

HSE MANAGEMENT PROCEDURE

Pollution Incident Response Plan Dee Why Procedure

Procedure EP-01-02DW

Revision No.13

Edition No.1

Date	Compilation	Verification	Approval
29.1.2026	Rowena Cabucos HSE LP Manager	Rishabh Kapur Production Director Telecom	Kristina Spirkoski HSE Director Oceania
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Important!

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

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

AFTER HOURS & PERSONS AUTHORISED TO NOTIFY AUTHORITIES

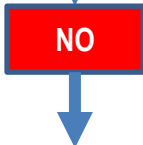
- (1) **Kristina Spirkoski**
HSE Director Oceania
0429 986 109

- (2) **Rishabh Kapur**
Production Director Telecom
0448 610 115


SERIOUS ENVIRONMENTAL INCIDENT NOTIFICATION CHECKLIST

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

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



1	RING EPA	Environmental Line 131 555
2	RING PUBLIC HEALTH UNIT	During office hours 02 9515 9420 After hours 02 9515 6111
3	RING SAFEWORK	Advise SafeWork that there is a serious environmental incident 131 050
4	RING NORTHERN BEACHES COUNCIL	Environmental Line 1300 434 434
5	RING FIRE AND RESCUE NSW	Advise Fire and Rescue NSW that there is a serious environmental incident 000

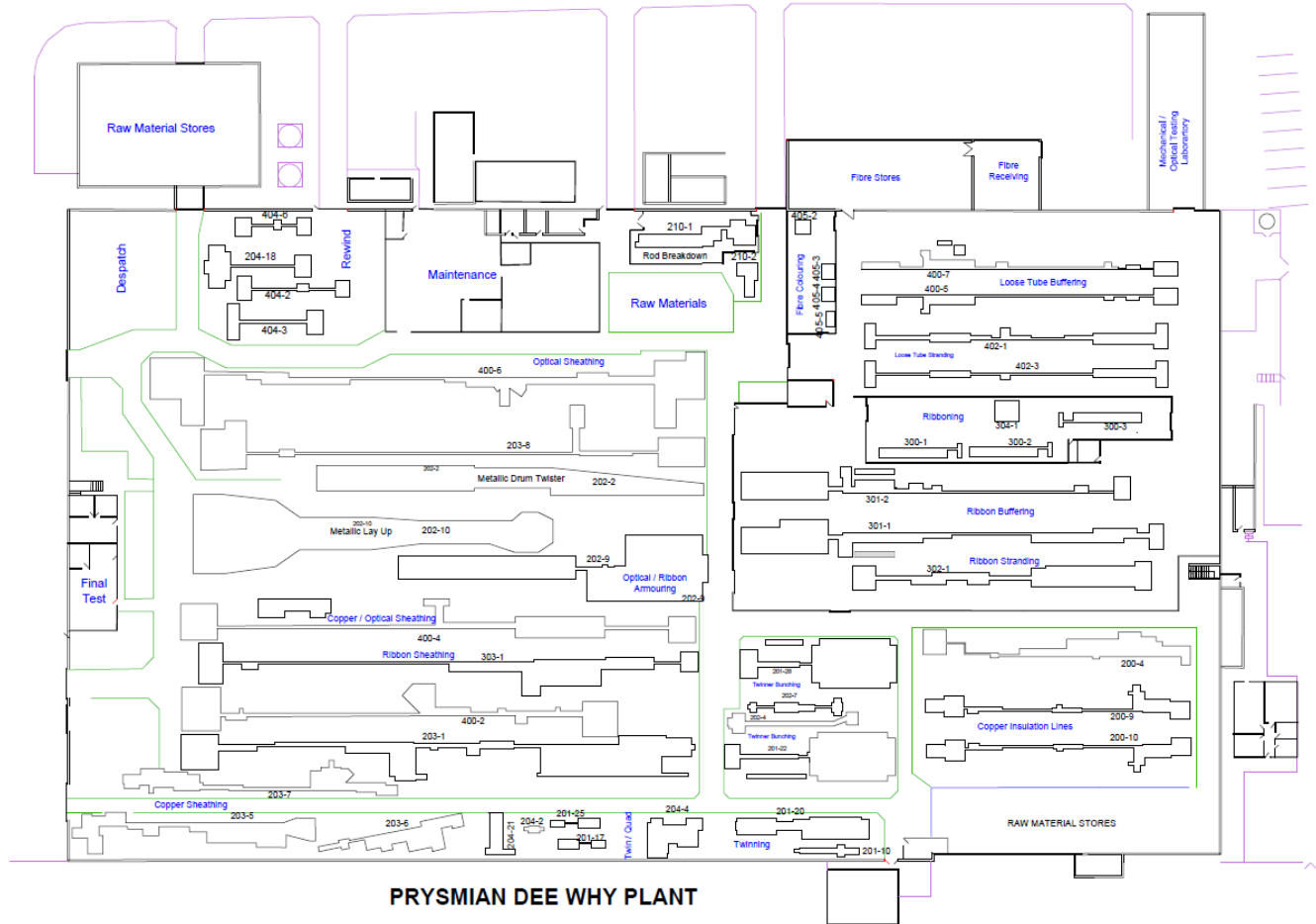
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EMERGENCY CONTACTS

