

## **Victorian Desalination Project**



## **Environmental Management Plan Attachment 5 – Environmental Incident Response Plan**

Document No: ENV-000-PL-005

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## Definitions and Acronyms

The following Definitions and Acronyms are used in this document:

|                                    |                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Class One Environmental Incident   | Class One Environmental Incidents create permanent or long term damage to the environment. This damage will result in the environment taking 12 months or more to return to pre-existing conditions or costs in excess of \$50,000 to remediate (see Attachment 5-C).                                                                                                               |
| Class Two Environmental Incident   | Class Two Environmental Incidents create short to medium term damage to the environment. This damage will result in the environment taking up to 12 months to return to pre-existing conditions or costs in excess of \$10 000 but not exceeding \$50,000 to remediate (see Attachment 5-C).                                                                                        |
| Class Three Environmental Incident | Class Three Environmental Incidents typically cause short term or nuisance damage. The damage is easily rectified usually within one day. Class 3 incidents do not cause medium or long term damage or costs less than \$10 000 to remediate (see Attachment 5-C).                                                                                                                  |
| DEECA                              | Department of Energy, Environment and Climate Action                                                                                                                                                                                                                                                                                                                                |
| DWSS                               | Desalinated Water Supply System, including the Desalination Plant, Transfer Pipeline and Power Supply (until the Electricity Handover Date when the Electricity Transmission and Connection Assets are handed over to the State or its nominee such as the Electricity Operator)                                                                                                    |
| EES                                | Environment Effects Statement                                                                                                                                                                                                                                                                                                                                                       |
| EIRP                               | Environmental Incident Response Plan                                                                                                                                                                                                                                                                                                                                                |
| Emergency Response Services        | May, as appropriate, mean police, ambulance, fire brigades, state emergency services, hospitals or other specialist groups                                                                                                                                                                                                                                                          |
| EMP                                | Environmental Management Plan                                                                                                                                                                                                                                                                                                                                                       |
| EMR                                | Environmental Management Representative                                                                                                                                                                                                                                                                                                                                             |
| EMS                                | Environmental Management System                                                                                                                                                                                                                                                                                                                                                     |
| Environmental Hazard               | Means something that can cause harm to the environment or human health from pollution or waste. Some common hazard include air contaminants, chemical spill, dust, erosion and sediment, fire and explosion emissions, noise, odour, pathogens, stormwater, waste and wastewater.                                                                                                   |
| Environmental Incident             | Any event that causes, has caused, or has the potential to cause an Environmental Hazard or Pollution (from section 4, Appendix S3, PS&PR). [Please see the definition of Environmental Hazard. Please see the definitions of <i>Pollution of Atmosphere</i> , <i>Pollution of Land</i> and <i>Pollution of Waters</i> for the legislative definitions of 'Pollution' in Victoria.] |
| EPA                                | Victorian Environment Protection Authority                                                                                                                                                                                                                                                                                                                                          |
| EP Act                             | <i>Environment Protection Act 2017</i>                                                                                                                                                                                                                                                                                                                                              |
|                                    | <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cwlth)                                                                                                                                                                                                                                                                                                        |
| GED                                | <i>General Environmental Duty</i>                                                                                                                                                                                                                                                                                                                                                   |
| Material Harm                      | An environmental incident that causes, or threatens to cause: <ul style="list-style-type: none"> <li>an adverse effect on human health or the environment</li> <li>an adverse effect on an area of high conservation value or of special significance</li> <li>pollution that would cost \$10,000 or more to clean up or restore.</li> </ul>                                        |
| MSDS                               | Material Safety Data Sheets                                                                                                                                                                                                                                                                                                                                                         |
| Near Hit                           | Any unplanned event in the workplace that, although not resulting in environmental damage, had the potential to do so                                                                                                                                                                                                                                                               |
| Notifiable Incident                | A pollution incident that causes or threatens to cause material harm to human health or the environment or a prescribed notifiable incident.                                                                                                                                                                                                                                        |

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|                      |                                                                                                                                                                                                     |
|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      | A notification must be made in the manner and form approved by the Authority (S.30 <i>Environment Protection Act 2017</i> (Vic))                                                                    |
| O&M                  | Operation and Maintenance                                                                                                                                                                           |
| O&M activities       | All things and tasks which are, or may be, required to operate, maintain or repair the Desalinated Water Supply System.                                                                             |
| OHS                  | Occupational Health and Safety                                                                                                                                                                      |
| Performance Criteria | The Performance Criteria outline the overarching requirements based on the environmental objective for each Subject Area of Schedule A of Appendix S3 of the Project Scope and Project Requirements |
| PS&PR                | Project Scope and Project Requirements                                                                                                                                                              |
| SEWPAC               | Commonwealth Department of Sustainability, Environment, Water, Population and Communities                                                                                                           |
| VDP                  | Victorian Desalination Project                                                                                                                                                                      |
| WTS                  | Watersure (Suez Water and Treatment Services Pty Ltd & Ventia Utility Services Pty Ltd, trading as Watersure)                                                                                       |

## **1 Purpose**

The purpose of this Environmental Incident Response Plan (EIRP) is to provide project specific details for the identification of and response to potential environmental related incidents for Operation and Maintenance (O&M) activities of the Victorian Desalination Project (VDP).

