ENVIRONMENTAL MANAGEMENT PLAN
FOR MRI
73 VICTORIA STREET, SMITHFIELD NSW

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Benbow
ENVIRONMENTAL

Engineering a Sustainable Future for Our Environment

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1. INTRODUCTION

This Environmental Management Plan (EMP) has been developed for MRI (Aust) Pty Ltd for their e-waste facility located at 73 Victoria Street, Smithfield using the following as a guide:

- AS/NZS ISO 14001, Environmental Management Systems – Specifications with guidance for use;
- AS/NZS 14004, General guidelines on principles, systems and supporting techniques; and
- Department of Infrastructure, Planning and Natural Resources, Guideline for the Preparation of Environmental Management Plans.

This report brings together the environmental documentation and risk assessments undertaken by MRI personnel and the requirements within the letter from Fairfield City Council, dated 3 April 2014 to provide the framework so that operations are undertaken with environmental aspects and impacts of activities in mind to minimise the potential to create environmental harm. Additionally, this EMP would ensure that MRI's corporate Environmental Policy will be adhered to.

The basic intention of the Environmental Management Plan is to achieve a continual cycle of improvement in managing environmental matters and therefore, each of the following core elements are addressed:

Reference: Vale, A., 1996, '*Environmental Awareness Training*'.

MRI's Smithfield site is a waste recovery operation that specialises in electronic components, electrical equipment and white goods. This includes recycling of a range of components being cathode ray tubes, plasma and liquid crystal display monitors, electronic and telecommunications equipment, white goods and refurbishment of computers. These items once processed are resold.

This EMP identifies how the management structure at the Smithfield site will satisfy the requirements of the environmental protection legislation and other regulatory requirements. The EMP covers all operations undertaken at the site by employees and contractors on their behalf and seeks to increase staff awareness, establish environmental management objectives, minimise environmental impacts and continuously improve environmental performance. The necessary procedures and safeguards to effectively manage the on-site and off-site environmental impacts of the activities are detailed. A copy of this EMP will be available on site at all times.

1.1 SITE DESCRIPTION

The site is located within an industrial area in the suburb of Smithfield in Sydney's west. There are industrial and commercial premises immediately surrounding the site and a main road to the south of the site.

Sensitive receptors are residential areas within a distance of 250m to the south (zoned R2 and R3 low and medium density residential respectively). Smithfield Public School is located at 130m south-west of the site.

Hours of operation include:

Monday to Friday:	6:00am to 11:00pm; and
Saturdays:	8:00am to 4:00pm

At full production, there would be a total of 40 employees working at the site. This would be distributed over 3 shifts per day and consists of:

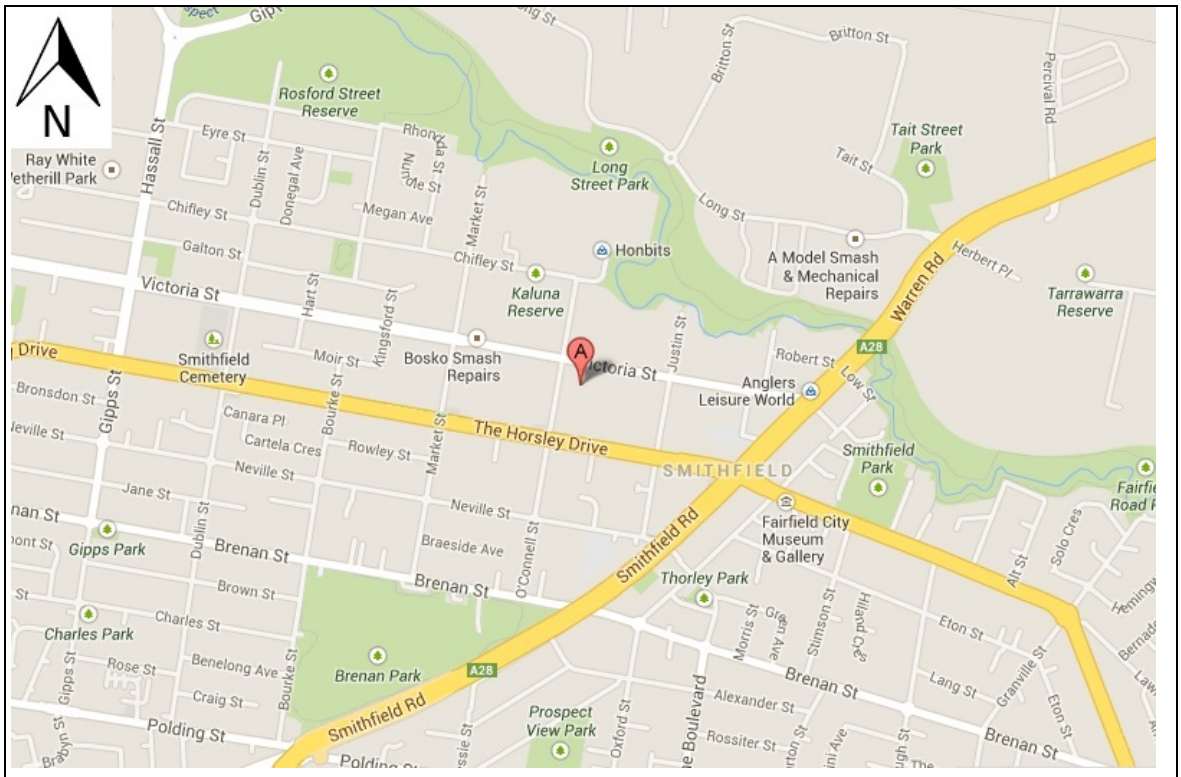
6:00am to 2.30pm	15
8:00am to 4.30pm	7
2.30pm to 11:00pm	10

There would also be 3 management staff and 5 sales/administration staff.

1.1.1 Site Location

The site located at 73 Victoria Street, Smithfield approximately 25km west of the Sydney CBD. Figure 1-1 provides a location map and Figure 1-2 provides an aerial photograph of the site.

Figure 1-1: Site Location



Source: Google Maps

↑N Not to scale	LEGEND: "A" = Site	Benbow Environmental 13 Daking Street, North Parramatta NSW 2151

1.1.2 Site Infrastructure

The site consists of a building that can be compartmentalised as two units – the "west" unit and the "east" unit and an office area.

The southern half of the "west" Unit is used for disassembly of cathode ray tube screens – TV's and PC's.

Pallet racking is used for storage purposes in the "east" unit. The east wall of the "east" unit is used for storing fridges and freezers returned from the major overseas manufacturers such as Samsung and LG.

The front is a car park area. There is an external area at the rear of the site that is used for storage of waste and recyclables. These areas need to be kept clear to enable semi-trailers to manoeuvre on site.

1.1.3 Operational Activities

The following processes are undertaken at the facility:

- **Recycling of cathode ray tubes**

Obsolete cathode ray tubes (CRT) monitors are recycled using a heated wire (400^0C) to momentarily melt the binded glass that holds the front and rear glass pieces together within a period of 30 seconds or less for each CRT. The metal band is removed and sent to a scrap metal recycler. The hot wire process is established in an enclosed space, to prevent potentially flying objects from causing physical injury upon breaking the CRT glass.

The conical end of the CRT contains valuable metals. These are sent to either South Korea or Japan for processing.

The glass sections – front and rear - are separated and sent to Campbelltown Recyclers. The glass is crushed and enters the glass stream sent to fibreglass insulation manufacturers.

Inside the front glass of a CRT, a phosphor coating has to be brushed off. A vacuum duct captures the phosphor. The two glass types are separated as re-use of each is limited due to the presence of substances – lead, barium and strontium which can only be added in small amounts to the glass recyclers that is occurring at the fibreglass manufacturers.

- **Recycling of plasma and liquid crystal display monitors**

Plasma and LCD TV monitors are disassembled using manual tools and air powered screwdrivers.

The flat screen TV's are stripped and various components recycled.

LED lights are now used in flat screen TV's. These have aluminium and copper strips which are removed for recycling.

- **Recycling of a range of available electronic and telecommunications equipment**

This equipment is disassembled, inspected and items are separated for reuse or recovery of metals.

Sorting of circuit boards is based on whether metals are present or silicon wafers. Valuable metals are removed from circuit boards and these are placed into large cardboard boxes and are shipped to either South Korea or Japan where metals are recovered in smelting ovens. Silicon wafers are removed for recycling at reprocessing plants located in South Korea and Japan. No reprocessing occurs in Australia.

- **Storage of re chargeable batteries**

MRI store redundant batteries at the site for packaging and shipment to their Victorian facility where batteries are further processed on-site or stored and exported to an overseas battery recycler.

Batteries consist of the following types:

- Lithium Ion;
- Lithium Primary;
- Nickel Metal Hydride;
- Alkaline;
- Lead-Acid; and
- Nickel Cadmium Batteries.

Drums are used to hold batteries. Batteries are separated into the various types listed above.

- **Recycling and refurbishment of various computers – mainframes, PC's and notebooks**

MRI refurbish computers including mainframes, PC's and notebooks. Depending on customer requirements, MRI can recycle the product completely, recover parts for reuse or test, upgrade and clean computers for resale.

Removing information from hard drives is another service that is provided.

- **Recycling of white goods**

Whitegoods include items such as microwaves, washing machines, fridges, freezers, air conditioning units and some decontaminated sanitised medical equipment that are brought to the site under contract.

Refrigerant from air conditioning units are removed and stored in gas cylinders before these are sent to a recycler within Australia.

Metal from white goods is sent to a metal recycler.

1.2 EMP CONTEXT

This EMP has been prepared in response to the letter from Fairfield City Council dated 3 April, 2014 in relation to the DA 876.1 / 2013.

The letter from Fairfield City Council specifies that:

> *The Plan shall be carried out by a suitably qualified environmental consultant and shall address means by which the commitment in the EIS, subsequent assessment reports, approval or licence conditions will be fully implemented. The EMP shall also provide a framework for managing and mitigating environmental impacts for the life of the proposal and make provisions for auditing the effectiveness of the proposed environmental protection measures and procedures. It is recommended that any monitoring/audits are conducted by a third party.*
>
> *The EMP shall incorporate:*
>
> - *All recommended mitigation measures as contained within Section 8 of the submitted Environmental Impact Statement (Report No. 137021_EIS_Rev2, prepared by Benbow Environmental, dated 16 December 2013).*
> - *Environmental Procedures (eg. Spill response procedures)*

- *Demonstrate how the external yards will be kept free of loose debris (ie. broken glass, plastic materials).*
- *Provide details of the frequency and method of cleaning activities within the external yards.*
- *Provide details of the staff members/position titles responsible for ensuring that the external yard is maintained in an environmentally satisfactory condition.*
- *A detailed plan of the external yard/s of the premises which illustrate the following:*
  - *Proposed designated storage areas including what type/s of goods are proposed to be stored externally and the proposed storage method/s (ie. in sealed containers etc)*
  - *Location of spill kit/s*
  - *Location of stormwater drains.*

Related documents include the Environmental Impact Statement and MRI's Environmental Management System documentation as follows:

- Benbow Environmental (2013), Environmental Impact Statement Report No. 137021_EIS_Rev2;
- MP-SHEQ-1.1-01 Environmental Policy Rev00;
- Aspects and Impacts Register_Smithfield_June2014;
- Mass balance and landfill diversion Check List – Sydney;
- F-HR-A.7-01 New Employee and Contractor Induction Checklist;
- EM-OPS-1.6-01 NSW Emergency Evacuation Plan Rev02;
- WI-OPS-A.8-01 Stormwater Drains Inspection Process Sydney Rev00;
- F-OPS-A.5-01 Stormwater Drains Check List Sydney Rev00;
- PR-SHEQ-A.7-03 Hazard Reporting and Investigation Procedure Rev00; and
- PR-SHEQ-14-01 Enviro and Safety External and Internal Communication Rev00.