EMERGENCY CONTACT NUMBERS (DEE WHY)

FIRE/AMBULANCE/POLICE	9931 7100 or 000
Security	(02) 9931 7100
Kristina Spirkoski (HSE Director Oceania)	0429 986 109
Rishabh Kapur (Production Director Telecom)	0448 610 115
VACANT (HR Business Partner)	0497 049 926
Andrea Kraus (CEO Oceania)	0409 877 652
Sagar Nagaraj (Maintenance Supervisor)	0499 300 760
Jason Zhang (Continuous Improvement/Process Engineer)	0459 953 781
Hao Yu (QA Manager)	0439 107 019
Stefano Sibarani (Supply Chain Manager Australia)	0479 176 369
Phill Eves (IT Manager Oceania)	0412 257 273
I.T Help Desk	(02) 9600 0200
Dee Why Fire Station	(02) 9982 3229
Beacon Hill Fire Station	(02) 9971 4847
Warringah Medical Centre / Dr Susan Wong / Dr Mark Green	(02) 9939 4399
Northern Beaches Hospital	0427 088 526 / (02) 9105 5000
Mona Vale Hospital	(02) 9998 0333
Dee Why Police Station	(02) 9971 3399
National Coronavirus Helpline	1800 020 080
Poison Information Hotline	131 126
Sydney Water	132 090
Energy Australia	133 466 / 131 535
Ausgrid (Distributor for Energy Australia)	131 388 / 131 365
Redmen	1300 725 594

SITE MAP



PRYSMIAN DEE WHY PLANT

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1. DEFINITIONS

Appropriate regulatory authority

Generally, the appropriate regulatory authority is the EPA for licensed premises and local Council for non-licensed premises. There are exceptions to this definition as stated in Clause 6 of the POEO Act.

Dangerous goods

Substances that are listed in The Australian Dangerous Goods (ADG) Code or that meet the classification criteria specified in that Code.

Environment

As defined in the POEO Act, *"environment" means components of the earth, including:*

- (a) land, air and water, and*
- (b) any layer of the atmosphere, and*
- (c) any organic or inorganic matter and any living organism, and*
- (d) human-made or modified structures and areas,*

and includes interacting natural ecosystems that include components referred to in paragraphs (a)-(c).

Harm

As defined in the POEO Act, *"harm" to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.*

Immediately

Promptly and without delay

Material risk of harm

"Material risk of harm to the environment" is defined under Section 147 of the POEO Act as:

(a) harm to the environment is material if:

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

(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable

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and practicable measures to prevent, mitigate or make good harm to the environment.

Material Safety Data Sheet (MSDS)

A Material Safety Data Sheet (MSDS,) also referred to as a Safety Data Sheet (SDS), is a document that describes the chemical and physical properties of a material and provides advice on its safe storage, handling and use. (www.safeworkaustralia.gov.au)

Non-scheduled activity

Under the POEO Act, a "*non-scheduled activity*" means an activity that is not a scheduled activity and is not scheduled development work.

Occupier

As defined under the POEO Act, "*occupier*" of premises means the person who has the management or control of the premises.

POEO Act

Protection of the Environment Operations Act, 1997

Pollution

As defined under the POEO Act, "*pollution*" means:

- (a) *water pollution, or*
- (b) *air pollution, or*
- (c) *noise pollution, or*
- (d) *Land pollution.*


Pollution Incident

The *Environmental Guidelines: Preparation of pollution incident response management plans* defines a pollution incident as:

"...an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise."

Pre-emptive action

Actions taken as a measure against possible or anticipated harm such as use of spill containment kits, installation of stormwater cut-off valves and installation of fire-containment water tanks.

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Premises

As defined under the POEO Act, "*premises*" includes:

- (a) a building or structure, or
- (b) land or a place (whether enclosed or built on or not), or
- (c) A mobile plant, vehicle, vessel or aircraft.

Prevention of pollution

Use of processes, practices, materials or products that avoid, reduce or control pollution, which may include recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution.

Note: The potential benefits of prevention of pollution include the reduction of adverse environmental impacts, improved efficiency and reduced costs.

Scheduled activity

"Scheduled activity" means an activity listed in Schedule 1 of the POEO Act. Scheduled activities must be licensed under the POEO Act.

Spill kit

A set of equipment used to isolate or control an accidental overflow or release of a substance or material.

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2. EXECUTIVE SUMMARY

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

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

Prysmian Telecom holds environmental protection licence No 2972 under the POEO Act to undertake

- a) The processing, handling, movement and storage of materials and substances used to carry out the activity; and
- b) The treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

At their site located at 4 Thew Parade Cromer 2099 NSW in the Northern Beaches Council.

