



POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

47 Talavera Road, North Ryde NSW 2113
May 2026

AstraZeneca PIRMP

Pollution Incident Response Management Plan

Document Control: Revision History, Tests and Training

Version	Date	Revision Details	Revised by	Approved by
Version 2.5	08-May-2026	Supersedes all previous versions with updated details to reflect: • PIRMP Test (completed 08-May-2026) • PIRMP Training conducted (completed 08-May-2026) • Annual Review of PIRMP (completed 08-May-2026) • Updated "PIRMP activation Procedure" (p. 5) with "IMMEDIATE ACTIONS".	Nathan Collett (Snr. Environmental Engineer)	Geraldine Murphy (Executive Director General Manager)



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Executive Summary

This Pollution Incident Response Management Plan (PIRMP) has been prepared for AstraZeneca facility (Site) located at located at 47 Talavera Road, North Ryde NSW 2113. The Site operates the scheduled activity of 'Chemical Production' in accordance with the conditions of an Environment Protection Licence (EPL No. 6891) issued under the *Protection of the Environment Operations Act 1997* (POEO Act).

All holders of an EPL are required to prepare and implement a PIRMP which includes procedures for the:

- Identification, risk assessment and appropriate controls in minimising the potential for a pollution incident associated with the Site operations and materials;
- Efficient and effective response to pollution incidents;
- Comprehensive and timely communication about a pollution incident to:
 - employees, contactors and visitors;
 - the **EPA** and other relevant Authorities such as local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW; and
 - neighbours and communities who may be impacted by the pollution incident; and
- Testing and review of the PIRMP for its accuracy, currency and effectiveness in responding and communication of a pollution incident.

The following flowchart provides a summary of the activation procedure of the AstraZeneca PIRMP.

PIRMP Activation Procedure

All Employees and Contractors

Any **Pollution Incident** such as spills / leaks / fire / excessive air emissions **Must** be **Immediately Reported** to either the SHE Lead or Engineering/Facility Lead with details of severity and response status

(See Sect 1.1 for Definitions of “Pollution Incident” and “Immediate Reporting”)



Pollution Incident - YES

SHE Lead

Does the incident have potential for **Material Harm?**

(See Sect 1.1 for Definition of Material Harm)

NO



SHE Lead

No requirement for “**Immediate Reporting**”. However, decision should be subject to updates on incident response status



YES – PIRMP activation Procedure

SHE Lead & PIRMP Response Team - IMMEDIATE ACTIONS

- Ensure appropriate response is being conducted to safely minimise impacts (See Sect 5.1)
- Ensure all employees / contractors / visitors are safe and restricted from incident area (See Sect 4.2)
- **SHE Lead to notify Authorities immediately** of the incident nature, substances involved, risks and response (See Sect 6.1)
- Notify neighbours/community of incident and any precautions they may need to take (See Sect 6.1 & 6.2)
- Coordinate with Authorities or external incident response - if in attendance (See Sect 5.1 & 5.2)
- Provide appropriate updates to Authorities and neighbours/community (See Sect 6.1 & 6.2)



Post PIRMP Activation Procedure

Site Manger & PIRMP Response Team

- Notify Authorities and neighbours/community incident response has been completed
- Inform Authorities and neighbours/community of any ongoing precautions required
- Clean-up response materials and dispose through licensed waste service provider
- Engage environmental consultants to investigate and remediate contamination (if required)
- Consider Duty to Report obligations on any residual contamination to EPA under S60 of CLM Act
- Conduct incident investigation and revise PIRMP with any learnings - **within 30-days of incident**
- If any amendments required to PIRMP - **post revised version on website**
- Provide incident investigation summary to Authorities, neighbours and community (See Sect 4.2 - Table 4)

1 INTRODUCTION

This Pollution Incident Response Management Plan (**PIRMP**) has been prepared for the AstraZeneca facility (**the Site**) which operates under the regulatory requirement of an Environment Protection Licence (**EPL No. 6891**) administered by the NSW Environment Protection Authority (**EPA**).

