



# NSW Rolling Stock Operations - Pollution Incident Response Management Plan (PIRMP)

## Contents

Purpose and Scope ..... 3

Legislative Requirements ..... 3

Definitions ..... 3

Duty to Notify a Pollution Incident ..... 4

Emergency Response ..... 4

Incident Notification Procedures and Contact Details ..... 5

Pacific National Contact Details ..... 6

Specialist Incident Response ..... 6

Community Complaints Line ..... 6

Immediate Actions to be taken to Minimise Harm ..... 7

Staff Training and Education ..... 7

Continual Improvement and Review ..... 7

Testing of Plan ..... 7

Procedure Details ..... 9

Revision Summary ..... 9

Document Name	Document Number	Next Review Date
NSW Rolling Stock Operations - Pollution Incident Response Management Plan (PIRMP)	18316	08/06/2028

Company Details	
<b>Site Name</b>	Pacific National Pty Ltd
	Pacific National Services Pty Ltd
<b>Scheduled Activity</b>	Railway Activities – rolling stock operations
	Transportation of Category 1 and Category 2 trackable waste within, and outside of NSW
<b>Site Address</b>	Level 16: 15 Blue Street, North Sydney NSW, 2060
<b>Site Contact Information (Principal)</b>	<b>Name</b> [REDACTED]
	<b>Position</b> Environment Manager
	<b>Mobile</b> [REDACTED]
	<b>Email</b> [REDACTED]
<b>Site Contact Information (Secondary)</b>	<b>Name</b> [REDACTED]
	<b>Position</b> Head of Legal
	<b>Mobile</b> [REDACTED]
	<b>Email</b> [REDACTED]
<b>Principal Environmental Contact Information</b>	<b>Name</b> [REDACTED]
	<b>Position</b> Environment Manager
	<b>Mobile</b> [REDACTED]
<b>Community Complaints Line</b>	1800 111 711
<b>Primary Site Telephone No:</b>	[REDACTED]
<b>Secondary Site Telephone No:</b>	[REDACTED]

Document Name	Document Number	Next Review Date
NSW Rolling Stock Operations - Pollution Incident Response Management Plan (PIRMP)	18316	08/06/2028

## Purpose and Scope

This Pollution Incident Response Management Plan ('PIRMP') has been prepared in accordance with section 153A of the *Protection of the Environment Operations Act 1997* (POEO Act). Pacific National Pty Ltd ('PN') is the holder of Environmental Protection Licence 21364 (**EPL 21364**).

Pacific National's operates rolling stock operations across NSW on Licence Rail Networks defined as:

*'A continuous or connected length of track greater than 30 kilometres that is operated by the same person in New South Wales<sup>1</sup>.'*

In addition, Pacific National Services Pty Ltd ('PN') is the holder of Environmental Protection Licence 21836 (**EPL 21836**).

Pacific National transports Category 1 and Category 2 trackable waste (specifically 'soils contaminated with a substance or waste referred to in Part 1, Schedule 1 of the *Protection of the Environment Operations (Waste) Regulation 2014*(N120)) within, and outside of the state of New South Wales (NSW). The transportation of Category 1 and Category 2 trackable waste within, and outside of NSW is a Scheduled Activity under Schedule 1, Part 2(48) of the POEO Act.

This PIRMP relates to activities and operations, including the transportation of Category 1 and Category 2 trackable waste within the defined boundaries of a **Licensed Rail Network** and applies to all employees, contractors, sub-contractors, and visitors.

## Legislative Requirements

This PIRMP has been developed and implemented generally in accordance with Part 5.7A of the *Protection of Environmental Operations Act NSW 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2021* (POEO(G) Regulation).

## Definitions

The below definitions are defined pursuant with Part 5.7 of the POEO Act 1997.

**Table 1:** Definitions

Key Word	Definition
Material Harm	<p>An incident is determined to be of Material Harm, if:</p> <ul style="list-style-type: none"> <li>i) It involves <u>actual or potential harm</u> to the health or safety of human beings or to ecosystems <u>that is not trivial</u>; or</li> <li>ii) It results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding <u>\$10,000.00</u> (or such amounts as is prescribed by the Regulations).</li> </ul> <p>Note: 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.</p>

<sup>1</sup> Refer to Part 8 – Special Conditions, Clause E1.1 Railway Licence Dictionary - **EPL 21364**

Document Name	Document Number	Next Review Date
NSW Rolling Stock Operations - Pollution Incident Response Management Plan (PIRMP)	18316	08/06/2028

Pollution Incident	<p>An incident or set of circumstances during or as a consequence of which <u>there is or 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.</u></p> <p>It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it <u>does not include</u> an incident or set of circumstances involving only the emission of any noise.</p>
--------------------	--

## Duty to Notify of a Pollution Incident

The following parties, in accordance with the *POEO Act 1997 Part 5.7* have an absolute duty to notify of a pollution incident **immediately** where the activity **causes or threatens to cause material harm to the environment:**

- The person carrying out the activity;
- An employee or agent carrying out the activity;
- An employer carrying out the activity;
- The occupier of the premises where the incident occurred.

