

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)



1 PURPOSE

- 1.1.1 This Pollution Incident Response Management Plan (PIRMP) has been prepared in accordance with Section 153A of the Protection of the Environment Operations Act 1997 (Act).
- 1.1.2 Watco WA Rail (Watco) is the holder of Environmental Protection Licence 21624 (EPL) issued by the NSW Environment Protection Authority (EPA). This plan outlines the procedures Watco will follow to ensure effective response to pollution incidents associated with its rail operations.

2 SCOPE

- 2.1.1 Watco is accredited for rolling stock operations in NSW and the PIRMP aligns with the requirements of Watco's EPL. The PIRMP applies to all employees, contractors, and visitors involved in Watco's operations on the Sydney Trains (TfNSW) network (the network) at Port Kembla. The plan covers activities that have the potential to cause pollution incidents within the scope of Watco's operations in this area.

3 RESPONSIBILITIES

3.1 Managing Director

- Ensures that processes are developed, implemented, and adequately resourced for effective incident management.
- Ensures Watco has sufficient resources to manage environmental, and pollution matters effectively.
- Initiates and authorises information sharing with the community regarding pollution incidents.

3.2 National Safety Manager (NSM)

- Develops and implements a robust occurrence management and investigation process.
- Manages notification of all environmental incidents in accordance with EPL requirements.
- Oversees effective management of environmental incident investigations.
- Ensures that risk assessments adequately consider environmental risks.

3.3 General Manager – NSW

- Provides adequate resources for the management of environmental incidents, including investigations and response activities.
- Ensures the PIRMP is prominently located and accessible to all team members potentially affected by pollution incidents.
- Provides copies of the PIRMP to any person upon receiving a written request.

3.4 Manager Operating Processes (MOP)

- Ensures all incidents within their area are promptly notified to the General Manager - NSW.
- Cooperates with and participates in any investigations, whether joint or internal, related to their area of responsibility.
- Ensures incident scenes are secured immediately to prevent loss or destruction of evidence, as far as is reasonably practicable.

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4 REFERENCES

Note: The most current version of relevant legislation and Australian Standards applicable to the state or jurisdiction where operations are taking place must always be consulted. These documents are subject to ongoing review and updates. Only current, officially sourced documents from the appropriate regulatory authorities are to be utilised.

- NSW Protection of the Environment Operations Act
- Protection of the Environment Operations (General) Regulation
- NSW- EPA- Guideline: Pollution Incident Response Management Plans
- NSW Dangerous Goods (Road and Rail Transport) Act

5 DESCRIPTION OF RISKS RELATED TO POLLUTION INCIDENT

- 5.1.1 In accordance with the Act, a pollution incident is defined as an event that causes or threatens to cause material harm to the environment.
- 5.1.2 Watco operates within a limited, defined section of the network between Cringila and Lysaghts. Watco haul steel products between two areas of the BlueScope Steelworks. No dangerous goods are transported on this section of track.
- 5.1.3 The rollingstock used consists of a single diesel-electric locomotive hauling flat wagons. All locomotives are approved under Watco's EPL.
- 5.1.4 Fuelling and maintenance of rollingstock are conducted off-site and do not occur within the TfNSW network rail corridor.
- 5.1.5 Due to the nature and scale of Watco's operations on the network, the risk of a pollution incident is considered very low. The following potential pollution risks and associated controls have been identified.

Ref	Risk	Hazard / Cause	Consequence	Control Measure(s)	Risk			Risk Managed
					L	C	Risk Level	
1	Diesel / oil Spill	Locomotive fuel tank rupture Poor rollingstock maintenance practices	Soil and groundwater contamination. Surface water pollution (Allan's Creek). Harm to local vegetation and wildlife.	Spill kits and Hazmat absorbent socks are available Rollingstock maintenance program	1	3	1	Yes
2	Locomotive fire	Defective Locomotive fault leading to fire	Harm to people Harm to local vegetation and wildlife Toxic fumes	Fire extinguishers are located in each locomotive Rollingstock maintenance program	1	3	1	Yes