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


The objectives of the PIRMP are threefold:

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

Requirements for pollution incident response management plans are stipulated in the *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012* and Part 5.7A of the POEO Act. Part 5.7A of the POEO Act specifies:

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

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

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- A description and likelihood of hazards to human health and the environment associated with the licensed activity;
- Pre-emptive actions to be taken to minimise risk of harm;
- An inventory of potential pollutants;
- A description of safety equipment and devices used to minimise risks and/or contain a pollution incident;
- 24-hour details of key site contacts and relevant authorities;
- Mechanisms used to provide early warnings to neighbours and the local community;
- Actions to minimise risk of harm should an incident occur;
- Actions to be taken during or immediately following a pollution incident;
- A detailed set of plans; and
- Staff training programs relating to implementing the plan.

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

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3. INTRODUCTION

Under Part 5.7A of the POEO Act Prysmian Telecom is required to prepare a Pollution Incident Response Management Plan. Prysmian holds an environmental protection licence (EPL) No 2792 for metallurgical activities, resource recovery and waste storage that are undertaken at 4 Thew Parade Cromer 2099 in the Northern Beaches council.

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

The *POEO (general) Amendment (Pollution Incident Response Management Plans) Regulation 2012* stipulates specific requirements to be included in such plans. In addition, the NSW EPA developed the *Environmental Guidelines: Preparation of Pollution Incident Response Plans*. This plan has been prepared following the regulation and guidelines.

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

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

This information will be made readily available as follows:

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


On the company website: <http://www.prysmiancable.com.au/about/environmental-sustainability/>

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

3.1 INTERNAL MANAGEMENT SYSTEM

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

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

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

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

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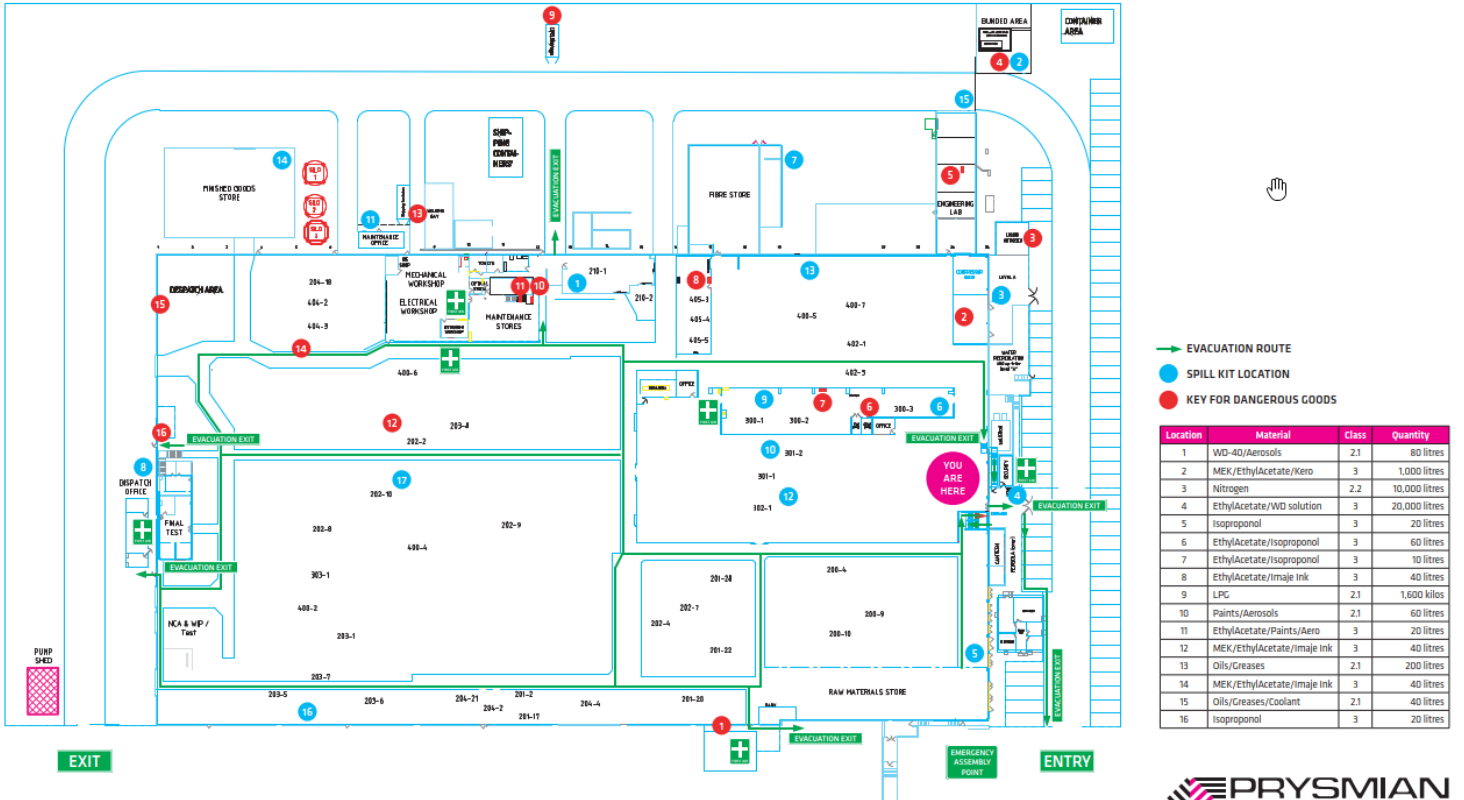
4. HAZARDS & RISKS



4.1 INVENTORY OF POTENTIAL POLLUTANTS

The table below provides a list of dangerous goods used and stored on site and the maximum quantities likely to be stored at particular locations.

