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Pollution Incident Response Management Plan ('PIRMP')

1. Introduction

1.1 Key Aspects of the Pollution Incident Response Management Plan

This Pollution Incident Response Management Plan (*'PIRMP'*) shall cover the key actions to minimise the occurrence of a pollution incident and in the event a pollution incident occur, how to manage the incident both, during and after.

This document has been developed and prepared to mitigate, minimise, and manage any adverse impacts to human and environmental health. This includes implementing effective and actionable protections and safeguards for Real Pet Food (*'RPF'*) employees and plant, nearby neighbours, and the broader community.

1.2 Background to Real Pet Food Company (*'RPF'*) Dubbo

The Real Pet Food Company has a manufacturing plant located at Lot 91R Purvis Lane, Dubbo NSW - an industrial zoned area. The plant holds an EPA licence 12155, of which enables the continued manufacturing processes undertaken on premises.

The plant manufactures a variety of dry pet food for both dogs and cats. Products produced are sold domestically across Australia and international, export markets.

1.3 Legislative Requirements

The specific requirements for the PIRMP are instructed by Part 5.7A of the Protection of the Environment Operations Act 1997 (*'POEO Act'*) (NSW)¹ and the *Protection of the Environment Operations (General) Regulation 2022* (*'POEO (G) Regulation'*) (NSW).²

In summary, these provisions require RPF, as an EPA licence holder, to satisfy the following requirements:


- All holders of environment protection licences must prepare a pollution incident response management plan.³
- The plan must be in written form⁴ and detail the following:
 - Procedures to be followed when reporting a pollution incident.
 - List of all relevant persons and authorities to be notified.
 - Detailed descriptions of actions to be taken immediately after pollution incident occurs, to reduce or control any pollution.
 - Co-ordination procedure, detailing how to best co-ordinate and respond with the relevant and notified authorities or persons.
 - Actions or procedures taken to combat the pollution.
 - Identification of whom all communications will be made through upon pollution incident.

¹ *Protection of the Environment Operations Act 1997 ('POEO Act')* (NSW) ch 5 pt 5.7A div 1.

² *Protection of the Environment Operations (General) Regulations 2022 ('POEO (G) Regulation')* (NSW).

³ *POEO Act* s 153A.

⁴ *POEO (G) Regulation* reg 71.

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- All other matter required by the regulations. ⁵
- Other matters required by the regulations:
 - Description of hazards to human or environmental health to which the licence relates.
 - The likelihood of the hazards occurring
 - Details of pre-emptive actions
 - Inventory of potential pollutants stored
 - Descriptions of safety equipment or other devices to be used to minimise, contain, or control pollution incident
 - Names, positions and 24-hour contact details:
 - Persons responsible for activating the PIRMP,
 - Persons authorised to notify relevant authorities,
 - Person responsible for managing the pollutant response
 - Details of mechanisms for early warning and regular updates
 - Arrangements for minimising risk of harm to persons on premises
 - Detailed map(s), indicating location of premises, potential pollutants, and storm water drains.
 - Description of how identified risks of harm to human health will be reduced at minimum by:
 - Early warnings
 - Updates
 - Actions taken during and immediately after the pollution incidents
 - Staff training program in relation to the PIRMP
 - Dates on which PIRMP is tested
 - Dates on which PIRMP is updated
 - Method in which the PIRMP will be tested and maintained ⁶
- Licensees must keep the plan at the premises to which the environment protection license relates. ⁷ It must be readily available to:
 - An authorised officer
 - Person responsible for implementing the PIRMP ⁸
- Licensees must make the PIRMP publicly available:
 - In a prominent position on the licensees publicly accessible website
 - Alternatively, a copy of the PIRMP shall be provided at no cost, to persons who make a written request for a copy. ⁹
- Licensees must test the PIRMP. ¹⁰
 - The PIRMP shall be tested at minimum, once every 12 months.
 - If a pollution incident has occurred, which caused or threatened material to the environment, the PIRMP shall tested within 1 month of the incident. ¹¹
- The PIRMP test must ensure:
 - The information within the PIRMP is accurate and up to date
 - The PIRMP is able to be implemented in workable and effective way. ¹²
- If a pollution incident occurs during an activity causing or threatening material harm to the environment, licensees must immediately implement the PIRMP. ¹³

⁵ POEO Act s 153C.

⁶ POEO (G) Regulation reg 72.

⁷ POEO Act s 153D.

⁸ POEO (G) Regulation reg 74(1).


⁹ Ibid reg 74 (2).

¹⁰ POEO Act s 153E.

¹¹ POEO (G) Regulation reg 75(1).

¹² Ibid r 75(2).


¹³ POEO Act s 153F.

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2. Structure of PIRMP

The below table will outline the structure of the PIRMP, in alignment with the legislative requirements, both the *POEO Act*, and the *POEO (G) Regulation*.