This EIRP is a document for specific use by the Watersure (WTS) Environment Team, to respond to management of potential and actual environmental incidents. It provides guidance on potential environmental incidents, and the mitigation strategies to manage these potential incidents, as well as response to actual incidents, and follow-up and reporting requirements.

This EIRP is a key attachment (Attachment 5) to the O&M Environment Management Plan (EMP). It is also a relevant, but not limited to, the following EMP documents:

- Attachment 2 – Environmental Obligations Register
- Attachment 3 – Environmental Risk Register
- Attachment 4 – Environmental Monitoring Schedule

This EIRP should be read in conjunction with the following WTS documents:

- O&M Manuals
- Incident Management Plan
- Crisis Management Plan
- Risk Management Plan
- Critical Infrastructure Protection Plan.

## **2 Scope**

This EIRP has been developed to comply with relevant regulatory requirements for the identified environmental risks, and the environmental incident response requirements of the Project Deed, specifically clause 4 of Appendix S3 to Annexure 3. For ease of reference, the specific Project Deed requirements are clearly identified in this document.

Emergency / Environmental Incident procedures must detail the actions to be followed in the event of an Incident. An Environmental Incident is defined as any event that causes, has caused or has the potential to cause an Environmental Hazard or Pollution. Appendix S3(4) of the Project Deed states that the Emergency / Environmental Incident procedures must provide the following:

- a) an assessment of the types of Incidents and emergencies that might impact on the environment and their potential causes and consequences (refer to section 3)
- b) preventative measures required to minimise the risk of Incidents and emergencies which may be incorporated into the Environmental Management Plan (refer to section 5)
- c) names and contact details of key response authorities including Emergency Services (refer to Attachment 5-A)
- d) names of key project response personnel and contact details (including after hours telephone numbers) (refer to Attachment 5-A)
- e) project personnel responsibilities (refer to section 7)
- f) location of on-site information on hazardous materials and dangerous substances, and spill containment equipment or structures (refer to section 6)
- g) a procedure for site personnel to follow to minimise/control the emergency/incident e.g. spill management (refer to section 9)
- h) procedures for notifying the on-site staff, contractors, regulatory agencies, and public, if required (refer to section 10).

### 3 Identification of Potential Environmental Incidents and Emergencies

All O&M activities are assessed as part of the risk assessment process undertaken as a requirement of the EMP, and presented in the Environmental Risk Register, which is Attachment 3 to the EMP. The Environmental Risk Register is “live” document.

Types of potential incidents associated with O&M activities that could impact on the environment, and their consequences, are identified and included in the Environmental Risk Register (Attachment 3). An assessment of the potential significance of these risks is included in the Register, based on the ISO 31000:2018 *Risk management – Principles and guidelines*.

The Environmental Risk Register should be referred to for the identification and significance of potential environmental impacts associated with O&M activities. The Environmental Risk Register also contains details on the O&M control measures.

### 4 Regulatory, Contractual and Other Requirements

The Environmental Obligations Register (ENV-000-PL-002) identifies all Commonwealth and State environmental requirements (legislation, approvals, licences, permits and policies), and the Project Deed requirements relevant to the O&M activities.

#### Duty to Prevent Pollution

The General Environmental Duty (GED) is at the centre of the *Environment Protection Act 2017* (Vic) and it applies to all Victorians (see Section 25 of the EP Act).

To comply with the GED, you must **understand** and **minimise** the risks that your activities have in relation to human health and the environment. For example, when planning work, you must consider all of the relevant safety and environmental risks of your activities and either eliminate those risks or implement controls to lower those risks to ‘As Low As Is Reasonably Practicable’ (ALARP) in accordance with the Hierarchy of Control. EPA guidance requires that the ‘State of Knowledge’ be considered in the risk assessment and management process (i.e. what is known in business and industry of these risks and their controls).

Refer to Watersure Risk Management Plan (RSK-000-PL-001) and Risk Management Procedure (RSK-000-PR-006) for further risk management guidance and method.

#### Duty to Notify of a Reportable Incident

Section 31 of the *Environment Protection Act 2017* requires that any person involved in an activity that causes or is likely to cause harm to human health or the environment to take action to restore the affected area to the state that it was in before the incident. The restoration must be carried out to the extent practicable.

Note – there are specific legislative and guideline requirements describing what the ‘extent practicable’ might be for a given event. The Environmental specialist will provide guidance and liaise with AQS EMR And the Victorian EPA as necessary to determine the extent practicable for clean-up in response to a pollution incident. For guidance, refer to EPA Publication 1856 Reasonably Practicable.

Section 32 of the *Environment Protection Act 2017* requires that any person involved in an activity that results in a notifiable incident must notify the EPA as soon as practicable. A notifiable incident is one that causes or threatens to cause ‘material harm’ to the environment or human health. This means that:

- There is an adverse effect on human health or the environment.
- There is an adverse effect on an area of high conservation value or of special significance.
- The clean up or management of the pollution or cost of restoration would cost \$10,000 or more.

The obligation to report applies even where the incident is contained to your site.

Actual harm doesn’t need to have occurred for you to report the incident. It also applies where harm is threatened by the event.

EPA guidance provides the following examples of the types of incidents to report:

- The release is uncontrolled or unplanned and could cause material harm.
- The substances are harmful to water or land in large quantities, such as a milk and organic materials.

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- A clean up would be expensive.
- The substance is a 'substance of concern' in the *Environment Protection Regulations 2021*(Vic).
- The substances are dangerous or toxic and threaten the environment or people. An example being your safety data sheet indicates risk to the environment or to people.

