

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN:

Incident Notification to Relevant Authorities

In accordance with the site's Emergency Management Plan and NSW regulatory requirements, Thales Maritime Precinct, Carrington will notify the relevant authorities in the event of a pollution incident.

Definition of a 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.

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined 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 \$10,000 (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 that causes or threatens "material harm" to the environment is caused or threatened.

Environmental Protection License Details

Name of Licensee (including ABN)	Thales Australia Limited ABN 66 008 642 751
EPL Number	21004
Premises name and address	Thales Maritime Precinct 50 Fitzroy St Carrington NSW 2294
Website address	https://www.thalesgroup.com/en/above-water-systems
Scheduled activity	Marinas and boat repairs
Fee based activity	Boat construction/maintenance (general)

Carrington Site Information

Thales undertakes shipbuilding and repair activity at the Thales Maritime Precinct 50 Fitzroy St, Carrington, NSW, 2294. This is classified by Australian and New Zealand Standard Industrial Classification (ANZSIC) code 2391, which appears on the National Pollutant Inventory list of ANZSIC codes. Thales is therefore required to report on emissions and transfers if reporting thresholds are exceeded.

The management of pollution incidents is formally documented in the Site Emergency Management Plan and the Pollution Incident Response Management Plan (PIRMP) - additionally Environmental Risks are also formally identified and documented in the Site Risk Register.

The facility is well placed to deal with any situation through procedures and works closely with state emergency services to ensure the best possible response in any emergency.

Risk Management

The systematic identification, assessment and management of hazards and associated risk is undertaken in accordance with the Thales HSE Hazard Identification, Risk Assessment and Control procedure

This process is supported by the requirement for contractors to provide their own risk assessment systems and processes, which are reviewed by Thales Carrington staff prior to the commencement of any Thales controlled activities within the Carrington site

Identified hazards and corrective actions are captured in Intelex eHSE Incident Management System

Waste Management

Thales Carrington provides general segregated waste management services for vessels undergoing maintenance in the construction zone. This also includes the use of bulk liquid transport for removal and disposal of vessel fuels, oils, and sewerage from vessels

Safety Equipment

Thales Carrington has spill kits located throughout the facility. Where a construction project is underway, dedicated spill kits will be kept in the construction zone.

First aid and fire fighting equipment are also located throughout the facility. Posters indicating trained First Aiders and the Emergency Control Organisation are promulgated throughout the site

Training

Thales Australia provides instruction and explanation in emergency response measures (including spill response) through several mediums. This is captured in the modules:

- Thales Carrington Induction
- Site/ Project specific training (as required)

Pollution Incident Causes and Effects

Carrington Environmental Hazards			
Incident	Activity	Likelihood	Pre-emptive Actions
Release of Fuel Oil, Waste Oil/Water and Sewerage leading to water pollution or fire	Liquid Transfer from Ships and Waste Water Collection Tanks	Possible (large quantities held)	Follow safety instructions outlined in Thales Maritime Precinct - Liquid Transfer Safety Check Sheet. Handle and store in accordance with SDS
Release of other flammable liquid leading to water pollution or fire	Painting Cleaning Transfer to Ships	Unlikely (small quantities held))	Follow appropriate bulk liquid handling procedures Handle and store in accordance with SDS
Release of flammable gas leading to explosion	Metalwork (Gas Cutting and Welding)	Unlikely (small quantities held)	Follow safety instructions in work instruction for specific activity including Hot work Permits. Handle and store in accordance with SDS
Release of organic peroxide, leading to water pollution or fire	Fiberglass Work	Unlikely (small quantities held)	Follow safety instructions in work instruction for specific activity Handle and store in accordance with SDS
Release of corrosive material leading to environmental damage	Cleaning Solutions	Unlikely (small quantities held)	Follow safety instructions in work instruction for specific activity Handle and store in accordance with SDS
Release of other environmentally hazardous liquid	Metalwork Cleaning	Unlikely (small quantities used)	Follow safety instructions in work instruction for specific activity Handle and store in accordance with SDS

Notification Procedures

Pollution Incident Notification Process			
Action	Authority	Contact	Responsibility
If the incident presents an immediate threat to human health or property	Fire and Rescue NSW	000 (1300 729 579 if notification only)	Site Security 0439 400 224
If the incident does not require an initial combat agency, or following the call to 000:	As outlined below:		As outlined below:
Immediate notification of incident to applicable regulatory authority (ARA)	VP Health Safety and Environment	0481 337 777	Program Manager Carrington Site
	EPA Environment Line	131 555	Program Manager Carrington Site
Immediate notification of incident to 24-hr contact for relevant authorities, in the order given.	NSW Ministry of Health via Newcastle Public Health Unit	(02) 4924 6477 (ask for Public Health Officer)	Program Manager Carrington Site
	SafeWork NSW	131 050	Program Manager Carrington Site
	Port of Newcastle	(02) 4929 3890	Program Manager Carrington Site
	Fire and Rescue NSW (if not called initially)	1300 729 579	Program Manager Carrington Site

Responsible person

Program Manager: Geophrey Gavin
 Address: 50 Fitzroy St, Carrington, NSW, 2294
 Postal Address: 50 Fitzroy St, Carrington, NSW, 2294
 Email: ian.harrod@thalesgroup.com.au
 Phone: 0412 240 212

Mechanisms for providing early warnings and regular updates to local community residents

In the event of an incident, emergency services will undertake all communications with the local community residents where necessary.

Testing of the PIRMP

The Pollution Incident Response Management Plan (PIRMP) is tested at 12-monthly intervals to ensure it is still relevant and accurate. The PIRMP is tested and maintained to ensure the information (including contact details) is accurate and up-to-date, and the PIRMP can be implemented in a workable and effective way.

This requirement is applicable to all licensees and testing is taken place at least once in any 12-month period (so there is less than 12 months between each test of the PIRMP) or will be tested within one month of a pollution incident that occurs while the licensed activity is taking place.

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