Clause	Requirement	Section in RPF PIRMP
<i>POEO Act</i> s 153A	Duty of licence holder to prepare a PIRMP	Whole document
<i>POEO Act</i> s 153C(a)	Procedures followed in notifying: i) Owners or occupiers of premises in the vicinity of the premises ii) Local authority iii) Persons or relevant authorities required to be notified	Section 5 Section 10
<i>POEO Act</i> s 153C(b)	Detailed description of actions to be taken after pollution incidents to reduce or control pollution	Section 6
<i>POEO Act</i> s 153C(c)	Procedures for coordinating action and communication	Section 5
<i>POEO Act</i> s 153D	Keeping of plan	Section 1
<i>POEO Act</i> s 153E	Testing of plan	Section 11
<i>POEO Act</i> s 153F	Implementation of plan	Section 4
<i>POEO (G) Regulation</i> reg 72(a)	Description of the hazard to human health or the environment associated with the activity to which the licence relates (the relevant activity)	Section 6
<i>POEO (G) Regulation</i> reg 72(b)	The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood	Section 6
<i>POEO (G) Regulation</i> reg 72(c)	Details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity	Section 6
<i>POEO (G) Regulation</i> reg 72(d)	An inventory of potential pollutants on the premises or used in carrying out the relevant activity	Section 7
<i>POEO (G) Regulation</i> reg 72(e)	The maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the license relates	Section 7
<i>POEO (G) Regulation</i> reg 72(f)	A description of the safety equipment or other devices that are used to minimise the risk to human health or the environment and to contain or control a pollution incident	Section 8
<i>POEO (G) Regulation</i> reg 72(g)	The names, positions and 24-hour contact details of those key individuals who: i. Are responsible for activating the plan ii. Are authorised to notify relevant authorities under s148 of the Act iii. Are responsible for managing the response to a pollution incident	Section 10.1
<i>POEO (G) Regulation</i> reg 72(h)	The contact details of each relevant authority referred to in section 148 of the Act	Section 10.2

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POEO (G) Regulation reg 72(i)	Details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the license relates or where the scheduled activity is carried on	Section 5.1 Section 6 Section 10
POEO (G) Regulation reg 72(j)	The arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on	Section 9
POEO (G) Regulation reg 72(k)	A detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any storm water drains on the premises	Section 3
POEO (G) Regulation reg 72(l)	A detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk	Section 6 Section 5 Section 10
POEO (G) Regulation reg 72(m)	The nature and objectives of any staff training program in relation to the plan	Section 11
POEO (G) Regulation reg 72(n)	The dates on which the plan has been tested and the name of the person who carried out the test	Section 11.3 As per Internal audit schedule
POEO (G) Regulation reg 72(o)	The date on which the plan is updated	Base document
POEO (G) Regulation reg 72(p)	The manner in which the plan is to be tested	Section 11, mock as per Internal audit schedule

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3. Site Information

3.1 Site Details

The site is a 13.354-hectare area, located at Lot 91-92 Purvis Lane, Dubbo, New South Wales 2830, Australia.


3.2 Immediate Neighbours

The table below lists RPF's immediate neighbours.