The law requires that EPA must be notified as soon as practicable, even if the information will put you or your business at risk of legal action. Failure to report may result in a penalty.

Note – Following the incident response steps in this procedure is intended to ensure compliance with the Duty to Notify requirements. Where necessary, the Environmental specialist will provide guidance and liaise with WTS Management Team, AQS EMR, project stakeholders and the Victorian EPA as necessary to confirm notification requirements in response to a pollution incident.

## **5 Preventative Measures to Minimise the Risk of Environmental Incidents**

The likelihood of potentially significant environmental impacts must be reduced and/or the potential impacts mitigated by implementation of appropriate preventative measures. These preventative measures for identified potentially significant environmental issues are documented in the relevant O&M Manuals and management plans. Refer to the Environmental Risk Register for references to relevant O&M Manuals and management plans respectively.

The Environmental specialist will be responsible for providing O&M personnel with guidance on the implementation of effective measures to appropriately manage the possible occurrence of these potentially significant environmental impacts identified through the risk assessment process. Responsibilities for implementing these measures are identified in the relevant O&M Manuals and management plans.

## **6 Location of EIRP, Information on Hazardous Substances and Spill Containment Equipment**

Paper copies of this EIRP are kept in the WTS Emergency Response Packs held by the Duty Manager (Incident Coordinator) and Plant Control Room.

An inventory of hazardous substances and materials is provided and maintained and will be available at all times. Copies of this inventory and the Safety Data Sheets (SDS) are accessed as follows:

- At the main site entrance,
- At bulk chemical storage locations
- At each First Aid Station
- Attached to Permits to Work (where relevant)
- Electronically via the Chemical Management Database within Paradigm.

In the event of an emergency situation involving hazardous substances, the O&M Manuals contain emergency procedures which reference the SDS on hazardous substances or materials and inform users with vital information on providing first aid, combating fires and managing spills. O&M Manuals are accessed at the plant control room and from the Integrated Management System (IMS) documentation within Paradigm.

The Environmental specialist ensures that the current version of the O&M Manuals is available to all operation team members and issues controlled or uncontrolled copies to applicable external organisations where necessary.

A detailed map of the Desalination Plant – showing the location of the hazardous substances and materials inventory and database is provided at Attachment 5-B. Emergency management signage is deployed around the site to mark first aid facilities, emergency assembly areas and fire protection services (for further details refer to the Incident Management Plan).

Spill kits are always located near the First Aid Stations and in each active work area along the Transfer Pipeline. Spill kits are checked as part of the monthly environmental inspection (see Environmental Monitoring Schedule – Environmental performance inspection). Additional spill kits and replacement materials are kept onsite in the stores areas.

## 7 Environmental Roles and Responsibilities

Various members of the WTS O&M Team have responsibilities for minimising the potential for and in responding to environmental incidents. Table 1 outlines the key team members and levels of authority. Broader environmental management roles and responsibilities associated with O&M activities are described in the EMP.

**Table 1. Project Team Structure, Roles, Responsibilities and Authorities for Environmental Incidents.**

| Title                             | Responsibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| WTS Plant Director                | <p>Implements and ensures compliance with the requirements of the Environmental Incident Response Plan. Ensures adequate funds, resources and allocates responsibilities to effectively develop, implement and maintain the Plan.</p> <p>Manages all formal communication with external authorities and media as per the WTS Stakeholder Engagement Plan.</p> <p>Ensures that appropriate reporting to DEECA, EPA and other regulatory agencies is actioned as appropriate, in accordance with the severity and status of the incident (as defined in Attachment 5-C).</p> <p>Reviews the outcome and close out of all major incidents with the Operations Manager, Contract &amp; Compliance Manager and Environmental specialist.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| WTS Operations Manager            | <p>Ensures O&amp;M Manuals and management plans are implemented to ensure environmental risks are correctly managed in accordance with identified best practices. Reviews the outcome and close out of all major incidents with the Plant Director, Contract &amp; Compliance Manager and Environmental specialist.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| WTS Contract & Compliance Manager | <p>Ensures WTS satisfies all its contractual, legal and reporting requirements. Coordinates community related activities. Reviews the outcome and close out of all major incidents with the Plant Director, Operations Manager and Environmental specialist.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| WTS Environmental Specialist      | <p>Participate and lead development of relevant O&amp;M Manuals and management plans to ensure environmental risks are correctly managed in accordance with identified best practices.</p> <p>Ensure environmental systems are functioning correctly through training, awareness, audits and reviews. Training includes Environmental Incident classification (Attachment 5-C) and the notification requirements (Attachment 5-A).</p> <p>Advise Operations Manager to cease work immediately if observed likely damage to environment.</p> <p>Inform Operations Manager and Contract &amp; Compliance Manager of corrective actions.</p> <p>Conduct reviews of the Risk Register at least annually during the O&amp;M phase or at other times such as when new aspects or impacts are identified or new activities proposed</p> <p>The Environmental specialist will be informed in the event of a Class 1 or 2 events immediately or a Class 3 during the current shift.</p> <p>Responsible for ensuring that all measures to contain, clean up and rectify the event have been completed and where necessary informing the Contract &amp; Compliance Manager, Operations Manager Plant Director, AquaSure EMR, DEECA, EPA and other appropriate regulatory authorities within the specified timeframes (as nominated in Attachment 5-A).</p> <p>Reviews the outcome and close out of all major incidents with the Plant Director, Operations Manager and Contract &amp; Compliance Manager.</p> |

