

More Trains More Services Stage 2 Works - Waterfall Station and Stabling Yard

Pollution Incident Response Management Plan

Document revision and history

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Signature sign off					
-01	16/03/2022	Updated following testing of PIRMP	A Cooper	J Ambler	J Ambler
Signature sign off					

Distribution

The master-controlled plan will be held within Transport for Tomorrow's document management system, where it can be accessed by personnel as necessary.

Issue, revision and re-issue

This plan has been prepared in accordance with the relevant requirements. The initial issue of this plan has been reviewed by the relevant discipline leader and endorsed for use on the Transport for Tomorrow Waterfall site.

Revisions of this plan may be required throughout the duration of the contract to reflect changing circumstances or identified opportunities for improvement

Revisions may result from:

- Management review
- Changes to the standard system
- Internal or external audit
- TfNSW feedback or non-conformance reports
- Legislative changes
- Improvement initiatives and process changes within Transport for Tomorrow
- Lessons learned.

Initial updates to this plan will be issued alphabetically for review. Once approved by TfNSW, subsequent updates will be numbered consecutively and transmitted to holders of controlled copies.

Updates to this plan and any other sub-plans will be provided to TfNSW for comment, review and approval within five days of amendment. Amendments will be clearly illustrated in the document.

Terms and definitions

The following terms, abbreviations and definitions are used in this plan:

Terms and definitions

Term	Definition
Asite	Document Control System
CLM Act	Contaminated Land Management Act 1997
ECM	Environmental Control Map
EPA	Environment Protection Authority
EPL	Environmental Protection License
ERC	Emergency Response Coordinator
ErSed	Erosion and Sediment (controls)
ESCP	Erosion and Sediment Control Plans
LORAC	Laing O'Rourke Australia Construction
OEH	Office of Environment and Heritage
PIRMP	Pollution Incident Response Management Plan
POELA	Protection of the Environment Legislation Amendment Act
POEO Act	Protection of the Environment Operations Act 1997
POEO Regs	Protection of the Environment Operations (General) Regulation 2009
TfNSW	Transport for New South Wales
TfT	Transport for Tomorrow
IDE	Incentivised Delivery Entity

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1. Purpose

This document aims to provide procedures for responding to pollution incidents that may occur on the project site. It seeks to raise awareness of pollution incidents and provide clear instruction on how to best respond to them.

2. Scope

This Pollution Incident Response Management Plan was developed for the Transport for Tomorrow Project, Waterfall Stabling Yard and Platform Extension works in accordance with the

- (i) Protection of the Environment Legislation Amendment Act (POELA) 2011
- (ii) Protection of the Environment Operations Act (POEO) 1997.

It is constructed to meet all requirements listed under the POELA Act and the POEO Act. It pertains to all those activities, products and services on the project sites over which it has control or influence.

On site, there are multiple hazards with the potential to cause a pollution incident. Briefly these are:

- (a) Spills / leaks from plant i.e. fuels and oils;
- (b) Hazardous chemicals
- (c) Land contamination;
- (d) Poor Waste Management;
- (e) Dust generation;
- (f) Effluent leaks;
- (g) Water contamination by dewatering or stormwater runoff.

This document details the action steps that should be taken in the event of an environmental incident.

3. Distribution Policy

The controlled copy will be retained in Asite, the TfT project document management system, where it can be accessed by personnel as necessary.

All paper copies of this PIRMP will be considered as 'uncontrolled' unless they have been allocated a 'copy number' in a colour other than black. The Project Leader and Project Environment and Sustainability Leader will keep an 'uncontrolled' copy of the PIRMP. A Paper copy will also be kept in project site offices.

4. Definitions

4.1 Material Harm

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).

4.2 Pollution incident

Pollution incident means an incident or set of circumstances during or as a 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.

5. Notification

5.1 Duty to report a pollution incident

Under the POEO Act a duty to immediately report an incident applies where a pollution incident occurs in the course of the project so that material harm to the environment is caused or threatened. It does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

Leaks, spills, water discharges and other pollution incidents can harm the environment. The relevant regulatory authorities need to be informed of pollution incidents immediately, so that action can be coordinated to prevent or limit harm to the environment. Regulatory authorities and notification responsibilities are given below.