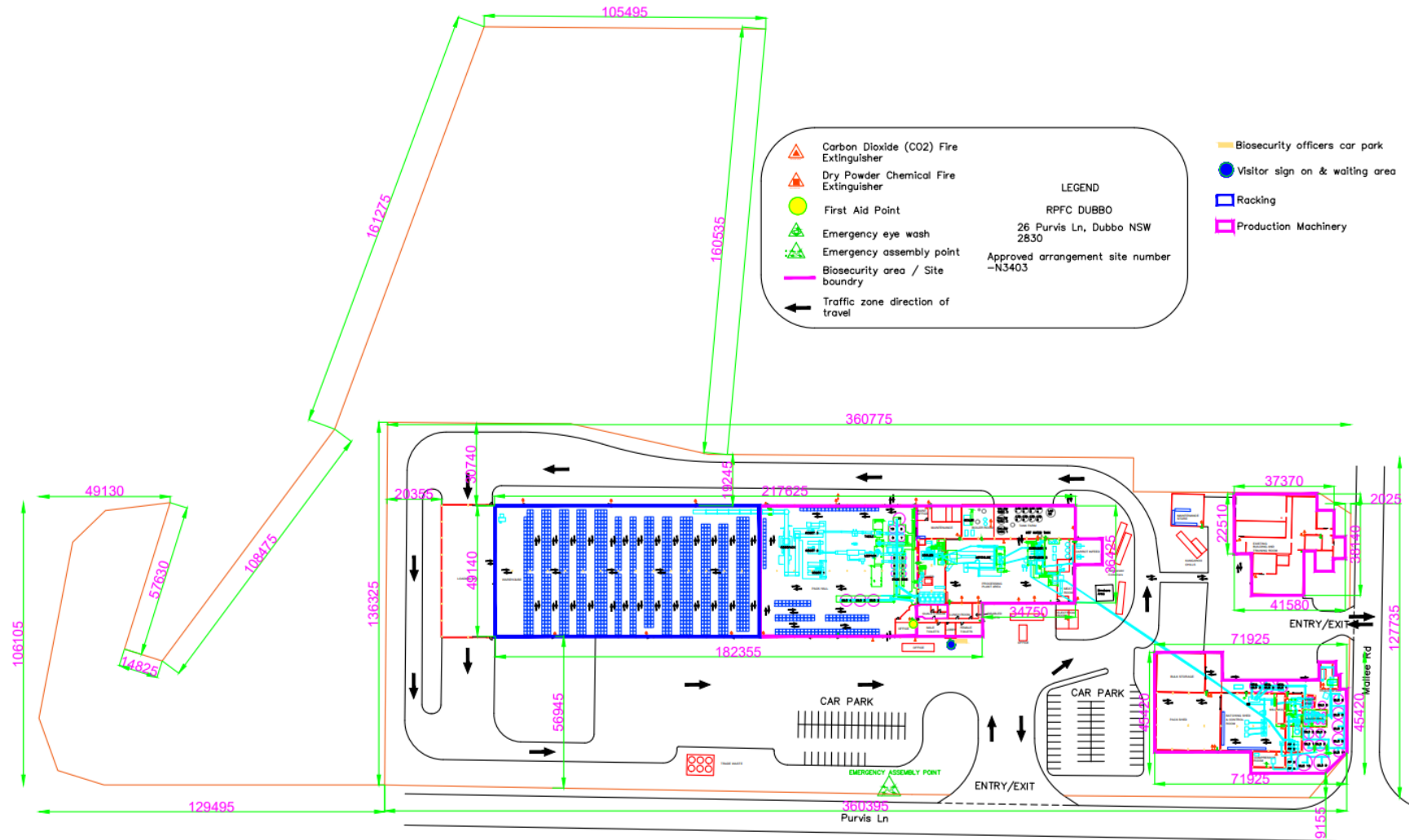
Location / Direction	Site / Premises
NORTH	<ul style="list-style-type: none"> • Direct behind factory, unused factory and paddocks
EAST	<ul style="list-style-type: none"> • EzyQuip Hire • Tippings Transport • Southern Steel Supplies
SOUTH	<ul style="list-style-type: none"> • Allied Seating Group (Tuffnuts) • Don Chad Woolbuyers • Tracserv • Dubbo Truck Alignments
WEST	<ul style="list-style-type: none"> • Smyths Structural Steel Fabrication


3.3 Site Aerial Photo



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3.4 Site Map A



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4. Definition of a Pollution Incident

Legislation defines a pollution incident as:

- An incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur.
- A pollution incident 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.¹⁴

The summarised purpose and objective of a PIRMP is to effectively pre-empt, respond, report, and contain pollution incidents by detailing procedures that must be executed to minimise and mitigate any risk of harm to human and environmental health. A pollution incident is required to be reported if there is a risk of ‘material harm to the environment’.

The POEO Act specifies ‘material harm to the environment’ as:

(a) Harm to the environment is material if:

- (i) It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*
- (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and*

(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.¹⁵

Should a pollution incident involving material harm occur or threatened material harm to human or environmental health on-site, RPF Dubbo will implement this PIRMP immediately.

5. Notification of an Incident and Actions

a) Identification, Internal Escalation and Notification

Employees are instructed to report any environmental, safety, and property incidents to their Shift Manager. Direction is additionally given to utilise and activate the press button emergency alarms when required. In the event the emergency is not detected, triggers (fire detectors) throughout the plant that will initiate the emergency alarm process.


RPF document OHSERP.23 - Emergency Preparedness details the sites alarm and evacuation processes, which includes:

- Audible alarms
- Provision of evacuation routes and assembly areas
- Roll calls and search processes to account for personnel
- Communication and reporting procedures to be followed when engaging with emergency services departments

If an environmental incident occurs that is a potentially notifiable pollution incident, it must be escalated to the Factory Manager immediately. The Factory Manager will consult with any

¹⁴ *POEO Act* Dictionary (‘definition of ‘pollution incident’).

¹⁵ *POEO Act* s 147(1).

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relevant site staff and co-ordinate the involvement of corporate staff to assess the incident and determine if a notifiable pollution incident has occurred.

In the event the Factory Manager is not onsite the deputy, the Shift Manager, will contact the Factory Manager and communicate all relevant details and updates regarding the potential pollution incident to the Factory Manager, until such time the Factory Manager is available onsite.

In the event of an environmental incident occurring at the site, impacts on the neighbouring businesses and local community will be variable and dependant on:

- Location of pollution incident,
- Volume of spill,
- Type of pollutant,
- Other relevant factors including wind direction and velocity.

If the environmental incident occurring on site, is likely to impact neighbouring businesses or the local community, surrounding neighbours and businesses shall be contacted by the Factory Manager and/or their representative to notify them of the unfolding or potential situations. Contact must occur whether by face-to-face contact, telephone or through information left at the place of residence or business. Notification should include any possible impacts to the neighbours and businesses, as well as the procedures that have been put in place to rectify and mitigate the incident. Communication methods will be used on a case-by-case basis, but in all situations RPFco will attempt to provide early warnings to those likely to be directly affected. Early warnings would typically include details of the nature of the incident and how those likely to be affected can best prepare and respond to the incident. Ongoing communication with neighbouring businesses and residents will be maintained until such time as the incident is rectified

b) External Notification


As aforementioned, the *RPF document OHSERP.23 Emergency Preparedness* details the emergency procedures to be followed should a manual alert, or activation of systems be required and contact with NSW emergency services be facilitated.