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| Title                                                | Responsibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| AquaSure Environment Management Representative (EMR) | <p>Responsible for ensuring that all Class 1, 2 and 3 environmental incidents have been appropriately responded to, and that corrective actions have been effectively implemented.</p> <p>Conduct audits and reviews of the EMS and O&amp;M EMP (including implementation).</p> <p>Responsible for ensuring that all measures to contain, clean up and rectify the event have been completed and where necessary ensuring that the Plant Director, DEECA, EPA and other appropriate regulatory authorities have been notified (as nominated in Attachment 5-A).</p> <p>Ensure that all incidents including Class 3 environmental incidents are reported (as a minimum) on a monthly basis in the Monthly Report to AquaSure and DEECA.</p>                                                       |
| WTS Health, Safety Officer                           | <p>Conduct surveillance of O&amp;M activities to confirm systems are being implemented, and stop work immediately if observed likely damage to environment. Inform Site Supervisor and Environmental specialist.</p> <p>HS Officer should notify the Environmental specialist immediately in the event of a Class 1 or 2 event, during the current shift for a Class 3 event, and ensure that all measures to contain, clean up and rectify the event have been completed.</p>                                                                                                                                                                                                                                                                                                                   |
| All WTS staff, employees and contractors             | <p>Comply with the management plans and O&amp;M Manuals, particularly environmental risk mitigation measures. Conduct regular environmental inspections in accordance with job responsibilities. If a likelihood of damage occurring to the environment as a result of O&amp;M activities, notify their supervisor, and take appropriate corrective action including following the relevant O&amp;M Manual emergency procedures, Incident Management Plan or similar corrective actions. Ensure communication external to the project regarding incidents occurs through the designated channels.</p> <p>All Staff, employees and contractors should inform the Environmental specialist immediately in the event of a Class 1 or 2 event, and during the current shift for a Class 3 event.</p> |

All staff will be made aware of the requirement to notify relevant supervisor and the Environmental specialist of potential and actual incidents. All personnel working on the site will be made aware of the internal incident notification requirements through inductions and the procedures in relevant O&M Manuals. When on site, all visitors will be under the direction of a fully inducted escort, who will be responsible for that visitor/s at all times including during an emergency event. Any personnel with incident/ complaint response or incident investigation responsibilities shall be appropriately trained.

The EIRP is principally a document for the Environmental specialist or delegate to use when responding to potential or actual incidents with environmental issues involved. However all O&M personnel affected by this EIRP have access to a copy via the WTS Management System.

## 8 Classification of Environmental Incidents

For the purposes of response and reporting arrangements, environmental Incidents are classified into three classes, as summarised in Table 2.

**Table 2. Classes of Environmental Incidents**

| Class One                                                                                                                                                                                                                                           | Class Two                                                                                                                                                                                                                                              | Class Three                                                                                                                                                                                                                                         |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Class One Environmental Incidents create permanent or long term damage to the environment. This damage will result in the environment taking 12 months or more to return to pre-existing conditions.</p> <p>Cost: &gt; \$50,000 to clean up.</p> | <p>Class Two Environmental Incidents create short to medium term damage to the environment. This damage will result in the environment taking up to 12 months to return to pre-existing conditions.</p> <p>Cost: \$10,000 to \$50,000 to clean up.</p> | <p>Class Three Environmental Incidents typically cause short term or nuisance damage. The damage is easily rectified usually within one day. Class 3 incidents do not cause medium or long term damage.</p> <p>Cost: &lt; \$10,000 to clean up.</p> |

The classifications, including sub-categories are explained in further detail in Attachment 5-C – Environmental Incident Classification Matrix.

## **9 Environmental Incident Response**

All environmental incidents will be responded to in accordance with the following documents:

