



POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN - EPL 21815

EPL 21815 – Maintenance Dredging

19 FEBRUARY 2024

**LEVEL 4, 251 WHARF ROAD
NEWCASTLE NSW 2300 AUSTRALIA**
+61 2 4908 8200
info@portofnewcastle.com.au
portofnewcastle.com.au

DOCUMENT CONTROL

Version	Date	Author	Reviewer	Purpose
A	30 Nov 2023	Brigid Kelly – Environment Manager	Calvin Grills – Dredging Manager Alicia Marix-Evans- Senior Manager Property, Environment and Planning	Changes to EPA legislation required an EPL to be in place. Previous version from 2015 used as a basis.
B				
C				
D				
E				
F				
G				

Annual PIRMP Test History

Revision	Test Date	Conducted By	Details of Test (Desktop / Actual)	Finding of Test/Issues Identified	Next Scheduled Test
A					
B					
C					
D					
E					
F					
G					
H					

CONTENTS

WHAT TO DO IF AN INCIDENT OCCURS	6
1. INTRODUCTION	8
1.1. WHAT IS A POLLUTION INCIDENT?.....	8
1.2. IMMEDIATE NOTIFICATION.....	8
2. REQUIREMENTS OF THE PIRMP	9
3. POLLUTION INCIDENT NOTIFICATION PROTOCOL	15
3.1. WHO DO YOU NOTIFY?	16
3.2. WHAT INFORMATION MUST YOU PROVIDE?.....	17
3.3. COORDINATION WITH AUTHORITIES.....	18
4. NOTIFYING A POLLUTION INCIDENT TO NEIGHBOURS	18
4.1. WIDER NOTIFICATION.....	18
4.2. COMMUNICATION MECHANISMS.....	18
5. TESTING OF PLAN	19
APPENDIX A – MAINTENANCE DREDGE AREA PLA	21
APPENDIX B – MAIN HAZARD AND PRE-EMPTIVE ACTIONS	23
APPENDIX C – POLLUTANT INVENTORY LIST	23
ERROR! BOOKMARK NOT DEFINED.	
APPENDIX D – SAFETY DATA SHEET MANIFEST	25

