



**Woolgoolga to Halfway  
Creek Project  
Pollution Incident Response  
Management Plan (PIRMP)**

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# Document change control

## Revision history

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1.1	9 July 2015	Nicola Fraser	Issued as Final

## Approval for use

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9 July 2015

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# 1 Introduction

## 1.1 Background and objectives

In accordance with the Woolgoolga to Halfway Creek Project Environment Protection Licence 20590 Condition O4 Emergency Response, the licensee must maintain, and implement a current *Pollution Incident Response Management Plan (PIRMP)* for the premises.

This document has been prepared in accordance with the NSW Environment Protection Authority Environmental Guidelines: Preparation of pollution incident response management plans.

The objectives of this plan are to:

- Ensure comprehensive and timely communication about an incident to staff, the Environment Protection Authority (EPA) and other relevant authorities (such as local councils, NSW Ministry of Health, Workcover NSW and Fire and Rescue NSW and the community) who may be affected by the impacts of a pollution incident
- Minimise and control the risk of a pollution incident on the project by requiring identification of risks and the development of planned actions to minimise and manage those risks
- Provide for the training of staff, in relation to the plan and its implementation, and ensure the plan is regularly tested for accuracy, currency and suitability.

## 1.2 Legislative requirements

The specific requirements for pollution incident response management plans are set out in Part 5.7A of the POEO Act and Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation). In summary, this provision requires the following:

- All holders of environmental protection licences must prepare a pollution incident response management plan
- The plan must include the information detailed in the POEO Act and be in the form required by the POEO(G) Regulation
- Licensees must keep the plan at the premises to which the environment protection licence relates or, in the case of trackable waste transporters and mobile plant, where the relevant activity takes place
- Licensees must test the plan in accordance with the POEO Regulation
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan.

### 1.3 Definition of 'pollution incident'

The definition of a pollution incident is:

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

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

(a) *harm to the environment is material if:*

(i) *it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or*

(ii) *it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and*

(b) *loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.*

## 1.4 Scope of this plan

This plan applies to the Woolgoolga to Halfway Creek project which is being constructed by the OHL York Joint Venture (OHLV).

The plan includes the activities that occur on the project as defined by the Environment Protection Licence that are under the direct control of OHLV and its subcontractors.

The plan does not include any activities that occur off the premises, for example transportation of bulk fuel or hazardous waste by a contractor licensed by the EPA, unless the transportation activity is being undertaken on the premises under the control of OHLV.

The plan is divided into a number of key components including:

- **Pollutant inventory:** A list of the potential pollutants stored or contained on the project. This includes fuels, chemicals and other materials both natural and artificial. For example, sediment from bulk earthworks and stockpiles is considered a pollutant and is covered under this plan.
- **Risk assessment:** The risk assessment provides a tool for the assessment of hazards on the project and the potential risks to the environment if an incident were to occur. It also provides a process for the identification of any areas where the management controls are not sufficient to address the identified risk. The risk assessment takes into account:
  - The location of the hazard and its proximity to sensitive receivers
  - The volume of the hazard (if applicable) at that location
  - The type of hazard
  - Its potential consequence on the receiving environment.
- **Implementation:** How the plan is activated and implemented for the project.
- **Mapping of pollutant risks:** Maps of significant risks and the path of this pollutant into the environment have been developed. These significant risks are identified through the risk assessment process and the mapping provided under this plan provides an easy reference to the location and the potentially impacted receivers if an incident were to occur.
- **Notification process:** The notification process for incident response if an incident were to occur for:
  - The community and sensitive receivers
  - Appropriate regulatory authorities and emergency services.
- **The principals of staff training:** What the objectives of the training program relate to and who the plan applies to at the project.
- **Testing and review process:** The testing and review process for the implementation of the plan includes the process for the testing of the plan for incident response and the processes under the plan.