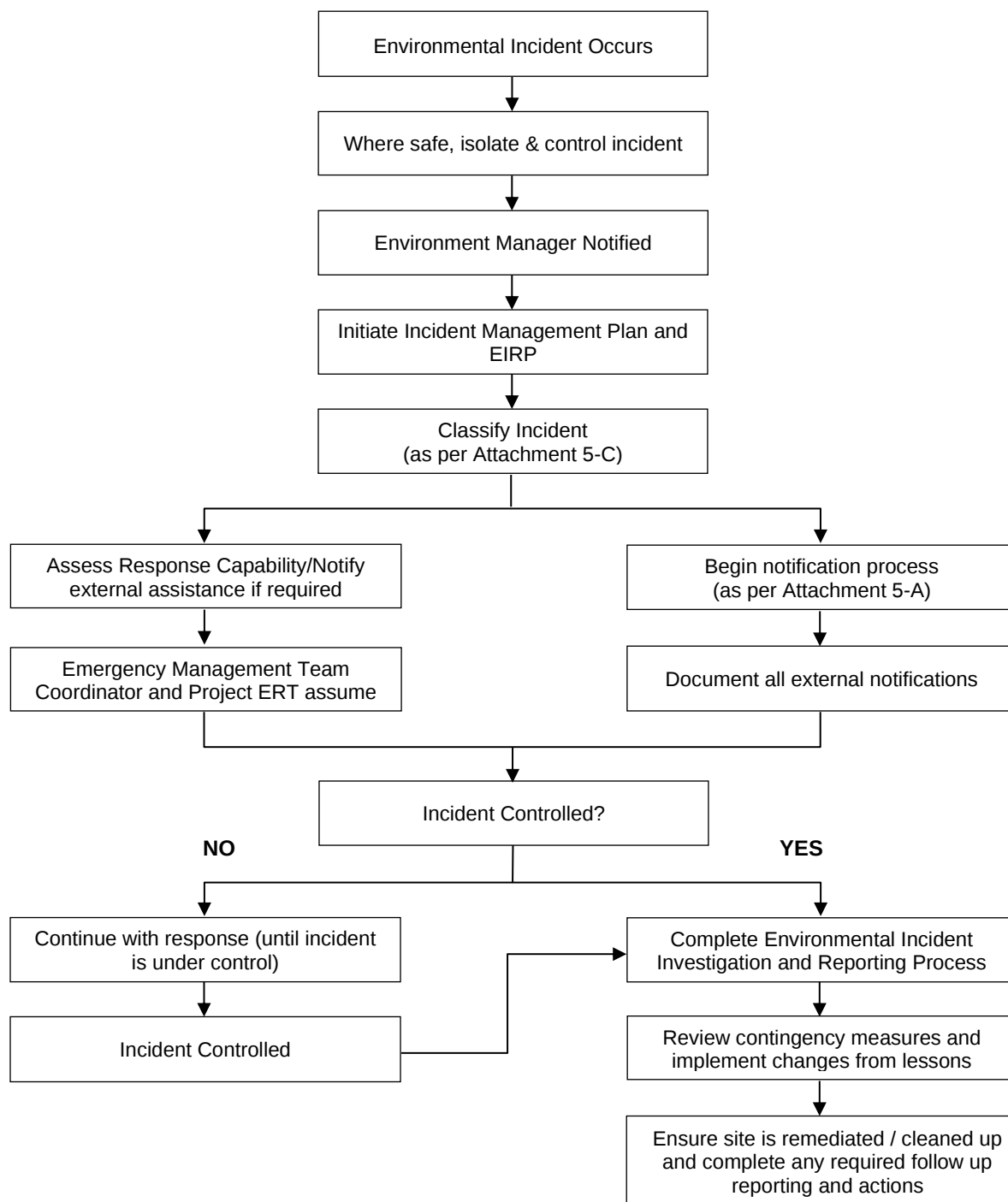
- Relevant O&M Manual emergency procedures.
- Incident Management Plan.
- EPBC Act Emergency Incident Environmental Management Strategy.

Incidents will be responded to as outlined in the environmental incident response flow chart (Figure 1). In summary:

1. STOP WORK and NOTIFY INTERNAL Supervisor and Environmental specialist.  
(Duty Manager to be notified if the Environmental specialist is not available).
2. PREVENT further environmental contamination/ spillage / pollution etc. (if safe to do so).
3. CONTAIN environmental contamination/ spill / pollution.
4. CLEAN UP environmental contamination/ spill / pollution.
5. WTS Environmental specialist to NOTIFY EXTERNAL contacts (see section 10).  
(Duty Manager to provide external notifications if the Environmental specialist is not available)

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Figure 1. Environmental Incident Response Flow Chart



## 10 Environment Incident Notification

### 10.1 Environmental Incident Notification Requirements

A master contacts list of incident / emergency response personnel will be kept in the EIRP (not distributed widely) and updated as regularly as required (Attachment 5-A). This notification protocol must be strictly complied with for all Classes of Environmental Incidents.

Notification and escalation to AquaSure and other stakeholders will follow the Environmental Incident Procedure (Attachment 5-A). The Environmental specialist (or Duty Manager if the Environmental specialist is not available) will report Class 1 and 2 environmental incidents to DEECA and EPA (as relevant) as soon as practicable within 30 minutes of the incident occurring.

Note that Part 3.4 of the *Environment Protection Act 2017* requires that pollution incidents that present risk or cause material harm to human health of the environment be notified to the EPA without delay. Refer to Section 4 for further guidance.

### 10.2 Emergency Services

Refer to the Incident Management Plan for notification requirements for all types of incidents. The Emergency Services contact details will be displayed in the plant control room and at first aid facilities (Attachment 5-A).

Additionally, site information will be produced to inform O&M personnel of which personnel are primary responders' e.g. first aiders, wardens, site safety representatives.

The Environmental specialist will coordinate the review and updating of the contact listing details and ensure the current qualifications of the listed persons at a minimum of six monthly intervals. All personnel issued with a company mobile phone shall be encouraged to keep emergency numbers in their mobile phone directories.

## 11 Environment Incident Investigation

In the event of an environmental incident, and regardless of severity, the Plant Director and Environmental specialist will ensure that all incidents are thoroughly investigated with the findings and outcomes recorded and identifying corrective action implemented. All incident investigations will be undertaken in a timely manner with investigations and reporting timeframes varying based on incident specifics. All incident investigations will be undertaken in accordance with Incident Management Plan.

A properly planned, executed and followed up incident investigation will have some or all of the following benefits:

- Reducing the probability of a repeat of the specific incident.
- Reducing the probability of related incidents.
- Reducing the probability of incidents that share some contributing factors with the specific incident.
- Identifying and initiating action on unrelated problems found as a by-product of the investigation.
- Providing the data required to detect developing trends that can be analysed to identify specific or recurring problems.