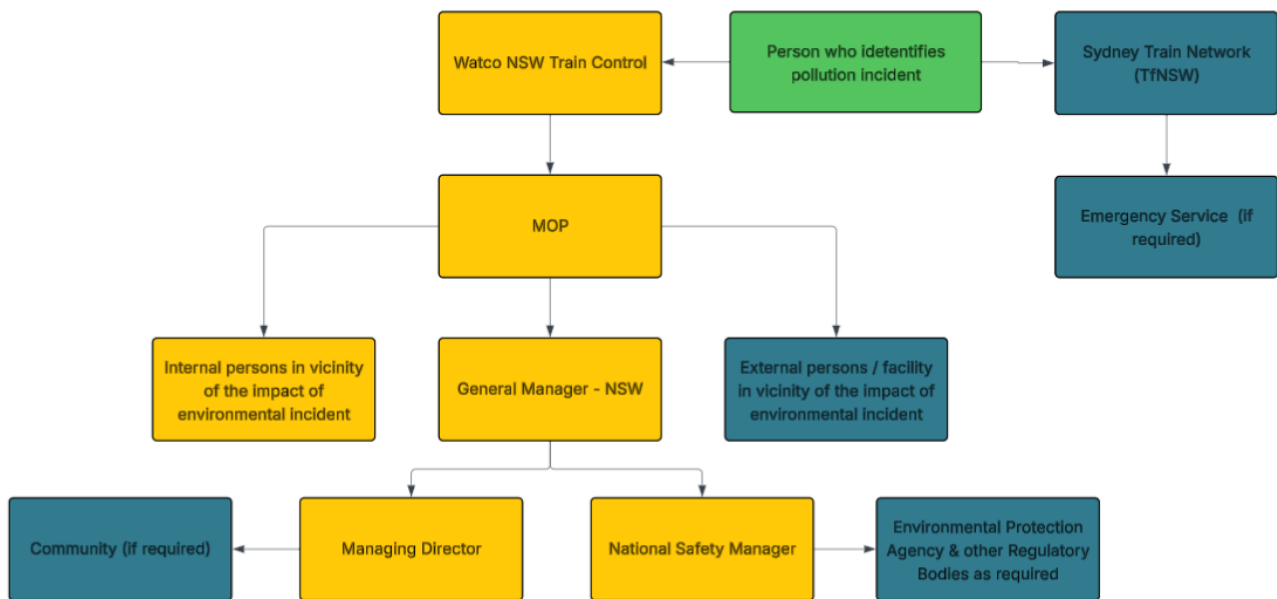
6 INCIDENT NOTIFICATION

- 6.1.1 All Watco team members, contractors and visitors have a duty to report all hazards and incidents as per Watco's incident management procedure.
- 6.1.2 Notification of a pollution incident, with the potential for, or where actual material harm has occurred must be reported immediately both internally and externally as per the chart below.

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6.1.3 The below table lists the internal and external contact details.

External Contacts			
Contact		Contact Information	
Sydney Trains (TfNSW)		02 9379 4733	
Fire and Rescue NSW (in the event of a fire)		Ph: 1300 729 579 Emergency Ph: 000	
Environmental Protection Authority		Ph: 13 15 55 (or +31 2 995 5555 if outside NSW) Complaints register and enquiries: info@epa.nsw.gov.au	
Wollongong Public Health Unit		Ph: 02 4221 6700 After Hours: 02 4222 5000 – ask for Public Health Officer	
SafeWork NSW (if a worker is injured)		Ph: 131 050	
Wollongong City Council (for community impact)		Ph: 02 4227 7317 After Hours Ph: 1300 557 980	
Internal Contacts			
Position	Name	Phone	Email
Watco Incident Reporting	NSW Train Control	02 4275 7494	
MOP	Manager on Shift	0499 646 232	bslmop@watco.com
General Manager NSW	Jakson Pavlovich	0498 143 219	jakson.pavlovich@watco.com
National Safety Manager	Jessica Murray	0460 696 273	Jessica.Murray@Watco.com

