




# Pollution Incident Response Management Plan Public Information

## Highland Pine Products NSW Environmental Protection Licences.

- Highland Pine Site 1 – EPL 887
- Highland Pine Site 2 – EPL 11229

### Review Register

Review Date	Review Team	Changes Made (Section)
1. 1/12/18	DM, SK	Update of original document drafted for review.
2. 1/03/19	SK, BG, DK	Approved for website publication
3. 14/5/20	SK/BG,DK	Reviewed - Updated
4. 13/10/20	SK	Appendices – updated wall chart and protocol docs
5. 27/07/21	SK	Wording/format change. Update appendices.
6. 25/07/22	SK	Update and removal of LOSP – update appendices
7. 01/08/23	SK	General review and update.
8. 01/08/24	SK, WL,NB	General update – name changes-minor wording.
9. 28/07/25	SK, WL,NB	Update to align with full site plan


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S Kavalieros EHSR Group	Management Representative	M Bitzer	HPP General Manager	HPP	1

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## Introduction.

This Pollution Incident Response Management Plan (PIRMP) has been prepared in accordance with Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act) and the Protection of the Environment (General) Regulation 2022. It applies to all Highland Pine Products (HPP) operations in New South Wales and is designed to guide the response to pollution incidents that may arise at our licensed premises.

The plan is applicable to emergency services, employees, contractors, visitors, and potentially affected off-site receptors. It establishes a framework for coordinated action to protect human health and the environment.

The objectives of this plan are to:

- Outline the methods for identifying, assessing, and responding to a pollution incident in order to minimise actual or potential harm.
- Set out the procedures to ensure timely and accurate reporting of incidents to the relevant authorities in accordance with the POEO Act.
- Describe the mechanisms for notifying neighbours and the broader community who may be affected by an incident, ensuring transparent and effective communication.

## HPP NSW Operations.

This plan is applicable to the following Highland Pine Products premises.

Site	Location	Environmental protection licence	Link
<b>Highland Pine Site 1 Oberon</b>	Gate 3 Albion St Oberon	EPL 887	<a href="https://apps.epa.nsw.gov.au/prpoeoapp/">https://apps.epa.nsw.gov.au/prpoeoapp/</a>
<b>Highland Pine Site 2 Oberon</b>	Gate 3 Albion St Oberon	EPL 11229	


Table 1: HPP Operations in NSW.

## Legal Requirements.

Under the Protection of the Environment (General) Regulation 2022, key elements of each Pollution Incident Response Management Plan (PIRMP) must be made publicly available and easily accessible on the licensee's website within 14 days of preparation. Only the information specified in section 153C(a) of the POEO Act and clauses 72(h)–(i) of the Regulation is required to be published.

In accordance with clause 75 of the Regulation, this PIRMP must be tested and reviewed at least once every 12 months and within one month of any pollution incident that causes or threatens material harm. The POEO Act imposes significant penalties for failing to prepare, keep on site, maintain, test, or implement a PIRMP.

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This public PIRMP is available electronically via the HPP website and may also be viewed in hard copy at Gate 3 Security, Albion Street, Oberon NSW 2787 (24-hour access).

## Activation of this Plan.

All pollution incidents will be assessed against this PIRMP. The plan will be immediately implemented in accordance with section 153F of the Protection of the Environment Operations Act 1997 (POEO Act) if an incident causes or threatens to cause material harm.

An incident is considered to involve material harm under section 147 of the POEO Act if:

- It results in actual or potential harm to the health or safety of human beings, or to ecosystems, that is not trivial; or
- It results in actual or potential property damage exceeding \$10,000, including the reasonable costs of taking all practicable measures to prevent, mitigate, or remediate environmental harm.

It is immaterial whether the harm occurs solely within the premises or extends beyond the site boundary.

The following positions are authorised to activate the PIRMP and notify the relevant authorities:

- General Manager
- Maintenance Manager
- EHSR Manager
- Site Lead Team Members


Where there is an immediate threat to human life or property, any person on site is authorised to dial 000 for emergency services and to enact the relevant site emergency response procedures.