## 12 References

ISO 31000:2018 *Risk management – Principles and guidelines*

*Environment Protection Act 2017* (Vic)

*Environment Protection Regulations 2021* (Vic)

ENV-000-PL-001 Environment Management Plan

ENV-000-PL-002 Environment Obligations Register

ENV-000-PL-003 Environment Risk Register

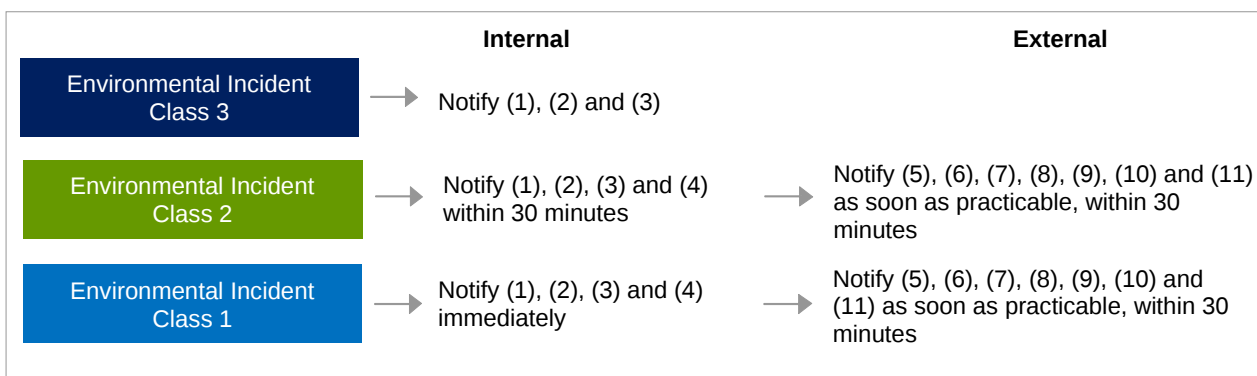
RSK-000-PL-001 Risk Management Plan

RSK-000-PR-006 Risk Management Procedure

**ATTACHMENT 5-A: ENVIRONMENTAL INCIDENT PROCEDURE**

All Environmental Incidents (e.g. spills/pollution incidents) (class 1, 2 and 3)

1. STOP WORK and NOTIFY INTERNAL Supervisor and Environmental specialist (see 6)  
(Duty Manager to be notified if the Environmental specialist is not available.)
2. PREVENT further environmental contamination/ spillage/ pollution etc. (if safe to do so)
3. CONTAIN environmental contamination/ spill/ pollution etc.
4. CLEAN UP environmental contamination/ spill/ pollution etc.
5. Environmental specialist to NOTIFY EXTERNAL contacts (see 6).  
(Duty Manager to provide external notifications if the Environmental specialist is not available.)
6. NOTIFICATION DETAILS:



1. WTS Environmental specialist

Name: [REDACTED]

Contact: [REDACTED]

2. WTS Contract &amp; Compliance Manager

Name: [REDACTED]

Contact: [REDACTED]

3. WTS Operations Manager

Name: [REDACTED]

Contact: [REDACTED]

4. WTS Plant Director

Name: [REDACTED]

Contact: [REDACTED]

5. AquaSure Environmental Management Representative (EMR)

Name: [REDACTED]

Contact: [REDACTED]

6. AquaSure Chief Executive Officer

Name: [REDACTED]

Contact: [REDACTED]

7. DEECA representatives

Name: [REDACTED]

Contact: [REDACTED]

8. EPA Representative

Name: [REDACTED]

Contact: [REDACTED]

9. Victorian EPA Pollution Watch

Hotline: 1300 372 842

10. DEECA Public Land Services

Name: [REDACTED]

Contact: [REDACTED]

11. Other relevant regulatory authorities

\*See emergency contact details (below)