If consultations with site and corporate staff have determined that a notifiable environmental incident has occurred, the Factory Manager will implement the PIRMP immediately. Initiating the notification, containment, and preservation of human and environmental health procedures (e.g., spill kit deployment, site evacuation, engagement of emergency services, site shutdown procedure, fire mitigation procedures etc.).

In notification, the Factory Manager will assign responsibility to execute the immediate notification and communication of pollution to all the Appropriate Regulatory Authorities ('ARA') and relevant external parties. These include:

- Environment Protection Authority (EPA),
- Ministry of Health,
- SafeWork NSW,
- Local council and authorities,
- Fire and Rescue NSW and,
- Surrounding properties.¹⁶

¹⁶ *POEO Act s 148(8).*

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c) Information to be given in a notification of a pollution incident

Pursuant to statute, all internal and external notifications of pollution incidents shall include the following information:

- The time, date, nature, duration, and location of the incident,
- The location of the place where pollution is occurring or is likely to occur,
- The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,
- The circumstances in which the incident occurred (including the cause of the incident, if known),
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,
- Other information prescribed by the regulations.¹⁷

Statute further instructs, the information given is to be known by the person making the notification of pollution incident, and any information that is not known at the time of initial notification must be notified immediately, as it becomes known.¹⁸

d) Actions following a Pollution Incident

If a pollution incident occurs, there shall be a detailed incident investigation and a report will be sent to RPF CO head office and relevant ARA's. If RPF CO were notified of the pollution incident by the public, the complaint will be logged in accordance with RPF CO complaint processes with subsequent incident reporting completed.

Following a pollution incident, the PIRMP must be reviewed and tested. A PIRMP test must occur within 1 month of a pollution incident at RPF CO.¹⁹

RPF CO will continue to liaise with the relevant ARA's to reduce the likelihood of the pollution incident re-occurring. Key outcomes of the incident investigation will be reported to staff and contractors. A review and debrief of the emergency and response procedures undertaken shall occur, to identify where improvements can be made to increase the protection of human and environmental health, improve the effectiveness of procedures, or to identify where better equipment and safeguards may be required.

All staff and contractors will receive relevant pollution incident training and refresher as courses as required.


Follow up communications with applicable community stakeholders will be carried out as directed by the Factory Manager. Further follow-up communications and undertakings include but are not limited to the following:

- Face to face contact or telephone call
- Letterbox drops
- Publication of updates on RPF CO website
- Emailing of updates
- Doorknocking

¹⁷ POEO Act s 150(1).

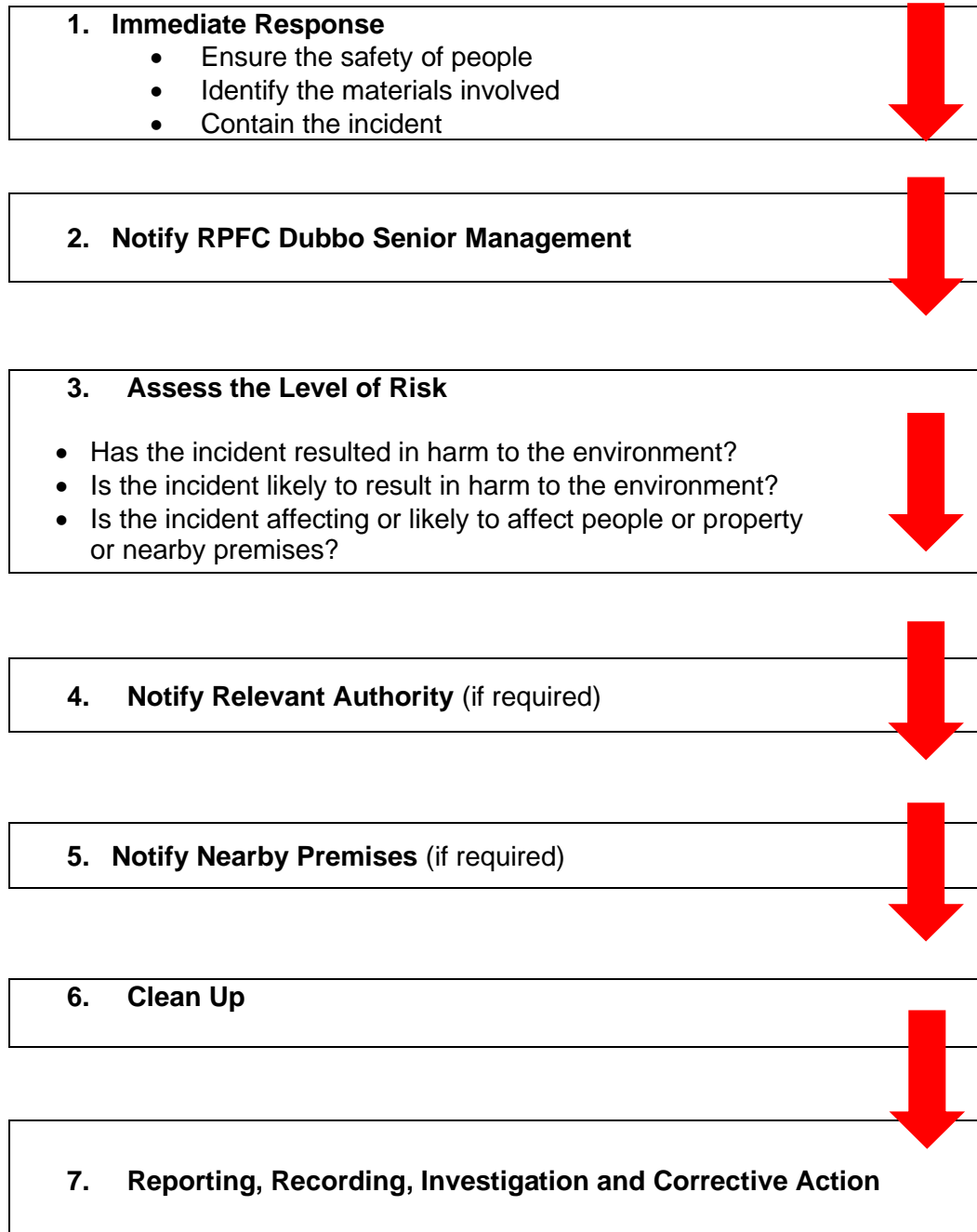
¹⁸ POEO Act s 150(2-3).