All holders of an EPL are required to prepare and implement a PIRMP which provides details on the manner in which the Site will comply with the requirements of Part 5.7A of the *Protection of the Environment Operations Act 1997* (**POEO Act**) and relevant clauses of the *POEO General Regulation* (**POEO Gen Reg**), which includes procedures for the:

- Identification, risk assessment and appropriate controls in minimising the potential for a pollution incident associated with Site operations and materials;
- Efficient and effective response to pollution incidents;
- Comprehensive and timely communication about a pollution incident to:
 - employees, contactors and visitors;
 - the **EPA** and other relevant Authorities such as local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW; and
 - neighbours and communities who may potentially be impacted by the pollution incident; and
- Testing and review of the PIRMP for accuracy, currency and effectiveness in responding and communication of a pollution incident.

1.1 KEY PIRMP DEFINITIONS

The following definitions provide an understanding of three key terms that the EPA generally reference in relation to when a PIRMP is to be activated:

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 at a premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

Material Harm to the environment is when:

- It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, **or**
- 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 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.

Immediately Reporting simply means promptly and without delay. The amount of time that this actually takes is likely to change depending on the circumstances of the incident.

1.2 ENVIRONMENTAL PROTECTION LICENCE DETAILS

Name of Licensee: AstraZeneca Pty Ltd

EPL number: 6891

Premises address: 47 Talavera Road, North Ryde, NSW 2113

EPL Scheduled Activity: Chemical Production

Fee-based Activity: Pharmaceutical and veterinary products production (>2000 – 5000t annual capacity)

1.3 SITE DESCRIPTION AND OPERATIONS

AstraZeneca is a leading pharmaceutical company with a broad range of medicines designed to fight disease in important areas of healthcare. The manufacturing facility at North Ryde produces products for the Australian market and generates exports to multiple countries around the world. Manufacturing activities include formulation and packing, with specialisation in respiratory medicines for human use. The Site is located within a precinct predominantly used for retail, commercial and light industrial operations (see Figure 1).

The Site manufacturing process require the storage and use of relatively small quantities of chemicals and materials that could be considered to have potential for causing material harm.

Key Site operations with potential for pollution events leading to material harm include:

- Storage warehouse in which package volumes of chemicals are stored;
- Engineering store where packaged volumes of machine oils/lubricants are stored;
- Receiving dock/bay where packed volumes of raw materials are received and transported to storage areas;

- Waste storage facility where predominantly solid wastes are stored in preparation for off-site disposal; and
- Heavy and passenger vehicular movement / parking in vicinity of stormwater drains.