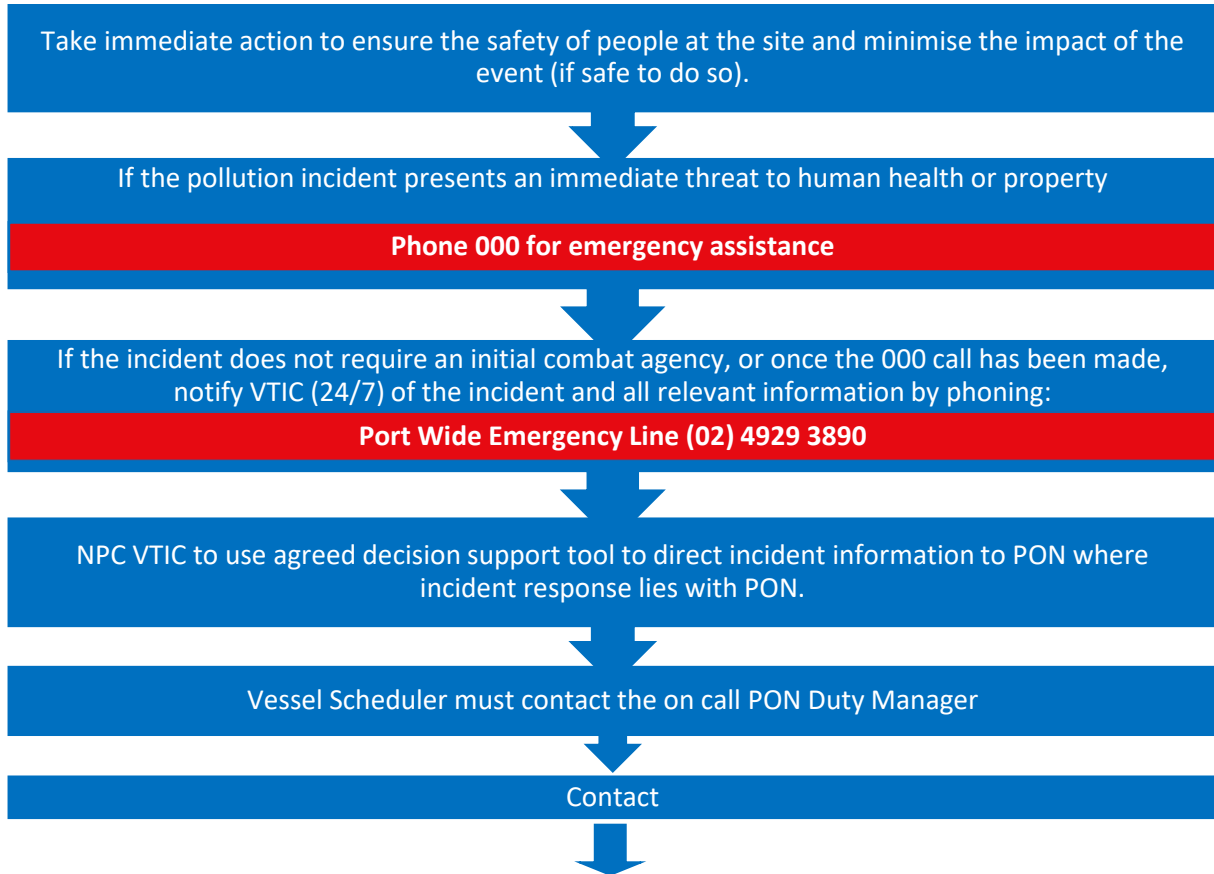
List of Tables

Table 1 Legislative Requirements of the PIRMP	9
Table 2 Notification to VTIC	16
Table 3 Notification to Relevant Authorities	16
Table 4: PON Person to Communicate with Authorities	18

Environment Protection Licence (EPL) Details	
Name of licensee: (including ABN)	Port of Newcastle Operations Pty Limited 97 539 122 070
EPL number:	21815
Premises name and address:	Port of Newcastle Maintenance Dredging Area Within the Hunter River Newcastle NSW 2300
Company or business contact details	(02) 4908 8200
Website address:	www.portofnewcastle.com.au
Scheduled activity/activities on EPL	Extractive Activities
Fee-based activity/activities on EPL:	Extractive Activities
Pollution incident – person/s responsible	
PIRMP Activation	Position or title: PON Duty Manager – Senior Manager Operations (or when unavailable Executive Manager Marine & Operation) Name of person responsible: Philipp Bourquin (or Glen Hayward) Business hours contact number/s: 0402 059 770 (or 0407 040 719) After hours contact number/s: 0402 059 770 (or 0407 040 719) Email: Philipp.Bourquin@portofnewcastle.com.au or Glen.Hayward@portofnewcastle.com.au
Notifying relevant authorities Notification should be made by a person with an appropriate level of authority within the company.	Name of person responsible: Glen Hayward Position or title: Executive Manager Marine & Operations Business hours contact number/s: 0407 040 719 After hours contact number/s: 0407 040 719 Email: Glen.Hayward@portofnewcastle.com.au
Managing response to pollution incident	Name of person responsible: Glen Hayward Position or title: Executive Manager Marine & Operations Business hours contact number/s: 0407 040 719 After hours contact number/s: 0407 040 719 Email: Glen.Hayward@portofnewcastle.com.au

What to do if an Incident Occurs

A 'Pollution incident is an incident that causes or threatens harm to the environment (See SI.1).