¹⁹ POEO (G) Regulation reg 75(1).

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6. Description and likelihood of hazards and pre-emptive actions

Pollution Incident Response Procedure Overview



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6.1 Hazard Identification and Likelihood

The table below has been prepared to meet requirements of the *POEO (G) Regulation* reg 72(1) (a-c). A pollution incident risk assessment for RPFco has been prepared to:


- Describe the hazards to human health and the environment,
- Describe the likelihood of any such hazards occurring,
- Outline existing controls to prevent pollution incident occurring,
- Outline the key pollution response measures.

6.2 Hazard Mitigation


The pollution risk assessment (table as seen below) outlines potential pollution incidents at RPFco. For each potential pollution risk, several controls have been outlined. Examples of generalised controls that have been implemented to reduce the likelihood of a pollution incident occurring include:

- Site environmental and safety management plans,
- Regular inspections and maintenance,
- Environmental monitoring,
- Correct storage and waste management,
- Training and awareness.


The RPFco Dubbo site will make all reasonable and practicable attempts to ensure the prevention and mitigation of pollution incidents. However, should an instance arise where a pollution incident is imminent and able to potentially cause detrimental impacts to human health or the environment, the site will implement and execute the PRIMP. An immediate notification will be initiated to ARA's, necessary stakeholders - employees, contractors, surrounding neighbours and businesses, to provide as much of an early warning as possible.

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Risk Category	Potential Hazard / Risk (Impact)	Likelihood	Potential Resulting Outcome	Rating	Condition or Event that could or would increase likelihood	Existing Controls / Management Response	Pollution Response Measures
Water System (storm water and sewer)	Contamination of water system causing impact to human health	Unlikely	Minor	Low	1. Poor maintenance and/or control of trade waste system 2. Not covering and/or protecting storm water drainage 3. Uncontrolled discharge of chemicals	1. Cleaning and sanitation standards 2. Routine maintenance / repair of machinery and plant undertaken within controlled environments 3. Emergency spill kits located throughout the areas of storage 4. Emergency procedures in place to control spills 5. Incident reporting procedures 6. Routine monitoring of water 7. Training and awareness on use of spill kits	1. Assess the situation 2. Contact ARA's in accordance with the PIRMP 3. If safe and possible to do so, undertake immediate measures that prevent further damage, such as deployment of spill containment equipment and intercepting substance from entering water system 4. Seek immediate assistance from a specialist environmental consultant 5. Take direction for ARA's as required 6. Complete incident investigation and send report to relevant ARA's
	Contamination of water system causing impact to the environment	Unlikely	Minor	Low			

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Risk Category	Potential Hazard / Risk (Impact)	Likelihood	Potential Resulting Outcome	Rating	Condition or Event that could or would increase likelihood	Existing Controls / Management Response	Pollution Response Measures
Overall Air Quality	Reduction of air quality causing impact to human health	Unlikely	Minor	Low	1. Poor treatment of trade waste system 2. Poor hygiene of waste disposal area 4. Poor cleaning practices within facility 5. Damage to chemical storage bins/tanks	1. Emergency evacuation procedures 2. Emergency response procedures 3. Fire, smoke detection systems 4. Emergency control equipment onsite 5. Incident reporting procedures	1. Visually Assess the situation 2. Activate emergency evacuation procedures. 3. Contact ARA's in accordance with the PIRMP 4. Take direction for ARA's as required 5. Complete incident investigation and send report to relevant ARA's
	Reduction of air quality causing impact to the environment	Unlikely	Minor	Low			