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7 INCIDENT RESPONSE

7.1 Immediate Actions (on site)

- Immediately following a potential or actual pollution incident, ensure the safety and wellbeing of all persons directly at risk. This may include evacuation, cordoning off the area, and shutting down rollingstock.
- If a spill occurs, contain the fluid promptly using spill kits and absorbent socks (Located at Rail Operations Centre building).
- In the case of fire, if safe to do so, use the fire extinguisher onboard the locomotive to extinguish any fires.
- All team members responding to the incident must assess the risks associated with attending the incident site to ensure safety.
- Assess and record the extent and impact of the incident, including volume of spillage, weather conditions, and any nearby facilities or people who may be affected.
- Notify internal and external stakeholders immediately as outlined in Section 6 of this PIRMP.
- For significant incidents, deploy the Watco Incident Management Team in accordance with the Watco Emergency Management Plan.
- Provide regular updates to all relevant stakeholders throughout the incident.

7.2 Containment & Recovery

- If it is safe to do so, secure and isolate the incident area to mitigate further environmental harm.
- Cooperate with and assist emergency services and the network incident controller.
- Absorb and collect spilled fluids using appropriate materials.
- Preserve the incident scene and restrict access pending investigation and regulatory notification.

7.3 Post-Incident Actions

- Conduct a thorough site inspection and risk assessment.
- Dispose of soiled absorbent materials and contaminated spill kit contents in accordance with regulatory requirements. Replenish used spill kit supplies.
- Remove rollingstock and any Watco property from the incident site as soon as practical.
- Restore the site to its original condition, as far as reasonably practicable.
- Notify regulators and stakeholders regularly on the incident status and progress towards resolution.
- Initiate an internal investigation to identify the causal factors of the pollution incident.
- Conduct and document a post-incident debrief with all relevant personnel.

8 COMMUNICATION AND RECORD-KEEPING

- 8.1.1 All incidents, including pollution incidents and near misses, must be recorded in Watco's electronic data management system, Myosh.

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- 8.1.2 The outcomes of any incident investigation, including findings and corrective actions, must be recorded in Myosh and communicated to relevant Watco team members to ensure organisational learning and continuous improvement.
- 8.1.3 A hard copy of the current PIRMP is maintained in a prominent location at the Watco NSW office. The electronic version is stored in the Watco Document Library, accessible to all team members.
- 8.1.4 Watco will make the PIRMP available to external stakeholders (e.g., regulators, community members) upon written request, free of charge and in a timely manner, in accordance with the requirements of the Act.

9 TRAINING

- 9.1.1 All Watco team members who may be affected by or involved in responding to a pollution incident on the network receive training in accordance with this PIRMP.
- 9.1.2 Training ensures that personnel are aware of their responsibilities and can respond effectively to pollution incidents.
- 9.1.3 Training activities include, but are not limited to:
 - Team Member onboarding induction.
 - Pre-start briefs
 - Incident management training
 - Pollution incident desktop exercise
 - Infrastructure Manager's emergency drill exercises (including exercises in conjunction with emergency services)
 - Lessons Learned following an incident

10 TESTING OF THE PIRMP

- 10.1.1 Watco conducts desktop exercises at least annually to test the effectiveness of the PIRMP. These exercises are designed to ensure team members are familiar with the PIRMP and are competent in responding to a pollution incident.
- 10.1.2 Exercises simulate realistic scenarios and assess readiness, communication protocols, and coordination with internal and external stakeholders.
- 10.1.3 All desktop exercises must be documented using the Watco Desktop Emergency Drill Exercise Form and include:
 - Scenario description
 - Participating personnel
 - Actions taken
 - Recommendations for improvement
- 10.1.4 Outcomes from testing are reviewed by the Watco leadership team and used to inform PIRMP updates, training needs, and operational improvements.