## 1.5 Plan framework

The framework for the plan has been developed based on a risk assessment approach consistent with Australian Standard AS4360. To facilitate the risk assessment, a review of the existing controls for the project has been undertaken. This review included a review of existing processes under:

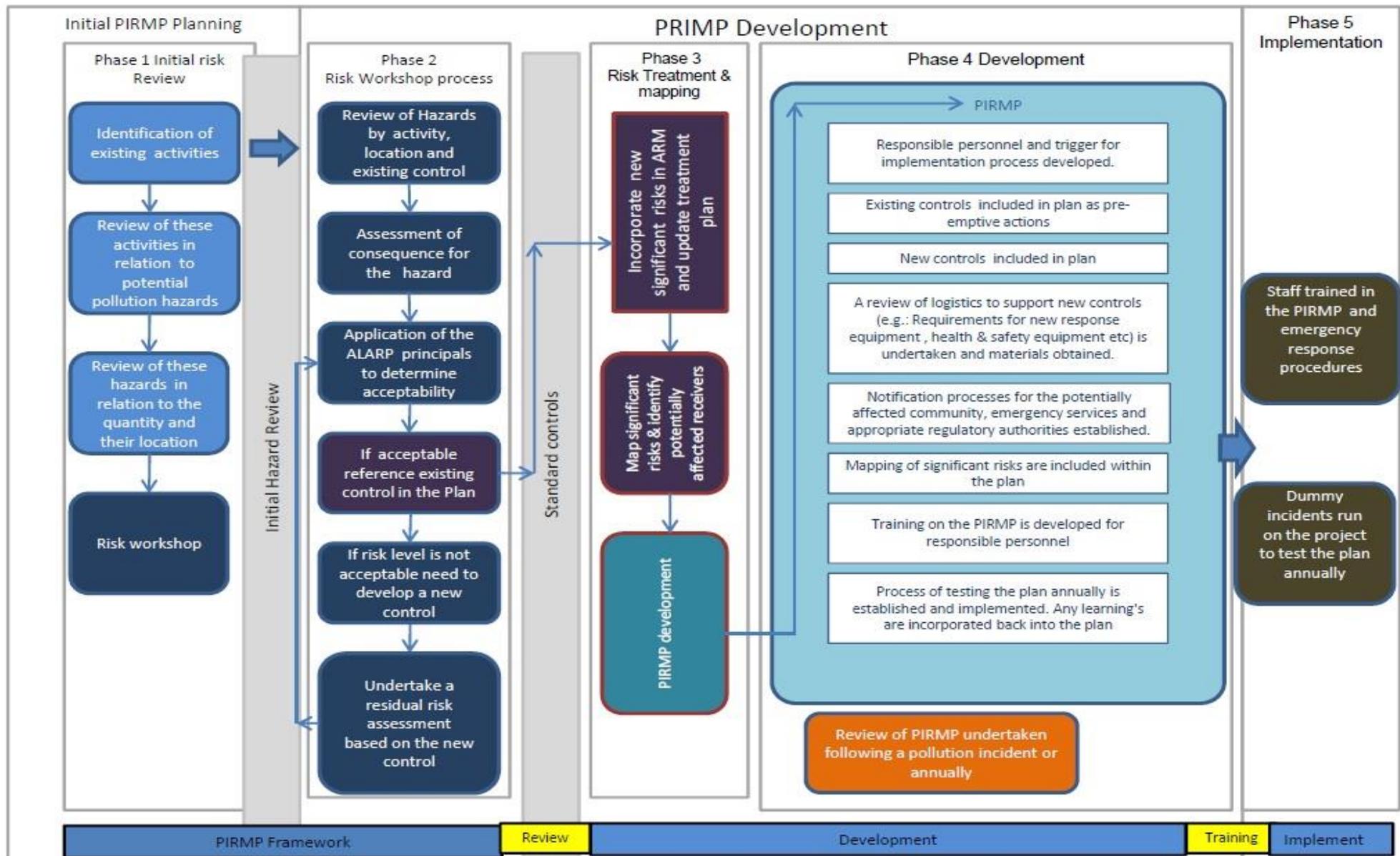
- The Construction Environmental Management Plan
- Emergency Response Plan
- Community Action Plan
- The Safety Management Plan.

The processes and procedures under these plans and the standard OHLY procedures provide a baseline on which to assess pollution hazards on the project.

The framework of the plan is consistent with the Pollution Incident Response Management Plan Guideline developed by the EPA. The process for the development and implementation of this plan is provided in Figure 1.