1.3 OBJECTIVES

The objectives of the EMP are:

- To ensure management and all staff and contractors are aware of the legal requirements and responsibilities pertaining to environmental management related to all site operations covered by this EMP;

- To ensure that all staff and contractors are aware of the environmental aspects and impacts related to the site operations;

- To ensure staff and contractors are aware of their responsibilities and are competent in implementing the specific environmental safeguards that apply to their activities;

- To ensure review processes are incorporated into the plan to ensure continual improvement;

- To ensure all relevant legislation is complied with; and

- To minimise any environmental harm as a result of the site operations.

In addition to these objectives, it will be the aim of senior management to change and improve the EMP with the updating of environmental regulations, the development of new practices and technology, and in the case of complaints or incidents. The EMP should be updated to reflect such changes.

1.4 ENVIRONMENTAL POLICY

The environmental policy is presented as Attachment 1. This policy is considered integral to the way MRI undertakes business and presents the company's values and principles of action. It would be made available throughout the Smithfield facility in staff areas.

Figure 1-2: Aerial Photograph of Site

Source:

↑N Not to scale		Benbow Environmental 13 Daking Street, North Parramatta NSW 2151

2. PLANNING

The planning process is used to establish and implement the elements of the EMP. Understanding environmental legal and other requirements for the company and how operations interact with the environment is identified in this section.

The following areas are summarised in this section:

- environmental legislation and other requirements;
- environmental aspects and potential impacts;
- objectives, targets and environmental programs; and
- performance indicators.

The planning process also identifies what the EMP is trying to achieve through objectives, targets and programs and how performance should be measured.

2.1 LEGAL REQUIREMENTS

The legal requirements that affect the operation of this site include any legislation which relates to activities or potential environmental impacts of the operations.

The following key NSW legislation and their relevant associated regulations pertain to the environmental management of the site:

- Protection of the Environment Operations Act, 1997 (POEO);
- Environmental Planning and Assessment Act, 1979 (EP&A);
- Waste Avoidance and Resource Recovery Act, 2001 (WARR); and
- Work, Health and Safety Act, 2011 (WHS).

Changes to legislation or regulations during operations would require a corresponding change to the EMP.

Affected procedures would need to be modified accordingly by management.

Two initial considerations will be the Environmental Planning and Assessment Act, 1979 (EP&A Act) which governs land use and the Protection of the Environment Operations Act, 1997 (POEO Act) which concerns prevention of environmental harm through operations. Conditions within development consent conditions (DCC) under the EP&A Act and Environmental Protection Licence under the POEO Act would need to be considered once these are issued.

Relevant State and Federal Legislation and how this applies to the site and activities is provided in Attachment 2.

2.1.1 Development Consent Conditions under EP&A Act

The Development Consent Conditions (DCC) are issued by Council on acceptance of a proposed development or alteration / addition to existing developments under the EP&A Act, 1979. The DCCs that apply to the site need to be fulfilled in order to comply with current environmental and planning legislation, policies and guidelines.

These are yet to be granted and this section would need to be reviewed upon receipt of these development consent conditions.

2.1.2 Environment Protection Licence

The site is required to be licensed under Schedule 1 of the Protection of the Environment Operations Act, 1997 for Activity 34 – Resource Recovery and Activity 42 – Waste storage.

Once the licence has been issued, the EMP would need to be updated to include relevant licence conditions and provisions to comply with these conditions.

2.1.3 Pollution Incident Response Management Plan

Under Clause 153A of the Protection of the Environment Operations Act, 1997, all licence holders are required to prepare and implement a Pollution Incident Response Management Plan (PIRMP). This can be prepared as part of the existing Emergency Plan or as a separate document.

2.2 ENVIRONMENTAL ASPECTS AND IMPACTS

A description of the environmental aspects and potential environmental impacts is provided in tabular form as Attachment 2.

An environmental aspect is defined in ISO14001, 3.6 as:

> *'An element of the organisation's activities, products or services which can interact with the environment.'*
> *NOTE: A significant environmental aspect has or can have a significant environmental impact.*

An environmental impact is defined as:

> *'Any change to the environment whether adverse or beneficial, wholly or partially resulting from an organisation's activities, products or services'.*

The significant environmental impacts have been identified and are presented in the following sections.

The Environmental Aspects Register (EAR) identifies potential environmental impacts and the risk of impact or harm. It also identifies the risk associated with each aspect.

Procedures to prevent or control each impact are also identified and an overview of relevant issues is provided to direct staff to more information within the EMP.

2.2.1 Determining Significance

Aspects and impacts have been identified in Attachment 2. To ensure that all aspects and impacts are identified, all facilities, their associated surrounding areas, and any additional areas utilised by MRI were examined for what infrastructure or equipment is present that could also impact on the environment.

The next step is to allocate aspects and impacts significance, in order of highest to lowest. This is done using an existing risk assessment matrix. Significant environmental impacts are also discussed in the following sections.

2.2.2 Description of Potential Environmental Impacts

The following sections describe the potential environmental impacts for the site that were identified in the Aspects and Impacts Register. These relate to:

- Receipt, transport, storage and handling of waste on site;
- Noise pollution;
- Air emissions;
- Sedimentation or contamination of stormwater;
- Storage and handling of dangerous goods (batteries); and
- Fire risk.

2.2.2.1 Waste

Waste is involved in each stage of the process and is the core of MRI's operations. Waste is brought in as a raw material for processing, dismantling, storage and recycling. MRI have obligations under the Protection of the Environment Operations (waste) Regulation 2005 as a in relation to transporting, waste consignment and receipt. Waste also needs to be stored safely.

The main risks in relation to waste on site are potential for waste to enter stormwater, litter and incorrect management. MRI provide designated waste bins and ensure that waste and recycling contractors used are licensed.

A procedure to comply with obligations under the POEO (waste) Regulation needs to be developed as part of this EMP.

2.2.2.2 Noise

Noise is generated from the operations within the building, forklifts and trucks loading and unloading. To mimimise night time noise, the southern roller door is kept closed between the hours of 10:00pm and 7:00am. It is another objective of MRI to have white noise reversing beepers installed on forklifts.

2.2.2.3 Air Emissions

The CRT process could potentially emit air emissions. An air filtration system captures these emissions on site. This system would be regularly maintained in accordance with manufacturer's instructions.

Loading and unloading of trucks may also release dust and particulates. Loads would be brought on site in bulk bins, cages or on pallets. The product that is delivered in bulk bins is tipped inside the rear section of the warehouse to prevent the release of dust and particles to the outside.

2.2.2.4 Stormwater

Stormwater has the potential to become contaminated from spills or leaks of batteries. Spill kits are kept in high risk areas, gross pollutant traps are positioned on all stormwater drains and procedures are in place for regular inspection and checking of drains.

2.2.2.5 Dangerous goods

Dangerous goods are stored on site in the form of batteries, refrigerant and some minor storage of flammable goods. Designated storage areas with clear signage are provided at the site. Spill kids are located in high risk areas.

2.2.2.6 Fire Risk

There is a fire risk associated with the storage of batteries and other components on site. Fire services in accordance with BCA and relevant Australian Standards are provided on site.

Particular care needs to be taken in relation to lithium ion batteries. The following needs to be provided on site:

- Class D rated fire extinguishers, PPE and appropriate emergency response equipment;
- Training provided to employees in relation to the risk associated with a lithium battery fire;
- Powdered copper metal fire fighting agent needs to be stored for lithium battery fires.

2.3 ENVIRONMENTAL OBJECTIVES & TARGETS

This section details the site environmental objectives, targets and programs. The purpose of setting environmental objectives and targets and implementing programs is threefold:

- To implement the goals of the environmental policy;
- To minimise the environmental impacts identified during environmental reviews and environmental audits of the site's operations and the environmental aspects and impacts register; and
- To achieve the internal performance criteria set by MRI.

The recommended environmental objectives, targets and programs for the site are presented in Attachment 3.

3. IMPLEMENTATION AND OPERATION

Successful implementation of this EMP requires knowledge, skills and training, the allocation of resources, and the clear delegation of responsibilities. It is also important that stakeholders and regulatory authorities are kept informed of any significant modifications to normal operations that may take place on the site and that the residential community are given the opportunity to voice their concerns or complaints.

This section details the necessary safeguards and mitigation measures required to ensure impacts on the environment and amenity of neighbouring properties are minimised.

3.1 ROLES AND RESPONSIBILITIES

The following table outlines typical roles and responsibility levels. It is not all encompassing, rather a guide to assist management in assigning the correct responsibilities and accountabilities to their staff and to assist staff in applying the EMP to their daily work activities.

All staff have the responsibility of actively participating in the implementation of the EMP and for ensuring that improvements or problems with implementing the EMP are brought to the immediate attention of their supervisor or manager.

Table 3-1: Roles and Responsibilities

Role	Responsibility
Managing Director	• Ensure the company environmental policy is implemented in the EMP for the site. • Allow adequate resources to ensure satisfactory implementation and maintenance of the EMP. • Monitor overall EMP performance
Production / Site Manager	• Responsible for implementation across all functions and maintenance of EMP. • Responsible for managing changes to EMP from changes across site operations and/or legislation. • Ensure responsibilities of others are delegated and understood. • Responsible for implementing corrective and preventative actions.
Safety Health Environment and Quality (SHEQ) Manager	• Responsible for implementation of the EMP across all business functions. • Responsible for maintaining the EMP documentation including updating changes to business activities, legislation, procedures, objectives, targets and programmes and training. • Responsible for delegating tasks to other staff members in order to achieve objectives and implement EMP programs. • Responsible for the annual EMP review. • Responsible for training relating to environmental management in the plant, and assessing staff's competence.

Table 3-1: Roles and Responsibilities

Role	Responsibility
Supervisors	• Responsible for undertaking any EMP tasks delegated to them to enable effective implementation of the EMP. • Responsible for carrying out work activities in accordance with the EMP and procedures. • Responsible for ensuring that operators & staff are aware of their environmental responsibilities and legal requirements. • Responsible for informing the Environmental manager of any issues with implementing the EMP or if amendments are needed as soon as practicable.
All staff and Contractors	• Responsible for carrying out work activities in accordance with the EMP and procedures. • Responsible for informing supervisor / manager of any issues with implementing the EMP, corrective and/or preventative actions required or amendments needed as soon as practicable.

3.2 ENVIRONMENTAL TRAINING

Environmental training is essential for all staff working at the site to ensure that environmental aspects of the site activities and how to manage these aspects is understood.

Training will need to be assessed on a periodic basis for staff while contractors would be assessed on a job-by-job basis. It is recommended that environmental training be included as part of the site induction and re-visited annually. The New Employee and Contractor Induction Checklist is provided as Attachment 4.

This "training" shall be conducted by site management prior to those persons carrying out their works on site or as required for specific tasks.

3.2.1 Staff Training

Training of staff is recommended to cover the following areas:

- How to communicate an emergency situation and who to contact.
- How to respond, what assistance is available.
- Where to go in an emergency, how to evacuate to a safe location, who will co-ordinate an evacuation.
- The risk and how to respond in the event of a lithium battery fire;
- Awareness of environmental aspects and potential impacts of their work activities and the environmental benefits of improved personal performance.
- Awareness of the corporate environmental policy and objectives of the site EMP.
- Awareness of individual accountability under environmental legislation applicable to the site including penalties for offences under the Protection of the Environment Operations Act, 1997.
- Aspects of the operations and how these could potentially impact on the environment.