Contact	Phone Number
The EPA Environment Line	131 555
The Minister of Health via the Newcastle Public Health Unit	(02) 4924 6477 (after hours diverts to John Hunter Hospital – ask for the Public Health Officer on call)
SafeWork NSW	131 050
Newcastle City Council	Water Pollution incident reporting (02) 4974 2000 Environmental Services Unit (02) 4974 2000
Fire and Rescue NSW	000
Portwide Reporting Number	(02) 4929 3890
Neighbouring organisations	Refer to Section 4

Following notification, follow PON's emergency and incident response procedures:

- WHS WI 0641 David Allan Safety Management System
- 'David Allan' Shipboard Oil Pollution Emergency Plan (SOPEP)
- Environment Incident Response and Reporting Procedure EMS-009
- Emergency Environment Response Procedure EMS-010
- Emergency Environment Response Procedure EMS-010

Which procedure to follow will depend on the nature of the incident and will be determined by the **supervisor and manager's onsite and the time of the incident.**

1. INTRODUCTION

PON holds Environment Protection Licence (EPL) 21815 with the NSW Environment Protection Authority. This pollution incident response management plan (PIRMP) has been prepared for Port of Newcastle's (PON's) maintenance dredging of the Port of Newcastle. Maintenance dredging in the Port of Newcastle is undertaken by PON's dredger the *David Allan*. The PIRMP sets out the procedure to be followed in the event of a pollution incident involving maintenance dredging.

1.1. What is a Pollution Incident?

In accordance with the *Protection of the Environment Operations Act 1997* (the POEO Act) (section 153F), if a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, the person carrying on the activity must immediately implement the PIRMP.

'Pollution Incident' is defined in the dictionary of the POEO Act as:

A 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.

'Material Harm' is defined in section 147 of the POEO Act. Material harm includes on-site harm, as well as harm to the environment beyond the premises where the pollution incident occurred.

147 Meaning of material harm to the environment

(1) For the purposes of this Part:

(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.

(2) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

1.2. Immediate Notification

EPL licensees, and anyone performing an activity or occupying a premises who becomes aware of a pollution incident are required to report the pollution incident **immediately** under section 148 of the POEO Act. (Formerly the requirement was 'as soon as practicable').

'Immediate' means licensees need to report pollution incidents promptly and without delay. There is a \$2 million maximum penalty for failure to notify of a pollution incident in accordance with the requirements of the POEO Act.

The duty to notify does not apply to a pollution incident involving only the emission of an odour and does not include an incident or set of circumstances involving only the emission of noise.

2. REQUIREMENTS OF THE PIRMP

The legislative requirements of the PIRMP and where these requirements have been met, along with the parts of the PIRMP to be made publicly available are shown in Table I Legislative Requirements of the PIRMP.

Table I Legislative Requirements of the PIRMP

Legislation	Requirement	Where this requirement is met	Publicly Available?
POEO Act: Part 5.7A Duty to prepare and implement pollution incident response management plans			
153A Duty of licence holder to prepare pollution incident response management plan	The holder of an environment protection licence must prepare a pollution incident response management plan that complies with this Part in relation to the activity to which the licence relates.	<p>This PIRMP in conjunction with the following PON documents:</p> <ul style="list-style-type: none"> – WHS WI 0641 David Allan Safety Management System – ‘David Allan’ Shipboard Oil Pollution Emergency Plan (SOPEP) – 2022-2032 Ten Year Maintenance Dredging Sea Disposal Permit – Long Term Monitoring and Management Plan (LTMMP); – Emergency Environmental Response Procedures (EMS-010). – Environmental Incident Response and Reporting Procedure (EMS-009). – Work instructions and procedures. 	
153C Information to be included in plan	<p>A pollution incident response management plan must be in the form required by the regulations and must include the following:</p> <p>a) the procedures to be followed by the holder of the relevant environment protection licence, or the occupier of the relevant premises, in notifying a pollution incident to:</p> <p>i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and</p>	<p>Refer to Section 1.</p> <p>Information is also referenced in:</p> <ul style="list-style-type: none"> – Section 5.3.6 and 5.3 Environmental Incident Response and Reporting Procedure (EMS-009). – Environmental Emergency Response (EMS 010) – For Major Incidents Section 5.3 Environmental Incident Response and Reporting Procedure (EMS-009). 	✓
	<p>ii) the local authority for the area in which the premises to which the environment</p>	<p>Refer to Table 3 of this PIRMP.</p> <p>Information also referenced in:</p>	✓