# PIRMP Development Process Flowchart

Figure 1



## **1.6 Relationship with other emergency plans**

This plan is not intended to duplicate existing site plans or procedures. Where an existing procedure or plan is in place to address a requirement of the PIRMP, the reference to that plan has been included within this plan.

Plans relevant to the PIRMP include:

- Construction Environmental Management Plan
- Emergency Response Plan
- Safety Management Plan
- Community Action Plan
- Project Quality Plan.

## 2 Roles and responsibilities

All personnel in the project team are responsible for protecting the environment and preventing incidents. The management team on the project are responsible for ensuring that environmental protection measures are planned for, resourced, communicated, installed, maintained and reviewed.

In responding to an incident there are key personnel who are responsible for the implementation of this plan and the provision of appropriate resources to adequately address the risks identified within this plan. The roles and responsibilities in relation to this plan are described in Table 1.

The General Superintendent is the Primary Emergency Controller. An onsite nominated Administrative Support person will be nominated by the Superintendent/Environment Manager to record events as they occur during the incident.

**Table 1 Roles and responsibilities**

<b>Role</b>	<b>Deputy</b>	<b>Key Responsibilities</b>
Project Manager	Construction Manager	Ian Chaffey
Environment Manager	Environment Co-ordinator	Nicola Fraser
Safety Manager	Safety Co-ordinator	Peter Naulty
General Superintendent	Site Foreman	Colin Lindschau
Community Manager	NA	Janice Smith

Contact details for the personnel involved in the implementation of the PIRMP are provided in Table 2:

**Table 2 Contact details**

<b>Role</b>	<b>Name</b>	<b>Telephone</b>
Project Manager	Ian Chaffey	0408 648 757
Environment Manager	Nicola Fraser	0400 675 298
Community Manager	Janice Smith	0477 883 933
General Superintendent/Primary Emergency Controller	Colin Lindschau	0408 817 723
Construction Manager	TBA	TBA

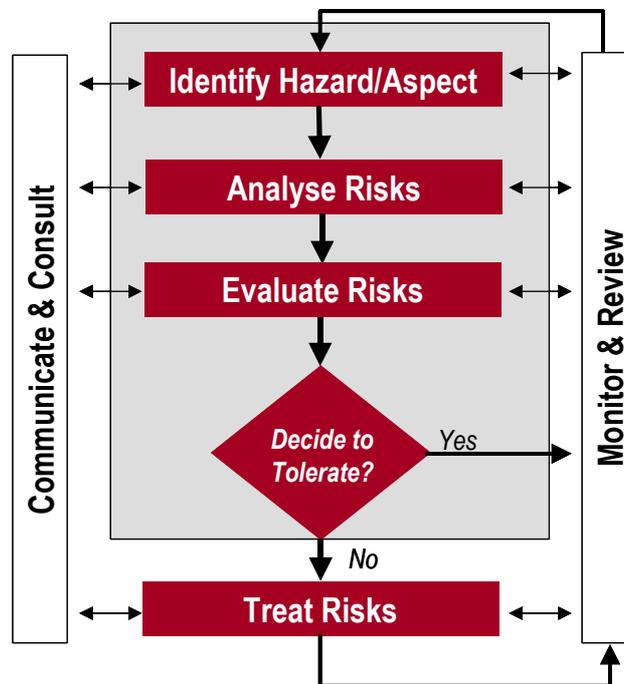
### 3 Hazard identification and risk assessment

#### 3.1 Risk assessment methodology

The methodology applied to the risk assessment was consistent with the framework, as outlined in the AS 4360 Risk Management (refer to Figure 2). The information generated for each risk and the overall risk is captured in a 'risk register', which has been included in of this report.

The risk register was pre-populated with the activities and hazards for the project at a particular location with this broken up into specific areas. This approach was utilised to effectively identify risks at specific locations on the project.