5.2 Responsibility

Under the POEO Act, the following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- (i) the person carrying out the activity;
- (ii) an employee or agent carrying out the activity;
- (iii) an employer carrying out the activity; and
- (iv) The occupier of the premises where the incident occurs.

5.3 Who to notify of material harm

Any pollution incident that occurs on the Transport for Tomorrow Project that causes or has the potential to cause material harm must be immediately reported to the Project Leader, the Project Environmental Manager and the Emergency Response Coordinator once the person becomes aware of the incident. The Emergency Response Coordinator and the Environmental Manager will then be the point of contact for notifying all relevant regulatory authorities.

If a pollution incident occurs and, the Emergency Response Coordinator, Project Leader and the Project Environmental Manager are all non-contactable then, it is the responsibility of the person carrying out the activity to notify all relevant regulatory authorities.

An incident does not require notification if the regulatory authority has already been notified by another party.

Notification to the client TfNSW Environmental Manager and Environmental Management Representative must also be made immediately by the Project Environmental Manager.

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6. Regulatory Authorities and project personnel to be notified

Below is a list of the relevant regulatory authorities and project personnel to be notified of any pollution incident for the Transport for Tomorrow Project.

Contact	Phone Number
EPA Pollution Hotline	131 555
NSW Ministry of Health	02 9391 9000
WorkCover	13 10 50
Fire and Rescue NSW	Emergency - 000
Program Environment and Sustainability Manager – Jason Ambler	0415 737 750
TfNSW Construction Response Line	1800 775 465
Project Leader – Jamie Jack	0477 355 531
TfNSW Senior Manager Environment & Sustainability– Philippa Hendy	0498 886 616
Site Environmental Manager – Alex Cooper	0421 782 632
Construction Manager - Chris Smith	0437 164 077
Construction Manager - Noel McCarthy	0428 935 784

7. Notification and Services

7.1 Regulatory Authority

Pollution incidents posing material harm to the environment must be notified to the Environmental Protection Authority.

If in doubt as to who to notify, ring EPA's Pollution Line on 131 555.

The relevant information about a pollution incident required to be reported consists of the following:

- (i) the time, date, nature, duration and location of the incident.
- (ii) the location of the place where pollution is occurring or is likely to occur.
- (iii) the nature, quantity or volume and the concentration of any pollutants involved.
- (iv) the circumstances in which the incident occurred (including the cause of the incident, if known).
- (v) the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution.

If the information required by items (iii) to (v) becomes known after the initial notification is made, that information must be provided to the authorities immediately after it becomes known.

A person/project must notify even though the notification might incriminate the person/project. However, the notification is not admissible in evidence against the person/project for an offence.

7.2 Emergency Services

If a pollution incident occurs, all necessary action should be taken to minimise the size and any adverse effects of the release. If adequate resources are not available to contain the release and if it threatens public health, property or the environment, the NSW Fire Brigades should be contacted for emergency assistance - phone 000.

In addition, if advice is needed on cleaning-up the incident or on the disposal of any resulting waste materials, EPA staff can be contacted 24-hours/day via Pollution Line on 131 555. If the NSW Fire Brigade are called, they may notify the EPA if they consider the environment or public health to be threatened. Notification by the NSW Fire Brigade does not negate the need for person carrying on the activity or the occupier of the premises to notify the EPA.

7.3 Contaminated Land

Any project activities that have contaminated land or owners of land who become aware that the land has been contaminated must notify the EPA as soon as practicable after becoming aware of the contamination, if the contamination meets certain criteria. The duty to notify is a requirement under section 60 of the Contaminated Land Management Act 1997 (CLM Act).

For on-site contamination this relates to.

The concentration of a contaminant in an individual soil sample is equal to or more than 250% of the Health Investigation Level and/or Health Screening Level for that contaminant for the current or approved use of the respective on-site land, as specified in Section 6, Schedule B1 of the National Environment Protection (Assessment of Site Contamination) Measure 1999 (NEPC 2013)

AND

A person has been or foreseeably will be exposed to the contaminant or a by-product of the contaminant.