Legislation	Requirement	Where this requirement is met	Publicly Available?
	protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and	<ul style="list-style-type: none"> Section 5.3.4 Environmental Incident Response and Reporting Procedure (EMS-009). 	
	iii) any persons or authorities required to be notified by Part 5.7	Refer to Table 3 of this PIRMP. Also referenced in: <ul style="list-style-type: none"> Section 5.3.4 Environmental Incident Response and Reporting Procedure (EMS-009). 	✓
	b) a detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection licence, or the occupier of the relevant premises, to reduce or control any pollution	Response procedures are specified in: <ul style="list-style-type: none"> Section 3 of the David Allan SOPEP. Emergency Environmental Response Procedures (EMS-010). Environmental Incident Response and Reporting Procedure (EMS-009). 	
	c) the procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made	Refer to: <ul style="list-style-type: none"> Section 3 of this PIRMP. Sections 2 and 4 of the David Allan SOPEP. 	
153D Keeping of plan	A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is kept at the premises to which the relevant environment protection licence relates, or where the relevant activity takes place, and is made available in accordance with the regulations.	A copy of the PIRMP will be kept on board the David Allan in a readily accessible folder on the bridge).	
153E Testing of plan	A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is	Refer to Section 5 of this PIRMP. Refer to David Allan SOPEP Introduction items 7 and 8 and the David Allan Drill Register,	

Legislation	Requirement	Where this requirement is met	Publicly Available?
	tested in accordance with the regulations.		
153F Implementation of plan	If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by this Part.	Noted.	
Protection of the Environment Operations (General) Regulation 2021: Chapter 8, Part 4 Pollution incident response management plans			
98B Form of plan	1) A plan is to be in written form	This PIRMP document.	
	2) A plan may form part of another document that is required to be prepared under or in accordance with any other law so long as the information required to be included in the plan is readily identifiable as such in that other document.	As noted, this PIRMP in conjunction with the following PON documents: <ul style="list-style-type: none"> - WHS WI 0641 David Allan Safety Management System - David Allan SOPEP - 2022-2032 Ten Year Maintenance Dredging Sea Disposal Permit – Long Term Monitoring and Management Plan (LT MMP); - David Allan Drill Register - Emergency Environmental Response Procedures (EMS-010). - Environmental Incident Response and Reporting Procedure (EMS-009). - ENVRG-010 PON Aspects and Impacts Register 	
98C Additional matters to be included in plan	1) General The matters required under section 153C (d) of the Act to be included in a plan are as follows: <ul style="list-style-type: none"> a) a description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity), 	Refer to: <ul style="list-style-type: none"> - Section 1.2 of the 'David Allan' SOPEP; - ENVRG-010 PON Aspects and Impacts Register; - Section 5 of the LT MMP; - WHSWI 650 Radiation Management Plans 	
	b) the likelihood of any such hazards occurring, including details of any conditions or events	Refer to: <ul style="list-style-type: none"> - David Allan SOPEP; 	

Legislation	Requirement	Where this requirement is met	Publicly Available?
	that could, or would, increase that likelihood	<ul style="list-style-type: none"> - ENVRG-010 PON Aspects and Impacts Register; - LTMMP Section 5. 	
	c) details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity	Refer to: <ul style="list-style-type: none"> - David Allan SOPEP; - ENVRG-010 PON Aspects and Impacts Register; - LTMMP Section 6 3 Table 6.7. 	
	d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity	Refer to: <ul style="list-style-type: none"> - Appendix 6 of David Allan SOPEP; - David Allan SDS Register. Section 9.1 	
	e) the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates	Refer to: <ul style="list-style-type: none"> - Appendix 6 of David Allan SOPEP; - David Allan SDS Register. - David Allan Fire Control Plan 	
	f) a description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident	Refer to Section 5.0, Appendix 2 and Appendix 4 of the 'David Allan' SOPEP	
	g) the names, positions and 24-hour contact details of those key individuals who: <ul style="list-style-type: none"> i) are responsible for activating the plan, and ii) are authorised to notify relevant authorities under section 148 of the Act, and iii) are responsible for managing the response to a pollution incident 	Refer to: <ul style="list-style-type: none"> - Refer to section <i>EPL and Contact information</i> of this PIRMP 	