- How the potential impacts are managed on site – the controls and mitigation measures in place to minimise these impacts. Any on-site management including monitoring, inspection and checking and any regular maintenance undertaken and the reasons maintaining these programs are important.
- Legal requirements and personnel roles and responsibilities.
- Procedures applicable to certain staff members e.g.: Administration staff should understand how the complaints register is implemented, Staff responsible for daily operations should be trained in any inspection checklists and how to follow up on any non-conformances.

3.2.2 Training for Contractors

Contractors would be physically inducted by the Site Manager by providing a tour of the site and outlining site policy, procedures, and scope of works during the tour. Records of staff and contractor's training by use of a sign-in and sign-out register must be completed and would be filed to effectively sign off on their understanding and agreement to abide by the procedures.

Shortfalls could be addressed by specific on-site training. Updates and reviews should also be conducted in the case of complaints or after any changes in the EMP, in particular, a change in management, procedures, site operations or legislation.

3.3 COMMUNICATION

Voluntary and open communications should be undertaken with all groups with which the company interfaces; this includes community groups, regulatory authorities, non-regulatory agencies, and certain industries. MRI have an internal procedure in place: *PR-SHEQ-1 4-01 Enviro and Safety External and Internal Communication*. This is provided as Attachment 5.

3.3.1 Reporting Requirements

A pollution incident that occurs in the course of an activity so that material harm to the environment is caused or threatened must be notified immediately to relevant authorities.

Under Part 5.7A of the POEO Act holders of environmental protection licences must prepare and implement a pollution incident response management plan (PIRMP) for each licensed activity. The PIRMP would provide a notification procedure detailing what to do in the event of a pollution incident.

3.3.2 Complaints & Incidents

Complaint & Incident records are required to be kept for at least four years after the complaint was made and are dealt with as part of the procedure PR-SHEQ-1.4-01 Enviro and Safety External and Internal Communication Procedure (Attachment 5). MRI record the determination using the PR-SHEQ-1.4-01 Enviro and Safety External and Internal Communication Procedure and then raise a HICAR if necessary. Information that should be recorded in relation to the complaint includes:

- The date and time of the complaint;
- The method by which the complaint was made;
- Any personal details of the complainant, which were provided by the complainant or, if no such details were provided, a note to that effect;
- The nature of the complaint;

- The action taken in relation to the complainant, including any follow up contact with the complainant; and
- If no action was taken, the reasons why no action was taken.

3.4 EMERGENCY PREPAREDNESS & RESPONSE

MRI's Site Emergency Plan is provided as Attachment 7. The plan identifies potential emergency situations and details how to respond to them.

A Pollution Incident Response Management Plan is required under the POEO Act. This will be incorporated within the existing Emergency plan and will cover requirements under the Act.

4. MONITORING & REVIEW

This section details the monitoring and review required to facilitate proper implementation, maintenance and due diligence of the EMP.

4.1 MONITORING & INSPECTION PLAN

An environmental monitoring and inspection plan is presented as Table 4-1. The results from such plans are aimed at safeguarding the environment from long term degradation. The plan is aimed at assessing the compliance of the site in relation to noise emissions, the release of contaminants into the air and waters, and the generation of waste. It also aims to improve the general environmental management of the site.

The plan has been based on recommended monitoring and inspection programmes and what is expected to be Consent Conditions and conditions of the EPL. This section needs to be updated once the Consent Conditions and EPL have been issued.

Table 4-1: Monitoring and Inspection Plan

	Process	Documentation	Responsibility
Workplace Inspections	Daily inspection of all areas of the site using a checklist.	Workplace Inspection Checklist	Shift Manager
Stormwater Drain Inspections	WI-OPS-A.8-01 Stormwater Drains Inspection Process Sydney Rev 00	F-OPS-A.5-01 Stormwater Drains Check List - Sydney Rev00	Shift Manager
Evaluating Compliance	Undertake an internal audit to ensure operations are undertaken in accordance with the EMP	Internal Audit Report	Environmental Manager
Confirming Compliance	Engage a qualified environmental consultant to undertake an Environmental audit to ensure site operations are in compliance with legal requirements and to check the effectiveness of safeguards and procedures	Environmental Audit Report	General Manager

4.2 ENVIRONMENTAL MANAGEMENT REVIEW

An annual internal management review of the EMP will be conducted to ensure the suitability, adequacy and effectiveness of the environmental management techniques implemented at the site. Opportunities for improvement shall be identified.

It is recommended that management reviews include the following:

- Internal audit results and evaluation of compliance with legal and other requirements;
- All communications relating to environmental issues of the site;
- Whether objectives and targets have been achieved;
- Status of corrective and preventative actions;
- Previous management reviews;
- Changes to legal or other requirements relating to environmental aspects; and
- Opportunities for improvement to the environmental management of the site.

Records of the annual reviews shall be maintained.

5. ENVIRONMENTAL PROCEDURES & PLANS

Environmental procedures and plans for the site are implemented in order to avoid environmental harm. Procedures and Plans considered adequate to comply with the site's environmental requirements include:

- Emergency Incident Report Records (within Emergency Plan)
- In the Event of Major Chemical Incident (within Emergency Plan)
- Typical Maximum Quantities of Dangerous Goods Stored on Site (within Emergency Plan)
- Site Dangerous Goods in Storage, Emergency & Spill Kit Location Plan (within Emergency Plan)
- WI-OPS-A.8-01 Stormwater Drains Inspection Process
- F-OPS-A.5-01 Stormwater Drains Checklist
- PR-SHEQ-A.7-03 Hazard Reporting and Investigation Procedure
- Workplace Inspection Process
- Workplace Inspection Checklist
- WI-OPS-A.5-03 Chemical Spill Containment and Clean-up Process
- WI-OPS-A.5-01 Oil Spill Containment and Clean-up Process
- WI-OPS-4.5.3-05 Bulk Battery Processing
- WI-OPS-4.5-03 Sorting of Materials to be Recycled
- WI-OPS-4.5-04 Sorting of Aluminium
- WI-OPS-4.5.5-01 Reclaiming of Refrigerant Gases
- F-OPS-A.8-02 Daily Forklift Checklist
- FM03 Vehicle Weekly Checklist

The Site's Emergency Plan is provided as Attachment 5. Other Procedures listed above are provided in Attachments 8 to 19.

This concludes the report.

Linda Zanotto
Senior Environmental Engineer

R T Benbow
Principal Consultant

6. LIMITATIONS

Our services for this project are carried out in accordance with our current professional standards for site assessment investigations. No guarantees are either expressed or implied.

This report has been prepared solely for the use of MRI (Australia) Pty Ltd, as per our agreement for providing environmental services. Only MRI (Australia) Pty Ltd is entitled to rely upon the findings in the report within the scope of work described in this report. Otherwise, no responsibility is accepted for the use of any part of the report by another in any other context or for any other purpose.

Although all due care has been taken in the preparation of this study, no warranty is given, nor liability accepted (except that otherwise required by law) in relation to any of the information contained within this document. We accept no responsibility for the accuracy of any data or information provided to us by MRI (Australia) Pty Ltd for the purposes of preparing this report.

Any opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal advice.

ATTACHMENTS

Attachment 1: Environmental Policy

MRI
e-cycle solutions

ENVIRONMENTAL POLICY

MRI's activities cover recycling of cathode ray tubes, recycling of plasma and liquid crystal display monitors, recycling of power transmission equipment (including oil filled equipment and cables), recycling of various electronic and telecommunication equipment (including mobile phones), recycling of rechargeable batteries, and recycling and refurbishment of computers (mainframes, personal and note book) and related equipment.

We are Australia's leading cathode ray tube recycler.

Our Environmental Policy is to be a responsible corporate citizen in protecting the environment. We are committed to complying with or exceeding accepted environmental practices related to our business aspects including to the applicable legal and other requirements to which we subscribe, to striving for continual improvement in our environmental performance management system and to minimising the use of resources and creation of waste and pollution.

We will manage our processes, our materials and our people in order to reduce the environmental impact associated with our activities and will continually give due consideration to environmental aspects in our business decisions.

We will periodically set and review objectives and targets aimed at maintaining and improving our environmental performance and take further steps as required towards ensuring their achievement.

We will maintain a certified ISO 14001 compliant Environmental Management System as a minimum system standard. It is, however, expected that through our diligence our system will exceed the requirements of this standard.

This policy will be communicated to all persons working for or on behalf of us and is available to public.

Approved 06 January 2012

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Attachment 2: Environmental Aspect Register