For off-site contamination this relates to.

The concentration of a contaminant in an individual soil sample is equal to or more than 250% of the Health Investigation Level and/or Health Screening Level for that contaminant for the current or approved use of the respective on-site land, as specified in Section 6, Schedule B1 of the National Environment Protection (Assessment of Site Contamination) Measure 1999 (NEPC 2013)

AND

The concentration of the contaminant in or on the soil on the neighbouring land will foreseeably continue to remain above the specified concentration.

8. Notification Procedure

Below is a step-by-step procedure for notifying pollution incidents on the Transport for Tomorrow Project:

Assess the situation and if safe to do so, immediately rectify the pollution source and control the migration of any pollution. Ensure access routes for spills to any surrounding drains or waterways are blocked. See project ERAPs for site specific controls.

Immediately notify the Tft Project Leader, Program Environment and Sustainability Manager, Site Environmental Manager, and the Construction Managers of the pollution incident, giving details such as location, volumes of pollutants and circumstances of the incident. If the incident is not able to be contained by means of the Project, notify the emergency services to aid in control of the incident.

If deemed to be required, the Program Environment and Sustainability Manager or elected representative will immediately notify the EPA giving the details as listed in this Section 6.

Notify the TfNSW Senior Environmental Manager and provide the details of the incident.

If information regarding the incident becomes known after the initial notification is made, that information will be provided to the authorities immediately after it becomes known by the Program Environment and Sustainability Manager or elected representative.

Any follow up reports required as per the Project licences and conditions will be submitted to TfNSW, Tft and the EPA by the Program Environment and Sustainability Manager within the given timeframes. This reporting is likely to detail, after investigation into the incident.

- (a) the cause of the incident,
- (b) any environmental harm or potential harm caused,
- (c) actions that have been undertaken to rectify, reduce or remediate the pollution incident,
- (d) responsibilities for the incident, and
- (e) actions to be implemented to avoid repeat occurrences of a similar incident.

Note: other environmental incidents i.e., chemical release and spills response are also contained within the Construction Health and Safety Plan and Emergency Response Management Plan.

9. Community and Stakeholder Notification

If in the event of a pollution incident community and stakeholder notification is required, this will be completed prior to works commencing.

Community liaison and notification procedures are detailed in the Tft Community Liaison Management Plans, which outlines measures including:

- (i) Individual briefings of affected residents.
- (ii) Notifications, signage, newsletters with maps explaining purpose of works and impacts to be distributed to stakeholders and community
- (iii) Letter box drops of newsletter to provide three month look-ahead to properties within 500 metres of construction site
- (iv) Fact sheets as required
- (v) Newspaper advertising to advise of works, contacts and road closures
- (vi) Mobile community information centre
- (vii) Briefings to strata managers, council officers, relevant government agencies and local groups
- (viii) 24-hour community information line

Community email address: projects@transport.nsw.gov.au

Mechanisms for early warnings and ongoing regular updates to the community may include:

- (i) Letter box drops of newsletter
- (ii) Doorknock of residents, businesses and others (e.g. schools) potentially impacted by the incident
- (iii) Publication of information on the Project website: www.transport.nsw.gov.au/projects/more-trains-more-services
- (iv) Installation of temporary directional signage

In the event of a pollution incident which has the potential to impact the local community, the Tft Community Place Manager will contact the Tft Site Environmental Manager who will liaise with the appropriate people within TfNSW to determine if community notification is required and the mechanisms by which the notification shall be made.

Notification to any residents, businesses or other premises that may be affected by the pollution incident shall include the following information:

Details of incident and extent of impact (as known at the time)

Safety warnings and recommendations to prevent / minimise impacts, if required

Potential impacts on the operation of local businesses, if required.

The area of the local community which may be affected by a pollution incident is dependent on a number of issues including weather and quantity of pollution. The Tft Community Place Manager, in consultation with the Site Environmental Manager and other personnel as required, shall determine the geographical extent of the public notification and details to be provided in the notification.