Legislation	Requirement	Where this requirement is met	Publicly Available?
	h) the contact details of each relevant authority referred to in section 148 of the Act	Refer to Table 3 of this PIRMP.	✓
	i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on	Refer to Section 4 of this PIRMP.	✓
	j) the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on	Refer to: <ul style="list-style-type: none"> - Section 3 and 5 of the 'David Allan' SOPEP; - WHS WI 0641 David Allan Safety Management System 	
	k) a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises	Refer to Appendix A of this PIRMP.	
	l) a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk	Refer to: <ul style="list-style-type: none"> - Section 3 and 5 of the 'David Allan' SOPEP; - David Allan Emergency Evacuation Plan WHS WI 0641; - Section 5.3.3 of Environmental Incident Response and Reporting (EMS 009) - Section 4.2 of this PIRMP 	

Legislation	Requirement	Where this requirement is met	Publicly Available?
	m) the nature and objectives of any staff training program in relation to the plan	Refer to Appendix 7 of the David Allan SOPEP	
	n) the dates on which the plan has been tested and the name of the person who carried out the test	Refer to: - Page 2 of this PIRMP Quality Information – Test History	
	o) the dates on which the plan is updated	Refer to: - Page 2 of this PIRMP Quality Information – Test History -	
	p) the manner in which the plan is to be tested and maintained.	Refer to Section 5 of this plan	
	2) Trackable waste transporters	Not applicable	
98D Availability of plan	1) A plan is to be made readily available: a) to an authorised officer on request, and	The PIRMP will be made readily available to an authorised EPA officer on request.	
	b) at the premises to which the relevant licence relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan.	The PIRMP will be kept in hard copy on the David Allan in a readily accessible folder on the bridge..	
	2) A plan is also to be made publicly available in the following manner within 14 days after it is prepared: a) in a prominent position on a publicly accessible website of the person who is required to prepare the plan, b) if the person does not have such a website— by providing a copy of the plan, without charge, to any person who makes a written request for a copy.	The PIRMP is publicly available on Port of Newcastle's website.	✓
	3) Subclause (2) applies only in relation to that part of a plan	The publicly available PIRMP includes those sections referred to in the Act and Regulation (refer to the right hand column	

Legislation	Requirement	Where this requirement is met	Publicly Available?
	<p>that includes the information required under:</p> <ul style="list-style-type: none"> a) section 153C (a) of the Act, and b) clause 98C (1)(h) and (i) or (2)(b) and (c) (as the case requires). 	of this Table 1 Legislative Requirements of the PIRMP).	
	<p>4) Any personal information within the meaning of the <i>Privacy and Personal Information Protection Act 1998</i> is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1).</p>	Noted.	
98E Testing of plan	<p>1) The testing of a plan is to be carried out in such a manner as to ensure that the information included in the plan is accurate and up to date and the plan is capable of being implemented in a workable and effective manner.</p>	See Section 5.0 of this plan	
	<p>2) Any such test is to be carried out:</p> <ul style="list-style-type: none"> a) routinely at least once every 12 months, and b) within 1 month of any pollution incident occurring in the course of an activity to which the licence relates so as to assess, 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. 	See Section 5.0 of this plan	

3. POLLUTION INCIDENT NOTIFICATION PROTOCOL

This section of the PIRMP sets out the procedure to be followed by PON in notifying a pollution incident to authorities.

3.1. Who do you notify?

Firstly, call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

If the incident does not require an initial combat agency, or once the 000 call has been made, you must immediately notify the Vessel Traffic Information Centre (VTIC) of the incident and all relevant information about it. Contact VTIC by phoning the Port Wide Emergency Line on contact details provided in Table 2.

Table 2 Notification to VTIC

Contact	Phone Number
Port Wide Emergency Line	02 4929 3890

Immediately following notification to VTIC, you must report the incident to the applicable Supervisor. The VTIC is to use the agreed decision support tool to direct incident information to PON where the incident response lies with PON.