Review Date 19/06/2014

Activity / Process	Aspect	Offensive Odour	Air Contamination	Stormwater Contaminatio	Sewer discharge	Solid waste	Prescribed Waste	Ground Water Contamina	Resource Utilisation	Damage to Flora & Fauna	Noise	Soil Contamination	Impact	Raw Risk E	Raw Risk L	Raw Risk C	Raw Risk Rating	Legislation/Standards/Guidance	MRI Procedures	Controls	Risidual Risk			Risidual Risk Rating
CRT Storage / Processing	CRT monitor break and Phosphor or glass particles are released			x									Stormwater Contamination	3	3	25	225	Protection of the Environment Operations Act 1997 Sectio	WI-OPS-A.8-01 Stormwater Drains inspection process Sydney	Drainwardens, spill kits	3	3	1	9
												x	Soil and ground contamination	3	3	25	225	Protection of the Environment Operations Act 1997 Sectio	Product is only stored on hardstand or within the building.	Staff training	3	3	1	9
						x							Phosphor sweepings sent to PIW landfill	3	10	5	150	Protection of the Environment Operations Act 1997 Waste Avoidance and Resource Recovery Act 2001 OEH Waste Classification Guidelines	No further action possible at the moment	Designated waste bin, Is sent to licensed landfill				0
			x										Air Contamination	1	3	25	75	Protection of the Environment Operations Act 1997 Section 128		Extraction system used on CRT Machine	1	1	25	25
	Waste Produced from process					x							Solid waste produced	6	10	5	300	Protection of the Environment Operations Act 1997 Sectio	Currently working with the customer in only delivering the CRT's in Stillages not in tip bins.	Designated waste bin, Is sent to licensed landfill				0
	Leaded Glass generation					x			x				Solid waste produced	10	10	15	1500	PROTECTION OF THE ENVIRONMENT OPERATIONS (WASTE) REGULATION 2005	Downstream vendor questionnaire	Designated waste bin, Glass is sent to Campbelltown Glass	10	1	5	50
Storage of Batteries	Battery Leaks			x									Battery leak enters Stormwate	3	1	25	75	Protection of the Environment Operations Act 1997 Sectio	WI-OPS-4.5.3-05 Bulk Battery Processing WI-OPS-A.5-03 Chemical spill containment and cleanup process	Staff training and spill kits	1	1	5	5
												x	Battery leak contaminates soi	3	1	50	150	Protection of the Environment Operations Act 1997 Sectio		Staff training and spill kits	1	0.5	5	2.5
						x							Used absorbent material and contaminated material sent to PIW landfill	3	10	5	150	Protection of the Environment Operations Act 1997 Waste Avoidance and Resource Recovery Act 2001 OEH Waste Classification Guidelines		Designated waste bin, Staff training	1	3	5	15
	Batteries are mislabelled												Non compliance with the DG7 code	2	3	1	6	Dangerous Goods (Road and Rail Transport) Regulation 2008	Battery Labels in MRIIMS 2.0	Staff training	2	1	1	2
	Batteries are inappropriately stored												Non Compliance with Work Health and Safety Regulation 2011	2	3	1	6	Work Health and Safety Regulation 2011	Dangerous goods storage areas, Clea signage	Staff training	2	1	1	2
Photo Copier / Toner Cartridges / Printer Storage	Toner leaks			x									Toner enters storm water	3	10	25	750	Protection of the Environment Operations Act 1997 Sectio	WI-OPS-A.8-01 Stormwater Drains inspection process Sydney	Drain wardens	3	1	25	75
						x							Leaked toner swept up and sent to landfill	3	10	5	150	Protection of the Environment Operations Act 1997 Section 142 Waste Avoidance and Resource Recovery Act 2001	No further action possible at the moment	Cleaned up and disposed of according to state requirements				0
Loading & unloading of trucks	Battery Leaks			x									Stormwater Contamination	3	10	25	750	Protection of the Environment Operations Act 1997 Sectio	WI-OPS-4.5.3-05 Bulk Battery Processing WI-OPS-A.5-03 Chemical spill containment and cleanup process	Staff training and spill kits	3	3	5	45
												x	Soil and ground contamination	3	10	50	1500	Protection of the Environment Operations Act 1997 Sectio						
							x						Used absorbent material and contaminated material sent to PIW landfill	2	10	5	100	Protection of the Environment Operations Act 1997 Waste Avoidance and Resource Recovery Act 2001 OEH Waste Classification Guidelines						
	Toner leaks			x									Stormwater Contamination	6	10	15	900	Protection of the Environment Operations Act 1997 Sectio	WI-OPS-A.8-01 Stormwater Drains inspection process Sydney	Drain wardens and spill kits	3	1	15	45
						x							Leaked toner sent to landfill	3	10	5	150	Protection of the Environment Operations ACT 1997 Waste Avoidance and Resource Recovery Act 2001 OEH Waste Classification Guidelines	No further action possible at the moment	Cleaned up and disposed of according to state requirements				0
	CRT monitor break and Phosphor is released			x									Stormwater Contamination	3	3	15	135	Protection of the Environment Operations Act 1997 Sectio	WI-OPS-A.8-01 Stormwater Drains inspection process Sydney	Drainwardens	2	1	15	30
												x	Soil and ground contamination	3	1	25	75	Protection of the Environment Operations Act 1997 Sectio	Product is only stored on hardstand or within the building.	Staff training	1	1	25	25
							x						Phosphor sweepings sento to PIW landfill	3	10	5	150	Protection of the Environment Operations Act 1997 Sectio Waste Avoidance and Resource Recovery Act 2001 OEH Waste Classification Guidelines	No further action possible at the moment	Are stored in DG poly lined drums before being sent to licensed landfill	3	3	5	45
	Release of dust & particulates		x										Emissions to air						None	All loads of incoming and outgoing materials will be covered				
	Truck has Oil leak			x									Stormwater Contamination	2	3	15	90	Protection of the Environment Operations Act 1997 Sectio	WI-OPS-A.5-01 Oil Spill containment and clean up process	Drainwardens	3	1	5	15
								x					Used absorbent material and contaminated material sent to PIW landfill	2	10	5	100	Protection of the Environment Operations Act 1997 Section 142 Waste Avoidance and Resource Recovery Act 2001		Staff Training	3	1	5	15
Forklift use	Exhaust Emmisions		x										Green house gases	6	6	1	36	Protection of the Environment Operations Act 1997 Ozone Protection ACT	F-OPS-A.8-02 Forklift Daily Checklist	Regular forklift checks are done - regualar servicing of forklifts is conducted.	6	6	1	36
	Gas Leak		x										Emmissions to Air	1	1	25	25	Protection of the Environment Operations Act 1997 Ozone Protection ACT	F-OPS-A.8-02 Forklift Daily Checklist	Regular forklift checks are done - regualar servicing of forklifts is conducted.	2	10	5	100
	Noise										x		Unwanted noise, complaints from neighbouring properties					Protection of the Environment Operations Act 1997 Sectio	F-OPS-A.8-02 Forklift Daily Checklist	White noise reversing beepers or forklifts				
	Hydralic Leak			x									Stormwater Contamination	10	10	5	500	Protection of the Environment Operations Act 1997	F-OPS-A.8-02 Forklift Daily Checklist	Regular forklift checks are done - regualar servicing of forklifts is conducted.	2	10	5	100

Use of Electricity	Greenhouse gases												Contribution to global warming	10	10	1	100	Protection of the Environment Operations Act 1997 Ozone Protection ACT	A/C set at 22°C or above	Staff training	3	10	1	30
	Electrical Fire	x	x	x		x	x					x	Smoke produced from fire	10	10	15	1500	Protection of the Environment Operations Act 1997 Ozone Protection ACT	EM-OPS-1.6-01 NSW Emergency evacuat	Staff training and fire equipment maintenance	1	1	15	15
Storage Plastic & Foam waste	Stormwater contamination												Plastic and Foam enter storm water system	6	3	5	90	Protection of the Environment Operations Act 1997 Sectio	WI-OPS-4.5-03 Sorting of Material to be Recycled	Staff training, drain wardens, and drain cover	1	3	5	15
	Sent to Landfill							x					Plastic and Foam are sent to Landfill	6	3	5	90	Protection of the Environment Operations Act 1997	WI-OPS-4.5-03 Sorting of Material to be Recycled	Staff training	1	3	5	15
Storage of Metal waste Ferrous/Non Ferrous	Land fill							x					Metal is sent land fill	6	3	5	90	Protection of the Environment Operations Act 1997	WI-OPS-4.5-03 Sorting of Material to be Recycled	Staff training	1	3	5	15
Storage of Paper & Cardboard waste	Stormwater contamination			x									Paper enters storm water system	6	3	5	90	Protection of the Environment Operations Act 1997	WI-OPS-4.5-03 Sorting of Material to be Recycled	Staff training, drain wardens, and drain cover	1	3	5	15
	Sent to Landfill							x					Paper is sent to landfill	6	3	5	90	Protection of the Environment Operations Act 1997 Waste Avoidance and Resource Recovery Act 2001	WI-OPS-4.5-03 Sorting of Material to be Recycled	Staff training	1	3	5	15
Waste - Floor sweepings etc	Sent to Landfill					x							Waste is sent to landfill	6	3	5	90	Protection of the Environment Operations Act 1997 Waste Avoidance and Resource Recovery Act 2001	WI-OPS-4.5-03 Sorting of Material to be Recycled	Staff training	1	3	5	15
	Stormwater contamination			x									Waste contaminates the storm water	6	3	5	90	Protection of the Environment Operations Act 1997	WI-OPS-4.5-03 Sorting of Material to be Recycled	Staff training, drain wardens, and drain cover	1	3	5	15
Wood waste	Sent to Landfill							x					Uncontaminated Wood is sent to landfill	6	3	5	90	Protection of the Environment Operations Act 1997 Waste Avoidance and Resource Recovery Act 2001	WI-OPS-4.5-03 Sorting of Material to be Recycled	Staff training	1	3	5	15
	Stormwater contamination			x									Wood enters storm water system	6	3	5	90	Protection of the Environment Operations Act 1997	WI-OPS-4.5-03 Sorting of Material to be Recycled	Staff training, drain wardens, and drain cover	1	3	5	15
General Storage inside	Fire risk			x									Water used to extiguish fire goes down the storm water	1	10	50	500	Protection of the Environment Operations Act 1997	EM-OPS-1.6-01 NSW Emergency evacuation plan	Reduction in fire load in warehouse and additional fire extiguishers have been added to warehouse	1	10	25	250
				x									Dry Powder used to extinguish fire goes down drain	1	10	50	500	Protection of the Environment Operations Act 1997			1	10	25	250
			x										Smoke produced from fire	1	10	50	500	Protection of the Environment Operations Act 1997 Section 128			1	10	25	250
						x							Burnt product has to be disposed of to landfill	1	10	50	500	Protection of the Environment Operations Act 1997			1	10	25	250
General Storage outside	Fire risk												Water used to extiguish fire goes down the storm water	1	10	50	500	Protection of the Environment Operations Act 1997		Reduction of fire load in yard - this is currently in process so that residual risk assessment can not be conducted until done. Internal fire controls cover external storage	1	10	25	250
													Dry Powder used to extinguish fire goes down drain	1	10	50	500	Protection of the Environment Operations Act 1997			1	10	25	250
													Smoke produced from fire	1	10	50	500	Protection of the Environment Operations Act 1997 Ozone Protection ACT			1	10	25	250
													Burnt product has to be disposed of to landfill	1	10	50	500	Protection of the Environment Operations Act 1997			1	10	25	250
Beryllium Oxide containing equipment	Accidental Release			x		x							Contamination of stormwater				0	Protection of the Environment Operations Act 1997 NPI,		Only a small quantity of this waste is generated (>50g) and is sent to secure landfill				0
Company Vehicles	Oil Leak			x									Oil gets into stormwater	2	3	5	30	Protection of the Environment Operations Act 1997	FM03 Vehicle Weekly Checklist	WI-OPS-A.5-01 Oil Spill containment and clean up process	1	2	5	10
	Exhaust Emmisions		x										emmisions to air	1	1	15	15	Protection of the Environment Operations Act 1997	FM03 Vehicle Weekly Checklist	Maintenance of vehicles	1	2	5	10
Handling of oil containing equipment	Leaks			x									Oil leak enters storm water system	2	3	5	30	Protection of the Environment Operations Act 1997	WI-OPS-A.5-01 Oil Spill containment and clean up process	Staff training, drain wardens	1	1	5	5
Degassing of A/C, refridgerant units and fridges	Accidental release to air		x										Refridgerant gas is released in to the air	2	3	50	300	Protection of the Environment Operations Act 1997 Ozone Protection ACT	WI-OPS-4.5.5-01 Reclaiming of Refrigerant Gases	Use of Licenced contractor	1	1	5	5
chemical use on site	Accidental Release - Household QTY					x							Used absorbent material and contaminated material sent to PIW landfill	1	1	15	15	Protection of the Environment Operations Act 1997	WI-OPS-A.5-03 Chemical Spill containment and clean up process	Staff training	1	1	5	5
Flouro Tubes	Mecury and phosphor release						x						Disposed of to Prescribed waste	10	1	5	50	Protection of the Environment Operations Act 1997	Needs to be Developed	Flouro tubes ar egoing to be delivered on site in specialised boxes of they are not required to be handled on site	1	2	5	10
Truck	Oil Leak												Oil gets into stormwater	2	3	5	30	Protection of the Environment Operations Act 1997	FM03 Vehicle Weekly Checklist	WI-OPS-A.5-01 Oil Spill containment and clean up process	1	2	5	10
	Exhaust Emmisions		x										emmisions to air	1	1	15	15	Protection of the Environment Operations Act 1997	FM03 Vehicle Weekly Checklist	Maintenance of vehicles	1	2	5	10
Office	Electricity use - A/C												Contribution to global warming	10	10	1	100	Protection of the Environment Operations Act 1997 Ozone Protection ACT	A/C set at 22°C or above	Staff training	3	10	1	30
	Paper use												Resourse use	10	10	1	100		The reuse of paper received in printers tc be recycled	Staff training	6	10	1	60