## Plan Objectives.

The objectives of this PIRMP are to:

- Identify and assess the main hazards associated with HPP operations that could give rise to a pollution incident.
- Detail the infrastructure and administrative controls in place to reduce the likelihood and consequence of these hazards impacting the receiving environment.
- Describe the systems and procedures established for responding to and managing pollution incidents in a timely and effective manner.
- Define the incident management structure, including roles and responsibilities for activation, response, and communication.

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- Establish the process for reviewing, testing, and updating the PIRMP to ensure it remains current, effective, and compliant.

## Description and Loss Likelihood of Main Hazards.

A comprehensive survey of potential pollutants has been undertaken at each HPP site. This process identified hazards that may present a risk to the environment or human health, and these were assessed using the consequence matrix set out in Table 2.

The matrix evaluates the severity of potential impacts on a scale from *Insignificant* to *Disastrous*. The criteria range from no measurable environmental impact and very low toxicity (Insignificant) through to catastrophic environmental impacts from extremely toxic or highly dangerous substances (Disastrous).

This structured assessment ensures that risks are prioritised according to their potential consequences. Pollutants that score as *Insignificant* are not regarded as main hazards and are excluded from further consideration in this plan. Higher-rated hazards are subject to risk reduction measures, incident planning, and monitoring.

Consequences	Risk of Hazard to Environment and/or People				
	Insignificant	Minor	Moderate	Major	Disastrous
	No measurable environmental impact. Very low level toxic and not dangerous.	Measurable environmental impact. Mildly toxic or low level dangerous.	Noticeable environmental impact. Toxic and medium level dangerous.	Significant environmental impact. Very toxic and high level dangerous.	Catastrophic environmental impact. Extremely toxic and very dangerous.

Table 2: Consequence Matrix - Main Hazard Identification.


## Risk Reduction Controls.

Following the identification and assessment of potential hazards, a range of risk reduction controls have been implemented across HPP's NSW operations. These controls are designed to minimise the likelihood and consequence of pollution incidents, thereby reducing potential harm to human health and the environment.

Two types of controls are applied:

- Infrastructure controls** – physical systems or equipment designed to prevent or mitigate environmental harm.
- Administrative controls** – management systems, procedures, and practices that reduce operational risk and support effective incident response.

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The effectiveness of both infrastructure and administrative controls is assessed using the business risk rating matrix, and controls are reviewed for suitability as new risks are identified or in the event of an incident. In many cases, multiple controls may be applied to a single hazard to ensure robust mitigation.

**Table 3** below summarises the infrastructure controls currently in place across HPP's operations, while **Table 4** outlines the administrative controls that support risk management and continual improvement.


Control	Purpose
<b>Bunding</b>	Act as secondary containment for liquid pollutants. Key control for bulk liquid storage systems.
<b>Sprinkler System</b>	Reduce risk and extent of fires.
<b>Spill Kits</b>	Limit impact of liquid pollutant spills for minor to moderate spill events.
<b>Triple/Single Interceptors</b>	Reduce pollutants discharged from site. Control of gross solids and oils.
<b>First Flush Dams</b>	Reduce solid pollutants discharged from site.
<b>Water Treatment Plant</b>	Reduce contaminants discharging from site.
<b>Over/Under Interceptors</b>	Reduce oil pollutants discharged from site.
<b>Gate Valves</b>	Contain spills to site for more effective clean up.
<b>Back Flow Prevention Devices</b>	Prevents process water backflow from re-entering town supply.
<b>Fire Hydrants</b>	Reduce risk and extent of fires.
<b>Crash Barriers</b>	Protect infrastructure from mobile plant collisions.

Table 3: Infrastructure Controls.

Control	Purpose
<b>Standard Operating Procedures and Permit to Work System</b>	Provide instruction for proper response to incidents and safe work procedures. Reduces the risk of an incident through operator error/lack of understanding.
<b>Housekeeping Inspections</b>	Identify risks, highlights failures in process and recommend corrective actions.
<b>Walkaround check-sheets</b>	Identifies and reports on potential plant failures that could impact on the environment if not addressed.
<b>Preventative maintenance program</b>	Routine maintenance of plant where failures impacting on the environment and productivity have been known to occur.
<b>Audits</b>	Identify risks and recommend corrective actions.
<b>Incident/Hazard/Near Miss Reporting</b>	Identify risks and recommend corrective actions. Identify training, work procedure and infrastructure improvement requirements. Essential to continual improvement.
<b>Environmental Monitoring</b>	Comply with license conditions. Monitor performance.
<b>Change Management</b>	Reduce risk posed by changes to process.
<b>Emergency Plan</b>	Reduce impact of emergencies on environment and business continuity. Reduce risks to human health/Safety.
<b>Induction Training</b>	Alert all employees and visitors to their environmental responsibilities.

