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		Effective Date: 20/01/2026
		Review Date: 19/01/2029
		No. of Attachments: 01
Pollution Incident Management Plan & Regulatory Compliance of License		

Procedure: Pollution Incident Management Plan & Regulatory Compliance of License

Document information, authorship and approvals			
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1. PURPOSE

To lay down the procedure for a method whereby notifiable pollution incidents are documented and communicated to the relevant authorities and the community in accordance with Protection of the Environment Legislation Amendment Act 2011 (POELA Act). To ensure regulatory compliance APVGLG use the services of an environmental consultant (icubed) to conduct an annual regulatory compliance analysis and the compliance review of environmental license requirements is supplied.

2. SCOPE

This SOP shall be applicable to The Environmental Protection Authority (EPA) licenses for AUTOPAK VETLAB GROUP (APVGLG).

License No	1035
Licensee	Autopak- Vetlab Group Pty Limited
Facility Name	Autopak- Vetlab Group Pty Limited
Location	21 - 45 Harris Street, St Marys, NSW

AUTOPAK VETLAB GROUP (APVGLG) as referenced in this SOP includes the following companies. Autopak Formulators Pty Ltd, Autopak Products Pty Ltd, Autopak Solutions Pty Ltd, Vetlab Pty Ltd & Vetlab Sterile Pty Ltd.

3. REFERENCES

- 3.1. SOP 201 - Generation, treatment and disposal of aqueous waste and solid waste.
- 3.2. SOP 604 - Emergency action procedure.
- 3.3. SOP 701 - Risk Management.
- 3.4. WI 108 - Control of captured storm water in the retention pit and the first flush system.
- 3.5. WI 217 - Control of accidental spillage.
- 3.6. WI 601 - Pollution Incident Management.
- 3.7. Annual Regulatory Compliance Report (icubed).


4. DEFINITIONS

4.1. Notifiable Pollution Incident

This is a pollution incident that escapes the site's boundaries into the air, water or soil e.g., into the storm-water system or gutters outside the site boundary.

OR

The contamination is confined to the site boundary AND costs \$10,000 or more to clean up.

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4.2. Regulatory Compliance Report

This is a report supplied by a third party professional environmental consultant. The consultant investigates any changes made by the NSW EPA that may have an impact on the APVLG EPA License to ensure the company is compliant with any such changes.

5. PROCEDURE

5.1. Notification – Actions to be taken during or immediately after a pollution incident [Clause 98C (1) (I)]

5.1.1. Notify the relevant authorities, tenants and neighbours.

In the event of a notifiable pollution incident being declared by the managing director, or his delegate, the receptionist, will alert the relevant authorities and neighbours in accordance with **Work Instruction 601**.

5.1.2. In conjunction with local authorities, decide action to be taken.

5.1.3. Update relevant authorities, tenants and neighbours as new information becomes available [clause 98C(1)(i)]

When instructed by the Managing Director or his delegate, the receptionist will contact neighbours and advise details of early warnings and updates. Records of the date and time called will be kept in accordance with **Work Instruction 601**.

The community can obtain updates by telephoning the Public Community Line on

- 02 9673 2566

5.1.4. Follow- up with a report of the incident in writing to the EPA within one week of the incident.

Describe additional notification and any additional notification

5.1.5. Test the plan in accordance with WI 601 Pollution Incident Management


5.1.6. Availability of the Plan

The plan is to be made readily available to an authorized officer on request, and at the premises to which the relevant license relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan. The plan and relevant documents are located at the main reception desk at 39 Harris St.

Only a portion of the plan is to be made **publicly available** within 14 days after it is prepared.

The plan is available on company websites for public access and community feedback.

In accordance with WI 601, upon written request from the community she will send free of charge copies of

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- **WI 601 Pollution Incident Management**
- **Form: EPA Notification**

She will also record the applicant's details in accordance with **Work Instruction 601**.

5.2. Additional Notification to Relevant Authorities

Re-notify the above by telephone immediately additional information becomes available. This can be up to within 7 days after the incident and before a written report is sent to the above.

Inform the EPA in writing within 7 days with a detailed description of the incident and the subsequent action taken.