Level 1	MRI Site	Activity	Aspect	Act/Regs	Jurisdiction	Rev	Section, Schedule, Page	Applicable Criteria	Our assessment against it	Do we comply	Audited
2	All			**Hazardous Waste (Regulation of Exports and Imports) Act 1989**	Federal	6	13 Applications for export permits	(1) A person who has one or more export proposals in relation to hazardous waste may apply to the Minister for a permit authorising the export of the waste. (2) The application must: (a) be in the form approved by the Minister; and (b) set out, or be accompanied by, such information relating to the proposals as is required by the form. (3) The application may deal with 2 or more export proposals in relation to hazardous waste only if: (a) the following matters are common to each proposal: (i) the physical and chemical characteristics of the waste; (ii) the route over which the waste is to be transported; (iii) the recipient of the waste; and (b) the proposals constitute a regular pattern; and (c) the proposals will all be carried out within 12 months of each other.	We currenly hold two Special Export permits for shipping batteries to Kobar for recycling	Yes	
2	All			**Hazardous Waste (Regulation of Exports and Imports) Act 1989**	Federal	6	13B Basel permit or special permit	(1) An application under section 12, 13 or 13A must state that the applicant is applying for: (a) a Basel permit; or (b) a special permit under a specified set of Article 11 regulations; but not both.	This is part of the application for	Yes	
1	All			**Hazardous Waste (Regulation of Exports and Imports) Act 1989**	Federal	6	40 Regulation of export of hazardous waste	Prohibition of exports (1) A person must not export hazardous waste unless: (a) the person is the holder of an export permit authorising the person to export the waste; or (b) the person is the holder of a transit permit authorising the person to export the waste; or (c) the export has been ordered under section 34 or 35A.	We liaise regularly with DSEWPAC in regards to is a permitis required for any products we are uncertain of	Yes	
1	All			**Hazardous Waste (Regulation of Exports and Imports) Act 1989**	Federal	6	40 Regulation of export of hazardous waste	Compliance with export permits (2) The holder of an export permit must not: (a) export the hazardous waste to which the permit relates except in accordance with the permit; or (b) whether before or after exporting the hazardous waste to which the permit relates, breach any of the permit conditions.	We only export batteries that are listed on the permit and regularly assess that we are not shipping more than the qty we are allowed to export.	Yes	
1	NSW			**Protection of the Environment Operations ACT 1997**	NSW	1/11/2011	120 Prohibition of pollution of waters	(1) A person who pollutes any waters is guilty of an offence. (2) In this section: "pollute" waters includes cause or permit any waters to be polluted.	Stormwater drain inspection process and checklist	Yes	
1	NSW			**Protection of the Environment Operations ACT 1997**	NSW	19/06/2014	124 Operation of plant (other than domestic plant)	The occupier of any premises who operates any plant in or on those premises in such a manner as to cause air pollution from those premises is guilty of an offence if the air pollution so caused, or any part of the air pollution so caused, Is caused by the occupier's failure: (a) to maintain the plant in an efficient condition, or (b) to operate the plant in a proper and efficient manner.	Regular maintenance of equipment is carried out		
1	NSW			**Protection of the Environment Operations ACT 1997**	NSW	1/11/2011	128 Standards of air impurities not to be exceeded	(1) The occupier of any premises must not carry on any activity, or operate any plant, in or on the premises in such a manner as to cause or permit the emission at any point specified in or determined in accordance with the regulations of air impurities in excess of: (a) the standard of concentration and the rate, or (b) the standard of concentration or the rate, prescribed by the regulations in respect of any such activity or any such plant.	MRI currently does not have any processes or plant at the Sydney facility that have emmisions that above the prescribed rates.	Yes	
1	NSW			**Protection of the Environment Operations ACT 1997**	NSW	1/11/2011		(2) Where neither such a standard nor rate has been so prescribed, the occupier of any premises must carry on any activity, or operate any plant, in or on the premises by such practicable means as may be necessary to prevent or minimise air pollution.	MRI services mobile plant and motor vehicles regularly to ensure that we comply with this requirement.	Yes	
1	NSW			**Protection of the Environment Operations ACT 1997**	NSW	19/06/2014	129 Emission of odours from premises licensed for scheduled activities	(1) The occupier of any premises at which scheduled activities are carried on under the authority conferred by a licence must not cause or permit the emission of any offensive odour from the premises to which the licence applies.	Emissions of odour are expected to be negligible.	Yes	
1	NSW			**Protection of the Environment Operations ACT 1997**	NSW	19/06/2014	139 Operation of plant	The occupier of any premises who operates any plant (other than control equipment) at those premises in such a manner as to cause the emission of noise from those premises is guilty of an offence if the noise so caused, or any part of it, is caused by the occupier's failure: (a) to maintain the plant in an efficient condition, or (b) to operate the plant in a proper and efficient manner.	The main sources of are on-site vehicles, air screw driver, grinder and compactor. The Noise Impact Assessment prepared by Benbow Environmental as part of the EIS found that noise emissions from the site would be negligible. Noise limits are not expected to	Yes	
	NSW			**Protection of the Environment Operations ACT 1997**	NSW	19/06/2014	143 Unlawful transporting or depositing of waste	If a person transports waste to a place that cannot lawfully be used as a waste facility for that waste, or causes or permits waste to be so transported: (a) the person, and (b) if the person is not the owner of the waste, the owner, are each guilty of an offence	Records of all waste movements are maintained.		

1	NSW			**Protection of the Environment Operations ACT 1997**	NSW	19/06/2014	144 Use of land as waste facility without lawful authority	(1) A person who is the owner or occupier of any land and who uses the land, or causes or permits the land to be used, as a waste facility without lawful authority is guilty of an offence.	environment protection licence with the NSW EPA to operate as a waste facility	Yes	
1	NSW			**Protection of the Environment Operations ACT 1997**	NSW	1/11/2011	148 Pollution incidents causing or threatening material harm to be notified	(2) Duty of person carrying on activity to notify A person carrying on the activity must, as soon as practicable after the person becomes aware of the incident, notify the appropriate regulatory authority of the incident and all relevant information about it.	In the event of an incident, the duty to notify extends to all staff and contractors of the site.	Yes	
								(3) Duty of employee engaged in carrying on activity to notify A person engaged as an employee in carrying on an activity must, as soon as practicable after the person becomes aware of the incident, notify the employer of the incident and all relevant information about it. If the employer cannot be contacted, the person is required to notify the appropriate regulatory authority.	Staff and/or contractors are required to notify the employer. Notification is required in the event of an incident that causes or threatens material harm to the environment.		
								(3A) Duty of employer to notify Without limiting subsection (2), an employer who is notified of an incident under subsection (3) or who otherwise becomes aware of a pollution incident which is related to an activity of the employer, must, as soon as practicable after being notified or otherwise becoming aware of the incident, notify the appropriate regulatory authority of the incident and all relevant information about it.	Relevant authorities include: • NSW EPA • Fairfield City Council • The Ministry of Health • WorkCover Authority • Fire and Rescue NSW		
								4) Duty of occupier of premises to notify The occupier of the premises on which the incident occurs must, as soon as practicable after the occupier becomes aware of the incident, notify the appropriate regulatory authority of the incident and all relevant information about it.	Details will be provided in the Site's Pollution Incident Response Management Plan		
								(5) Duty on employer and occupier to ensure notification An employer or an occupier of premises must take all reasonable steps to ensure that, if a pollution incident occurs in carrying on the activity of the employer or occ on the premises, as the case may be, the persons engaged by the employer or occupier will, as soon as practicable, notify the employer or occupier of the incident and all relevant information about it.			
	NSW			**Protection of the Environment Operations ACT 1997**	NSW	19/06/2014	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	A Pollution Incident Response Management Plan will be prepared once the Environment Protection Licence is issued.		
1	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (WASTE) REGULATION 2005**	NSW	26/10/2011	22 Obligations on consignor of waste relating to transportation of waste	(1) A consignor of waste must ensure that the waste is not transported from one place to another place unless the consignor: (a) holds a consignment authorisation in respect of the waste, and (b) has obtained a waste transport certificate for the waste and has certified that any part of the certificate that is required to be completed by the consignor has been completed accurately, and (c) has given the waste transport certificate to the transporter of the waste, and (d) has ensured that the transporter is licensed (if required by or under the Act) to transport the waste, and (e) has ensured that the waste facility to which the waste is to be transported is legally able to accept waste of the type concerned.	All waste the is transported interstate is done so with a consignment authorization and a waste transport certificate and on a licenced transporter.	Yes	
								(2) A consignor of waste must: (a) retain each consignment authorisation for a period of not less than 4 years after the day on which the consignment authorisation is obtained by the consignor, and (b) retain a copy of each waste transport certificate for a period of not less than 4 years after the day on which a copy of the certificate was given by the consignor to the transporter of the waste, and (c) make each document retained under paragraphs (a) and (b) available for inspection by an authorised officer on request.	MRI will develop a procedure for this	No	
								(3) A consignor of waste must not contravene or fail to comply with any condition of a consignment authorisation that is held by the consignor.		Yes	
1	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (WASTE) REGULATION 2005**	NSW	26/10/2011	23 Copy of waste transport certificate to be given to occupier of waste facility	Within 7 days after the day on which an authorised agent for the occupier of a waste facility gives a waste transport certificate to the transporter of the waste under clause 22 (1) (c), the authorised agent must give the occupier a copy of the waste transport certificate in the same form as it was given by the agent to the transporter.	All waste transport certifciates are given to the transporter on the day the waste is delivered.	Yes	

1	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (WASTE) REGULATION 2005**	NSW	26/10/2011	25 Obligations on receiver of waste relating to waste	(1) Before accepting any waste, a receiver of waste must (except as provided by subclause (2)): (a) ensure that there is a consignment authorisation that authorises the transport of the waste, and (b) obtain the waste transport certificate for the waste, and (c) certify that any part of the certificate that is required to be completed by the receiver has been completed accurately.	When interstate waste is received it is confirmed to have a consignment authorization before it is authorised to be shipped to us.	Yes	
					NSW			(2) A receiver of waste may accept waste if: (a) there is no valid consignment authorisation or waste transport certificate for the waste or the waste transport certificate is inaccurate, and (b) the receiver is licensed to store the waste.		yes	
					NSW			3) If waste is transported to a waste facility without a waste transport certificate, the receiver of waste who occupies the facility must: (a) generate a waste transport certificate for the waste, and (b) complete as much of the certificate (including any parts that are required to be completed by the consignor and transporter except any signature or certification required) as is possible for the receiver to complete based on the information available to the receiver.	MRI does not have a process in place for this	No	
					NSW			(4) A receiver of waste must: (a) within 3 working days after waste arrives at a waste facility occupied by the receiver, notify the EPA in writing if the waste was delivered without a valid consignment authorisation or waste transport certificate, and (b) within 3 working days of accepting or rejecting waste, notify the EPA in writing if the receiver considers that the transport certificate for the waste is inaccurate and of the ways in which the receiver considers the certifica to be inaccurate, and (c) in a case where the waste is rejected, notify the EPA in writing within 3 days after the waste is rejected that the waste has been rejected and the date on which it was rejected.	MRI does not have a process in place for this	no	
					NSW			(5) If waste is transported to a waste facility, the receiver of waste who occupies the facility must within 14 days after accepting or rejecting the waste, notify the consignor in writing whether the receiver has accepted or rejected the waste.		No	
					NSW			(6) If waste is transported to a waste facility, the receiver of waste who occupies the facility must: (a) as soon as practicable after the waste arrives at the facility, record on the waste transport certificate the date on which the waste arrived, and (b) within 21 days of the arrival of the waste or such longer period as is permitted in writing by the EPA, record on the waste transport certificate for the waste whether the receiver has accepted or rejected the waste and the date on which the waste was accepted or rejected, and (c) in a case where the waste is accepted and is processed at the facility, record on the waste transport certificate, within 3 days after the waste is processed, the date on which the waste was processed and the method of processing used, and (d) in a case where the waste is accepted and is only stored at the facility, record on the waste transport certificate that the waste has been accepted for storage only, within 3 days.		Yes	
2	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (WASTE) REGULATION 2005**	NSW	26/10/2011	26 Receiver of waste may accept or reject waste	1) If a receiver of waste accepts waste delivered to a waste facility occupied by the receiver, any subsequent transport of the waste from the waste facility is to be treated as a new consignment of the waste for the purposes of this Part and, accordingly, requires a new consignment authorisation and waste transport certificate.		Yes	
					NSW			(2) If a receiver of waste rejects waste delivered to the receiver, the receiver must inform the transporter of the waste of a waste facility to which the waste may be transported, being a waste facility at which the waste can be legally accepted.		50%	
					NSW			(3) For the purposes of this Part, a consignment authorisation or waste transport certificate for waste that has been rejected by a receiver of waste is taken to authorise the transport of the waste to a waste facility at which the waste can legally be accepted.		Yes	
1	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (WASTE) REGULATION 2005**	NSW	26/10/2011	32 Record keeping requirements relating to occupiers of waste facilities	An occupier of a waste facility who is not a consignor of the waste must retain the following records for at leas years: (a) copies of each waste transport certificate given to the occupier of a waste facility by the consignor of the waste, (b) copies of each agreement evidencing the appointment of an authorised agent as referred to in clause 27 (2) (b)	MRI's files these in the operation office	Yes	
1	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (WASTE) REGULATION 2005**	NSW	26/10/2011	33 Record keeping requirements relating to consignors of waste	A consignor of waste must retain the following records for at least 4 years: (a) copies of each waste transport certificate required to be completed by the consignor under this Part, (b) if the consignor is an authorised agent of one or more occupiers of waste facilities, a list of premises from which waste that was the subject of such a waste transport certificate was transported, (c) if the consignor is an authorised agent of one or more occupiers of waste facilities, copies of each agreem entered into by the consignor as referred to in clause 27 (2) (b).	WTC records are kept for a period of over 4 years	Yes	