Figure 1: Site Boundary and Surrounding Locality



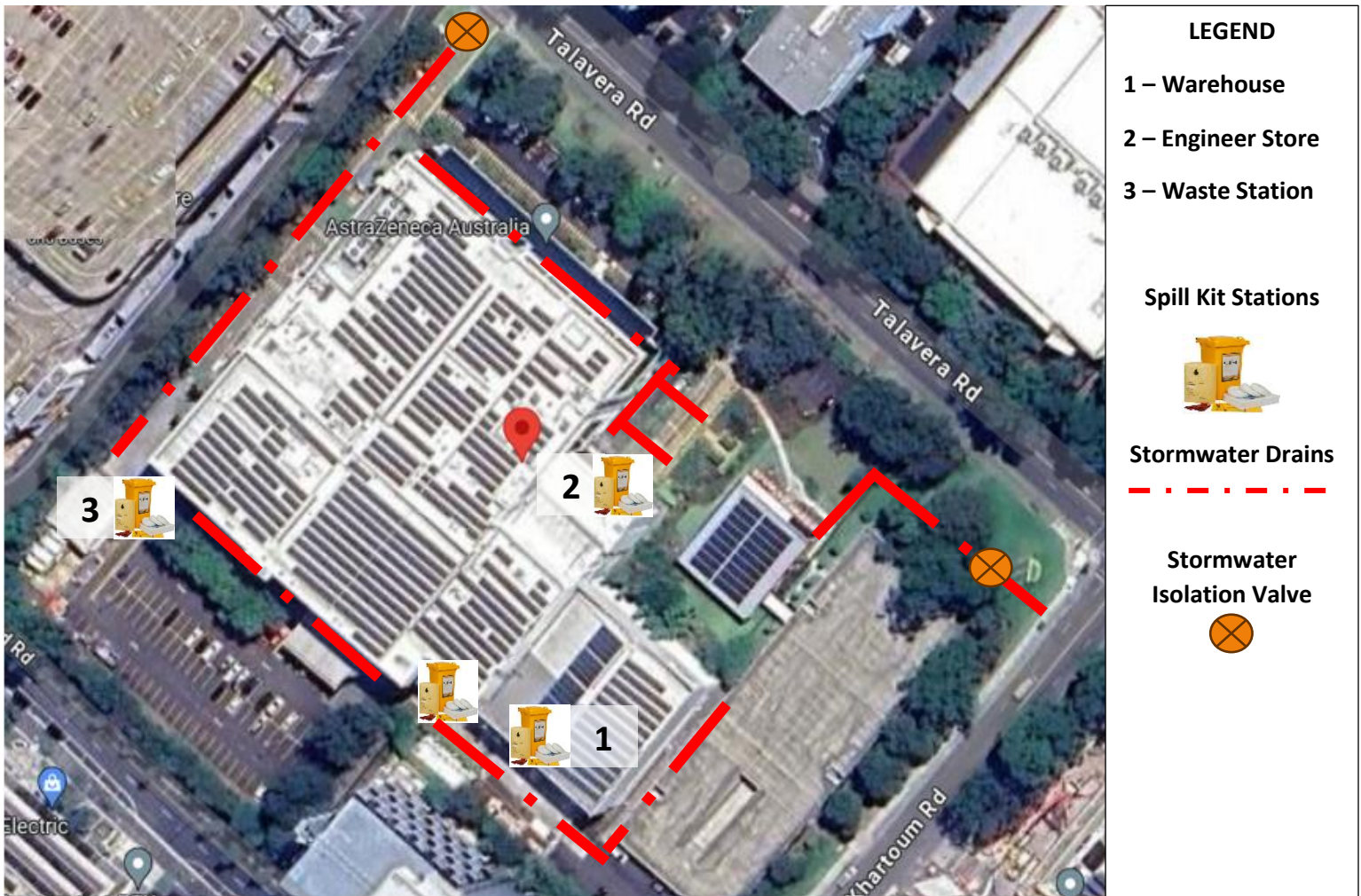
Image sourced from Google Earth on 26-May-2025

2 LOCATION OF CHEMICALS AND SPILL RESPONSE EQUIPMENT

The Site manufacturing operations require the storage and use of small volumes of chemicals, some of which if not appropriately managed have potential to adversely impact upon the environment and human health.

Figure 2 shows the locations at which chemicals listed in Table 1 below are stored and spill kits/drain covers for response to a pollution incident.

Figure 2: Chemical Storage Locations and Spill Response Equipment



3 INVENTORY OF CHEMICALS AND RISK ASSESSMENT

Table 1 provides an inventory of chemicals required as part of Site manufacturing operations and a risk assessment on the likelihood and consequence of a pollution incident which could result in material harm. The respective risk rankings are based on the most severe incident impacting the environment and/or human health with each of the chemicals using the risk matrix presented in Table 2 below. The risk assessment was subject to a verification of current activities and materials as part of 2026 PIRMP review