Identifier	Material	Storage type	Capacity	Storage Location	Class	Quantity
1	WD-40 Aerosols	Shelving	100 lts	Raw Material	2.1	80 lts
2	MEK Ethyl Acetate Kero	Bunker	2000 lts	Oil Store	3	1.000 lts
3	Nitrogen	Above ground tank	10000 lts	Car Park	2.2	10.000 lts
4	Ethyl Acetate WD solution	Bunded Area	30000 lts	Car Park	3	20.000lts
5	Isopropanol	D/G Cabinet	160 lts	The Lab	3	20 lts
6	Ethyl Acetate Isopropanol	20 ltr drums	100 lts	Ribbon Room Lab	3	60 lts
7	Ethyl Acetate Isopropanol	D/G Cabinet	250 ltr	Ribbon Room Lab	3	10 lts
8	Ethyl Acetate Imaje ink	20 ltr Drums	80 lts	Colouring Room	3	40 lts
9	LPG	Gas Cylinders	1800 kgs	Yard - Cage	2.1	1.600 kgs
10	Paints Aerosols	D/G Cabinet	160 ltr	Maintenance Store	2.1	60 lts
11	Ethyl Acetate Paints Aerosols	D/G Cabinet	160 ltr	Maintenance Store	3	20 lts
12	MEK Ethyl Acetate Imaje ink	D/G Cabinet	250 ltrs	400-6/230-8	3	40 lts
13	Oils Grease	Container	1000 lts	Maintenance External	2.1	200 lts
14	MEK Ethyl Acetate Imaje ink	D/G Cabinet	60 lts	Winding	3	40 lts
15	Oils Grease Coolant	D/G Cabinet	160 lts	Despatch	2.1	40 lts
16	Isopropanol	D/G Cabinet	60 lts	Final Test Cage	3	20 lts

Figure 4.1: Site Map / Dangerous Goods Depots Location



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Classes of Dangerous goods are described in Table 4-2. The shaded cells indicate these dangerous goods classes are stored at 4 Thew Parade Cromer 2099 NSW site.

Table 4-2: Dangerous Goods Description and Hazards.		
Class	Description	Hazards
1	Explosives	Explosives are capable by chemical reaction of producing gases at temperatures, pressures and speeds as to cause catastrophic damage through force and/or of producing otherwise hazardous amounts of heat, light, sound, gas or smoke
2.1	Flammable Gases	Gases are capable of posing serious hazards due to their flammability, potential as asphyxiants, ability to oxidize and/or their toxicity or corrosiveness to humans
2.2	Non-flammable, Nontoxic gases	
2.3	Toxic Gases	
3	Flammable Liquids	Flammable liquids are capable of posing serious hazards due to their volatility, combustibility and potential in causing or propagating severe conflagrations
4.1	Flammable Solids	Flammable solids are capable of posing serious hazards due to their volatility, combustibility and potential in causing or propagating severe conflagrations. Also included are substances which are liable to spontaneous heating under normal transport conditions, or to heating up in contact with air, and are consequently liable to catch fire and substances which emit flammable gases or become spontaneously flammable when in contact with water.
4.2	Spontaneously Combustible	
4.3	Dangerous when wet	
5.1	Oxidising Substances	Oxidizers, although not necessarily combustible in themselves, can yield oxygen and in so doing cause or contribute to the combustion of other materials. Organic peroxides are thermally unstable and may exude heat whilst undergoing exothermic autocatalytic decomposition. Additionally, organic peroxides may be liable to explosive decomposition, burn rapidly, be sensitive to impact or friction, react dangerously with other substances or cause damage to eyes
5.2	Organic Peroxides	
6.1	Infectious Substances	Toxic and infectious substances can pose significant risks to human and animal health upon contact
6.2	Toxic Substances	
7	Radioactive Substances	Whilst undergoing radioactive decay radionuclides emit ionizing radiation, which presents potentially severe risks to human health



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Table 4-2: Dangerous Goods Description and Hazards.		
Class	Description	Hazards
8	Corrosives	Corrosives cause severe damage when in contact with living tissue or, in the case of leakage, damage or destroy surrounding materials
9	Miscellaneous dangerous goods	Miscellaneous dangerous goods present a wide array of potential hazards to human health and safety, infrastructure and/ or their means of transport

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

Table 4-3: Other Potential Pollutants			
Potential Pollutant	Source/s	Location	Approximate Quantity
Wire drawing solutions	Machines	Tandem	10, 000L
Wire drawing solutions	Above ground tank	Car park	35, 000L

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4.2 HAZARDS TO HUMAN HEALTH AND THE ENVIRONMENT

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

- **Spills**

- Chemical spills could occur during handling activities or through damaged equipment. This could lead to the pollution of nearest waterways.
- Chemical spills can cause storm-water contamination if not mitigated. Storm water impacts could cause introduction of chemicals into waterways, which could potentially cause some ecological impacts. The nearest waterway affected by a storm water contamination event is South Creek river, which connects to Narrabeen Lagon.

