

LOCAL FUCHS PROCESS DEFINITION

LF-PD ENV 242

BERESFIELD

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

ENVIRONMENT PROTECTION LICENCE No.20862

PUBLIC VERSION

| | Department / Organization | Date |
|--------------------|----------------------------------|------------|
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Content

| | | |
|----|---------------------------------|---|
| 1. | Purpose..... | 3 |
| 2. | Scope / Validity | 3 |
| 3. | Terms and Abbreviations..... | 3 |
| 4. | Responsibilities | 4 |
| 5. | Content | |
| 6. | Other Valid Documentation | 7 |
| 7. | Appendix..... | 7 |
| 8. | Change History | 7 |

1. Purpose

This Pollution Incident Response Management Plan (PIRMP) has been developed in accordance with the requirements of the Protection of the Environment Operations Act 1997 (POEO Act) and the Protection of the Environment Operations (General) Regulations 2022.

2. Scope / Validity

This document outlines what steps are in place to minimise the risk of a pollution incident on our premises. In the event a pollution incident occurs this document covers the notification of an incident, actions required to be taken to control and minimize the environmental impact, the communications of the incident to ensure the incident is dealt with safely, and all relevant people and authorities are notified, and kept informed throughout the incident.

This document has been prepared in accordance with Environment Protection Licence No.20862.

3. Terms and Abbreviations

| | |
|----------------------------|---|
| EPA | Environment Protection Authority |
| EP Licence | Environment Protection Licence. These are issued by the Environment Protection Authority (EPA) to regulate activities that have the potential to impact the environment significantly. All holders of environment protection licences are required to prepare a PIRMP in accordance section 153A of the <i>Protection of the Environment Operations Act 1997</i> (POEO Act). |
| EP Licence 20862 | Licence issued to FUCHS Lubricant Australasia by the Environment Protection Authority for the Beresfield Plant. |
| Notifiable Incident | An incident that causes or threatens to cause material harm to the environment. |
| PIRMP | Pollution Incident Response Management Plan. This is a document that outlines what procedures are in place to minimise the risk of a pollution incident on a premises. This includes having clear and effective notification, action and communication procedures to ensure the incident is dealt with safely, and all relevant people and authorities are notified, and kept informed throughout the incident. |
| POEO Act 1997 | The Protection of the Environment Operations Act 1997 (POEO Act) is a key piece of environmental legislation in New South Wales, Australia. It aims to protect, restore, and enhance the quality of the environment in NSW. |
| Pollution Incident | An occurrence that involves a leak or spill. It can also involve an unintended or unauthorised deposit, or an escape of a substance which results in pollution. |

4. Responsibilities

| | |
|------------------------------|-----------------------------------|
| Process Responsible | Environment Manager |
| Execution Responsible | Supply Chain & Operations Manager |

The Environment Manager is responsible to ensure this document is maintained up to date and is reviewed on an annual basis.

The Environment Manager has the responsibility to notify the EPA of any notifiable incident.

The Supply Chain & Operations Manager or deputy is responsible to ensure the incident response process takes place in a safe and controlled manner

5. Content

HAZARD/POLLUTION IDENTIFICATION

POLLUTANT INVENTORY

Due to the nature of the business, the products manufactured and/or stored on site are considered potential pollutants.