**Figure 2 - Risk Management Framework (as per AS/NZ 4360 – Risk Management)**



#### 3.2 ALARP

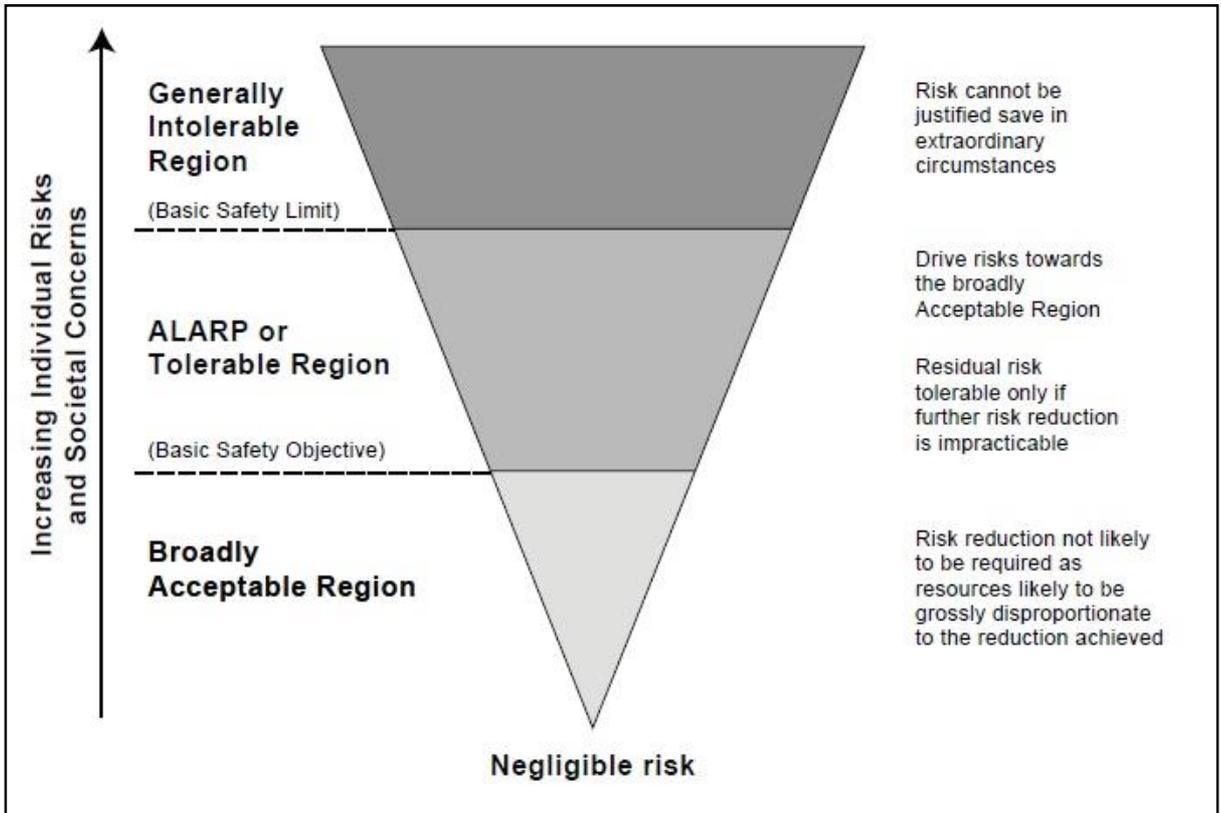
The As Low As Reasonably Practical (ALARP) principles (Figure 3) provide a means to assess a risk and determine whether that risk is acceptable and tolerable if mitigation is implemented, or is intolerable in so far as the risk cannot be supported except in exceptional circumstances. This approach has been utilised to review the risks identified in the risk register populated for the project.

The principles under the risk assessment are:

- All reasonable efforts should be made to reduce risks to the lowest level possible until the point is reached where the cost of introducing further mitigation measures is disproportionate to the environmental benefit that would be achieved

- A risk should be tolerated only if it can be demonstrated that there is a clear benefit in doing so.

Figure 3 ALARP (AS 4360: 2004 Risk Management Guidelines)



Existing controls were considered as a baseline for the risk assessment. A residual risk assessment was then undertaken of the risk where the initial result was intolerable, with further mitigation included to minimise the risk.

If this risk was assessed as tolerable following the residual risk assessment the mitigation process was incorporated into the PIRMP. For those where the risk was still intolerable the process was repeated with alternative mitigation to address the risk (and so on). The bands under the ALARP principles can broadly be defined as:

### Intolerable

Risks are considered unacceptable regardless of the benefits associated with the activity. A risk that falls into this category must be eliminated or reduced to a level so that it falls into one of the two other categories or there are exceptional reasons that require the activity or practice (e.g. emergency response to a train collision).