- **Fire**

- The site holds a number of combustible liquids and flammable gas which may ignite accidentally during site activities. Smoking (if procedures on site are not followed with regards to smoking) can also initiate a fire on site.
- Fire can cause high releases of toxic combustion products from the site, if not mitigated. If the atmospheric/weather condition does not allow dispersion of fire combustion emissions, then it is possible for these emission clouds to be brought down to ground level and cause potential health effects to the nearest premises occupied by persons. No storm water contamination events are anticipated, provided that the site would have fire fighting water contained through the use of appropriate controls and procedures (e.g. storm water shutoff valve is used during a fire incident).

- **LPG leak or fire**

- Releases and fires related to the storage of LPG may occur due to damaged cylinder or valves.
- LPG leaks will provide detection of the leak by employees on site; however undetected leaks can lead to an explosion if it is caught by an ignition source on-site or off-site.
- Explosions can cause physical impact to persons affected by the shockwave released from this event. The severity of the shockwave is dependent upon the amount of materials involved in causing the explosion.
- If the leaked gas is not enclosed, then a flash fire would occur, which is an instantaneous combustion of the leaked gas and would not cause any shockwaves. However, this can become and initiator of a fire event.
- Minimal toxic combustion emissions are released from a fire event involving LPG, given the isolation requirements for LPG that need to be complied with.

4.3 RISK ASSESSMENT

The likelihood of the main hazards listed in the previous section occurring is assessed using the EPA’s Compliance Audit Risk Analysis Matrices in:

Figure 4-2: Likelihood of Environmental Harm Occurring

Risk Matrix

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

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

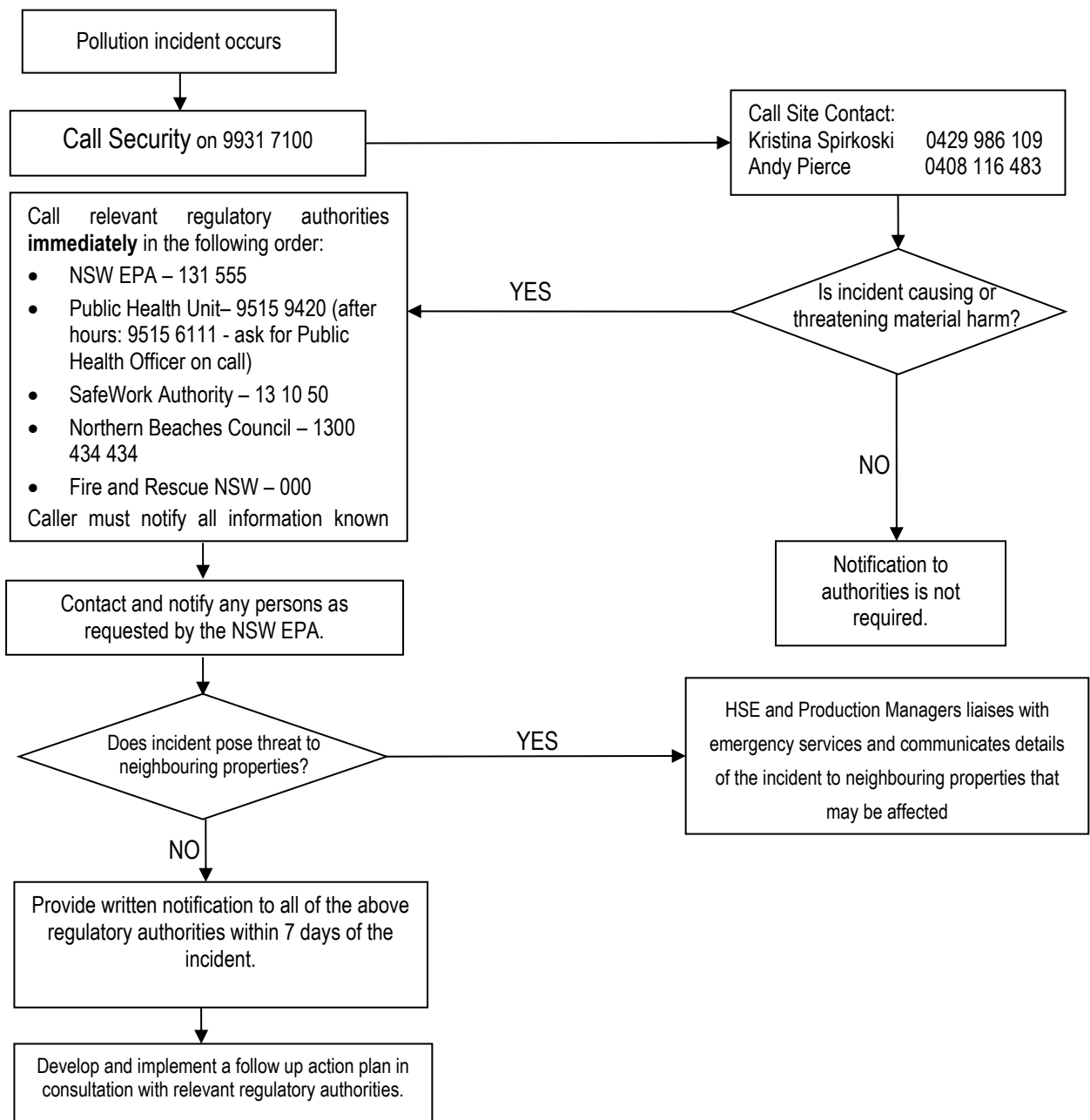
Table 4-4: Hazard and Likelihood Risk Assessment and Control Measures							
Site Name: Prysmian Telecom						Responsible person: HSE Manager	
Hazard/Incident	Description of Hazard / Incident leading to hazard	Level of impact	Likelihood	Priority	Impact on Neighbours	Control Measures / Corrective Action	Responsible Person
Waste	Contamination	2	B	2B	Severe	Waste management plan Training Inspection Labelling	Maintenance Manager Logistics Manager Production Manager
Copper wire drawing fluid and waste	Contamination	2	B	2B	Severe	Concentration analysis NPI reporting Spill kit availability	Production Manager HSE Manager
Chemical storage	Possible spill Lack of awareness	2	B	2B	Minor	Training Monthly inspection Use bunded pallets	Production Manager HSE Manager
Spills	Entering drains Contamination	2	B	2B	Minor	Training Service spill kits Bunding Drains Covers Monthly inspection	Production Manager HSE Manager