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Risk Category	Potential Hazard / Risk (Impact)	Likelihood	Potential Resulting Outcome	Rating	Condition or Event that could or would increase likelihood	Existing Controls / Management Response	Pollution Response Measures
Waste	Incorrect handling, use, storage and/or disposal of waste causing impact to human health	Unlikely	Minor	Low	1. Poor control of waste treatment area 2. Poor hygiene of waste disposal area 3. Large production 'event' causing excess rejected product and liquid waste	1. Cleaning and sanitation standards 2. No access to the site by public 3. Contracts with licenced contractors 4. Waste tracking and reporting streams 5. Incident reporting procedures 6. Training and awareness	1. Visually assess the situation 2. Activate emergency evacuation procedures 3. Contact ARA's in accordance with the PIRMP 4. Seek immediate assistance from a specialist environmental consultant 5. Take direction for ARA's as required 6. Complete incident investigation and send report to relevant ARA's
	Incorrect handling, use, storage and/or disposal of waste causing impact to the environment	Unlikely	Minor	Low			

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Risk Category	Potential Hazard / Risk (Impact)	Likelihood	Potential Resulting Outcome	Rating	Condition or Event that could or would increase likelihood	Existing Controls / Management Response	Pollution Response Measures
Noise	Noise emissions from site causing impact to human health	Unlikely	Minor	Low	1. Failure of pressure release valves include air compressors 2. Doors left open 3. Grinding work conducted outside facility 4. Alarm testing completed during evening hours	1. All work conducted within building 2. Complaint handling procedure 3. N/A for environment	1. Upon receipt of a noise complaint handle and manage complaint in accordance with the complaints procedure 2. Immediately investigate noise levels recorded by noise monitoring equipment to determine the source of the noise at the time of incident 3. N/A for environment
	Noise emissions from site causing impact to the environment	Unlikely	Minor	Low			


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6.3 Risk Matrix on conditions or events that could, or would, increase the likelihood

1. Determine the risk score						
SEVERITY						
Probability		INSIGNIFICANT	MINOR	MODERATE	MAJOR	SEVERE
	RARE	Low 1	Low 3	Medium 6	Medium 10	Medium 15
	UNLIKELY	Low 2	Low 5	Medium 9	Medium 14	High 19
	POSSIBLE	Low 4	Medium 8	High 11	High 18	Very High 22
	LIKELY	Medium 7	Medium 12	High 17	High 21	Very High 24
	ALMOST CERTAIN	Medium 11	High 16	High 20	Very High 23	Very High 25

2. Probability...What is the possibility that the effect will occur?		
	Criteria	Description
Almost Certain	Expected to occur in most circumstances	Effect is a common result
Likely	Will probably occur in most circumstances.	Effect is known to have occurred at this site or it has happened
Possible	Could occur at some time	Effect could occur at the site or I've heard of it happening
Unlikely	Not likely to occur in normal circumstances	Effect is not likely to occur at the site or I have not heard of it happening
Rare	May occur only in exceptional circumstances	Effect is practically impossible.

3. Severity...What will be the expected effect?	
Consequence / Impact level	Description
Insignificant	No effect – or so minor that no first aid is required
Minor	First aid treatment required
Moderate	Medical treatment required
Major	Hospital Admission
Severe	Death or permanent disability

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4. Record...Risk score on worksheet


Note – Risk scores have no absolute value and should only be used for comparison and discussion.

Score	Action
Very High	Operations must stop immediately until risk / impact is minimised.
High	Agreed controls must be in place and verified to effectively minimise the risk/impact before commencing task.
Medium	Actions to minimise the risk/impact must be completed within 1 month.
Low	Actions, where applicable, must be completed within 3 months

7. Pollutant Inventory

A site inspection has been conducted to establish a potential pollutants and hazards inventory. The inventories include details of the type of pollutant, the location of stores and the maximum quantity that is likely to be stored or held at the facility.

Product Name	Location	Maximum Quantity
LPG Tank	External Southeast side – Near raw packaging shed	4.5KL
Phosphoric Acid	North wall top tower	1500L
Chemical Storage	Northeast fence line	500L
Waste Holding Tank	South-side trade waste plant	6,000L
General Waste	North – side Storage location	20,000kg
Liquid Material	Tank Farms	200,000L
Dry Mill Storage	Mill Silos	1200T
Sulfuric Acid	South-side trade waste plant	5000L

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8. Inventory of Safety Equipment

All emergency response equipment are visibly identifiable and placed at strategic locations throughout the facility. Please refer to RPF document *OHSERP.23 - Emergency Preparedness*. The emergency evacuation plan shows the egress from the building during an emergency evacuation.

Upon induction to premises, RPF Dubbo staff, contractors and visitors are informed and inducted to know how to identify emergency response equipment locations, evacuation routes and assembly areas.