### Tolerable

Risks that are generally tolerable which provide benefits to the project (i.e. use of mobile plant for construction and the associated risk of a fuel spill). Tolerable risks must be properly assessed and controlled to ensure the residual risk ALARP. These risks must be reviewed periodically to ensure they remain ALARP.

### Broadly acceptable

Risks are considered sufficiently low and well-controlled. Further risk reduction is required only if reasonably and practicable measures are available. Broadly acceptable risks are those that are regarded as insignificant.

In regards to the PIRMP the actions and activities under the project may include those in the intolerable range. These are those actions that relate to emergency response. Under these risks there may be external parties involved including emergency services.

## 4 Results of the risk assessment

The risk assessment assessed the hazards on the project in regards to their consequence and likelihood. Of the risks assessed they could be divided into a number of different types, relating to safety or environment. The consequence categories for the risks in relation to environment are consistent with the RMS Incident Reporting Procedure categories:

### Category 1

- Material harm to the environment or persons as per Part 5.7 of POEO (including harm onsite)
- Unauthorised damage or destruction to any State or locally significant relic or Heritage item.
- Unauthorised harm or damage to threatened species, endangered populations, endangered ecological communities or critical habitat.
- Discharge of waters from site not in accordance with any applicable determination / approval / environmental protection licence.

### Category 2

- Spills that do not leave the site boundary and are cleared up without material harm or residual environmental impact.
- Failure to implement component of Environmental Management Plan that does not result in a category 1 incident.

The risk assessment undertaken considered the following main hazards on the project:

- Asphaltting
- Bulk fuel storage
- Chemical storage
- Concrete batching operation
- Drainage works
- Drainage works (earthworks)
- Earthworks (general)
- Finishing works
- Haul roads
- Paving operations
- Plant operation
- Refuelling of mobile plant (onsite)
- Revegetation
- Sediment basin desilting
- Sediment basin failure
- Spray sealing
- Works within a creek

### 4.1 Inventory of pollutants

The pollutants for the project were identified prior to the risk workshop and incorporated into the risk assessment. An inventory of pollutants was prepared of these chemicals. The pollutant inventory developed includes details of chemicals and fuels stored and used on the premises, the approximate volume and the location of storage.

Other potential pollutants are included outside of these including sediment.

## 5 Implementation

### 5.1 Plan activation

The PIRMP will be activated if an incident causes or threatens material environmental harm (as described in Section 147 of the Protection of the Environment Operations Act) and as defined in Section 1 (above). This activation process will include the Environment Manager and the Project Manager.

In the event that there is an incident that constitutes material environmental harm, the plan will be triggered. This will include following the notification protocol (refer to Section 5.6). Management measures will be undertaken to ensure that the area is safe and mitigation measures under this plan will be implemented.

### 5.2 Pre-emptive measures

Pre-emptive measures are prescribed within the project construction environment management plan, sub plans, associated procedures and environmental work method statements.

### 5.3 Safety equipment

The following table provides a summary of safety equipment on the project available for response to incidents:

Pollution incident	<ul style="list-style-type: none"> <li>Incident response</li> </ul>	<ul style="list-style-type: none"> <li>Spill kits located at each compound and sensitive environmental sites</li> </ul>
Minor oil spill	<ul style="list-style-type: none"> <li>Spill kit</li> </ul>	<ul style="list-style-type: none"> <li>Located on site</li> </ul>
Major oil spill	<ul style="list-style-type: none"> <li>Spill kit</li> <li>Earthmoving equipment (eg excavator, dozer, front end loader, backhoe etc)</li> <li>Oil boom</li> <li>Call fire brigade if incident cannot be contained</li> </ul>	<ul style="list-style-type: none"> <li>Located on site</li> <li>Installed downstream or/and stored by environmental foreman</li> </ul>
Acid handling	<ul style="list-style-type: none"> <li>Gloves, mask, goggles</li> <li>Spill kit</li> </ul>	<ul style="list-style-type: none"> <li>In PPE storage</li> <li>Located on site</li> </ul>
Lime handling	JSEA	<ul style="list-style-type: none"> <li>PPE in accordance with JSEA</li> </ul>
Dust	Use of water cart to suppress airborne dust	<ul style="list-style-type: none"> <li>Water cart fleet on site</li> </ul>
Asbestos	Asbestos management procedure	<ul style="list-style-type: none"> <li>Asbestos to be managed by licensed asbestos contractors and disposed to licensed landfill</li> </ul>