Table 4: Administrative Controls.

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## Procedure for Internal and External Incident Reporting.

All incidents must be reported, investigated, and recorded. HPP has established protocols to guide environmental incident reporting. Compliance with PIRMP notification requirements does not remove the obligation to notify incidents under other legislation, such as the *Work Health and Safety Act 2011*, or other environmental protection laws.

### Internal Incident Reporting

All incidents, hazards, and near misses are reported under HPP's internal procedures, which utilise a risk matrix to classify severity and prioritise corrective actions. These procedures provide transparency to internal stakeholders and include a review mechanism to ensure corrective actions are completed and lessons learned are applied.

### External Incident Reporting

HPP's external notification procedure provides site-based personnel with clear direction in the event of a loss of containment or other pollution incident. Training is delivered annually to ensure personnel at all levels understand their obligations and notification responsibilities.

External notifications are made in accordance with section 148 of the POEO Act. Where material harm is caused or threatened, the following authorities are notified immediately:

- NSW Environment Protection Authority (EPA)
- Oberon Council
- Fire and Rescue NSW
- NSW Ministry of Health
- SafeWork NSW


The notification process is supported by tools including the Pollution Incident Response Wall Chart (**Appendix 1**), the Notification Assessment Worksheet (**Appendix 2**), and the Notification Protocol (**Appendix 3**). These documents provide clear and practical guidance for decision-making during an incident.

### Neighbour And Community Notification.

Where emergency services are engaged as first responders, all external communication will be managed by the authorised person activating the PIRMP. Each incident is assessed on a case-by-case basis, and appropriate mechanisms are selected to provide early warnings and updates to neighbours and the local community. Methods may include:

- Updates on the HPP website

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- Social media (Twitter, Facebook)
- Direct telephone calls or SMS
- Emails to community representatives (e.g. consultative committee)
- Letterbox drops
- Door-to-door contact
- Public meetings

Initial communication with neighbours will always be guided by advice from emergency services, including any directives relating to evacuation or shelter-in-place requirements. These reporting and communication measures directly support the objectives of the PIRMP by ensuring timely incident response, regulatory compliance, and transparent engagement with the local community.

## Manner in which plan will be tested and maintained.

This PIRMP is subject to scheduled testing and maintenance to ensure it remains current, effective, and capable of supporting a timely response in the event of a pollution incident. In accordance with clause 75 of the Protection of the Environment (General) Regulation 2022, the plan must be tested at least once every 12 months and within one month of any incident that causes or threatens material harm.

The following activities are undertaken as part of the review and maintenance process:

- Review of the PIRMP at least annually and after every incident.
  - Annual reviews are recorded in the Routine Activities section of the Site EHSR Improvement Plan.
  - Reviews require formal sign-off by senior management.
- Spill response training and drills conducted every 12 months.
- Regular training to ensure staff are aware of their responsibilities under the PIRMP.
- Amendments to the PIRMP recorded promptly in the Amendment Register.


This systematic approach ensures that the PIRMP remains accurate, tested, and aligned with both operational needs and statutory requirements. Regular training and review reinforce a culture of compliance, preparedness, and continuous improvement across HPP's operations.