The Vessel Scheduler must contact the on call PON Duty Manager, who will consult the PON Executive Manager Marine & Operations. The PON Duty Manager is the Senior Manager Operations, or in the case when unavailable, the PON Executive Manager Marine & Operations.

The PON Duty Manager is:

- the first point of contact for any PON staff who identify an incident that requires escalation;
- responsible for activating the PIRMP, and
- authorised to notify relevant authorities as advised below, and
- responsible for managing the response to a pollution incident.

Upon receiving notification, the Duty Manager must determine the level of the incident. If the event is a pollution incident (refer to section 1.1) the Duty Manager must then immediately (that is, promptly and without delay), provide notification of the pollution incident to all the authorities identified in **Table 3**, in the order as listed.

Table 3 Notification to Relevant Authorities

Contact	Phone Number
1. The EPA Environment Line	131 555
2. The Ministry of Health via the Newcastle office of the Public Health Unit	Ph: 02 4924 6477 (after hours calls divert to John Hunter Hospital - ask for the Public Health Officer on call)
3. SafeWork NSW	13 10 50
4. Newcastle City Council	Water pollution incident reporting: 02 4974 2000 (during and after business hours)

Contact	Phone Number
5. Fire and Rescue NSW	000
6. Additional – PANSW Emergency Line	02 9296 4962
7. Additional - AMSA	1800 627 484

Whenever you make an incident notification you must **contact all five (5)** relevant authorities. For example:

- If you initially called Fire and Rescue on 000 due to an immediate threat to life and property, you must still contact the other four authorities; or
- If the incident did not require an initial combat agency, you must still notify all of the response authorities (including Fire and Rescue) in the order listed in **Table 3**.

You do not have to notify if you know that all relevant authorities are already aware of the incident (section 151 POEO Act).

If, at the time of making the notification, you believe that some of these authorities do not need to attend the incident, you may provide that advice. However, you must still provide all the information you have regarding the incident to each authority. It is the responsibility of each authority to decide whether they need to attend the incident.

Where authorities decide not to attend, the incident notification enables each authority to respond to enquiries about the incident and provides them with initial information in the event that the incident escalates or their involvement in managing the incident is required at some later stage.

PON may also need to make the following notifications:

- If the incident is also a security incident, PON must notify the Department of Planning and Environment (DPE), Transport for NSW, Regional Development and Local Government within four hours of being notified. Contact details are found in the Port Security Management System;
- If the incident is a ship related incident or pollution and oil spill, PON must notify NSW Maritime's 24 hour Duty Officer, on 02 9962 9074; and
- If the incident involves an accident that involves a commercial vessel and /or a serious injury/fatality, PON must notify NSW Maritime Incident Reporting Hotline on 0419 434 826.

3.2. What information must you provide?

Sufficient detail of the incident must be reported to the EPA to enable appropriate follow-up action. The relevant information required includes:

- a) the time, date, nature, duration and location of the incident;
- b) the location of the place where pollution is occurring or is likely to occur;
- c) the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known;
- d) the circumstances in which the incident occurred (including the cause of the incident, if known); and

- e) the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

Any information that is not known when the incident is notified must be provided immediately once it becomes known.

3.3. Coordination with authorities

In the event of an immediate threat to life and property, the incident will be coordinated by emergency services. PON will act under instruction from emergency services and take any action as directed to combat pollution caused by the incident.

Following initial notification, the PON person through whom all communications are to be made to coordinate with authorities is the PON Duty Manager. Contact details are provided in Table 4.

Table 4: PON Person to Communicate with Authorities

Contact	Name	Phone Number
PON Executive Manager Marine & Operations	Glen Hayward	0407 040 719

4. NOTIFYING A POLLUTION INCIDENT TO NEIGHBOURS

This section of the PIRMP sets out the procedures to be followed by PON in notifying a pollution incident to the owners or occupiers of premises in the vicinity of M4.

4.1. Wider notification

The EPA can formally direct PON to notify others. If so directed, PON would contact the commercial, industrial and residential neighbours to inform them of the circumstances of the incident and what action is being taken in response to it. It will be an offence not to comply with such a direction.