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## ATTACHMENT 5-C: ENVIRONMENT INCIDENT CLASSIFICATION MATRIX

### CLASSIFICATION MATRIX

#### ENVIRONMENTAL

| Damage Incurred | Incident Type      | Environmental Incident Type                       | Classification                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------------|--------------------|---------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 |                    |                                                   | Class 1                                                                                                                                                                                                                                                                                                                                               | Class 2                                                                                                                                                                                                                                                                                                                                                                                       | Class 3                                                                                                                                                                                                                                                                                                                                                                                 |
| Yes             | Environmental Harm | Controlled & uncontrolled discharges to water     | Major and persistent discharge of pollutant to water outside site or workplace. Major long-term impact on water resources e.g. <ul style="list-style-type: none"> <li>acid drainage run-off from mining operations;</li> <li>tailings dam failure;</li> <li>extensive contamination / pollution of groundwater or water catchment areas.</li> </ul>   | Major or persistent discharge to water. Short-term impact on water resources e.g. <ul style="list-style-type: none"> <li>oil spill escapes into stormwater or watercourse;</li> <li>operations cause minor pollution of groundwater in localised area(s);</li> <li>uncontrolled discharge from sedimentation basin via emergency spillway above allowable limits.</li> </ul>                  | Minor pollutant discharge to water. No impact on water resources e.g. <ul style="list-style-type: none"> <li>discharge from sedimentation basin above allowable limits;</li> <li>uncontrolled discharge of site drainage run-off water.</li> <li>placement of material in a location where it could potentially result in pollution.</li> <li>Spill less than 1 litre of oil</li> </ul> |
|                 |                    | Contamination of land                             | Major spill or escape of hydrocarbons or chemicals. <ul style="list-style-type: none"> <li>persistent contamination of land.</li> <li>spill may or may not be contained to defined area(s) within site or workplace.</li> <li>extensive clean up required.</li> <li>spill greater than 5000 litres from operations or storage into ground.</li> </ul> | Significant spill of hydrocarbons or chemicals. <ul style="list-style-type: none"> <li>some residual contamination of land.</li> <li>spill contained to defined area(s) within site or workplace.</li> <li>significant clean up required over and above removal of contaminated material to land farm or nominated / approved waste area.</li> <li>spill greater than 1000 litres.</li> </ul> | Minor spill of hydrocarbons or chemicals. <ul style="list-style-type: none"> <li>no residual contamination of land.</li> <li>spill contained to defined area(s) within site or workplace.</li> <li>no significant clean up required other than removal of contaminated material to land farm or nominated / approved waste area.</li> <li>spill less than 1000 litres.</li> </ul>       |
|                 |                    | Controlled & uncontrolled emissions to atmosphere | Major or persistent discharge of hazardous pollutant to atmosphere outside site or workplace e.g. <ul style="list-style-type: none"> <li>explosion or leak of hazardous gas;</li> <li>possible or actual evacuation of local vicinity;</li> <li>risk to human health or the environment. (notifiable incident)</li> </ul>                             | Major or persistent release of pollutant to atmosphere outside site or workplace: <ul style="list-style-type: none"> <li>some contained risk to human health.</li> </ul>                                                                                                                                                                                                                      | Minor discharge of pollutant to atmosphere outside site or workplace e.g. <ul style="list-style-type: none"> <li>overfill of cement silo, cement dust release;</li> <li>no risk to human health.</li> </ul>                                                                                                                                                                             |

Environmental Management Plan  
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|--|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | Noise, dust, vibration & odour              | <p>Generation of dust, noise, vibration or odour causing damage to property outside site or workplace, the environment or human health e.g.</p> <ul style="list-style-type: none"> <li>noise generated causes damage to hearing and human health;</li> <li>non-contained hazardous dust generation i.e. asbestos dust with potential long term damage to human health;</li> <li>vibration causes damage to property.</li> </ul>                                                                    | <p>Generation of dust, noise, vibration or odour causing sustained periods of inconvenience or disruption to community and the environment e.g.</p> <ul style="list-style-type: none"> <li>sustained generation of dust with inadequate dust suppression, causing nuisance or local hazard.</li> </ul>                                                                           | <p>Generation of dust, noise, vibration or odour causing periodic inconvenience or disruption to community and the environment e.g.</p> <ul style="list-style-type: none"> <li>occasional breach of noise restrictions outside approved hours i.e. concrete pour takes longer than planned.</li> </ul>                                                                                                                               |
|  | Solid and other wastes                      | Unapproved storage, transport, treatment or disposal of a significant quantity (10,000 lt, 10 tonnes or 10.0 M <sup>3</sup> ) of priority or reportable priority waste (solid or other) not easily removed to an appropriate location.                                                                                                                                                                                                                                                             | Unapproved storage, transport, treatment or disposal of a significant quantity (10,000 lt, 10 tonnes or 10.0 M <sup>3</sup> ) of industrial waste or minor quantity (205 lt, 200 Kg or 0.2 M <sup>3</sup> ) of priority or reportable priority waste (solid or other), easily removed to an appropriate location.                                                                | Unapproved storage, transport, treatment or disposal of a minor quantity (205 lt, 200 Kg or 0.2 M <sup>3</sup> ) of industrial waste (solid or other), easily removed to an appropriate location.                                                                                                                                                                                                                                    |
|  | Effects on the natural environment          | <p>Major loss or impact on land or water based flora or fauna. Destruction of ecologically significant habitat. Endangering viability of species, habitat or eco-system. Damage that cannot be remediated without risk of long-term loss e.g.</p> <ul style="list-style-type: none"> <li>destruction of habitat in a national park;</li> <li>death of an animal or species that is in danger of extinction.</li> <li>disruption of protected fauna-breeding cycle for an entire season.</li> </ul> | <p>Medium impact on land or water based flora, fauna and habitat. Short-term impact on eco-system. Damage that can be remediated e.g.</p> <ul style="list-style-type: none"> <li>partial destruction of native habitat leading to impact on local species numbers or disruption to breeding cycles.</li> <li>short-term disruption of protected fauna breeding cycle.</li> </ul> | <p>Minor loss or impact on land or water based flora, fauna &amp; habitat, but no negative effect on the eco-system. Limited damage to an area of land of no ecological significance e.g.</p> <ul style="list-style-type: none"> <li>death of a native animal or species, that is not identified as abundant or a pest;</li> <li>accidental felling of a tree;</li> <li>over clearing of an area that is not native bush.</li> </ul> |
|  | Archaeological, heritage or cultural issues | Destruction or irreparable damage to highly valued structures / items / locations of cultural or heritage significance or value.                                                                                                                                                                                                                                                                                                                                                                   | Damage to structures / items of cultural / heritage significance, or significant infringement of cultural values / sacred locations.                                                                                                                                                                                                                                             | Minor repairable damage to commonplace structures, or minor infringement of cultural values.                                                                                                                                                                                                                                                                                                                                         |