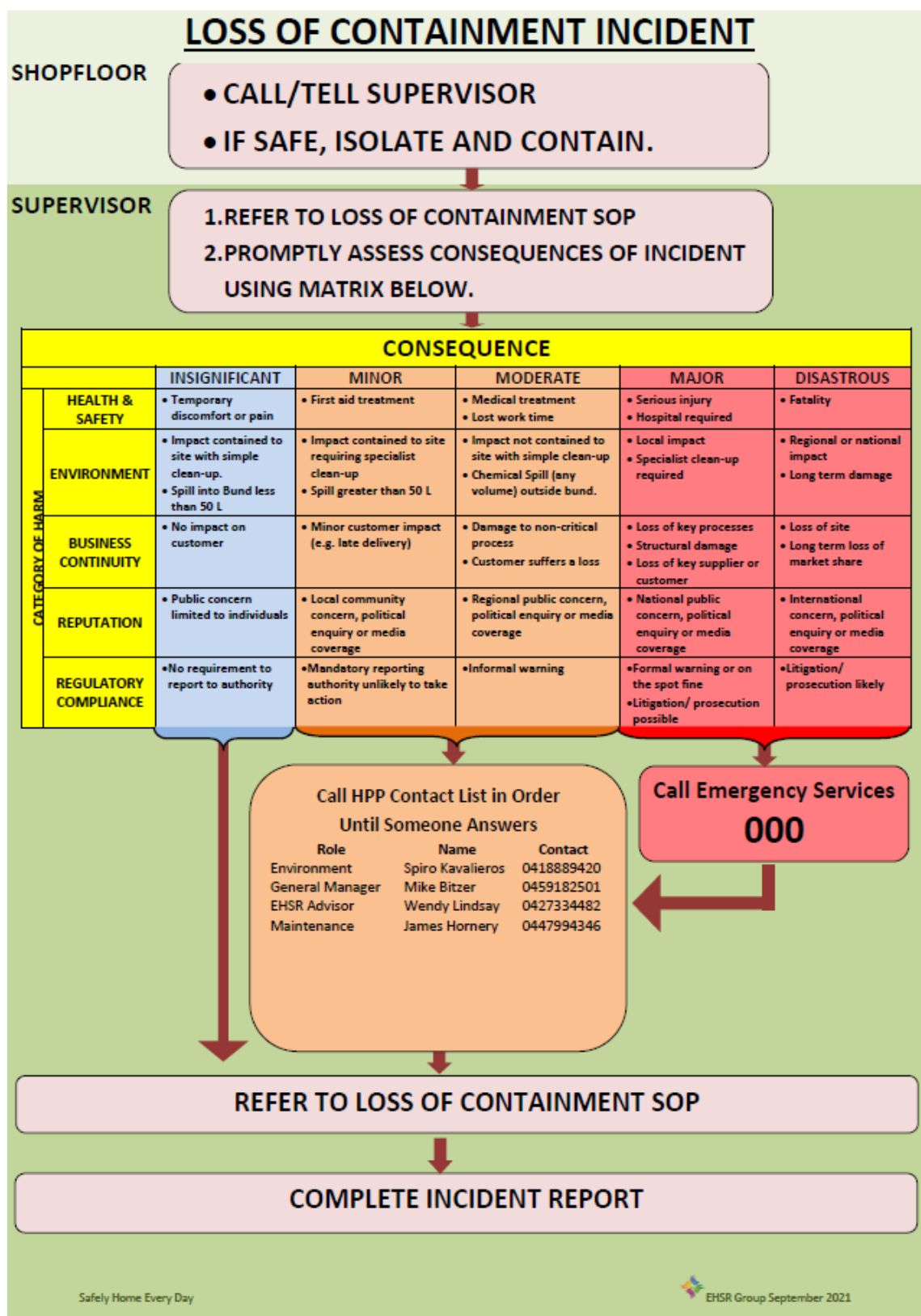
Task	Who	Frequency
<b>Full review of plan including chemical risk assessment. Review must be documented.</b>	Site EHSR, Engineering Dept, Production Dept. Site Manager	Annual
<b>Post incident plan review.</b>	Site EHSR, Engineering Dept, Production Dept. Site Manager	Within 30 days of this plan being activated.
<b>Spill response training drills</b>	All shop floor personnel	Annually
<b>PIRMP responsibility training</b>	All site personnel	Annually
<b>PIRMP review signoff</b>	Site Manager, Site EHSR	Annually
<b>Amend register and update records</b>	Site EHSR	Annually or as updates occur.

Table 5: PIRMP Testing and Maintenance.

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Appendix 1: Loss of Containment Wallchart.