1	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (WASTE) REGULATION 2005**	NSW	26/10/2011	35 Record keeping requirements relating to receivers of waste	A receiver of waste must retain the following records for at least 4 years: (a) copies of each consignment authorisation issued by the receiver, (b) each waste transport certificate given to the receiver for waste accepted by the receiver and each waste transport certificate generated by the receiver, (c) copies of each notice required to be given to the EPA under this Part.	WTC records are kept for a period of over 4 years Consignment authorisations are kept electronically and idenfinately	Yes	
1	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (WASTE) REGULATION 2005**	NSW	26/10/2011	36 Returns by receivers of waste	A receiver of waste: (a) must provide the EPA (or such other person or body as may be approved for the purposes of this clause) with such information as the EPA (or other person or body) may require from time to time in relation to the waste received by the receiver, including (but not limited to) a description of the waste, the quantity of the waste and the proposed treatment intended for the waste, and (b) must retain a copy of the information provided for a period of at least 4 years from the time it was provided.	Any informtion requested by the EPA is supplied.	Yes	
1	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (WASTE) REGULATION 2005**	NSW	26/10/2011	48 Requirements relating to storage of waste generally	A person who stores waste on premises (whether or not the waste was produced on the premises) must ensure that it is stored in an environmentally safe manner.	All waste is stored inside where possible . If stored externally, sealed waste receptacles are provided	Yes	
2	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (WASTE) REGULATION 2005**	NSW	26/10/2011	49 Requirements relating to transportation of waste generally	A person who transports waste (whether or not required to hold a licence) must comply with the following requirements: (a1) the transportation of waste must be carried out in a manner that avoids the spillage of the waste, (a) any vehicle or plant used for the transport of the waste must be constructed and maintained so as to prevent spillage of the waste, (b) any container used to transport the waste must be secured safely on the vehicle used to transport the waste, (c) any waste that is transported by a vehicle must be covered during its transportation unless the waste consists solely of tyres or scrap metal (or both), (d) incompatible wastes must not be mixed or transported together on any vehicle used by the person to transport waste, (e) any material segregated for recycling that is transported by the person must not be mixed with other waste, (f) liquid waste must not be mixed with other waste, (g) the waste must be able to be sampled by the release of suitable and accessible valves located on the top and, where appropriate, bottom of any container used to transport the waste, (h) the following must be carried in the vehicle transporting the waste: (i) a copy of any environment protection licence required to authorise the transport of the waste, (ii) HB 76-2004: Dangerous Goods-Initial Emergency Response Guide , published by Standards Australia ("the Standards Australia Guide") or a document setting out procedures to be followed in an emergency and containing all information from the Standards Australia Guide that relates to the type of waste being transported, (iii) a spill kit that is appropriate for the type of waste being transported.	I need to review this to ensure that under the ACT we are not classified as transporting waste.	Yes	
2	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (CLEAN AIR) REGULATION 2010**	NSW	26/10/2011	16 Motor vehicles emitting excessive air impurities	(1) An owner of a motor vehicle is guilty of an offence if the vehicle emits excessive air impurities while being used.	All company vehicles are serviced regularly and this is assess as part of that process.	Yes	
2	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (CLEAN AIR) REGULATION 2010**	NSW	26/10/2011	18 Fitting of certain anti-pollution devices to be compulsory	A motor vehicle that is propelled by a diesel engine and that has a manufacturer's gross vehicle mass of more than 4.5 tonnes must be fitted with a "complying exhaust pipe" which means, for the purposes of this Regulation: (a) in the case of a motor vehicle for which, as at the date of its manufacture, an Australian Design Rule prescribed requirements with respect to the exhaust pipe to be fitted to it, a vertical exhaust pipe that complies with those requirements, or (b) in any other case, an exhaust pipe: (i) that terminates 150 millimetres or more above the highest part of the vehicle's cab, and (ii) whose exhaust vent is directed upwards (within 30 degrees of the vertical) and away from the nearside of the vehicle.	All vehicles when purchased has a RWC and as part of this, this is assessed and the vehicle exhaust system is not modified after purchase unless it need fixed.	Yes	
2	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (CLEAN AIR) REGULATION 2010**	NSW	26/10/2011	20 Maintenance of vehicles	For the purposes of section 159 of the Act, a motor vehicle that is required to have a complying exhaust pipe must be maintained so that the exhaust pipe is free of holes (other than holes necessary for the effective operation of the exhaust system).	Vehicles are serviced regularly and the exaust system is inspected as part of this.	Yes	
2	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (CLEAN AIR) REGULATION 2010**	NSW	26/10/2011	21 Use of motor vehicle requires anti-pollution device	1) An owner of a motor vehicle who uses the motor vehicle, or causes or allows it to be used, must ensure that each anti-pollution device that is required by this Regulation to be fitted to the motor vehicle is fitted to the motor vehicle in the required manner.	All vehicles when purchased has a RWC and as part of this, this is assessed and the vehicle exhaust system is not modified after purchase unless it need fixed	Yes	
2	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (CLEAN AIR) REGULATION 2010**	NSW	26/10/2011	23 Removal or adjustment of anti-pollution devices	(1) The owner of a motor vehicle who uses the motor vehicle, or causes or allows it to be used, must ensure that at the time of that use, any anti-pollution device that has been fitted to the motor vehicle has not been: (a) removed, disconnected or impaired, or (b) adjusted or modified and the adjustment or modification results in the emission of excessive air impurities by the motor vehicle.	Same as above.	Yes	

2	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (CLEAN AIR) REGULATION 2010**	NSW	26/10/2011	25 Transfer of petrol into fuel tanks of motor vehicles	3) A person must not, at premises to which this clause applies, transfer petrol into the fuel tank of a motor vehicle by means of a petrol delivery hose unless the nozzle of the hose is inserted as far as it will go into the fuel tank's fill-pipe.	This is part of how to safely fill a petrol tank and is observed by all employees that have or drive a company vehicle	Yes	
1	NSW			**Work Health and Safety Act 2011**		7/06/2011	19 Primary duty of care	(1) A person conducting a business or undertaking must ensure, so far as is reasonably practicable, the health and safety of: (a) workers engaged, or caused to be engaged by the person, and (b) workers whose activities in carrying out work are influenced or directed by the person, while the workers are at work in the business or undertaking.		50%	
								(2) A person conducting a business or undertaking must ensure, so far as is reasonably practicable, that the health and safety of other persons is not put at risk from work carried out as part of the conduct of the business or undertaking.		50%	
								(3) Without limiting subsections (1) and (2), a person conducting a business or undertaking must ensure, so far as is reasonably practicable: (a) the provision and maintenance of a work environment without risks to health and safety, and (b) the provision and maintenance of safe plant and structures, and (c) the provision and maintenance of safe systems of work, and (d) the safe use, handling, and storage of plant, structures and substances, and (e) the provision of adequate facilities for the welfare at work of workers in carrying out work for the business or undertaking, including ensuring access to those facilities, and (f) the provision of any information, training, instruction or supervision that is necessary to protect all persons from risks to their health and safety arising from work carried out as part of the conduct of the business or undertaking, and (g) that the health of workers and the conditions at the workplace are monitored for the purpose of preventing illness or injury of workers arising from the conduct of the business or undertaking.		50%	
1	NSW			**Work Health and Safety Act 2011**			20 Duty of persons conducting businesses or undertakings involving management or control of workplaces	(2) The person with management or control of a workplace must ensure, so far as is reasonably practicable, that the workplace, the means of entering and exiting the workplace and anything arising from the workplace are without risks to the health and safety of any person.	MRI is partially complying, we have SWM statements for our process but need to do new risk assessments for our processes since we have moved since these were done	40%	
2	NSW			**Work Health and Safety Act 2011**			21 Duty of persons conducting businesses or undertakings involving management or control of fixtures, fittings or plant at workplaces	(1) In this section, person with management or control of fixtures, fittings or plant at a workplace means a person conducting a business or undertaking to the extent that the business or undertaking involves the management or control of fixtures, fittings or plant, in whole or in part, at a workplace, but does not include: (a) the occupier of a residence, unless the residence is occupied for the purposes of, or as part of, the conduct of a business or undertaking, or (b) a prescribed person.	MRI has a maintenance plan in place to address this.	Yes	
								(2) The person with management or control of fixtures, fittings or plant at a workplace must ensure, so far as reasonably practicable, that the fixtures, fittings and plant are without risks to the health and safety of any person.	s	TBA	
1	NSW			**Work Health and Safety Act 2011**			38 Duty to notify of notifiable incidents	(1) A person who conducts a business or undertaking must ensure that the regulator is notified immediately after becoming aware that a notifiable incident arising out of the conduct of the business or undertaking has occurred.	When a notifiable incident occur we do notify the Work Cover authority but there is no documented procedure that actually outlines what to d	Yes	
								(2) The notice must be given in accordance with this section and by the fastest possible means. (3) The notice must be given: (a) by telephone, or (b) in writing. Example. The written notice can be given by facsimile, email or other electronic means. (4) A person giving notice by telephone must: (a) give the details of the incident requested by the regulator, and (b) if required by the regulator, give a written notice of the incident within 48 hours of that requirement being made.		Yes	
								(7) A person conducting a business or undertaking must keep a record of each notifiable incident for at least 5 years from the day that notice of the incident is given to the regulator under this section.	5	No	
1	NSW			**Work Health and Safety Act 2011**			39 Duty to preserve incident sites	(1) The person with management or control of a workplace at which a notifiable incident has occurred must ensure so far as is reasonably practicable, that the site where the incident occurred is not disturbed until an inspector arrives at the site or any earlier time that an inspector directs.	To date this has been complied with	Yes	
								(2) In subsection (1) a reference to a site includes any plant, substance, structure or thing associated with the notifiable incident.		TBA	
								(1) A person must not use plant or a substance at a workplace if: (a) the regulations require the plant or substance or its design to be authorised, and (b) the plant or substance or its design is not authorised in accordance with the regulations.		TBA	