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11 RELATED DOCUMENTATION

- (Watco's) Environmental Protection Licence 21624
- WWA-IMS-24-MAN-01 - Emergency Management Plan
- WWA-IMS-21-F-01 - Incident Notification Form
- WWA-NSW-13-PLN-01 – Environmental Management Plan – Sydney Trains Network
- WWA-IMS-24-F-011 - Desktop Emergency Drill Exercise

12 DEFINITIONS

Term	Definition
Material harm (pollution)	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.
Notifiable pollution incident	Notification is required even where 'harm to the environment is caused only in the premises where the pollution incident occurs', as specified in section 147(2).
Pollution	The EPA Act defines pollution as either 'water pollution', 'air pollution', 'noise pollution' or 'land pollution'.
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

13 DOCUMENT CONTROL AND REVIEW

13.1.1 The PIRMP must be reviewed annually, within one month of a pollution incident and if there are significant changes within the area Watco operates on the Sydney Trains (TfNSW) network.

Document Owner	National Safety Manager	Department	Safety
Approver	Vice President Operations	Review Frequency	12 months
Effective Date	18 July 2025	Next Review Date	18 July 2026
Revision History			
Revision	Date	Description of Change	Approved By

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3	18 July 2025	Full review and re-write to align with the POEO Act and the requirements of Watco operations. The PIRMP has been transferred to the new Watco template.	Nicole Bickerstaff
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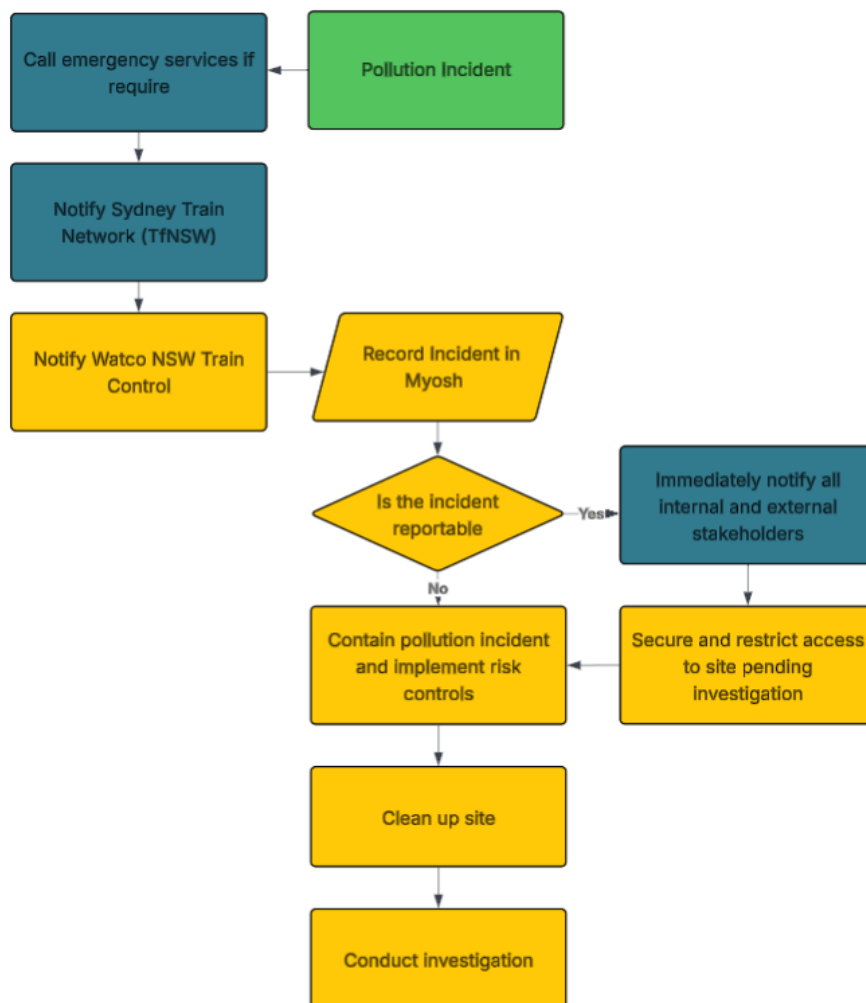
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14 APPENDIX A - IMMEDIATE INCIDENT RESPONSE