The EPA may advise PON of the extent of notification required. If not, PON would determine the extent of who to contact based on the nature of the pollution incident and the conditions at the time (for example, the type of pollutant, prevailing winds, magnitude of incident, and possible impacts).

In addition to the above notification process, advice would also be sought from relevant tenants should the pollution incident involve their product, as follows:

- Carrington Precinct: Graincorp;; BP; Aurizon; NAT; Linx
- Kooragang 2: Orica; Cement Australia; Cargill
- Kooragang 3: Kooragang Bulk Facilities; Incitec Pivot; Cargill
- Mayfield 4: Stolthaven; Rex Andrews

In this instance each tenant would implement their respective Pollution Incident Management Plan.

4.2. Communication mechanisms

In the event that the pollution incident is being coordinated by emergency services, communications would be under the control of emergency services. Emergency services are able to send out SMS messages to defined catchment areas to alert and advise the community if required. PON’s **Executive Manager Marine & Operations or appropriate persons** to work with emergency services to provide communications assistance and support, including direct doorknocks if they were required.

If communication is not coordinated by emergency services, notification to the owners or occupiers of premises in the vicinity of the maintenance dredge area or incident would be coordinated by PON's **Executive Manager Marine & Operations**.

PON has in place mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity, and to the broader community if required. The mechanisms available include:

- SMS messages to immediate neighbours;
- media releases to the broader community (radio and television);
- incident notification on the PON website;
- emails to community representatives; and
- doorknocking of affected community members.

The communication response to be used in the event of a pollution incident would depend on the circumstances of the event, and any direction that may be provided by the EPA.

PON's **Executive Manager Corporate Services (or delegate)** is available to be contacted 24/7 in the event that a media release is required. Media updates could be provided on an ongoing basis depending on the incident.

PON conducts a consultative meeting with Newcastle Port users every three months under the Newcastle Port User Group (NPUG). This two-way consultative meeting has capability to be a forum for PON to report on any progress, updates or changes following an incident to Port users.

5. TESTING OF PLAN

Testing requirements are outlined in section 133 of the *Protection of the Environment Operations (General) Regulation 2021*:

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

Section 2.2.3 of EPA (2020) *Guideline: Preparation of pollution incident response management plans* identifies that there are two methods of testing are:

- Undertaking desktop simulations; and
- Practical exercises or drills.

Testing must cover all components of the plan. Additional matters to be included in plan are outlined in section 98C of the Regulation:

- (n) the dates on which the plan has been tested and the name of the person who carried out the test,
- (o) the dates on which the plan is updated,
- (p) the manner in which the plan is to be tested and maintained.

APPENDIX A – MAINTENANCE DREDGE AREA PLAN



Project: E:\w\GIS\projects\201119 channel and berth map\201119 channel and berth map.aprx