1	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (GENERAL) REGULATION 2009**			65 Collection of data from reporting facilities	(1) Subject to Part 4, the occupier of each reporting facility is to provide the EPA with the following information if a reporting threshold for a substance is exceeded in a reporting period: (a) supporting data for the facility, (b) substance identity information and emission data, estimated in accordance with Part 3, for each substance for which the reporting threshold is exceeded in the period, (d) any other information that may be required to assess the integrity of the emission data, (e) substance identity information and mandatory transfer data for each substance for which a category 1, category 1b or category 3 reporting threshold is exceeded in the period, (f) any information that may be required to assess the integrity of the mandatory transfer data, (g) a statement, signed by the occupier or a person authorised by the occupier for that purpose, that the occupier has exercised due diligence in gathering and providing the information referred to in paragraphs (a)-(f).	This is done as part of the APS. We report to the EPA what we are required to	Yes	
1	NSW			**PROTECTION OF THE ENVIRONMENT OPERATIONS (GENERAL) REGULATION 2009**			66 Occupier must keep data for period of 4 years	(1) The occupier of a reporting facility must keep the data used in deciding if the reporting threshold for a substance is exceeded in the reporting period for the occupier's facility for 4 years after the reporting period ends. (2) The occupier must keep the data used in calculating emission or transfer data given to the EPA for 4 years after the emission or transfer data is required to be given.	The data MRI uses for its reporting is kept indefinately on its internal BB system	Yes	

Attachment 3: Environmental Objectives

Objective Ref.: Mass Balance / Diversion from Landfill

Objective – Mass Balance/ Diversion from Landfill					**Objective Set Date**: 25th **October 2013**
Target (with measure)	Activities (with measure)	Responsibility			Review Result
		Person	Dept/ Function	Completion Date	
Mass balance of sites to be neutral and to reduce the amount of waste to landfill so that we are diverting it by a minimum of 95%	Volume of product received Volume of product on site at the start of the month Product despatched for the month Product left on site for the month	Amanda	EMR	End Dec 13	Review Date: 2nd December 2013. By Amanda Muir Result 2-12-13 The figures retrieved from the BB system are still having issues. Action A follow up meeting with the IT Manager and Systems Technician to see what we can do to fix the problem Result 13-01-13 Figures have been calculated and there is a large difference between sites and Melbourne has a significantly lower diversion rate to Sydney. It is being discussed about if there is an issue with how the data is captured or if we a using the correct data to work out this figure. Action The Vic Operations Manager, and the SHEQ Manager are working through possible other ways of calculating this figure and are also looking at what is going to landfill at the Vic site to determine if this is significantly different to what Sydney does.

Objective – Comply with Part 5.7A of the POEO Act					**Objective Set Date**: 23 June 2014
Target (with measure)	Activities (with measure)	Responsibility			Review Result
		Person	Dept/ Function	Completion Date	
Engage a qualified environmental consultant to prepare a Pollution Incident Response Management Plan (PIRMP).	Include aspects of the PIRMP in environmental training programs	Amanda	EMR	23 August 2014	

Objective –					**Objective Set Date**: 23 June 2014
Target (with measure)	Activities (with measure)	Responsibility			Review Result
		Person	Dept/ Function	Completion Date	
Implement a regular workplace inspection and checklist as part of this EMP	Undertake daily inspections of all areas including work areas, storage areas, dangerous goods areas and external areas. No non-compliances within 3 months of implementation	Amanda John	EMR	23 July 2014	

Objective – Implement Regular Workplace Inspections					**Objective Set Date**: 23 June 2014
Target (with measure)	Activities (with measure)	Responsibility			Review Result
		Person	Dept/ Function	Completion Date	
Implement a regular workplace	Undertake daily inspections of all	Amanda	EMR	23 July 2014	

inspection and checklist as part of this EMP	areas including work areas, storage areas, dangerous goods areas and external areas. No non-compliances within 3 months of implementation	John			

Objective –Minimise noise emissions					**Objective Set Date**: 23 June 2014
Target (with measure)	Activities (with measure)	Responsibility			Review Result
		Person	Dept/ Function	Completion Date	
Install white noise reversing beepers on forklifts		Amanda John	EMR	23 July 2014	

Objective –Comply with POEO (waste) Regulation					**Objective Set Date**: 23 June 2014
Target (with measure)	Activities (with measure)	Responsibility			Review Result
		Person	Dept/ Function	Completion Date	
Prepare and implement a procedure to enable to site to comply with obligations under the POEO (waste) regulation		Amanda John	EMR	23 July 2014	

Objective –Comply with WHS Act 2011					**Objective Set Date**: 23 June 2014
Target (with measure)	Activities (with measure)	Responsibility			Review Result
		Person	Dept/ Function	Completion Date	
Prepare and implement procedures to comply with		Amanda John	EMR	23 July 2014	

obligations under the Work Health and Safety Act 2011.					

Objective – Implementation of EMP					**Objective Set Date**: 23 June 2014
Target (with measure)	Activities (with measure)	Responsibility			Review Result
		Person	Dept/ Function	Completion Date	
Implement an internal environmental audit program to ensure effectiveness of site environmental management. Ensure effectiveness of environmental management	Undertake annual internal audits to ensure this EMP has been implemented. Audit outcomes (Target: No non-conformances) Undertake annual Internal Management Review of the EMP using outcomes of the annual audit. Identify improvements and put an action plan in place to implement these and assess their effectiveness by updating this objectives table.	Amanda John	EMR	Ongoing Review annually in June	

Attachment 4: New Employee and Contractor Induction Checklist

MRI e-cycle solutions	**New Employee/Contractor Safety Induction Checklist**	**Doc No:** F-HR-A.7-01 **Rev:** 00

Name: _____ Dates / /

From (company): _____ / /

Position: _____ / /

Supervisor while onsite: _____ / /

NOTE	*As a minimum, all casuals/contractors must be advised of the following safety requirements by an authorized person. Any additional requirements related to specific process/site works are to be advised and detailed below by the supervisor named above.*

Minimum (all Non-permanent Employees):

Item	Task	Site contact	Contractor
Emergency Exits	Locations shown		
Emergency Evacuation	Location of meeting point shown		
Fire Extinguishers	Locations shown		
Smoking	Permitted areas shown		
Pedestrian Walkways	Yellow markings shown		
Personal Protective Equipment	Equipment required		
First Aid Officer	Person to report with injuries		
Chemical Spills and Leaks	Person to report to		
Licences	Copy relevant current licences		
Insurance (Contractors only)	Copies of relevant insurance - Workers compensation - Public liability		
Incident Reporting	Person to report incident to		

Process/Contract Specific:

Note: *Listed below are additional instructions (as determined by the Supervisor) appropriate to the designated work area (eg. Emergency Stop Procedure, Hot Work authorised, etc.):*

Equipment	Operating instructions	Site contact	Contractor

Note: All minimum and job specific safety requirements/work instructions listed above have been explained and are understood. Once completed and signed-off by all parties, this form is to be returned to Melbourne Admin for filing and to be scanned to the SHEQ folder.

Person	Signed	Date

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Attachment 5: Enviro and Safety External and Internal Communication Procedure

Purpose

The purpose of this procedure is to describe the methods used to ensure the effective and timely communication of safety/environmental-related information and issues concerning this facility's Integrated Management System.

Applicable ISO 14001 and AS4801 Clauses

ISO 14001 4.4.3
AS 48001 4.4.3.2

Definitions, Abbreviations and Acronyms Used

Abbreviations and Acronyms

SHEQ: Safety Health Environment and Quality
SHEQ Rep: SHEQ Representative

Procedure

Internal Communication

Internal (within MRI) communication requests for environmental or safety information are directed to the SHEQ Manager or in their absence the Managing Director. The SHEQ Manager researches and provides a response to internal requests for environmental/safety information. The mechanisms that are used for various types of communications include, but are not limited to:

1. meetings,
2. email,
3. telephone calls,
4. memoranda and letters, and
5. newsletters.

A variety of processes are used for internal communication on safety/environmental-related matters. The effectiveness of these communication processes are evaluated on an on-going basis, through management review, employee surveys, safety and environmental training programs, organization audits and inspections, and informal discussions. Major topics of internal communication include, but are not limited to:

1. Safety or environmental policy, objectives, and targets,
2. Safety or environmental management roles and responsibilities,
3. organizational performance compared to safety and environmental objectives and targets,
4. safety and environmental procedures,
5. safety and environmental compliance issues, and
6. Emergency response procedures.
7. Risk assessments and their outcomes
8. HICAR's and actions from them

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External communication recording

The SHEQ Manager maintains a record of all external requests for environmental information or all external interested parties' communications to MRI other than emails. The record system includes name, subject, and date (This does not include tender responses)

External Communication

All inquiries and other communications received by mail, fax, telephone, or in person, from external parties concerning the EMS or environmental performance may be received by a number of MRI representatives. External communication requests received from the media must be forwarded to the Managing Director, and external communication requests received from the public and other interested parties must be forwarded to the SHEQ Manager.

The SHEQ Manager provides the appropriate information for release to external communication requests for safety or environmental information. General rules for external communications require that the information provided by MRI:

1. be understandable and adequately explained to the recipient(s), and
2. present an accurate and verifiable picture of MRI and its integrated management system, its safety and environmental performance, or other related matters.

Internal communication that is generated to the media, concerning MRI's IMS or safety/environmental performance is initiated and/or reviewed by the SHEQ Manager and Managing Director and issued by the Managing Director.

Records

Records are kept by the SHEQ Manager and the relevant site SHEQ Rep

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Attachment 6: Hazard Reporting and Investigation Procedure

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SECTION 1 - INTRODUCTION

PURPOSE

The purpose of this procedure is to ensure that:

- All hazards, near misses and injuries are reported to management.
- Investigations are conducted in a timely manner with preventative actions identified and implemented.
- Follow up monitoring and review of corrective actions implemented is undertaken to ensure hazards are eliminated or reduced as much as possible and that no new hazards have been introduced to the workplace.

Accurate information is collected to analyse trends in incident types and make recommendations with the aim of controlling hazards.

SCOPE

The procedure applies to:

- The reporting of all incidents, near misses / incidents which involves employees, contractors, visitors or members of the public on a MRI site.

The reporting of dangerous occurrences resulting in damage to equipment, machinery, property, environment or facilities.

DEFINITIONS

WORD/ TERM	Definition
Act of Violence	Incident where person is physically attacked or threatened in the workplace.
Dangerous Occurrence	A **Dangerous Occurrence** is defined by the OH&S Act 2004 as being one of the following: • The collapse, overturning, failure or malfunction of, or damage to any plant that the regulations prescribe must not be used unless the plant is licensed or registered; or • The collapse or failure of an excavation or of any shoring supporting an excavation; or • The collapse or partial collapse of any part of a building or structure; or • An implosion, explosion or fire; or • The escape, spillage or leakage of any plant, substance or object; or • The fall or release from a height of any plant, substance or object
Hazard	Condition or situation which has the potential to cause injury or illness (physical or psychological) or damage to property and the environment.
Health and Safety Representative	A member of a designated work group who has been elected and holds office in accordance with the provisions of the OHS Act 2004.
Hierarchy of Control	The Hierarchy of Control is the preferred priority for risk control, emphasising hazard elimination and, where this is not possible, risk minimisation and other considerations: • Elimination of hazard • Substitution

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	• Isolation • Engineering controls • Administrative controls • Personal protective equipment.
Incident	An event or sequence of events resulting in loss of control over a hazard. Such an incident may also result in injury to a person or damage to property or equipment or facilities.
Injury / Illness	Work related injury / illness, categorised as 'No treatment', 'First aid' and 'Medical injury'.
Manager / Supervisor	For the purposes of this procedure a manager is any person who: • Supervises or controls the work of staff, contractor or visitor
Near Miss	An incident / event which had the potential to cause injury or damage to equipment / machinery / property/ facilities.
Property Damage	Damage to property including plant & equipment.
Reasonably practicable	Means having regard to: • the severity of the hazard or risk in question; • the state of knowledge about that hazard or risk and any ways of removing or mitigating it; • the availability and suitability of ways to remove or mitigate that hazard or risk; and The cost of removing or mitigating that hazard or risk.
Register of Injuries	As required under Accident Compensation Act 1985 Section 101 the employer is expected to keep a register of injuries to include the following information: • Name & job title • Date and time of injury or disease • Exact location where injury or illness sustained • How the injury or disease happened • Nature of the injury or disease and what parts of the person's body are affected • Names of witnesses to the injury or disease Date employer notified.
Risk	How severely someone can be harmed by the hazard, and how likely it is that a person will be harmed by the hazard.
Serious Incident	Refer Appendix 1
Serious near miss	Those incidents / near misses which have the potential for significant injury or illness and / or pose a serious potential threat to damage to property or the environment.