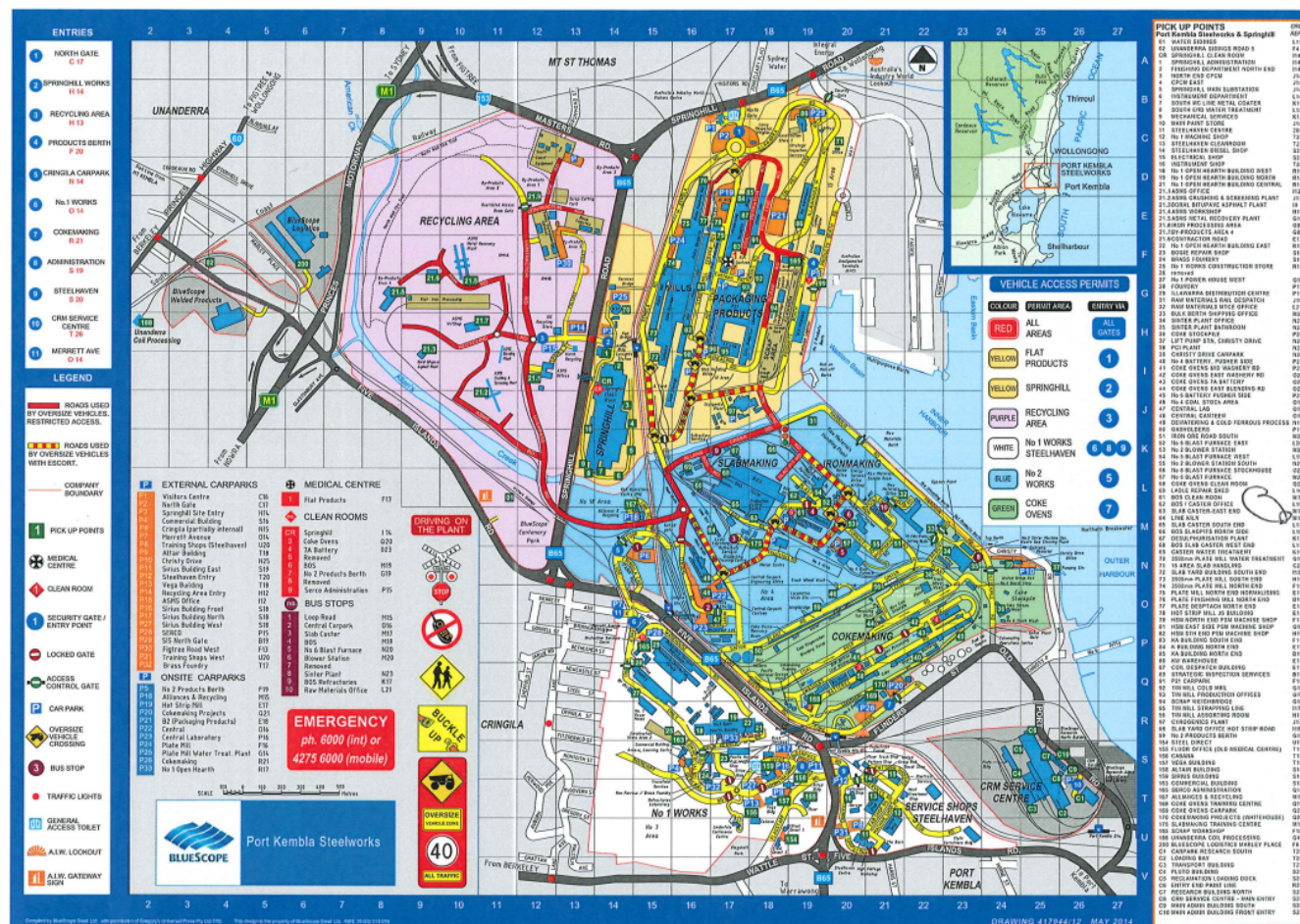
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15 APPENDIX B - SITE MAP



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