Table 1: Inventory and Risk Assessment

Chemicals / Risk of Material Harm	Max Quantity	Risk Assessment		Risk Ranking (See Table 2)
		Consequence	Likelihood	
No. 1 (Warehouse) - Packaged quantities of thinners / solvents / hand sanitiser inks (Spill/Leak entering stormwater drains and impacts have (or suspected to) beyond stormwater isolation valves)	2,500L Collectively at any time	3	1	Very Low
No. 2 (Engineer Store)- machine oils and lubricants	1,500L Collectively at any time	2	1	Very Low
No. 3 – (Waste Station) (Spill/Leak entering stormwater drains and/or surface waters – mainly solids in form of rags)	Variable	1	1	Very Low
No 4 - Fuel (Petrol & Diesel) Leaking - ruptured fuel tank of parked employee/visitor/truck vehicles that could enter stormwater drains	Variable	2	1	Very Low
No 5 – Fire Plume Possible off-site plume emissions from large or localised fire incidents	Variable	3	1	Very Low

Table 2 – Risk Assessment Matrix

An Event that can be anticipated to happen once or more within a 12 month period	 Likelihood	Very High 5					
An event that can be anticipated to happen once or more within the next 2.5 years		High 4					
An event that can be anticipated to happen once or more within the next 5-10 years		Med 3					
A rare event that can be envisaged but has not happened in the company history 10+ years		Low 2					
Never happened and relies on multiple unlikely events		Very Low 1					
Environment People Injury People Illness			Very Low 1	Low 2	Medium 3	High 4	Very High 5
			 Impact				
			No AZ intervention required for event with recovery of any effect. Off site: no impacts	AZ intervention required for event with recovery of any effects. Off site: No impact	AZ intervention required with recovery plan put into operation. Requiring regulator notification	On site and off site: AZ intervention not impacting site operations. Regulatory interaction in confirmed harm to environment	On site and off site: AZ intervention required adversely impacting site operations. Regulator enforcement/ lead to issues.
			First Aid Injury treated at time of the event. Full recovery	AZ Reportable injury with no impact on work activities. Full recovery	A lost time and/or temporary disability	A partial or permanent disabling/ incapacitating injury	Serious SHE event (SIF) resulting in fatality, life threatening or altering (permanent) injuries
			No noticeable health effects	Short term health effect with full recovery	Medium term health effect with temporary restrictions required. Full recovery	Long term health effects with limited recovery	Serious permanent health effects or death

4 PRE-EMPTIVE MEASURES

Pre-emptive measures implemented to minimise the risk of a pollution incident associated with key Site activities and materials include the following:

4.1 PIRMP ADMINISTRATION

A copy of the PIRMP will be available on-site at all times. The PIRMP will be the subject of annual training and testing amongst relevant Site Managers/employees, and contractors to ensure there is a high level of awareness of requirements and procedures in preventing, minimising and responding to potential harm to the environment or human wellbeing during a pollution incident.

The PIRMP will be the subject of at least an annual review or within 30-days of a pollution incident. Any revised versions of the PIRMP will be posted on the AstraZeneca website within 14-days of internal approvals of amendments.

Inductions of new employees, contractors and visitors will include key aspects of the PIRMP such as alarm warnings, emergency evacuation points and safety muster locations to minimise potential harm to people on or likely to be on the Site during a pollution incident.

4.2 SHE EMERGENCY PREPAREDNESS AND RESPONSE PLAN

This document is to provide procedural awareness of the site requirements towards establishment of an Emergency Management Plan. The documents also detail the specific requirements towards Emergency Management Preparedness which includes response to small or large scale chemical spills and evacuation strategies to ensure the safety of all personnel within the area.

4.3 STORAGE AND MANAGEMENT OF POTENTIAL POLLUTANTS

4.3.1 Warehouse

Storage of packaged chemicals (i.e. oils, solvents, hand sanitisers and inks) is undertaken in within a bunded floor area away from any immediate stormwater drain. A spill kit station and fire extinguishers are located within the warehouse.

During on-site movements, bulk and packaged chemicals are secured within a forklift safety cage to minimise potential for spills.

Stock inventory and control is undertaken to minimise on-site quantities and volumes of potential pollutants.