10. Hazards

LORAC have completed risk assessment of the site and identified hazards

- (i) Hazards with the potential to cause a pollution incident include:
- (ii) Spills / leaks from plant i.e. fuels and oils;
- (iii) Hazardous chemicals
- (iv) Land contamination/Poor Waste Management;
- (v) Dust generation;
- (vi) Effluent leaks;
- (vii) Water contamination by dewatering or stormwater runoff.

For a details of the likelihood of above hazards occurring, please refer to the risk assessment contained in Appendix D.

11. Potential Scenarios

There are a number of potential scenarios under which the hazards identified in Section 11 may cause material harm. The potential scenarios listed below do not form a fully comprehensive list but are typical scenarios that must be planned for. Each incident should be considered in its own right as to whether it constitutes material harm.

11.1 Spills / leaks from plant i.e. fuels and oils

Plant failure leading to an uncontrolled release of fuel or oil into stormwater systems.

11.2 Hazardous chemicals

Spill of hazardous chemicals during use. Those chemicals flowing off-site, into stormwater systems or remaining on-site and causing material harm.

Hazardous chemical containers being affected by flood waters leading to an uncontrolled release of pollutants.

11.3 Land contamination/Poor Waste Management

Incorrect disposal of contaminated material leading to the spread of contaminated material.

Incorrect re-use of contaminated material.

11.4 Dust generation

Strong winds during construction activity leading to a dust event that may impact nearby residents and businesses.

11.5 Effluent leaks

Spill of effluent during effluent tank pump out.

Overflows from effluent tanks entering local waterways.

Effluent tanks affected by flood waters leading to an uncontrolled release of effluent.

11.6 Water contamination by dewatering or stormwater runoff

Dewatering of contaminated water in excavations, pits or other into stormwater systems.

Major failure of erosion and sediment controls leading to the release of inappropriately treated stormwater entering stormwater systems.

12. Pre-emptive actions to be taken

Pre-emptive actions taken to minimise the likely hood of hazards occurring include:

- (i) Project induction,
- (ii) Mission Zero Next Gear Induction and Asbestos Awareness,
- (iii) Contaminated Soil Management Plan,
- (iv) Spill containment kits on site and trained personal,
- (v) Water carts on site,
- (vi) Water testing, pumping procedure and permit,
- (vii) Erosion and sediment controls and plans,
- (viii) Environmental Control Maps,

- (ix) Training and competency tracking,
- (x) Plant maintenance checks,
- (xi) Storage of chemicals in accordance with requirements.

13. Environmental Mapping Systems

Environmental Control Maps (ECMs) and Erosion and Sediment Control Plans (ESCPs) detail controls implemented on site to prevent environmental pollution incidences, including incidents that may migrate from the site. Environmental control maps will identify hazardous zones, illustrate environmental controls, and detail proposed construction activities. All locations of drainage inlets are recorded in the ESCPs. Erosion and Sediment Control Plans are updated regularly for the construction stage.

14. Safety Equipment

The location of spill kits and environmental controls is detailed on the project Environmental Control Maps and Erosion and Sediment Control Plans.

Safety equipment, controls and personnel protective equipment required for the works are detailed in Safe Work Method Statements (SWMS).

A Safety Data Sheet (SDS) folder is kept within the chemical storage container.

A Dangerous Goods and Hazardous Substances Register is kept on site and outlines maximum quantities of potential pollutants kept on site.

Specific controls required to work within areas contaminated with asbestos are detailed in the Contaminated Land Management Plan (CLMP) which forms part of Transport for Tomorrow's Construction Environmental Management Plan and work area specific asbestos removal plans.

Segregated chemical storage containers and segregated waste storage are mapped in the ECMs.

Testing equipment for water testing are located in the Main Site Compound. Chemicals for water treatment are located in the chemical storage container.

Copies of all plans are readily available on site and supplied to all work crews.

15. Prepare, Test and Maintain

After preparation of this PIRMP, it is to be tested via a mock pollution incident to ensure personnel are aware of the processes and responsibilities on site. All testing of this plan and any supplementary amendments that are made are to be documented and stored with the Project files and may be requested by the EPA at any time.