Notification of a pollution incident, with the potential for, or where actual Material Harm has occurred, must be given **immediately** to the PN Integrated Planning Service (IPS) for further action.

All environmental incidents causing, or threatening material harm shall be reported to the NSW EPA immediately via the NSW EPA Hotline on **131 555**.

Pacific National shall notify each relevant authority:

- the NSW EPA: 131 555;
- the relevant Ministry of Health via the local Public Health Unit (this can be determined by accessing <https://www.health.nsw.gov.au/Infectious/Pages/phus.aspx> );
- the NSW SafeWork Authority: 13 10 50;
- the relevant NSW Local Government Authority (this can be determined by accessing <https://www.olg.nsw.gov.au/public/find-my-council/local-government-area-boundaries-and-mapping-information/> ); and
- NSW Fire and Rescue: 1300 729 579.

If an environmental incident involves soils contaminated with a substance or waste listed under the Regulation, [REDACTED]

[REDACTED] If unsure as to whether an environmental incident requires notification, contact a member from the Environment Team (Table 2).

## Emergency Response

All necessary action should be taken to ensure the safety of employees, contractors, visitors or members of the public if the event presents an **immediate** threat. NSW Fire and Rescue, Police and Ambulance services **must** be contacted immediately by site management or the incident controller by phoning **000**.

Document Name	Document Number	Next Review Date
NSW Rolling Stock Operations - Pollution Incident Response Management Plan (PIRMP)	18316	08/06/2028

All necessary actions should be taken immediately to mitigate against further potential and/or actual material harm to the environment. This may include the appropriate deployment of containment materials and infrastructure appropriate and proportionate to the event is safe to do so.

## Incident Notification Procedures and Contact Details

In accordance with *POEO Act 1997 Part 5.7* Pollution incidents are to be reported **immediately**. The procedures for the notification of a pollution incident to internal and external stakeholders is maintained in the Site ERP and supplemented by PN’s Incident Reporting and Management Standard (*PN-STD-SAF Incident Reporting and Management Standard*) and the Incident Reporting Handbook (*PN-PRO-SAF Incident Reporting Handbook*). These three documents address:

- Reporting and responsibilities at a premise level;
- Reporting of the incident to IPS;
- Recording of incident data; and
- Reporting of incidents to external agencies and regulators.

Guidance included in [PN-FOR-SAF Spill Assessment Tool](https://pnrail.sharepoint.com/sites/SafetyNet/_layouts/15/Doc.aspx?sourcedoc={FF5120BC-0828-45E5-B64B-45421C35082C}&file=PN-FOR-SAF%20Spill%20Assessment%20Tool%20(SAT).docx&action=default&mobileredirect=true&DefaultItemOpen=1) ([https://pnrail.sharepoint.com/sites/SafetyNet/\\_layouts/15/Doc.aspx?sourcedoc={FF5120BC-0828-45E5-B64B-45421C35082C}&file=PN-FOR-SAF Spill Assessment Tool \(SAT\).docx&action=default&mobileredirect=true&DefaultItemOpen=1](https://pnrail.sharepoint.com/sites/SafetyNet/_layouts/15/Doc.aspx?sourcedoc={FF5120BC-0828-45E5-B64B-45421C35082C}&file=PN-FOR-SAF%20Spill%20Assessment%20Tool%20(SAT).docx&action=default&mobileredirect=true&DefaultItemOpen=1)) and [PN-GUI-HSE External Incident Reporting Guideline \(Attachment 1: Environmental Incident Details and Notification Form\)](#) must be used as guidance when documenting and reporting incidents to external relevant authorities. IPS are also responsible for the completion of the Appendix B - Spill Assessment Tool that includes a matrix that determines if notification of relevant authorities is required.