HAZARD IDENTIFICATION & ASSESSMENT

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

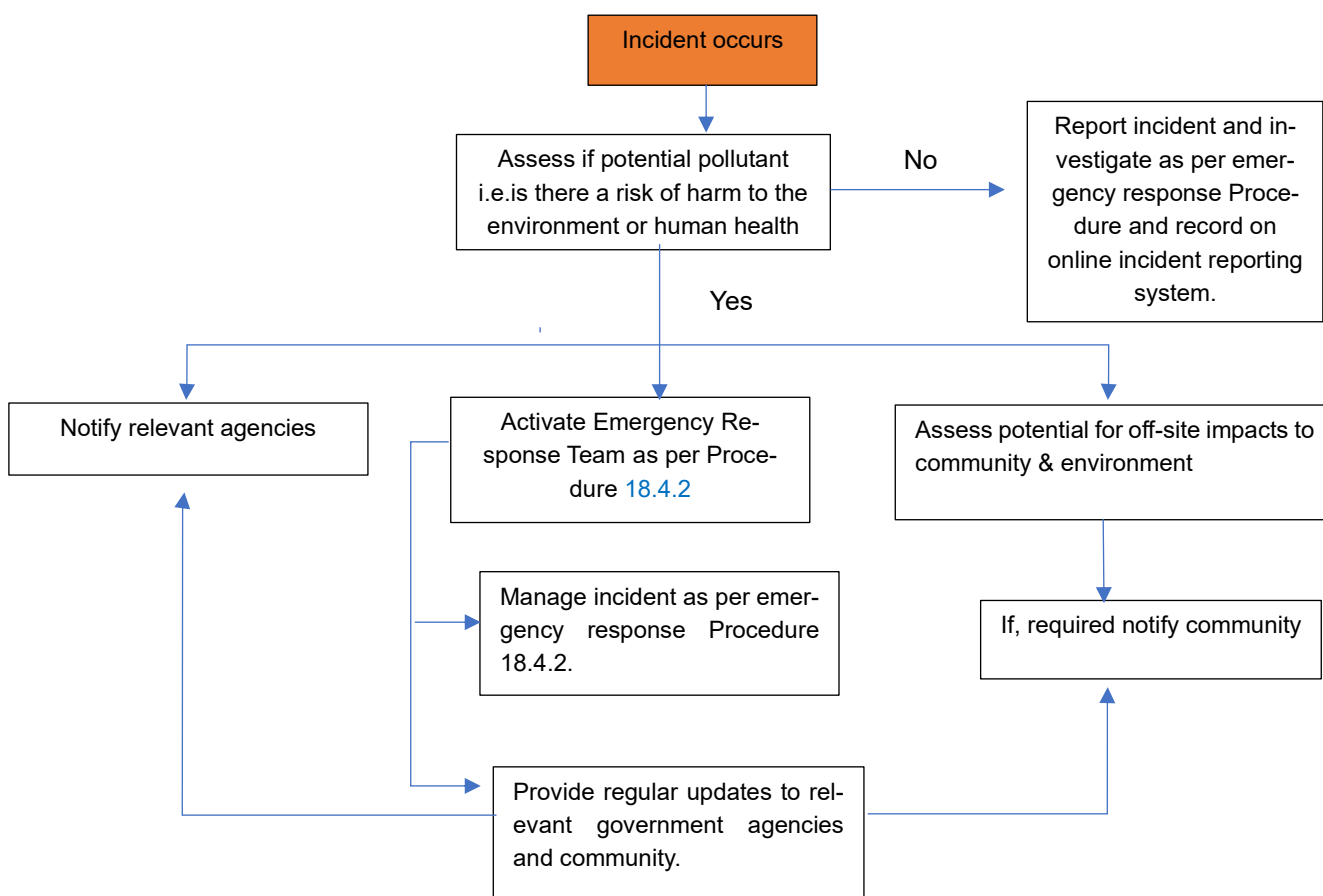
A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act:

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

An assessment of the site was undertaken to identify the main hazards to human health, or the environment associated with the activity undertaken on site. This assessment lists pollution incidents with potentially adverse consequences and details the event or likely cause, consequence, response controls and risk rating of the consequences.

INCIDENT RESPONSE

This section provides details on the incident response including the communication and on-site emergency response actions for responding to an incident that has resulted in an adverse impact to human health and/or the environment.



COMMUNICATION

Internal Communication (i.e. Employees/Contractors/Visitors)

All incidents are to be reported immediately to the Supply Chain and Operations Manager.

Government Agencies

The key contacts associated with the implementation/activation of this plan are listed below.

If a pollution incident occurs where 'material harm' to the environment is caused or threatened, the notification protocol set out in section 3 (above) is followed.

If the incident presents an immediate threat to human health or property, call 000.

If the incident does not require an initial combat agency, immediately notify the authorities in the order listed below.

| External Agencies | |
|--------------------------------|--|
| Ambulance, Fire or Police | 000 |
| Environment Protection Agency | 131 555 |
| Safe Work NSW | 13 10 50 |
| Newcastle City Council | 02 4974 2000 |
| Hunter Water Corporation | 1300 657 000 |
| Ministry of Health (Newcastle) | 02 4924 6477 (diverts to John Hunter Hospital)- ask for Public Health Officer on call |

Local Community

Community stakeholders that are potentially affected by a potential incident will be notified immediately by phone call after being instructed by one of the key contacts for the site. As detailed in the emergency response procedure any incident is to be communicated to the immediate neighbours. The communication method may change depending on the nature of the event or as directed by the relevant agency. Regular updates if required will be provided to the affected community throughout the course of event by one of the key contacts.

On-Site Incident Management

Emergency Response/Evacuation Plan is in place for the site. This procedure outlines the actions required to be taken when there is an incident on site which may result in adverse impact to human health and/or the environment. This procedure and this plan will be used in-conjunction with each other to ensure that the impacts of pollution incidents are minimised as much possible to through early intervention.

ADMINISTRATION

This section of the plan provides details on the processes that will be used by the employees on-site and off-site to make them aware of the plan requirements and document the process for regular testing of the plan.

STAFF AWARENESS/TRAINING

All new staff will be made aware of the requirements of this plan and the emergency response procedures as part of their environmental induction with the Environment Manager.

Staff in the warehouse, laboratory and production areas must attend annual spill kit training to ensure they are able to contain a spill and raise the alarm where required.

PLAN AVAILABILITY

In accordance with Section 153D of the POEO Act, the plan will be made available to all site employees via the intranet. A hard copy of the plan will also be available at the site in the emergency information box.

TESTING OF PLAN

An annual environmental spill drill and/or annual spill kit training will be conducted to ensure that the information contained within the plan and the emergency response plan is accurate and up to date. When drills are carried out findings will be documented.

Attendees of annual spill kit training will receive a certificate of attendance to show competency.

6. Other Valid Documentation

7. Appendix

8. Change History

| Revision | Changes to previous version |
|----------|--|
| 0 | Initial Release – no changes |
| 11 | Changed over to new template. The Protection of the Environment Operations (General) Regulations 2021 has been updated to Protection of the Environment Operations (General) Regulations 2022. |