5.3. Immediate Action to be taken after the pollution incident

For spills, cover the nearest storm water grate with a large plastic bag filled with water. Also ensure that the exit from the detention pit is closed. Cover the spill with sand, and then collect in drums for subsequent disposal. If the spill has entered the detention pit, it should be pumped into 1000L IBC for subsequent processing in the liquid waste treatment plant.

5.4. Keeping of Plan

A copy of the Plan and the site map is to be kept in the main reception at 39 Harris Street.

5.4.1. Testing, Maintaining and Updating the Plan

The dates on which the plan has been tested and the name of the person who carried out the test will be recorded in addition to the dates on which the plan is updated.


Following a pollution incident, and at least once a year the plan is to be tested and maintained as described in WI 601

5.5. Staff Training [clause 98C(1)(m)]

The nature and objectives of the training program in relation to the plan are described in **WI 217 Control of Accidental Spillage**.

5.6. Map of the premises and a map of the surrounding area [clause 98C(1)(k)]

A detailed map (or set of maps) showing the location of the premises to which the license 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 storm water drains on the premises is shown in the Manifest Site Plan and Topographical Map (located M:\WHS\SITE MAPS). And in the Emergency Information cabinet located outside the site office at Gate 2.

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5.7. HAZARDS

5.7.1. Description and likelihood of hazards to human health and the environment [clause 98C (1)(a) and (b)]

The hazards to human health or the environment associated with the company's activity to which the license relates fall into Dangerous Goods Classes 3, 5, 8, and 9 and are described below,

a) **Class 3 Flammable**

- May irritate or burn skin and eyes.
- Runoff from fire control or dilution water may pollute waterways.
- Vapour may cause dizziness or drowsiness.

b) **Class 6 Toxic**

- Poisonous, may be fatal if inhaled, swallowed or absorbed through skin.
- Inhalation, ingestion or contact with the substance may cause severe injury or death.
- Effect of contact or inhalation may be delayed.
- Runoff from fire control or dilution water may be poisonous and/or corrosive and pollute waterways.

c) **Class 8 Corrosive**

- Poisonous, may be fatal if inhaled, swallowed or absorbed through skin.
- Inhalation, ingestion or contact with the substance may cause severe injury or death.
- Contact with molten substance may cause severe burns.
- Runoff from fire control or dilution water may be poisonous and/or corrosive and pollute waterways.

d) **Class 9 Environmentally Hazardous Substances**

- Inhalation or contact with substance may be harmful.
- Runoff from fire control or dilution water may pollute waterways.

5.7.2. Likelihood of such hazards occurring

Unlikely to occur during normal handling. Conditions or events that could, or would, increase that likelihood, include spills, leaks, or fire. Refer Attachment 1 Risk Assessment of the site's hazards.

5.7.3. Action that will be taken to control these hazards

Pre-emptive action [clause 98C (1) (c)] to be taken to minimize or prevent any risk of harm to human health or the environment include: -

- Early warnings
- Updates
- Actions to be taken during and after a pollution incident.

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- Bunding production areas, tanks, and warehouses. Daily site inspections.
- Plastic bags filled with water to prevent entry of spilt liquids into storm water drains.
- 50, 000 litre sump to catch runoff.
- Spill control procedure, WI 217 Control of accidental spillage.
- Risk assessments of the site's hazards. These include the measures to control these risks and are shown in Attachment 1 Risk Assessment of the site's hazards.

5.7.4. Minimising harm to persons on the premises [clause 98C(1)(j)]

Any identified risk of harm to human health will be reduced, by control measures outlined in individual batch and pack sheets and **Attachment 1 Risk Assessment of the site's hazards**. In the event of a spill that is not reportable, **WI 217 Control of accidental spillage** will be followed.

Where applicable, staff are provided with training, PPE and access to MSDS's.

Pre-emptive actions to be taken include:

a) Actions described in section 5.7.3 above.

b) Safety equipment and infrastructure to minimize the risk to human health and the environment [clause 98C (1) (f)]

Safety equipment or other devices that are used to minimize the risks to human health or the environment, and to contain or control a pollution incident include: -

PPE including full face shield, dust mask, safety glasses, gloves safety shoes, **respiratory protection** and overalls.

Equipment for confined space entry.

5.7.5. Inventory and maximum quantity and location of each potential pollutant [clause 98C(1)(d) and (e)]

A Physical Site Manifest and Chemical Register is maintained which contains site inventory and maximum quantity of potential pollutants likely to be stored on the premises. The Register is updated monthly by the WHSE Manager and created through ERP reports.