RPF Dubbo have trained and maintain Fire Wardens and First Aid Officers. There are Fire Wardens and First Aid Officers on each production shift, they are trained in knowing how to alert the site of imminent hazards, how to initiate site evacuations, how to contact emergency services, the suitability of differing emergency response equipment, the operation of emergency response equipment, the various types of fires and potential emergency situations that may occur at the Dubbo site.

Note: Emergency response equipment includes fire extinguishers, fire hose reels, first aid kits and spill clean-up kits.

Fire Extinguishers

Please refer to the emergency evacuation map for the location of fire extinguishers.

This equipment is only suitable to use on fires in their incipient stages, and not fires that are well developed or have been burning for some time.

The classes of fire are:

- **Class A** - Ordinary Combustibles
- **Class B** - Flammable and combustible liquids
- **Class C** - Flammable gases
- **Class D** - Combustible metals
- **Class E** - Electrically energized equipment
- **Class F** - Cooking oils and fats

Dry Chemical Powder – Red with a white band

These extinguishers are rated ABE and are considered suitable for Class A, Class B, Class C and Class E fires. They are not considered effective for Class F fires.

Carbon Dioxide (CO₂) – Red with a black band


Suitable for Class E fires. Has a limited effectiveness on Class A, Class B, and Class F fires.

Fire Hose Reels

Fire hose reels provide a reasonably accessible and controlled supply of water to combat a potential Class A fire risk.

Spill Kits

There are spill kits located in factory areas as per the site map and these are to be used to contain and clean a chemical spill, should it be accidentally spilt onto floors or surfaces.

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First Aid Kits and Defibrillators

First aid kits and defibrillators are located throughout the facility, including the administration office. The first aid kits and defibrillators are serviced monthly by AlSCO.

Safety Data Sheets (SDS)

There are SDS folders kept in the Laboratory and relevant SDS's are located in each production and processing area.


Emergency Alarms

RPFC Dubbo has an emergency alarm system fitted, which is hard wired. The fire alarm is regularly monitored and tested by Wormald.

FIRE EXTINGUISHER SELECTION CHART



Class & Type of Fire	Colours	A	B	C	D	(E)	F	
Type of Extinguisher		Wood, Paper, Plastic	Flammable & Combustible Liquids	Flammable Gases	Combustible Metals	Electrically Energised Equipment	Cooking Oils and Fats	
Water		✓	✗	✗	✗	✗	✗	Dangerous if used on flammable liquid, energised electrical equipment and cooking oil/fat fires.
Carbon Dioxide (CO2)		LIMITED	LIMITED	✗	✗	✓	✗	Not suitable for outdoor use or large class A fires.
Dry Chemical Powder (ABE/BE)		✓ AB(E) ✗ B(E)	✓	✓	✗	✓	✗ AB(E) ✓ B(E)	Look carefully at the extinguisher to determine if it is a BE or ABE unit.
Foam		✓	✓	✗	✗	✗	LIMITED	Dangerous if used on energised electrical equipment.
Wet Chemical		✓	✗	✗	✗	✗	✓	Dangerous if used on energised electrical equipment.
Fire Blanket		LIMITED	LIMITED	✗	✗	✗	✓	Fire Blankets effective for oil and fat fires within saucepans and are effective for extinguishing clothes that catch on fire. (Ensure you replace after every use).

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9. Minimising harm to persons on the premises

All staff and contractors are to be inducted before entering the site or before completing any work on site. The induction covers procedures for minimising the chance of a pollution incident occurring, managing a pollution incident and actions following a pollution incident

Minimising the impact to persons and the environment at RPFco during a pollution incident must be of the highest priority.


In the event that a pollution incident requires the evacuation of the site, actions will be completed in accordance with the site evacuation procedure. All staff are informed on the location of the evacuation locations throughout the site inductions, instructive signage is visible indicating assembly areas and ongoing training and refresher courses are provided, Staff know how to identify and locate Fire Wardens and/or First Aid Officers.

As part of the preparation, review and testing of the PIRMP, the key aspects of the plan will continue to be provided to staff, visitors and contractors. The key aspects will be provided via site inductions, hazardous area classification (HAC) training, emergency and pollution awareness and training, staff toolbox meetings, and daily morning meetings.

10. Contact details

10.1 Details for those responsible for activating the plan, managing the response, and authorised to notify relevant authorities under section 148 of the POEO Act, with site Factory Manager taking the lead – are documented in the table below.