## 5.4 Minimise harm to persons

To minimise harm to our workforce on the project OHLY implement Environmental Work Method Statements (EWMS), Safety Health and Work Method Statements (SHWMS), Job Safety Environmental Assessments (JSEA) and pre-starts.

These tools detail how activities are to be undertaken and the processes around these activities. They include specifics about the handling and management of any hazardous substances associated with the activities undertaken.

For significant incidents relating to hazardous materials management controls are referenced under the Emergency Response Plan.

A summary of the process to minimise harm to personnel and the community are provided below. The Project Manager directs available site resources (labour, equipment, materials) to prevent or mitigate harm to persons on the premises.

This includes (but is not limited to):

- Evacuation procedures
- Clearly advertised muster points
- Activating audible and/or visible warning alarms.

Any work to prevent harm shall be undertaken in accordance with the Safety Management and Emergency Response Plan.

## 5.5 Actions to be taken during or immediately after a pollution incident

The actions immediately following an incident will depend on the pollution incident type and severity. The following steps will be followed. The principles are to contain the pollutant, notify relevant parties and organise the clean-up operation. The measures undertaken to contain and clean up the pollutant will depend on the exact scenario but will be undertaken under the instruction of the Environmental Manager and General Superintendent. Containment of the pollutant is likely to include measures such as installing bunding around the immediate area or deploying a boom if the incident related to a watercourse or waterbody. The pollutant would be cleaned up using site spill kits and additional measures depending on the scale of the incident. All contaminated material would be disposed of through specialist waste contractors.

Actions to be undertaken immediately following an incident:

- Step 1 Individual or crew who caused/discovered the incident is to assess the situation (environmental and safety risks)
- Step 2 Works are to cease in the immediate area surrounding the incident including the shutdown of all equipment
- Step 3 Individual or crew who cause/discovered the incident are to deploy spill containment materials and equipment to contain the pollutant if safe to do so. Containment will be proportional to the scale of the incident e.g bunding around the immediate area or deploying a boom if the incident related to a watercourse or waterbody

- Step 4 The relevant supervisor, Superintendent and Foreman are to be notified of the incident immediately
- Step 5 The Superintendent or Foreman is to notify the Environmental Manager, who in turn will notify Project Manager should the incident be a Category 1.
- Step 6 The Project Manager is to notify the joint venture's parent companies and the Safety Manager, pending on safety and environmental risk.
- Step 7 Environmental Manager to immediately attend the site of the incident
- Step 8 The Foreman is to implement additional containment measures if able under direction from the Environmental Manager
- Step 9 Environmental Manager to ensure that the incident is managed in accordance with the relevant sub plan(s) and procedures
- Step 10 Environmental Manager is to immediately notify the relevant authorities as detailed in Section 5.6 and the Roads and Maritime Service Environmental Officer
- Step 11 Environmental Manager is then to notify, record and manage incident in accordance with Environmental Incident Reporting Procedure
- Step 12 The Foreman is to clean up / rectify the incident as appropriate under direction from Environmental Manager
- Step 13 Any contaminated waste form the incident to be disposed of through specialist waste contractors.

## **5.6 Notification to authorities**

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

- a) Harm to the environment is material if:
  - (i) It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
  - (ii) It results in actual or potential loss or property damage of an amount or amounts in aggregate, exceeding \$10, or such another amount as is prescribed by the regulations), and
- b) Loss includes the reasonable costs and expenses that would be incurred in taking all the reasonable and practical measures to prevent, mitigate or make good harm to the environment.