A copy is kept in the red Emergency Information box near the gate 2 entry.

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5.7.6. KEY PERSONNEL


Authority	Name	Position	Telephone (Business hours)	Telephone After hours
Responsible for activating the plan	Peter Kearney	Managing Director	(02) 02 9678 0212	0450 663 800
Authorized to notify relevant authorities under section 148 of the Act. EPA, Fire and Rescue, NSW Health, Safe work NSW and Local Council.	Adam Smith	Chief Operation Officer	0432 368 335	0432 368 335
Responsible for managing the response to the pollution incident	Craig Wallis	WHS, Regulatory & Training Manager	0410 624 695	0410 624 695

5.8. Regulatory Compliance of License.

Annually a third-party environmental specialist is engaged to check compliance of the APVLG License by way of the NSW EPA. Any changes made by the regulatory body that affect the APVLG environmental license will be actioned accordingly to ensure compliance. The supplied reports will be filed with the license for reference.

6. ATTACHMENTS

Attachment 1: Risk Assessment of the Site's Hazards (SOP 701)

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7. REVISION HISTORY

Version No.	Date	Description of change
1	31/08/2012	New
2	21/10/2015	General Review. Update template. Update OHS Manager
3	12/04/2018	General review for currency. No significant changes. Minor change made to remove reference to WI's 602,603,604
4	30/01/2020	Change to document scope. One combined license now exists for AP-VL Group. SCUBA PPE no longer required, title change of Peter & Paul Kearney and numbering format within document changed
5	09/02/2022	General review. Changes to Section 5.7.5 to include Physical Site Manifest and Chemical Register, links to site maps and amendment under Scope to include all Autopak-Vetlab Group companies.
6	20/12/2023	Addition of Section 5.8- Regulatory Compliance of License and use of third-party environmental specialist. Updated to new SOP format.
7	16/01/2026	Location corrected in scope, references corrected to reflect current numbers and title of procedures, key personnel table data updated to include contact details for COO as authorized to notify relevant authority, typographical errors corrected, 5.7.5 updated to include location of emergency information, SOP updated to new template with 3 years of review period as per CC25-066

END OF PROCEDURE

8. DISTRIBUTION QA Documentation Office

<N:\SOPs\SOP Masters\SOP 703 Pollution incident management plan\SOP 703 Pollution incident management plan.pdf>

Red Fire Box

ORIGINAL



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Attachment 1 Risk Assessment of the Site's Hazards (SOP 701)

ENVIRONMENTAL ASPECT	HAZARD	RECEIVING ENVIRONMENT	POTENTIAL RECEPTORS	POTENTIAL ENVIRONMENTAL IMPACT	LIKELIHOOD	CONSEQUENCE	O/ALL RATING	CONTROL MEASURE
Use & storage of chemicals	Uncontrolled spill leading to discharge to storm-water system	Surface waters	<ul style="list-style-type: none"> Aquatic ecosystem & users 	<ul style="list-style-type: none"> Water pollution Potential health impacts for those that come into contact with it 	E	3	M	Bundling of warehouses & tanks. Use of SCUBA equipment.
Use & storage of chemicals	Uncontrolled spill leading to discharge to land	Land Ground water	<ul style="list-style-type: none"> Employees Neighbouring residents 	<ul style="list-style-type: none"> Land contamination and/or groundwater pollution Potential health impacts for those that come into contact with it 	E	3	M	Bundling of warehouses & tanks. Use of SCUBA equipment.
Vapours emitted during operations	Emissions contain potentially harmful substance	Local Air-shed	<ul style="list-style-type: none"> Employees Neighbouring residents 	<ul style="list-style-type: none"> Inhalation of vapours leading to illness 	D	2	L	Pass vapours through scrubbers.
Off-site disposal of waste to landfill	Waste contaminated due to poor segregation	(Off-site) Land Ground water	<ul style="list-style-type: none"> Employees of Landfill Neighbouring residents of Landfill 	<ul style="list-style-type: none"> Land contamination and/or groundwater pollution Potential health impacts for those that come into contact with it 	E	3	M	Triple rinse containers before crushing. Segregate metal and paper waste

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