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|--|-----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | Use of land, water, fuels & energy, and other natural resources | <p>Operations cause persistent unplanned disruption to the availability of resources to the community or the environment. Exhaustion or serious degradation of natural resources for future use e.g.</p> <ul style="list-style-type: none"> <li>• mining activities cause acid drainage run-off &amp; subsequent deforestation of surrounding land;</li> <li>• operations cause loss of flow in natural watercourses;</li> <li>• operations cause water table to rise increasing salinity problem i.e. unusable grazing pasture.</li> </ul> | <p>Operations cause substantial unplanned disruption to the availability of resources to the community or the environment. Significant impact on other energy / natural resource users outside site or workplace e.g.</p> <ul style="list-style-type: none"> <li>• water usage / de-watering by operations causes loss of pressure or flow to local / adjacent water bores.</li> </ul> | <p>Operations cause temporary unplanned disruption to the availability of resources to the community or the environment. Minor impact on other energy / natural resource users outside site or workplace e.g.</p> <ul style="list-style-type: none"> <li>• short-term loss of water or power supply.</li> </ul> |
|  | Public / media                                                  | <ul style="list-style-type: none"> <li>• probable public or media attention with national or international coverage;</li> <li>• significant actual or potential damage to reputation;</li> <li>• lobbying of State and/or Federal Governments for action against company.</li> </ul>                                                                                                                                                                                                                                                        | <ul style="list-style-type: none"> <li>• may attract attention from local media and/or heightened concern by local community;</li> <li>• negative attitudes towards company – calls for action by Regulatory Authorities.</li> </ul>                                                                                                                                                   | <ul style="list-style-type: none"> <li>• public concern restricted to repeated local complaints.</li> </ul>                                                                                                                                                                                                     |
|  | Total Cost (\$) – fines, remedial, lost time, legal cost        | > \$50,000                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | > \$10,000 - < \$50,000                                                                                                                                                                                                                                                                                                                                                                | < \$10,000                                                                                                                                                                                                                                                                                                      |

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## ENVIRONMENTAL CONTINUED

| Damage Incurred | Incident Type                  | Environmental Incident Type                  | Classification                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                        |
|-----------------|--------------------------------|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 |                                |                                              | Class 1                                                                                                                                                                                                                                                                                      | Class 2                                                                                                                                                                                                                                           | Class 3                                                                                                                                                                                                                                                |
|                 |                                | General environmental and social effects     | Pollution or degradation, which has or may have irreversible detrimental effects on the environment and/or community.                                                                                                                                                                        | Pollution or degradation, which has persistent (greater than three months) but reversible detrimental effects on the environment and/or community.                                                                                                | Pollution or degradation, which has short-term (less than one month) and reversible detrimental effects on the environment and/or community.                                                                                                           |
| No              | Statutory Environmental Breach | Legal                                        | <ul style="list-style-type: none"> <li>major breach of regulation identified and/or serious incident notification;</li> <li>investigation by Regulatory Authority with actual or potential prosecution and/or significant financial penalties against company and/or individuals.</li> </ul> | <ul style="list-style-type: none"> <li>possible or potential serious breach of regulation or licence conditions with on-the-spot fine and/or Regulatory Authority notification with possible prosecution.</li> </ul>                              | <ul style="list-style-type: none"> <li>minor licence non-compliance or non-conformance.</li> </ul>                                                                                                                                                     |
|                 | Procedural Breach              | See categories above for Environmental Harm. | <ul style="list-style-type: none"> <li>Procedural breach where Class 1 environmental harm (as defined above for the respective environmental incident type) could realistically occur.</li> <li>Did not involve a statutory breach.</li> </ul>                                               | <ul style="list-style-type: none"> <li>Procedural breach where Class 1 environmental harm (as defined above for the respective environmental incident type) has some chance of occurring.</li> <li>Did not involve a statutory breach.</li> </ul> | <ul style="list-style-type: none"> <li>Procedural breach where Class 1 environmental harm (as defined above for the respective environmental incident type) has almost no chance of occurring.</li> <li>Did not involve a statutory breach.</li> </ul> |
|                 | Near Hit - Environmental       | See categories above for Environmental Harm. | Potential to result in class 1 environmental harm as defined above for the respective environmental incident type, but did not involve a statutory or procedural breach.                                                                                                                     | Potential to result in class 2 environmental harm as defined above for the respective environmental incident type, but did not involve a statutory or procedural breach.                                                                          | Potential to result in class 3 environmental harm as defined above for the respective environmental incident type, but did not involve a statutory or procedural breach.                                                                               |

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## HIGH POTENTIAL INCIDENT

| General                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>A “<b>high potential incident</b>” is an event, or a series of events, that causes or has the potential to cause a significant adverse effect on the safety or health of a person or the environment.</p> <ul style="list-style-type: none"><li>• A fatality associated with the projects activities</li><li>• Multiple serious injuries,</li><li>• Permanent disabling injury</li><li>• Significant adverse reaction from authorities, media or the general public</li><li>• CSW Incidents resulting in:<ul style="list-style-type: none"><li>▪ Loss of load</li><li>▪ Fall from &gt;2m height</li><li>▪ Electrical shock</li></ul></li><li>• Potential class one plant/property damage.</li><li>• Potential permanent disability/fatality.</li><li>• Reasonable probability that incident could have been a Class 1 environmental incident</li></ul> |