	10	No limit	No
Cationic Emulsifier - polyamine	2	-	15	Class 8 PG II/III	8 tonnes	>500	>30	2	5	No
Cationic Emulsifier - tallow triethylenediamines ethoxylated	3	-	34		15 tonnes					
Hydrochloric Acid	24	-	8		3 tonnes					
Ceca Base	4	-	5		5 X 1000L IBC					
Bitumen	-	15	480	Class 9	23 tonnes	>1000	>60	No limit	SEPP 33 does not have value	-
Delvac 1330	1	-	0.08		2 X 40L drum					
Mobilith SHC 220	1	-	0.06		2 X 40L drum					
Bitumen Class 170 or 320	-	7	160		25 tonnes					
Diesel	12	-	48		3.5 tonnes					
Notes: 1) load sizes below this quantity do not require assessment. As per the guideline, if quantities are below this level, the potential risk is unlikely to be significant.										



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ANNEX B – ENVIRONMENTAL IMPACT AND CONSEQUENCE CLASSIFICATION

Environmental incidents shall be classified initially in accordance with the “Risk Consequence” descriptors for “Environmental Impact” (see Column “C”). The examples/impacts descriptors included in columns “C” to “I” are provided to assist in determining the appropriate environmental incident classification/ category. Table adapted from DG-ZH-PR006 Incident Management Procedure.

Rating	Health and Safety	Environment	Plant and Property	Legal/ Compliance	Management Impact	Outcome
6 Extreme	Multiple fatalities or significant irreversible effects to more than one person.	Catastrophic widespread impact on the environment resulting in irreversible damage; or complete loss of trust by affected community leading to long-term social unrest and outrage.	Catastrophic damage to or loss of a facility resulting in costs of \$100m+; or complete loss of production.	Breach of legislation resulting in prosecution and prolonged action; major litigation with damages plus significant costs of \$10m+; jailing of executives or senior managers	Long-term significant impact on the business that requires considerable executive management time to handle over years; leads to premature closure of the effected part of the Group; business objectives unobtainable; inability to execute core functions.	Damage or harm with catastrophic loss that has the potential to impact Downer’s viability; includes multiple level 5 incidents; loss of ‘licence to operate’.
5 Very High	Single fatality or severe irreversible disability to one or more persons.	Significant impact or serious environmental harm; or prolonged community outrage.	Major damage to plant or a facility resulting in potential costs of \$10m+; or significant long-term business process affected.	Breach of legislation resulting in prosecution; major litigation costing up to \$10m; possibility of custodial sentence for Downer managers and employees.	Critical incident or disaster with significant impact on the business that requires considerable senior business group management time to handle over many months; ongoing underperformance and inefficiencies against competitors.	Damage or harm with permanent loss of capability and has the potential to impact on the BU viability; limitations to ‘licence to operate’.
4 High	Moderate irreversible disability or impairment to one or more persons; Lost Time Injury more than 28 days.	Significant impact or material harm on the environment; or an environmental notifiable incident; or long-term community irritation leading to disruptive actions and requiring continual management attention.	Serious damage to major plant or a facility costing \$1m+; or mid-term interruption with significant processes affected.	Breach of legislation resulting in regulatory authority issuing a punitive fine.	Will require the involvement of BU senior management and will take up significant time of business-level general managers for several weeks; rectifiable underperformance and inefficiencies; organisational review of affected areas required.	Damage or harm with permanent loss of function; includes dangerous occurrences.
3 Medium	Lost Time Injury with 28 lost days or less; or a Medical Treatment with more than 28 days restricted.	Moderate or material environmental harm; or an environmental notifiable incident; or short-term community unrest and dissention.	Significant damage to plant, equipment or facility costing \$100k+; or short-term interruption with some processes affected.	Breach of legislation resulting in warning from regulatory authority, but no punitive fines issued; notifiable incident to an external regulatory body.	Significant incident that can be managed with the careful attention of management; will take some business-level management time over several weeks; capability review of roles required	Damage or harm with temporary loss of function.
2 Low	Medical Treatment Injury with 28 restricted days or less.	Minor impact on the environment; or community complaint requiring intervention and management attention.	Minor plant and equipment damage requiring repairs or replacement costing \$10k+ with minor interruption to the business.	Not a notifiable incident.	Will require some local management attention over several days; internal review of roles and resources.	Damage or harm with no loss of function.
1 Very Low	First aid case or less.	Negligible impact on environment; or no community complaint.	Cosmetic damage to plant and equipment, absorbed in maintenance budget.	No breach of legislation.	Impact of incident absorbed in normal management activity; internal review of roles and responsibilities.	Insignificant disruption.