**Table 3 Contact details of appropriate regulatory agencies**

<b>Organisation</b>	<b>Telephone number</b>	<b>Person responsible</b>
EPA Pollution Line	131555	Environment Manager
NSW Fire and Rescue	1300 729 579	Safety Manager
State Emergency Services	13 25 00	Safety Manager
Poisons Information	13 11 26	Safety Manager
NSW Police	000	Environment Manager/Project Manager
NSW Ambulance	000	Safety Manager
NSW Health	02 9391 9000	Safety Manager
Coffs Harbour City Council	6648 4000	Environment Manager
Clarence Valley Council	6643 0200	Environment Manager
Workcover	131050	Safety Manager / Project Manager

Where the incident is a potential Level 1, Gary Davey and Brett Nudd (0428 985 173) of EPA are to be notified by the Environment Manager.

## **5.7 Community stakeholder notification**

### **Definition of community stakeholders**

Community stakeholders relate to the area around the project and include:

- Adjacent and nearby residents and occupiers of commercial premises
- Motorists, cyclists, trucking companies and pedestrians (for instances where the incident results in a hazard to motorists)
- Occupiers of special use buildings such as hospitals, shopping centres, day care centres and schools
- Users of recreational and special use facilities such as ovals, golf courses, parks, rivers, theatres and entertainment facilities
- Users of waterways for recreational purposes (e.g. boating, swimming, fishing)
- Users of waterways for commercial purposes (e.g. fishing, oyster leases)
- Users of groundwater (where applicable) for agricultural or domestic purposes.

Key community stakeholders in close proximity to the project that may be affected by a pollution incident include:

- Adjacent property owners
- The Lorikeet Holiday Park
- Darlington Beach NRMA Holiday Park
- Corindi School
- Rainbows End Farm Resort
- Amble Inn

- Blueberry farm
- Commuters and through traffic
- Service providers
- Bus services

These sensitive receivers will be notified in the accordance with the activation process for community stakeholder notification.

## **Activation of community stakeholder notification**

The process in determining whether or not the community is to be notified depends on the type of pollutant, the volume of the pollutant and its potential to impact on the community. Community stakeholder notification is required for events which:

- Will result in an unacceptable health risk to community stakeholders immediately and at the time of the pollution incident (where community stakeholders are present (e.g. residing in their houses or using adjacent recreational facilities at the time of the incident)
- Will result in an unacceptable health risk to the community for instances where pollution of an area that is to be used by community members in the days and weeks following the incident (until such time when the pollution hazard is removed). These community stakeholders may not be present during the incident but might be present following the incident.

An unacceptable health risk is defined as one which has the potential to harm the health of a member of the community. This takes into consideration immediate health impacts (that occur during the incident) and health risks in the period following the incident till the pollution hazard is removed.

## **Community stakeholder notification process**

The process for notification of stakeholders relates directly to the nature of the hazard. In the event that there is an unacceptable risk to the community from the pollution incident the identified community will be notified.

In this event the following actions shall be taken where appropriate and safe to do so:

- Community stakeholders will be contacted by either face to face or by telephone to advise the stakeholder of the incident with recommended actions (that the community stakeholder can take to prevent or minimise harm) (for example, close windows, evacuate the building etc). Further follow up communications will be undertaken as directed by the Community Manager. This may include but not be limited to:
  - Further face to face/telephone contact
  - Letterbox drops
  - Update to project website
  - Providing protective fencing and barricading to prevent community stakeholders from entering into a polluted area

- Use of technology such as electronic message signs/motorway signage and radio communications. This is particularly relevant for projects that are operating adjacent to an existing motorway.

Further details are provided in the Community Action Plan and Emergency Response Plan.

## **5.8 Intervention by an emergency service**

In the event that the incident is unable to be contained or managed in a safe manner using the available resources on site and intervention by an emergency service is required (e.g. fire and rescue services), the relevant emergency service will direct and control the response to the incident, including any planned evacuation or rescue of any community stakeholders.

The project sensitive area plans (SAPs) illustrate the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises, the location of drains on the premises and the discharge locations of the stormwater drains to the nearest water course. The maps have been developed for sensitive parts of the alignment and for the compound sites.

## 6 Documentation

### 6.1 Mapping

Mapping of sensitive areas has been undertaken for the project which display key environmental constraints, sensitive receivers, etc

### 6.2 Public display of information

This plan will be kept on file on site and will be made available for all site persons involved in the implementation. The plan must be readily available to an EPA officer on request.