5. NOTIFICATION OF POLLUTION INCIDENTS

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

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

Figure 5-1: Notification of a Pollution Incident



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5.1 WHEN TO NOTIFY

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

5.2 HOW TO NOTIFY

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

CALL 000 Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service.

If the incident does not present an immediate threat, or once the initial 000 call has been made notify the relevant authorities in the following order:

- NSW EPA – Environment Line **131 555**
- Public Health Unit **9515 9420** (After hours: **9515 6111** - ask for Public Health Officer on call)
- SafeWork on **13 10 50** (SafeWork will ask for the ABN)
- Northern Beaches Council – **1300 434 434**
- Fire and Rescue NSW – **000**
- Notify other persons as required by the EPA.

5.3 WHAT TO NOTIFY

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

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

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

5.4 CONTACTS

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

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5.4.1 Site Contacts

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

- (i) are responsible for activating the plan, and
- (ii) are authorized to notify relevant authorities under section 148 of the Act, and
- (iii) Are responsible for managing the response to a pollution incident.

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

Table 5-1: Site Contacts

Contact Name	Telephone	Responsibilities
Kristina Spirkoski	0429 986 109	HSE Director Oceania
Rishabh Kapur	0448 610 115	DW Plant Director

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

5.4.2 Regulatory Authority Contacts

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

NSW EPA – Environment Line **131 555**

Public Health Unit **9515 9420**

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

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

Northern Beaches Council – **1300 434 434**


Fire and Rescue NSW – **000**

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5.4.3 Surrounding Area Receptors

The nearest sensitive receptors and neighbouring facilities have been identified in the following table 5-2 and shown in figure 5-2

Receptor	Nature of Occupancy/Sensitivity	Approximate Distance	Contact Details	Address
North – Ausgrid	Offices / Depot	<500m	131 388	21 Middelton road Cromer NSW 2099
North/east – Northern Beaches Council Depot	Offices / Depot	<500m	9942 2111 1300 434 434	55 Middelton road Cromer NSW 2099
East – Manly Warringah Gymnastic Club	Offices / Business	<500m	9972 9222 9453 5481	24 Middelton road Cromer NSW 2099
East – Soap Solutions	Offices / Business	<500m	9979 7245	24 Middelton road Cromer NSW 2099
East – Roband Australia	Offices / Business	<500m	99711788	24 Middelton road Cromer NSW 2099
South – Northern Beaches Secondary College	School	<500m	9981 1155 9939 6942	120 South Creek Road Cromer NSW 2099
West – Small business units	Offices / Business	<500m		1-5 Thew Parade Cromer NSW 2099

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6. MINIMISING RISK OF HARM

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

6.1 PRE-EMPTIVE ACTION

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

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

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


6.2 SAFETY EQUIPMENT

Procedures and plans relating to safety, emergency response and spill response equipment include:

Prysmian maintain emergency and spill safety equipment at a number of strategic locations on site including:

6.2.1 Alarm System

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

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6.3 EARLY WARNING MECHANISMS

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

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

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

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


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Table 6-1: Early Warnings and Pre-emptive Actions				
Site Name: Prysmian Australia Telecom Plant			Responsible person: HSE Manager	
Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
Chemical Spill	Waterways	Typically negligible offsite, however major spills can impact South Creek river and Narrabeen Lagon.	Hazard/incident is instantaneous if it occurs. Communication and early warnings can only be established after the incident has occurred, and would be conducted via telephone to NSW EPA, and/or police. Premises adjacent to the site would also be alerted via visits by Prysmian Group employees or by the police.	Pre-emptive actions undertaken include: <ul style="list-style-type: none"> • Site induction with competency test. • Contractors are required to provide their Safe Work Method Statements before commencing any work on site. Physical controls and measures in place include: <ul style="list-style-type: none"> • Early detection by operators and staff. • Spill kits in areas where spills have been determined to be present. • Danger tags. • Locking system. • Out-of-service tags. • Storm water Shutoff Valve.