Where known, the following information is required to be communicated to each relevant authority:

- Time/date of the incident
- Nature of the incident
- Duration of the incident
- Location of the incident
- Nearby sensitive receivers / receptors
- Volumes of pollutants lost
- Actions completed to date to control the incident.

All information must be factual and avoid speculation. If specific details of the incident are not known (such as volume, or extent), state that details are not known and that further details may be provided to the relevant party as they become available.

Relevant authorities may attend the site of the incident following notification to assist in the management and response of the incident (FRNSW) or to validate incident response / potential for environmental harm as part of their due diligence (EPA). Contact with representatives from a responding relevant authority should be managed via a single delegated point of contact such as the Site Superintendent, Site Supervisor or relevant PN representative.

All engagements with relevant authorities are to be performed in a respectful and cooperative manner, with the delegated point of contact responsible for logging details of interactions with each responding authority such as time on/off site, any requests made during the incident, actions taken and general dialogue / correspondence with the relevant authority.

Document Name	Document Number	Next Review Date
NSW Rolling Stock Operations - Pollution Incident Response Management Plan (PIRMP)	18316	08/06/2028

All staff, contractors and visitors are responsible for the reporting of incidents or hazards to site personnel, site escorts, supervisors and/or site management.

Please note, in the event of a fire or environmental incident where there is determined to be actual and or potential material harm to the environment the incident **must** be reported to the NSW EPA **immediately**.

## Pacific National Contact Details

**Table 2:** Pacific National Contact Details

Position	Name	Phone	Email
Incident Reporting (IPS)	Pacific National	[REDACTED]	[REDACTED]
Environment Manager	[REDACTED]	[REDACTED]	[REDACTED]
Environment Advisor	[REDACTED]	[REDACTED]	[REDACTED]
Environment Advisor	[REDACTED]	[REDACTED]	[REDACTED]
Environment Advisor	[REDACTED]	[REDACTED]	[REDACTED]
Community Complaints	Pacific National	1800 111 771	<a href="mailto:ext_comm_complaints@pacificnational.com.au">ext_comm_complaints@pacificnational.com.au</a>
Site Supervisor / Area Manager	IPS to advise	IPS to advise	IPS can assist with determining the appropriate Site Supervisor / Area Supervisor

## Specialist Incident Response

In the event Fire and Rescue NSW demobilise from the incident as their services can be provided by third parties, Pacific National engages ISS First Response to assist in specialist emergency response, containment, and incident clean-up. ISS First Response provides an emergency response call centre service and provides full time emergency response, incident management and specialist response services such as deployment of vacuum trucks, transportation of controlled wastes and other services. IPS will engage ISS First Response to provide specialist response services where required and will designate the Site Superintendent / Supervisor as the nominated contact person.

Pacific National transports a variety of materials and products on behalf of its customers, that may include dangerous and hazardous goods, or wastes defined as trackable as authorised by EPL 21836. Products and materials will be loaded into shipping containers or holding vessels by the customer before prior to being loaded onto a Pacific National rail wagon. As such, other than unloading and loading of the containers and vessels onto rail wagons, these materials are not directly handled by PN personnel.

## Community Complaints Line

In accordance with EPL 21364 and EPL21836, Pacific National maintains a Community Complaints Line 24 hours a day, 7 days a week. Interested parties can log community complaints regarding SFT operations via the Community Complaints Line: **1800 111 711**.

Document Name	Document Number	Next Review Date
NSW Rolling Stock Operations - Pollution Incident Response Management Plan (PIRMP)	18316	08/06/2028

PN’s operations cover multiple rail networks with an extensive geographical footprint. Density of private and public receptors over this area and availability of exposure pathways to a potential incident varies significantly.

Due to likely probability of limited PN resources on the scene during an incident involving rolling stock (ie limited to the train operators), all community notification will be performed in consultation with, and where available assistance from emergency services.

Communication methodology will be determined on a case-by-case basis that considers the types and locations of neighbouring landowners who may require information, the nature of the incident and the stage of incident response. Communication may employ the following modes:

- Media statements
- Telephone calls, SMS or other messaging services
- Emails to community representatives
- Letterbox drops
- Community notice boards
- Doorknocking of potentially affected community members.

## Immediate Actions to be taken to Minimise Harm

Upon the confirmation of an event which causes or has the potential to cause material environmental harm, this PIRMP shall be implemented. The first priority in the case of a potential and or actual environment event, is the safety and wellbeing of all persons who are directly at risk from the event.