4.3.2 Engineer Store

The Engineer Store is roofed with no stormwater drains in close proximity. Packaged volumes (20L) of machine oil/lubricants are stored over a pallet bund.

4.3.3 Waste Station

The waste station is a roofed facility with drainage directed internally towards a floor sump. A spill kits station and fire extinguishers are located within this facility.

4.3.4 Stormwater Drains and Discharge Points

The Site has stormwater drains servicing vehicular movement and car park areas. Spill kit stations and drain covers are available for response to any spills and leaks. There are also two stormwater isolation valves along the northeastern boundary which can be used to prevent/minimise any off-site discharge of pollutants.

The Site is subject to a Trade Waste agreement and discharges are routinely sampled and tested to ensure pollutants meet the prescribed concentrations.

4.3.5 Equipment and Vehicles

All chemical storage areas and transfer equipment / infrastructure are subject to regularly scheduled inspections and maintenance. The hydraulic and fuel systems of forklifts and heavy vehicles are subject to a scheduled maintenance program.

Spill kits are regularly inspected for content and will be replenished if ever used/required.

5 PIRMP ACTIVATION

5.1 PIRMP RESPONSE TEAM

The PIRMP will be activated in the event of an incident causing or potential to cause material harm by the authorised AstraZeneca response team list in Table 3. Pending the nature and severity of a pollution incident, there may be a requirement to engage external specialist emergency response assistance and contact details are also provided in Table 3.

Table 3: PIRMP Team Roles and Responsibilities

PIRMP Response Team	Roles & Responsibilities	Contact Details
Priona Naidoo (SHE Lead) Available 24 hours	- Receives internal notification of an incident and response updates - Provides notification to Authorities and provides updates - Provides notification and updates to neighbours - Coordinates with Emergency Services if providing on-site response assistance	Mobile: 0440 101 027 Email: priona.naidoo@astrazeneca.com
Scott Morphet (Engineering Lead) Available 24 hours	- Provides immediate response in accordance PIRMP Table 4 Actions with using with appropriate PPE - Internal communicates incident and response status - Assist with the coordination of Emergency Services / Authorities if required - Ensures appropriate response resources are maintained and replenished after the incident - Assist with incident investigation and implementation of learnings - Assist with PIRMP review after incident	Mobile: 0491 092 112 Email: scott.morphett@astrazeneca.com
Site Security Available 24 hours	Alternative contact should above nominated PIRMP response team are unavailable	Site Security Team (02) 9978 3803
Cleanaway Available 24 hours	Assistance with post emergency response and clean-up of significant spill events (if required)	Emergency Spill Hotline: 1800SPILLS

5.2 PIRMP ACTIONS

Table 4 details specific PIRMP actions in response to potential pollution incidents associated with each of the locations (see Figure 2 and Table 1 above) with potential for a pollution incident which could result in material harm.

Table 4: PIRMP Actions

Pollution Incident	PIRMP Action	Post-PIRMP Action
No.1: Extreme spills from: • Warehouse • Engineer Store • Waste Station • Chemical deliveries and transfers • Vehicles / equipment There is potential for release of chemicals beyond Site boundaries if the stormwater isolation valves have not been closed in time to prevent off-site discharge.	• Using appropriate PPE stop or restrict source of spill / leak by closing stormwater isolation valve and using spill response kits <u>If Material Harm has / or has potential to occur:</u> • If off-site release has (or suspected) to have occurred, contact all relevant Authorities (refer to Section 6.1) and provide periodic updates • Contact local neighbours (refer to Section 6.1) and inform them of potential impacts by spill incident and provide periodic updates • Incident area to be restricted to PIRMP Response Team, Authorities, and specialised emergency response personnel if in attendance • Evacuate non-essential AstraZeneca personnel, contractors and Site visitors if required • Continue to use of spill kits and drain covers until diversions around spill to contain/divert spill until external incident response specialists arrive with more specialised resources and equipment (i.e. suction truck)	• Provide update to all Authorities and neighbours contacted during the incident • Engage specialised emergency response specialist to clean spill area and pump out any residue collected up to stormwater isolation valves (if required) • If chemical spill has been confirmed (or suspected) to have discharged beyond stormwater isolation valves – engage Environmental Consultants to investigate potential extent of impacts and any remediation required • Assess Duty to Report contamination to EPA under S60 of the <i>Contaminated Land Management Act (1997)</i> • Check and replenish response equipment/resources • Dispose of contaminated response material through licensed contractor • EPL Condition R2.2: Provide NSW EPA with written details of the notification within 7 days of the incident being reported • Investigate incident and review PIRMP within 30-days of incident