A PIRMP Test Tracking spreadsheet template can be seen in Appendix A.

The PIRMP will be reviewed and maintained to ensure information in the plan is accurate and up to date. The review process will occur every 12 months and within one month of any pollution incident occurring. This will ensure any issues within the plan are identified and revised.

16. Staff Training

All managers, supervisors and staff will be trained progressively throughout the project development. Toolbox talks will be presented to educate workers of preventative actions, controls, PIRMP updates, site issues and environmental pollution incidents involved in the site. Training records are kept as per project training register. The induction will include the PIRMP procedures.

Appendix A – PIRMP Test Tracking Spreadsheet

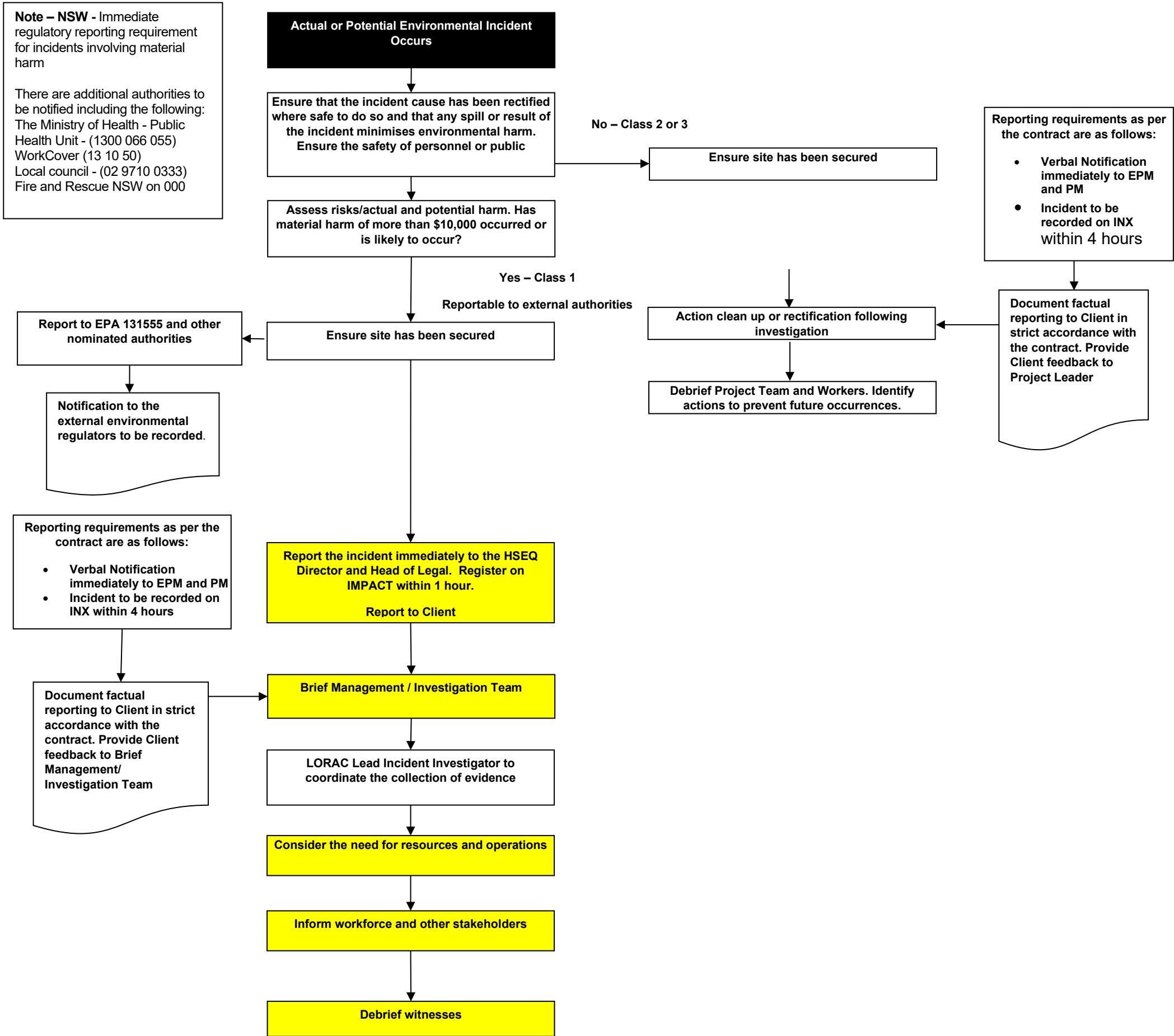
PIRMP Test Date	Personnel Involved	Position on Project	Responsibility	Amendments Required
16-03-2022	Alexander Cooper Noel McCarthy Chris Ambrose	Environment Manager Construction Manager Site Supervisor	Waterfall and Mortdale Sites Waterfall Waterfall	PIRMP amended to take account of a change in project staff.