Where safe to do so, personnel in response to an event shall:

- **Stop**, Identify and Assess – Safety is the first priority.
- Identify the source of the spill or leak;
- If safe to do so – secure, isolate and mitigate further potential environmental harm.

All incident responses are to be undertaken in consultation with internal subject matter experts, the network operator and emergency services and regulators as required.

## Staff Training and Education

Pacific National shall maintain and implement the following forms of training and education:

- Induction Packages
- Emergency response awareness training
- Workplace engagements / information releases
- Spill Response Procedure
- Environmental incident reporting.

## Continual Improvement and Review

### Testing of Plan

In accordance with section *Protection of the Environment Operations Act 1997 No 156, section 153E*

Document Name	Document Number	Next Review Date
NSW Rolling Stock Operations - Pollution Incident Response Management Plan (PIRMP)	18316	08/06/2028

'A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations'.

Section 133 of the *Protection of the Environment Operations (General) Regulation 2021* mandates:

- (1) *The testing of the plan is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner.*
- (2) *Any such test is to be carried out –*
  - a. *Routinely at least once every 12 months, and*
  - b. *Within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as to assess, on the light of that incident, whether the information included on the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.*

This PIRMP is to be accessible to staff operating rolling stock within the network within NSW. It should also be tested, reviewed and updated (as required) on an **annual basis within the current reporting period**. Records of the test shall be kept for verification.

Reoccurring Action Items are to be assigned to relevant personnel in its HSE Reporting and Action management system (SHED) to ensure annual testing and review(s) are undertaken.

To assist in the undertaking of this review process a template has been developed, refer to [PN-FOR-ENV Pollution Incident Response Management Plan Test Checklist](#). The Pacific National Staff member/s undertaking this review are required to:

- Complete the review template (refer to [PN-FOR-ENV Pollution Incident Response Management Plan Test Checklist](#));
- Log a version control change in the table on page 1; and then
- Close out the relevant SHED action, attaching the completed review form.

It is imperative that following any incident that has initiated the PIRMP, a debrief meeting is held with input from relevant stakeholders and those involved in the incident response. The debrief should be conducted no greater than two weeks after the completion and rectification of the incident. The purpose of the debrief is to identify and confirm:

- Which processes worked well
- Opportunities for improvement
- Any changes to the PIRMP, EMP and/or associated tools and resources, including training and competency.

The testing and updating (as required) of the PIRMP may be performed in coordination with the debrief meeting.

Document Name	Document Number	Next Review Date
NSW Rolling Stock Operations - Pollution Incident Response Management Plan (PIRMP)	18316	08/06/2028



## Procedure Details

INFORMATION	
<b>Policy Category</b>	Environment and Sustainability
<b>Approval Date</b>	18 July 2023
<b>Review Frequency</b>	Annually, pursuant to anniversary date of 18 July (EPL21836)
<b>Review Date</b>	18 July 2024
<b>Procedure Owner</b>	Environment Manager
<b>Approver</b>	Environment Manager

RELATED DOCUMENTS	
<b>Legislation</b>	Protection of the Environment Operations Act 1997 Protection of the Environment Operations (General) Regulation 2021
<b>Policy</b>	Health Safety and Environment Policy
<b>Procedure / Standards</b>	PN-STD-SAF Environmental Management Standard
<b>Supporting Documents</b>	PN-GUI-HSE External Incident Reporting Guideline PN-FOR-SAF Spill Assessment Tool PN-FOR-SAF Pollution Incident Response Management Plan Checklist

## Revision Summary

First Issue	Issue Date	Implementation Requirements	Approved by
1.0	12/3/2021	General review / resting after PIRMP activated. Nil changes	Environment Manager

Version No.	Revision Date	Summary of Revision Details	Approved by
2.0	16/7/2021	General review / resting after PIRMP activated. Nil changes	Environment Manager
3.0	17/3/2022	Updated contact details	Environment Manager
4.0	28/6/2022	General review / resting after PIRMP activated. Nil changes	Environment Manager
5.0	8/9/2022	Update contact details	Environment Manager
6.0	8/6/2023	Update template in accordance with revised format. Update community notification and relevant authority details, specialist spill response, reference to SAT tool, testing and continual improvement and include appendices	Environment Manager
7.0	18/7/2023	Updated to incorporate EPL21836 and additional requirements regarding [REDACTED]	Environment Manager

Document Name	Document Number	Next Review Date
NSW Rolling Stock Operations - Pollution Incident Response Management Plan (PIRMP)	18316	08/06/2028