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Date		Time		Name		Incident Report Number	
Description of Incident							

CONSEQUENCE (TICK THE BOX)						
		INSIGNIFICANT	MINOR	MODERATE	MAJOR	DISASTROUS
CATEGORY OF HARM	HEALTH & SAFETY	• Temporary discomfort or pain <input type="checkbox"/>	• First aid treatment <input type="checkbox"/>	• Medical treatment <input type="checkbox"/> • Lost work time <input type="checkbox"/>	• Serious injury <input type="checkbox"/> • Hospital required <input type="checkbox"/>	• Fatality <input type="checkbox"/>
	ENVIRONMENT	• Impact contained to site with simple clean-up <input type="checkbox"/> • Spill into a bund less than 50 L <input type="checkbox"/>	• Impact contained to site requiring specialist clean-up <input type="checkbox"/> • Spill greater than 50 litres <input type="checkbox"/>	• Impact not contained to site requiring simple clean-up <input type="checkbox"/> • Chemical spill (any volume) outside bund <input type="checkbox"/>	• Local impact <input type="checkbox"/> • Specialist clean-up required <input type="checkbox"/>	• Regional or national impact <input type="checkbox"/> • Long term damage <input type="checkbox"/>
	BUSINESS CONTINUITY	• No impact on customer <input type="checkbox"/>	• Minor customer impact (e.g. late delivery) <input type="checkbox"/>	• Damage to non-critical process <input type="checkbox"/> • Customer suffers a loss <input type="checkbox"/>	• Loss of key processes <input type="checkbox"/> • Structural damage <input type="checkbox"/> • Loss of key supplier or customer <input type="checkbox"/>	• Loss of site <input type="checkbox"/> • Long term loss of market share <input type="checkbox"/>
	REPUTATION	• Public concern limited to individuals <input type="checkbox"/>	• Local community concern, political enquiry or media coverage <input type="checkbox"/>	• Regional public concern, political enquiry or media coverage <input type="checkbox"/>	• National public concern, political enquiry or media coverage <input type="checkbox"/>	• International concern, political enquiry or media coverage <input type="checkbox"/>
	REGULATORY COMPLIANCE	• No requirement to report to authority <input type="checkbox"/>	• Mandatory reporting authority unlikely to take action <input type="checkbox"/>	• Informal warning <input type="checkbox"/>	• Formal warning or on the spot fine <input type="checkbox"/> • Litigation/prosecution possible <input type="checkbox"/>	• Litigation/prosecution likely <input type="checkbox"/>

FILL IN THE WHITE BOXES				
Cost of material lost				Estimated Cost \$
Oil	L	X	\$5.00/L	
Fuel	L	X	\$10.00/L	
Chip/sawdust	T	X	\$100.00/T	
Waste Water	L	X	\$10.00/L	
Treatment Chems	L	X	\$50.00/L	
All Other Chems	L	X	\$20.00/L	
Damage Repair	\$	X	\$ Estimate	
Lost Product	\$	X	\$500/tonne	
What critical process went down?				
Hrs	Down	X	\$1250	
What non-critical process went down?				
Hrs	Down	X	\$250	
Clean up costs				
Hrs	X	Men	X \$50	
Sucker truck		Hrs	X \$380	
spill kits x \$700		half kits x \$350		
Waste disposal				
Tip fees		M3	X \$100	
Special disposal		T	X \$200	
Lab sampling		ea	X \$500	
Total Cost =				
This estimation tool provides guidance when assessing potential cost of an incident.				

CALLS MADE CHECKLIST (FILL IN THE WHITE BOXES)		
AUTHORITY	CALLED	REFERENCE NO.
No call necessary	<input type="checkbox"/>	NA
Emergency Services 000	<input type="checkbox"/>	
Fire & Rescue NSW	<input type="checkbox"/>	
EPA	<input type="checkbox"/>	
NSW HEALTH	<input type="checkbox"/>	
Safework NSW	<input type="checkbox"/>	
Local Council	<input type="checkbox"/>	

#### WHAT TO TELL AUTHORITIES (KEEP TO THE FACTS)


- Your name and contact details.
- Location and site address – Address is 63 Lowes Mount Rd Oberon. Emergency Services entry is Gate 3 – Albion St Oberon.
- Time and Date of incident.
- Environment Protection Licence Number (EPL).
  - Highland Pine Site 1 EPL887
  - Highland Pine Site 2 EPL 11229
- Nature of Issue – fire, spill (contained on site or discharged off site), fire water discharge, injury relating to an environmental incident.
- Quantity of material lost – estimate.
- Other relevant information known at the time – facts only.