Relevant sections of this plan will be placed on the OHLY website in the section relevant to the project. This includes the following information:

- Procedures for contacting the relevant authorities including the EPA, local council, NSW Ministry of Health, Workcover NSW and Fire and Rescue NSW
- Procedures for communicating with the community
- The information may be exclusive of any personal information within the meaning of the *Privacy and Personal Information Protection Act 1998*.

### 6.3 Information collected

Information to be collected during the incident and immediately after will consist of (but not be limited to):

- Interviews of persons involved with the incident (both directly and indirectly)
- Safety Data Sheets (SDS) of any fuels, chemicals, etc involved in the incident
- Log of events (to be recorded by the Support Administrator)
- Sample collection (sediment, dust, water, etc)
- Photos.

## 7 Continual improvement

### 7.1 Testing and review of the PIRMP

The PIRMP shall be tested and reviewed at least once every 12 months. The testing will be carried out in such a manner as to ensure the information included in the plan is accurate and up to date and that each plan is capable of being implemented in a workable and effective manner. The testing will be undertaken:

- On an annual basis as part of a mock exercise
- Within one month following an incident that results in activation of the PIRMP (may be desktop based review). This is to ensure lessons are captured and any improvements implemented to ensure the plan is being implemented in an effective manner.

The mock exercise will involve personnel responsible for the implementation of the PIRMP. This will include (but not be limited to) the following persons:

- Project Manager
- General Superintendent
- Environment Manager
- Construction Manager

The testing of the plan may be undertaken as a joint exercise as part of the Emergency Response Plan.

### 7.2 Training and awareness

To ensure that the PIRMP is implemented effectively in the event of an incident, training will be provided to personnel involved in the implementation of the PIRMP.

The training will include:

- The notification protocol
- Incident response equipment and its location
- Procedures for emergency response.

The principles around the training for the PIRMP are:

- **Prevention/mitigation activities:** Provide training to assist in eliminating or reducing the impact of hazards themselves
- **Preparedness activities** which establish arrangements and plans to deal effectively with incidents on the project
- **Response activities** which activate arrangements and plans to deal with incidents and emergencies if and when they do occur.

A register of personnel trained under the PIRMP will be kept for the project and updated regularly (at least annually) following the testing of the plan. Staff responsible under the PIRMP will be trained on an annual basis (as a minimum).

## Appendix 1 Risk Matrix (Consequence & Likelihood criteria)

### Likelihood Criteria

Probability Table	
Probability band	Description
Almost Certain (5)	The threat can be expected to occur 75% - 99%
Likely (4)	The threat will quite commonly occur 50% - 75%
Possible (3)	The threat may occur occasionally 25% - 50%
Unlikely (2)	The threat could infrequently occur 10% - 25%
Rare (1)	The threat may occur in exceptional circumstances 0% - 10%

### Consequence Criteria

Impact Table		
Impact band	Health & Safety	Environment
Substantial (5)	Class 1 (Fatal Incident)	Significant impact unable to be addressed by site resources. Significant cleanup required. Involvement of emergency services required.
Major (4)	Class 1 (Permanent Injury)	Localised harm, residual effects cleanup required, (can be addressed by site resources).
Moderate (3)	Class 2 (Lost Injury Time)	Moderate impact. Potential for short term environmental impact (some clean up required)
Minor (2)	Class 3 (Minor injury, medical treatment required)	Minor impact short term (<1 day) (no residual effects)
Negligible (1)	Class 3 (Slight injury, First Aid)	Very minor localised short term (<1hr) impact (no residual effects)

### Risk Matrix

Risk Assessment Matrix		Impact				
		Negligible	Minor	Moderate	Major	Substantial
Probability	Almost Certain	Low (5)	Moderate (10)	Very High (18)	Extreme (23)	Extreme (25)
	Likely	Low (4)	Moderate (9)	Very High (17)	Very High (20)	Extreme (24)
	Possible	Low (3)	Moderate (8)	High (13)	Very High (19)	Very High (22)
	Unlikely	Low (2)	Low (7)	High (12)	High (15)	Very High (21)
	Rare	Low (1)	Low (6)	Moderate (11)	High (14)	High (16)