	• Co-ordinate with Authorities and specialised emergency response personnel (as required) • Engage professional service provider to pump-out any contained/captured diesel/petrol, clean-up and appropriately dispose of waste generated	• Implement incident investigation learnings – including PIRMP response efficiency • Communicate investigation findings and corrective actions to Authorities and neighbours (if required)
No 2: Extreme fire with visible plume There is potential for air emissions from fire adversely impacting the health and amenity of neighbours	• Dial triple 000 and request response from Fire and Rescue NSW • Contact all other relevant Authorities (refer to Section 6.1) and provide periodic updates • Contact local neighbours (refer to Section 6.2) with potential to be adversely impacted by air emissions and provide periodic updates • Co-ordinate with Authorities and specialised emergency response personnel (as required) • Cease all activities around the fire incident until Fire and Rescue have advised operations may recommence	• Provide update to all Authorities and neighbours contacted during the incident • Investigate incident and review PIRMP within 30-days of incident • EPL Condition R2.2: Provide NSW EPA with written details of the notification within 7 days of the incident being reported • Implement incident investigation learnings • Communicate investigation and corrective actions to Authorities and neighbours

6 PIRMP NOTIFICATION AND COMMUNICATION

6.1 NOTIFICATION OF AUTHORITIES

In the event of a pollution incident causing or potential to cause material harm, the Site HSE Lead or authorised nominees (see Table 3) will notify the Authorities listed in Table 5. All Site employees and Contractors must either through inductions and training be aware of reporting any actual or potential pollution incidents directly to HSE Lead (or authorised nominees).

If the incident has an immediate threat to human health or property, Emergency Services (dialling triple 000) will be the first of the Authorities to be contacted as they will be able to provide initial advice and if required, on-site assistance in controlling, containing and combating incidents.

If the incident does not require emergency services, or once the triple 000 call has been made, notification of the other relevant Authorities listed in Table 5 must be undertaken.

The information to be provided to the Authorities will include the following:

- The time, date, nature, duration and location of the incident
- The estimated quantity or volume of any pollutants involved
- An initial understanding of the circumstances in which the incident occurred
- The action taken or proposed to be taken by internal and external resources to deal with the incident and any actual or potential pollution arising from the incident

Table 5: Compulsory Authority Contact Details

Authority	Contact Details.	Notification Responsibility
<u>Emergency Services</u> • Fire and Rescue NSW • NSW Police • NSW Ambulance Service	Call: 000	Either of the following AstraZeneca personnel are responsible for notification to Authorities: Priona Naidoo (SHE Lead) Scott Morphet (Engineering Lead) Site Security (in the absence of the above personnel)
NSW EPA	131 555	
WorkCover Authority	131 050	
Ryde City Council	(02) 9952 8222.	
Ryde Hospital	(02) 9858 7888	

6.2 NOTIFICATION OF NEIGHBOURS / COMMUNITY

In the unlikely event that immediate neighbours listed in Table 6 or the wider community may be impacted by a pollution incident associated with AstraZeneca operations, the SHE Lead, as deemed appropriate, will either contact nominated neighbours by: phone, email, text or door knocking to provide the following information:

- Nature of the incident, response being undertaken and any precautions that may be required to reduce the risk of impact on their health and amenity;
- Likely duration and periodic updates on the status of the incident;
- End of incident response and any associated residual risks that may exist until appropriate clean-up/remediation can be completed; and
- Summary of incident investigation and learning to minimise a repeat of the event.