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Table 6-1: Early Warnings and Pre-emptive Actions				
Site Name: Prysmian Australia Telecom Plant			Responsible person: HSE Manager	
Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
				<p>Corrective actions conducted upon the initiation of the incident are in the following order:</p> <ul style="list-style-type: none"> • Staff or persons upon detecting the hazard/incident report to any available site management employee for immediate response. If safe, alerted employees will utilise their training and the corresponding procedure for spill kit use to minimise impact of spill. • Relevant persons on site adhere to the site's 'Spill Kit and Spill Response procedures' during the event. • Site management initiates the Emergency Response Plan. Upon initiation, all persons on site adhere to this plan. • Assigned Prysmian staff contact the fire brigade, police and/or

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Table 6-1: Early Warnings and Pre-emptive Actions				
Site Name: Prysmian Australia Telecom Plant			Responsible person: HSE Manager	
Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
				NSW EPA, depending on magnitude of spill. If required, the nearest affected premises are also alerted by Prysmian and/or by the police. If storm-water system is affected the arrestor pit will be shut off. <ul style="list-style-type: none"> • Prysmian would issue letterbox drops to make the nearest potentially affected premises aware of the spillage incident. • Incident is recorded, documented, reviewed, and procedures would be generated if necessary to account for the cause that has been identified from the experience.
Fire (Developing or Uncontrolled)	Air, waterways	Depend on size of incident. Major fires would impact on the adjacent properties.	For developing fires, telephone to fire brigade, NSW EPA and police. If required, visits to potentially affected	Pre-emptive actions undertaken include: <ul style="list-style-type: none"> • Site induction with competency test. • Contractors are required to provide their Safe Work Method

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Table 6-1: Early Warnings and Pre-emptive Actions				
Site Name: Prysmian Australia Telecom Plant			Responsible person: HSE Manager	
Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
			residences would be conducted by the police or by Prysmian Group employees to provide necessary warnings. For instantaneous and uncontrolled fires, communication and early warnings can only be established during the incident, and would be conducted via telephone to fire brigade, NSW EPA, and police. Premises adjacent to the site would also be alerted	Statements before commencing any work on site. Physical controls and measures in place include: <ul style="list-style-type: none"> • Early detection by operators and staff. • Fire alarms in buildings • Danger tags. • Locking system. • Out-of-service tags. • Designated smoking areas. • Storm water Shutoff Valve (for firewater). Corrective actions conducted upon the initiation of the incident are in the following order: <ul style="list-style-type: none"> • Staff or persons upon detecting the hazard/incident report to any available site management employee for immediate response.

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Table 6-1: Early Warnings and Pre-emptive Actions				
Site Name: Prysmian Australia Telecom Plant			Responsible person: HSE Manager	
Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
			via visits by Prysmian Group employees or by the police.	<ul style="list-style-type: none"> • Site management initiates the Emergency Response Plan. This includes the use of the siren to initiate the evacuation. • All persons on site adhere to the site's 'Fire Extinguishers, Storm water Shutoff Valves, and Fire procedures' during the event. • Assigned Prysmian staff contact the fire brigade, police and/or NSW EPA, depending on magnitude. If required, the nearest affected premises are also alerted by Prysmian or by the police. • Incident is recorded, documented, reviewed, and procedures would be generated if necessary to account for the cause that has been identified from the experience.
LPG Leak, Fire or Explosion	Air, Waterways (For Firewater)	Depend on size of incident. Projectiles can	Hazard/incident is instantaneous if it	Pre-emptive actions undertaken include:

Table 6-1: Early Warnings and Pre-emptive Actions				
Site Name: Prysmian Australia Telecom Plant			Responsible person: HSE Manager	
Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
		fly up to a few kilometres from the site. Explosion overpressure distances are anticipated to be between 500 metres to a few kilometres, depending on size of explosive cloud.	occurs. Communication and early warnings can only be established after the hazard/incident has occurred, and would be conducted via telephone to fire brigade, NSW EPA, and police. Premises adjacent to the site would also be alerted via visits by Prysmian Group employees or by the police.	<ul style="list-style-type: none"> • Site induction with competency test. • Contractors are required to provide their Safe Work Method Statements before commencing any work on site. • Pocket Hazard Handbook for Prysmian employees are always utilised on site. Physical controls and measures in place include: <ul style="list-style-type: none"> • Early detection by operators and staff. • Cages and physical impact structures for protection of LPG cylinders on site. • Danger tags. • Locking system. • Out-of-service tags.


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Table 6-1: Early Warnings and Pre-emptive Actions				
Site Name: Prysmian Australia Telecom Plant			Responsible person: HSE Manager	
Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
				<ul style="list-style-type: none"> Storm water Shutoff Valve (for firewater). <p>Corrective actions conducted upon the initiation of the incident are in the following order:</p> <ul style="list-style-type: none"> Staff or persons upon detecting the leak or events that could lead to this incident would report to any available site management employee for immediate response. Site management initiates the Emergency Response Plan. This includes the use of the siren to initiate the evacuation, if necessary (depending on the size of leak). All persons on site adhere to the site's 'Fire Extinguishers, Storm water Shutoff Valves, and Fire procedures' during the event.