The testing of the plan will be undertaken:

- (a) routinely at least once every 12 months, and
- (b) within 1 month of any pollution incident occurring in the course of an activity to which the environment protection licence relates so as to assess, in the light of that incident, whether the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.

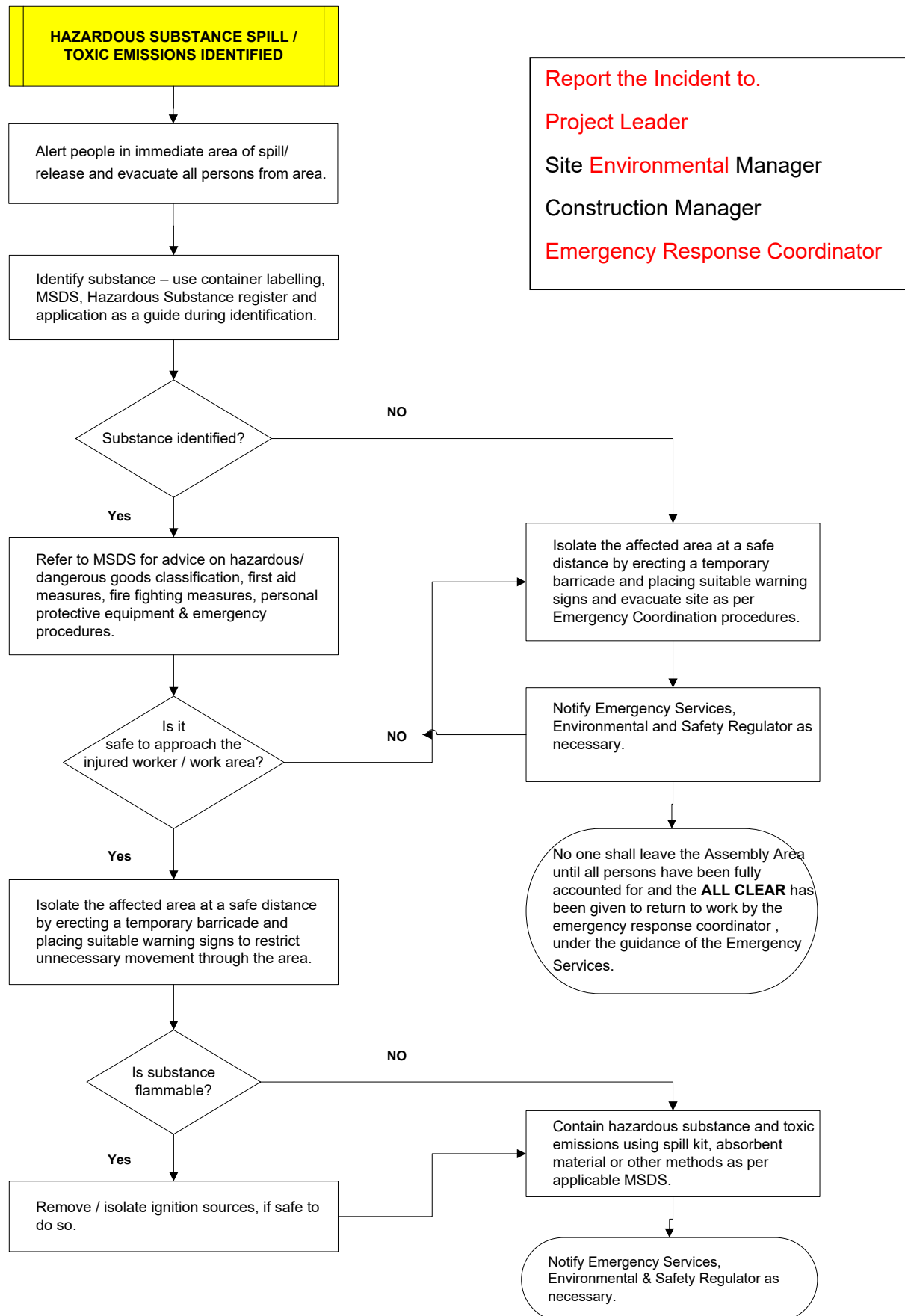
Appendix B – Emergency Reporting Flow Chart