Figure 1 Declared depths within PON channels and berthing boxes

APPENDIX B – MAIN HAZARDS AND PRE-EMPTIVE ACTIONS

Main Hazards	Likelihood of hazard occurring	Conditions or events that could increase the likelihood of the hazard occurring	Pre-emptive Actions
Disturbance of sea floor	Low	<ul style="list-style-type: none"> - Water pollution by turbidity - Change to coastal / estuarine processes 	<ul style="list-style-type: none"> - Offshore placement under Sea Dumping Permit; Training for Sea Dumping Permit; Long Term Maintenance and Monitoring Plan. - Operating in high turbidity area during dredging. Shallow draft vessel minimises disturbance of sea bed. Only the drag head makes contact with the sea floor. Dredging under suction or grab. - Maintenance of hopper seal. - Repeating the same areas for dredging; areas dredged have recently silted with minimal opportunity for establishment of benthic communities. High vessel traffic areas.
Spillage or disposal of solid waste to land	High	<ul style="list-style-type: none"> - Failure of machinery 	<ul style="list-style-type: none"> - Retain all waste on-board; - 2x wheelie bins on ship with volume of 3m³; - Oily wastes are separated; - rubbish in skips on shore; - disposal by licensed contractor, - logbook kept.
Spillage or disposal of solid waste to water	High	<ul style="list-style-type: none"> - Failure of machinery 	<ul style="list-style-type: none"> - Retain all waste on-board; - 2x wheelie bins on ship with volume of 3m³; - rubbish in skips on shore; - disposal by licensed contractor, - logbook kept.
Spillage of hydrocarbons or oily waste to land	Medium	<ul style="list-style-type: none"> - Failure of machinery - Collision with machinery 	<ul style="list-style-type: none"> - On-board retention; pump-out of waste oil by licensed contractor into holding tank; oil disposal records; Tripartite Permit issued by PA NSW, which covers bunkering, sewage and waste oil. Pollution Incident Response Management Plan Maintenance Dredging Port of Newcastle. - Oily wastes are separated; - SDS kept on board - Environmental Incident Response and Reporting Procedure (EMS-009); PON procedure 'WI 908-5E Dangerous Goods, Vessel Bunkering & Oily Waste Transfer'.
Spillage of hydrocarbons or oily waste to water	Medium	<ul style="list-style-type: none"> - Failure of machinery - Collision with machinery 	<ul style="list-style-type: none"> - On-board retention; pump-out of waste oil by licensed contractor into holding tank; oil disposal records; Tripartite Permit issued by PA NSW, which covers bunkering, sewage and waste oil. Pollution Incident Response Management Plan Maintenance Dredging Port of Newcastle. - Oily wastes are separated; - Bridge procedure and passage plan; vessels operated by experienced and qualified masters;

Main Hazards	Likelihood of hazard occurring	Conditions or events that could increase the likelihood of the hazard occurring	Pre-emptive Actions
			<p>dedicated lookout, differential GPS (DGPS), backup steering systems, crew competency; clean-up kit on-board for minor spills and VTIC for larger spills; Emergency Response Procedures; lookout at all times; PON Incident Control Plan; PIRMP.</p> <ul style="list-style-type: none"> - SDS kept on board - Environmental Incident Response and Reporting Procedure (EMS-009); PON procedure 'WI 908-5E Dangerous Goods, Vessel Bunkering & Oily Waste Transfer'.
Collision with marine fauna	Medium	<ul style="list-style-type: none"> - Weather conditions - Lack of awareness 	<ul style="list-style-type: none"> - Watch and observe; - Commonwealth Sea Dumping Permit; - Training for Sea Dumping Permit; - Long Term Maintenance and Monitoring Plan; - upon sighting caution zones are required; - vessel must travel at a constant slow speed and leave a negligible wake to reduce underwater noise; - record of any sightings is kept on ship.
Discharge of sediment causing water pollution (turbidity, debris, organic material)	High	<ul style="list-style-type: none"> - Weather conditions - Lack of inspections 	<ul style="list-style-type: none"> - Visual turbidity checks; Sea Dumping Permit; Cth Department of Environment; Training for Sea Dumping Permit; Long Term Maintenance and Monitoring Plan. - A risk assessment is performed for the operation. At the end of every dredge run the grate is cleared of various debris including rocks, plastic and vegetation. Rocks are disposed at sea, plastics are disposed in bins for recycling and vegetation is disposed in general waste bins. - Department of Environment Licence; dumping occurs in a designated area where there is existing spoil; monitoring of dump area; electronic data records where dumping occurs; impact is localised; Sea Dumping Permit- Cth Department of Environment; Training for Sea Dumping Permit; Long Term Maintenance and Monitoring Plan.
Leak of radioactive material from radiation gauge	Medium	<ul style="list-style-type: none"> - Lack of maintenance and inspections of gauge - Damage to gauge 	<ul style="list-style-type: none"> - Radiation management license. - Two trained radiation safety officers. - Annual external inspection and certification. - Annual internal inspection. - Radiation Management Plan, - Radiation Gauge replaced September 2015.

APPENDIX C – SAFETY DATA SHEET MANIFEST

[David Allan Safety Data Sheet Register](#)