Table 6: Immediate Neighbours Contact Details

Neighbour	Address	Contact Details
Macquarie Shopping Centre	Cnr Waterloo Rd	(02) 9887 0800
AstraZeneca Commercial building	66 Talavera Rd	(02) 9856 8340 Building Manager 0436 329 888
Focus building	64 Talavera Rd	Strata Manager 0404 096 911
3 Dalton Engineering	54-60 Talavera Rd	0413 595 168
Guardian Childcare and Education	Gate C, 19-25 Khartoum Rd	13 82 30
ADCO construction site	11 Khartoum Rd	Site Manager 0429 709 674
WISE Emergency Centre	17 Khartoum Rd	(02) 9216 7676
FUJIFILM building	8 Khartoum Rd	(02) 9856 5000
Macquarie Innovation Centre (Schneider Electric) building	2 Banfield Rd	Building Manager (02) 9925 0000
Tower 2 residential building	101 Waterloo Rd	Building Manager 1300 761 610

7 PIRMP TESTING AND TRAINING

7.1 PIRMP TESTING

The PIRMP will be tested and reviewed on at least an annual basis or within a month (30 days) of a pollution incident occurring at the Site. A summary report will be prepared for each PIRMP test that will detail results and learnings against the scope and actions presented in Table 7.

Table 7: Scope and Actions of PIRMP Tests

Scope / Action
Include SHE Lead, Engineering and Facilities Leads and relevant Response Team with PIRMP responsibilities
Response to simulated pollution incident associated with activities, equipment and materials associated with Site operations (i.e. under rain / dry / windy scenarios and during chemical deliveries)
Awareness and effectiveness of communication and notifications with internal Site Managers, nominated Authorities, Incident Response Specialists and neighbours/communities
Level of availability, awareness, efficiency and effectiveness in the use of incident response resources
On-site coordination with external response services/Authorities - pending incident severity
Minimising harm to people on-site - simulated incident to include requirement for site warning alarm / evacuations
Combating/minimising the pollution caused by incident
Discuss - Inspection, maintenance and replenishment of response equipment/materials used in responding to incident
Discuss - Clean-up and disposal of contaminated response materials through licensed contractor
Prepare Summary Report of the simulated PIRMP Test
Review of PIRMP to reflect any learnings from simulated PIRMP Test – if review requires a revised version of the PIRMP, the amended version will be posted on the AstraZeneca website within 14-days of the review findings.
Schedule next PIRMP Test within next 12-month period

7.2 PIRMP TRAINING

PIRMP training will be conducted through either formal awareness sessions, inductions, toolbox style presentations or simulated incidents. The frequency of training will be at least annually for the PIRMP response team and Site Leads / Manager (and nominated back-up personnel). Training will also be provided to new employees and contractors through inductions and on an as required basis. A training register will be maintained detailing attendees and the manner in which training was provided.

The objective of the training will be to ensure Site Leads / Managers, incident response team, relevant site employees and contractors are aware of the pollution risks associated with manufacturing operations, response equipment and materials and an awareness of roles and responsibilities in the administration and activation of the PIRMP.

7.3 PIRMP TRAINING AND TESTING SCHEDULES

Routine PIRMP training and testing will be conducted in accordance with dates and scope presented in Table 8.

Table 8: Completed and Scheduled PIRMP Training and Tests

Date	Test / Training	Scope	Status
08-May-2026	Test & Training	- Training: POEO Act / Regulation PIRMP Requirements - Test: simulated pollution incident No. 1 ("Extreme spill event") – see Table 4 above)	Completed (08-May-2026)
No later than of 31 May 2027	Test/Training	To be determined	Date Requires Schedule Confirmation