RPFco Business Contacts	
Person	Phone Number
RPF Dubbo Office - Reception	(02) 6841 0400
David Grant – Chief Executive Officer	0419 588 551
Neville Howarth – Factory Manager	0417 774 190
Scott Magill – Safety & Training Manager	0476 853 482
Shankar Amaravelu - Maintenance Manager	
Anna Jones – Quality Assurance & Environment Manager	0407 546 697
Ryan Monaghan - Food Safety (Food Industry Recall Protocol)	0459 168 997
Shannon Deaves – Site Manufacturing Manager	0481 096 377
Karen Bryon – Procurement	0429 871 225
Insurance – Marsh Policy: QMVITOAUS PLB	(07) 3115 4516


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10.2 Details for the Appropriate Relevant Authorities ('ARA's)

The following tables outlines the contact details for the appropriate regulatory authorities (ARA's) for reporting incidents:

Emergency Services	
Organisation	Phone Number
Fire	000
Ambulance	000
Police	000
Fire and Rescue NSW	(02) 6884 7447
Hospital - Dubbo General	(02) 6809 6809
Hospital - Dubbo Private	(02) 6841 8800
Poisons Information Centre	13 11 26

General Services	
Organisation	Phone Number
Water NSW DUBBO	1300 662 077
DUBBO Regional Council	(02) 6801 4000
Environmental – EPA DUBBO (24 hours)	(02) 6883 5333
Western NSW Local Health District	(02) 6809 8600
SafeWork NSW	13 10 50
Department of Planning and Environment	1300 305 695
Department of Primary Industry	(02) 6391 3100

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Adjoining Property Owners	
Organisation	Phone Number
EzyQuip Hire	1300 399 784
Don Chad Woolbuyers	(02) 6882 2587
Allied Seating Group (Ruffnuts)	(02) 6883 2100
Tracserv	(02) 6884 2023
Smyths Structural Steel Fabrication	0419 221 446
Tippings Transport	(02) 6882 1810
Southern Steel Supplies	(02) 6882 1500
Dubbo Truck Alignments	0437 191 286


10.3 When contacting neighbouring premises and businesses

In the event of a pollution incident – which may impact neighbouring premises or the broader local community, the following methods will include but not limited to:

- Face to face contact
- Telephone contact advising community stakeholders of the incident with recommended actions to prevent of minimize harm such as shutting doors and windows, evacuate building or premises, not to drink or swim in water courses, etc.
- Potentially affected community members will be determined based on the nature / scale of the pollution incident and the current weather conditions

10.4 Following up with neighbouring premises and businesses

As discussed above, in section 5(d), follow up contact will be completed.

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11. Plan Testing, Training, Review and Records

11.1 Testing of Plan

The PIRMP will be tested at least once every 12 months in alignment with RPF document 2.5.4 - *Internal Audits and Inspections* to ensure that the information contained within the plan is accurate and up to date, and that the plan is capable of being implemented in a workable and effective.²⁰

The primary method for testing the plan will be via desktop simulations. Comprehensive records including observations, analysis, non-conformances, and the details of persons carrying out the test will be recorded on RPF document *Form-018-DUB Internal Audit Report*.

11.2 Staff Awareness and Training

All site staff will be made aware of the requirements and key aspects of the PIRMP during the RPFC Dubbo site induction processes, hazardous area classification training, and toolbox meetings.


The RPF site induction incorporates, HACCP, Hazardous Area Classification training, evacuation procedures, and additional safety and awareness information. Completion of the induction is a pre-requisite to entry and any work commencement at RPFC Dubbo.

Regular refresher training will be offered and reviewed annually in conjunction with site mock evacuations. RPF Fire Wardens and First Aid Officers will be up to date in any training, change of procedure, and any arising potential threats of harm or pollution on site.

To satisfy the requirements under this PIRMP the training nature and objectives will include:

- Awareness of the PIRMP
- Who the responsible persons are
- Who the relevant authorities are
- Where the PIRMP can be accessed and located
- Pollution incident classification – what is a notifiable pollution incident
- Notification and reporting under the PIRMP
- Spill response actions under the PIRMP
- Other incident response actions under the PIRMP
- Notification of early warnings, both internally and externally
- Specific procedures in dealing with potential pollution incidents e.g., spill response procedure

²⁰ POEO (G) Regulation reg 75.

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11.3 Review

The RPFC Dubbo Pollution Incident Response Management Plan (*'PIRMP'*) and associated documents, shall be reviewed on an annual basis as part of RPFC Dubbo Food Safety and Quality Management System Review process and according to with RPF document 2.5.4 - *Internal Audits and Inspections*.

This PIRMP was last tested on	Test by	Result
Thursday 9/6/22 4am Fire in the yard area of unused pallets	Lionel Liego HSE Advisor	<ul style="list-style-type: none"> • Radio contact between wardens was poor • Alarm not very audible outside on the northern side of the building. • Unable to utilize UKG for roll call • Review number of wardens in the warehouse • Conduct drills for other 2 shifts

11.4 Records

Comprehensive records of all PIRMP reviews, testing, incidents, corrective actions, and notifications must be kept and maintained for a period of **4 years**.²¹

11.5 Availability of Pollution Incident Response Management Plan (*'PIRMP'*)

A copy of RPFC Dubbo Pollution Incident Response Management Plan (*'PIRMP'*) shall be accessible by:

- The RPF website,
- The HAZMAT control box at front gate (of which Emergency Services have access to)
- Contacting the business contact list reference in this PIRMP.
- Written request


- By post:

Attention: Factory Manager
PO Box 1032
DUBBO NSW 2830

- By email:

Customer.Service@realpetfoodco.com.au
Attention: Factory Manager

²¹ POEO (G) Regulation reg 120.

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Re: PIRMP