Signed:

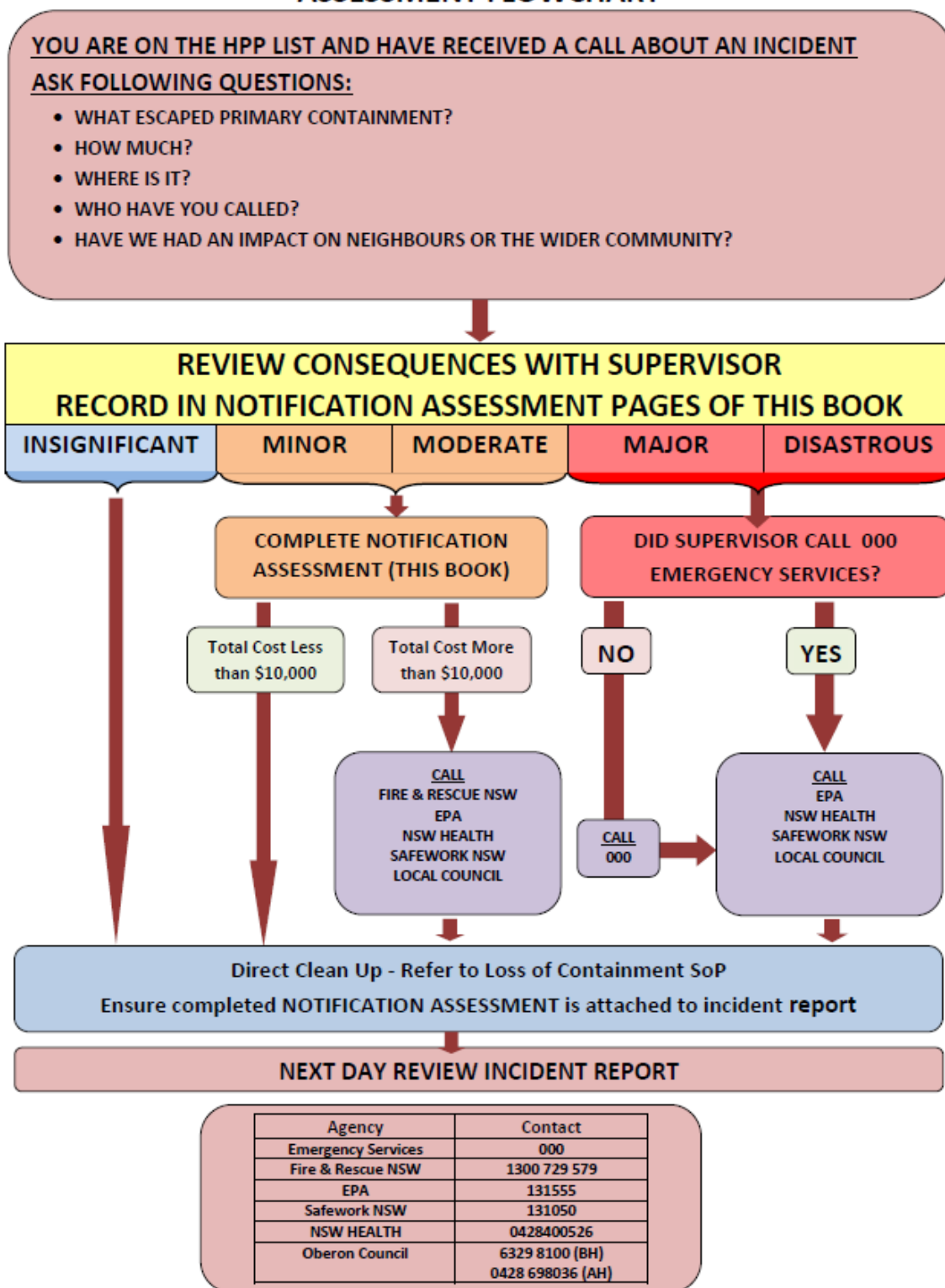
#### Appendix 2: Notification Assessment Worksheet.

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## ASSESSMENT FLOWCHART



Appendix 3: Notification Assessment Protocol.

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