REPORT ALL INCIDENTS IMMEDIATELY TO THE PROJECT LEADER



Appendix C – Emergency Response Plan

(Chemical Release or Explosion, spill or leak)



Appendix E – PIRMP Risk Assessment

Typical pollution incident that may occur on Transport for Tomorrow Works have been assessed in accordance with the table below:

Risk Assessment Rankings: E = Extreme H = High M = Medium L = Low

The risks must be reassessed following the consideration of control measures.

Mitigation measures are not compulsory if a subsequent risk assessment is carried out for particular circumstances and controls are agreed to by the appropriate personnel including the Construction Manager (or delegate) and Environmental Representative.

Issues or activities that represent an Extreme risk after the application of control measures are not to be undertaken.

Aspect	Potential Environmental Impact	Initial Risk Rating			Control Measures	Residual Risk Rating		
		P X	C =	Risk		P X	C =	Risk
Spills / leaks from plant i.e. fuels and oils;	Significant plant failure – spill entering stormwater/waterways and impacting downstream	P	2	E	Refuel in laydown area only with drip tray and spill kit Appropriate number of spill kits on site Spill kit training All plant/vehicle maintenance to be carried out off-site Vehicles and plant to undergo maintenance as per manufacturer’s requirements. Prestart check to be undertaken.	U	3	M

					Protection of stormwater pits where possible			
Hazardous chemicals	Hazardous chemical spill leaving site and/or entering stormwater/waterways and impacting downstream	P	2	E	<p>Appropriate storage of hazardous chemicals</p> <p>Storage container located outside of 100 year ARI flood zone</p> <p>Appropriate number of spill kits on site</p> <p>Spill kit training</p> <p>SDS register to be maintained within the site office and chemical storage container</p> <p>Minimise volumes of hazardous chemicals kept on site</p> <p>Choose less hazardous substitutes where possible.</p> <p>Protection of stormwater pits where possible</p>	U	3	M
Land contamination/Poor Waste Management;	Spreading of contaminated material to new areas	L	2	E	<p>Distribute mapping of contaminated areas</p> <p>Demarcated contaminated areas/stockpiles where possible</p> <p>Maintain a waste register</p> <p>Ensure waste subcontractors have appropriate permits for hazardous waste</p> <p>An Occupational Hygienist and asbestos removalist must be present when working with or disposing of asbestos</p>	U	2	M