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Table 6-1: Early Warnings and Pre-emptive Actions				
Site Name: Prysmian Australia Telecom Plant			Responsible person: HSE Manager	
Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
				<ul style="list-style-type: none"> Assigned Prysmian staff contact the fire brigade, police and/or NSW EPA, depending on the size of release. If required, the nearest affected premises are also alerted by Prysmian or by the police. Incident is recorded, documented, reviewed, and procedures would be generated if necessary to account for the cause that has been identified from the experience.
Explosion (from Process)	Air	Depend on size of incident. Possible impact on adjacent properties. Projectiles can fly up to a few kilometres from the site. Explosion overpressure distances are anticipated to be between 500 metres to a few kilometres,	Hazard/incident is instantaneous. Communication and early warnings can only be conducted after this incident has occurred, which would be via telephone to fire brigade, and police.	Only pre-emptive actions can be undertaken, given the instantaneous nature and the high consequence associated with this incident. This includes the following: <ul style="list-style-type: none"> Site induction with competency test. Contractors are required to provide their Safe Work Method

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Table 6-1: Early Warnings and Pre-emptive Actions				
Site Name: Prysmian Australia Telecom Plant			Responsible person: HSE Manager	
Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
		depending on size of explosive cloud generated.		<p>Statements before commencing any work on site.</p> <p>Physical controls and measures in place include:</p> <ul style="list-style-type: none"> • Danger tags. • Locking system. • Out-of-service tags. <p>Corrective actions carried out aftermath would include:</p> <ul style="list-style-type: none"> • Fire brigade and police alert the nearest affected premises. • Assigned Prysmian staff contact the fire brigade, police and/or NSW EPA, depending on magnitude. If required, the nearest affected premises are also alerted by Prysmian or by the police. • Incident is recorded, documented, reviewed, and procedures would be generated if necessary to account

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Table 6-1: Early Warnings and Pre-emptive Actions				
Site Name: Prysmian Australia Telecom Plant			Responsible person: HSE Manager	
Hazard/Incident	External Release	Neighbours Impacted/Extent of Impact	Communication Methods Early Warnings	Pre-emptive Actions and Other Control Measures
				for the cause that has been identified from the experience.

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7. MAPS & PLANS

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

8. STAFF TRAINING

Prysmian Telecom employees and contractors must complete a number of training inductions in order to undertake work on site. Each department has additional inductions that must be completed by relevant employees. A general site induction must be completed every 12 months for contractors and every 5 years for Prysmian Telecom.

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

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

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

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

- Site Security; and
- All Site Contacts listed in Section 5.4.1.
- Maintenance managers
- Production managers

9. TESTING OF PLAN

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

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

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

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

This is undertaken as follows:

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

Records of drills and reviews are maintained including:

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

Table 9-1: PIRP testing records

Reason for Testing	Type of Test	Date of Test	Tested by	Finding of test
Annual Test	Desktop	04/05/2023	Rick Masotto (HSE) Peter Naylor (Final Test) Manuel Mayorga (R&D) Andy Pierce (Production) Sam Finocchiaro (QHSE) Freddie Sepehr (Logistic) Stefano Sibarani (Logistic) Rish Kapur (Production) Mauricio Herrera (HSE)	Contact Details need to be updated (new HSE director starting in June 2023). New emergency contact list need to be included. No other changes required.
Annual Test	Desktop	30/05/2022	Viral Surti (maintenance) Andy Pierce (Production) Rick Masotto (HSE) Mauricio Herrera (HSE)	Contact details and emergency number are accurate. No changes required.
Annual Test	Desktop	18/05/2021	Viral Surti (maintenance) Rick Masotto (HSE) Freddie Sepehr (Planning) Deepak Manoharan (Production) Danny Menegazzi (Production) Peter Naylor (Final Test) Helen Curl (HSE) Sam Finocchiaro (QHSE) Mauricio Herrera (HSE)	Contact details and emergency number are accurate. No changes required.

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10. REVISIONS HISTORY

Ed.	Rev.	Date	Description of Modifications
1	13	28/01/2025	Updated Emergency Contact List, table 5-1.
1	12	2/5/2023	Updated Emergency Contact List
1	10	03/07/2023	Updated Emergency Contact List, signatories, included testing of PIRP records and general review
1	10	01/05/2023	Updated Emergency Contact List and general review
1	9	28/06/2022	Updated Emergency Contact List and general review
1	8	16/11/2020	Updated Emergency Contact List
1	7	16/06/2020	Document Review and updated signatories
1	6	Dec 2018	Update contacts Update hospital information Update nominated doctor information
1	5	Sep 2018	Contact updates
1	4	Nov 2017	Document Review Contact updates
1	3	April 2015	Changed Prysmian three contacts Changed the site plan Add site Dangerous Goods
1	2	Aug 2014	Added latest standard cover page, list of contents and supplied controlled document address in footer.
1	1	1/3/2013	Review of Procedure adding more Prysmian contacts
1	0	1/9/2012	New Issue