					<p>Manage soil in accordance with the Contaminated Land Management Plan and CEMP</p> <p>Induction and Toolboxes to cover signs of contamination, asbestos contamination in soil and signs of Acid Sulphate Soils where applicable</p>			
Dust generation;.	<p>Significant dust event during high winds resulting in dust deposition to nearby residents and/or businesses. Impacts to local traffic.</p>	P	4	M	<p>Minimise stripping of surface/vegetation until works need to occur in an area</p> <p>Use of water carts/dust suppressants</p> <p>Restrict plant and vehicle movement during dry and windy weather</p> <p>Utilise shade cloth on barrier fencing</p>	R	4	L
Effluent leaks;	<p>Spilled effluent leaving site and/or entering stormwater/waterways and impacting downstream</p>	L	3	H	<p>Fit abluion blocks with cut-off valves and high level alarms</p> <p>Ensure an effluent spill kit is maintained at all abluion blocks</p> <p>Locate abluion blocks outside of flood zones</p> <p>Form an earth bund around the downslope side of the abluion block</p> <p>Protection of stormwater pits where possible</p>	U	3	M
Water contamination by dewatering or stormwater runoff.	<p>Contaminated water leaving site and/or entering stormwater/waterways and</p>	L	2	E	<p>Induction and toolbox talks to educate workforce on dewatering practices</p>	U	2	M

	<p>impacting downstream. This may occur through dewatering or ErSed control failure.</p>				<p>Dewatering must be conducted under an approved dewatering procedure.</p> <p>Maintain Erosion and sediment controls and conduct regular inspections</p> <p>Toolbox workers on actions to be taken during a service strike where sewerage is released or where pressurised water may wash spoil offsite</p> <p>Protection of stormwater pits where possible</p>			
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Environmental Risk Assessment Rankings

This table may be used as a guide in determining the level of risk for each environmental issue.

For each identified issue, consider the ‘maximum credible’ (not absolute worst case) risk that could result with minimal or no controls other than existing and using normal construction practices.

Note: Any one of the listed consequences must result in the use of the applicable consequence grading.

Select a letter and a number from each column. Plot letter and number selections on the Risk Ranking Matrix to determine applicable ranking:

Likelihood (Probability and Frequency of Occurrence)		Consequence (Outcome or Severity of Occurrence)			
C	Certain	Common or repeating occurrence Consequence can reasonably be expected to occur in life of Project.	1	Severe	Major pollution incident causing significant and widespread damage or potential to health or the environment Persistent reduction in ecosystem function and value. Ongoing disruption and loss of protected species. Major prosecution likely, outcome in excess of \$500,000
L	Likely	Known to have occurred / “has happened” Conditions may allow the consequence to occur on the Project during its lifetime	2	Major	Significant widespread and persistent changes to habitat, species or environmental media Significant pollution incident causing damage or potential damage to health or the environment external to the site.

		The event has occurred within the Business Unit within the previous 5 years.			<p>Potential for prosecution. Potential outcome between \$50,000 - \$500,000</p> <p>Numerous substantial complaints</p> <p>Actual material environmental harm</p>
P	Possible	<p>Could occur / “heard of it happening”</p> <p>Exceptional conditions may allow consequences to occur on the Project, or has occurred nationally within the Australian Business.</p>	3	Moderate	<p>Localised irreversible habitat loss or effects on habitat, species or environmental media</p> <p>Reportable incident to the relevant environmental regulator or other authority.</p> <p>Demonstrated breach of legislative, licence or guideline requirements.</p> <p>Likely infringement notice or fine, potential for prosecution up to \$50,000.</p> <p>Will cause complaints.</p>
U	Unlikely	<p>Not likely to occur</p> <p>Reasonable to expect that the consequence will not occur on the Project.</p> <p>Has occurred in industry but not in Business Unit.</p>	4	Minor	<p>Localised degradation of habitat or short term impacts to habitat, species or environmental media.</p> <p>Pollution incident that marginally exceeds licence conditions or guidelines for acceptable pollution.</p> <p>Fine unlikely.</p> <p>Potential for complaints.</p>
R	Rare	<p>Practically impossible</p> <p>Not known to have occurred in industry or unheard of.</p>	5	Incidental	<p>Localised or short term effects on habitat, species or environmental media.</p> <p>Fully contained on site and can be fully remediated. Little potential for fine or complaints.</p> <p>Insignificant or trivial incident</p>

Probability ► ▼Consequence	CERTAIN	LIKELY	POSSIBLE	UNLIKELY	RARE
1 – Severe	E	E	E	H	M
2 – Major	E	E	H	M	M
3 - Moderate	H	H	M	M	L
4 – Minor	M	M	M	L	L
5 - Incidental	M	L	L	L	L