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LEGISLATIVE CONTEXT

Name	Location
Occupational Health and Safety Act, 2004	http://www.austlii.edu.au/au/legis/vic/num_act/ohasa2004107o2004319
Accident Compensation Act 1985	http://www.austlii.edu.au/au/legis/vic/consol_act/aca1985204/

Responsibilities

Site Management shall:

- Implement this procedure in areas under their control including activities conducted on sites other than MRI property.
- Develop appropriate Department reporting processes to ensure timely reporting of incident / hazard (HICAR) reports to management
- Ensure, as far as is reasonably practicable, that adequate financial provision is made available to implement corrective / preventive actions identified from incident / Heads of Management units shall:
- Implement this procedure in areas under their control including activities conducted on sites other than MRI property.
- Develop appropriate Department reporting processes to ensure timely reporting of HICAR reports to management
- Ensure, as far as is reasonably practicable, that adequate financial provision is made available to implement corrective / preventive actions identified from HICAR report investigations.
- Ensure that the appropriate staff receive incident / hazard investigation training and can demonstrate competency to carry out their role/s in investigation and record keeping.

Managers shall:

- Ensure that local procedures are developed in response to this procedure and that these are followed by staff;
- Ensure via information, training, instruction and supervision all staff are aware of the purpose of reporting hazards, near misses / incidents and injuries and of their responsibilities under this procedure.
- Undertake investigations for all reports made to them, consulting with the relevant health & safety representative (where possible) to identify all root causes and maintain records of such investigations.
- Forward the incident report together with records of investigations and identified corrective actions to HR within required time frames.

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Staff shall:

- Take reasonable care for their own health & safety, and for the health & safety of anyone else who may be affected by their acts or omissions in the work environment.
- Follow local arrangements / guidelines developed under this procedure and any other additional requirements set out by their department or manager.
- Report any hazards, incidents / near misses or injury / illness as they become aware of these, and in accordance with this procedure.
- Notify their manager / supervisor if they are injured or develop an illness from work within 30 days of becoming aware of the injury or disease. Reports not made within this time frame may impact on any entitlements made under a compensation claim.

Under the OHS Act Division 5 Clause 58 health & safety representatives may:

- Inspect any part of the workplace at which a member of the representative's designated work group works:
- at any time after giving reasonable notice to the employer or employer's representative; and
- Immediately in the event of an incident or any situation involving immediate risk to the health and safety of any person.

The SHEQ Manager shall:

- Assist Site Management and Managers to ensure OHS training has been delivered to the appropriate personnel to enable them to fulfil their obligations under this procedure.
- Disseminate information arising from hazard and incident investigations to other stakeholders within the company e.g. contact SHEQ manager to forward onto other MRI sites for reference.
- Provide information and guidance Site Management, Managers / Supervisors, health & safety representatives OHS committees on HICAR reporting, recording and investigation.
- Assist all stakeholders in the investigation of incidents as necessary or on request as well as identification of preventative actions to prevent repeat.

SECTION 2 – PROCEDURE

1. Incident / Hazard (HICAR) Reporting

1.1	Reports are categorised as: • Act of violence • Injury / Illness • Incident / Near miss • Hazard • Property Damage	**All staff**
1.2	All incident, hazard or injury reports are to be recorded using MRI's HICAR system. Report all incidents, hazards or near misses. Also report when an injury / illness has been sustained.	**All staff**

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1.2	A detailed description of the incident / hazard should be entered into the form. For example: R**ather than**: *'Picking up paper and felt pain in back'* **Instead:** *'Staff member retrieving box of 4 reams of paper from above shoulder height shelf; felt discomfort in lower back when placing box on floor'.*	**All staff**
1.3	If a person is reporting the incident on behalf of another person / party, the wording used within the report should reflect this i.e. was advised, observed, heard, witnessed etc. The report is to be given to the relevant manager of the area / person involved.	**All staff**
1.4	In the event of an injury, the manager, or supervisor, is to ensure the injured person receives the appropriate medical attention (i.e. first aid response, medical) treatment by a health professional or transported for medical treatment.	**SHEQ Manager**
1.5	For any injury requiring a first aid response from MRI's first aid officer, this shall be recorded in the HICAR. This becomes the record of first aid.	**First Aid Officer**
1.6	Where an employee is injured, and this injury results in the employee having a total incapacity or partial incapacity for work the manager shall refer to MRI's Rehabilitation Policy and contact the Return to Work Coordinator to assist in the development of alternative / suitable duties as part of a return to work program.	**Manager**
1.7	On receiving notification of a hazard, near miss or incident, the manager will determine the extent of the immediate threat to personnel, and take appropriate action to contain any immediate threat to safety. Any action/s to contain an immediate hazard shall not be delayed until the HICAR report form is received.	**Manager**

2. Notifiable Incident Reporting

2.1	For serious incidents or dangerous occurrences the manager is to notify: • SHEQ Manager immediately or; If the SHEQ Manager is not available then the Managing Director	**Manager**
2.2	The SHEQ Manager will notify the Managing Director of MRI of any incident which may require a formal notification to Work Safe.	**SHEQ Manager**

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2.3	The relevant local manager shall determine the extent of immediate threat to persons, take appropriate action to contain any immediate threat to the safety of persons, e.g. section off the area, close the room and ensure integrity of site is maintained so that an investigation can commence.	**Manager**
2.4	Where a threat to personnel remains and further immediate response is required, the local most senior manager on-site shall take immediate action and advise the relevant Director and SHEQ Manager of actions taken.	**SHEQ Manager**
2.5	In the event that there is a death or serious injury the site must not be disturbed beyond: • Protecting the health & safety of a person. • Aiding an injured person involved. • Taking essential action to make the site safe or to prevent a further occurrence of an incident. The site must be secured until directed by a WorkSafe Inspector that the site may be accessed.	**Manager**
2.6	The SHEQ Manager will assist managers in all investigations of notifiable incidents and dangerous occurrences.	**SHEQ Manager**
2.7	The SHEQ Manager will as required notify the Victorian WorkCover Authority of the incident in accordance with the requirements of the OHS Act 2004.	**SHEQ Manager**

4. Incident Investigation and Control

3.1	The SHEQ manager should endeavour to commence an investigation as soon as possible following information of an incident.	**SHEQ Manager**
3.2	The incident investigation should ideally be conducted at the site of the reported incident / hazard and include interviews with the person/s involved. The SHEQ Manager should be contacted to assist in the investigation process. If the hazards relate to specialist areas e.g. analysing air samples for hazardous substances, the services of an OHS specialist / occupational hygienist can be arranged through the SHEQ Manager.	**SHEQ Manager**
3.3	The information recorded in the HICAR should reflect accurately the nature of the hazard, sequence of events and findings of investigations. If further information relevant to the investigation is identified this should be recorded in the HICAR. If there is insufficient space to record this information managers / supervisors can record	**Manager**

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	their findings as an attachment to the HICAR. Managers need to remember that the purpose of their investigations is not to assign blame but to establish all possible causes for the hazard being present / incident occurring. By identifying causes, preventative actions can then be identified to prevent a recurrence.	
3.4	Managers are to document all information even if it is difficult to determine its relevance at the time. It is important to remember that records generated from any investigation can be referred to in a court of law. All managers are to ensure an investigation commences no later than 24 hours following advice of an incident / hazard.	**Manager**
3.5	Evidence should be retained – for example broken glass, spilt chemicals and any unknown substance that was involved – provided such evidence is isolated and does not remain a threat to persons, photographs or video footage should be obtained.	**Manager**
3.6	The SHEQ manager should consult with the relevant Health & Safety Representative for the area during or following their investigations.	**SHEQ Manager**
3.7	In the HICAR managers undertaking the investigation should consider: • Gaps / breakdowns in systems • Issues associated with plant or equipment e.g. size, weight, maintenance Possible environmental factors which may have contributed to the incident • Behaviours of persons e.g. job competency, training etc. • Both the immediate and underlying causes of the hazard or incident must be investigated.	**Manager**
3.8	When considering the identification and implementation of corrective actions managers shall have regard to 'reasonably practicable' as defined within the OHS Act 2004: • the severity of the hazard or risk in question; • the state of knowledge about that hazard or risk and any ways of removing or mitigating it; • the availability and suitability of ways to remove or mitigate that hazard or risk; and • The cost of removing or mitigating that hazard or risk.	**SHEQ Manager**
3.9	The manager shall communicate the findings, including identification of corrective actions of all investigations to the person/s involved in the incident or who made the report of a hazard.	**Manager**
3.10	The manager shall ensure that as part of team meetings under the agenda item OHS, that the findings and / or corrective actions coming out of investigations are communicated to other personnel within the	**Manager**

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	work area.	
3.11	Corrective actions identified are to be allocated to a person or persons indicating the date by which the action/s are to be implemented. All corrective actions, together with name of persons responsible and date by which actions are to be implemented are to be recorded in the HICAR.	**Manager**

4. Implementation of Corrective Actions

4.1	The Site Manager has ultimate responsibility for the implementation of any agreed actions identified following an investigation.	**Site Manager**
4.2	The Site Manager will take such action as appropriate to ensure that the hazards associated with the incident are eliminated where possible or controlled so that the risk of recurrence of a similar incident is minimised. The SHEQ Manager shall: • Consult with the Site Manager as necessary and seek approval, as necessary, for the implementation of corrective actions that require expenditure beyond their level of authority. • Liaise with other departments as necessary. • Source expert opinion as required.	**SHEQ Manager**
4.3	The HICAR together with identification of hazards, assessment of risk and identification of corrective actions must be kept by each work area for a period of 5 years, becoming the Register of Injuries for the work site.	**Manager**
4.4	Managers are to advise the SHEQ Manager when corrective actions are implemented so that the implementations of these are recorded in MRI's HICAR System on BB.	**Manager**

5. Monitor and Review of Corrective Actions

5.1	The investigating manager should determine after the appropriate time, in consultation with the relevant personnel that controls implemented have been effective and have not created other new hazards.	**Manager**
5.2	If the hazards associated with the incident have not been adequately controlled the investigating Manager / Supervisor is required to ensure that hazards are re-assessed and further corrective actions identified to eliminate or reduce the risk.	**Manager**
5.3	The SHEQ Manager will monitor all HICAR's and ensure that local	**SHEQ Manager**

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	worksite investigations have identified all root causes and any corrective actions identified are appropriate to the hazards. The SHEQ Manager will assist site Managers in the monitoring and implementation of corrective actions until all agreed actions have been implemented.	
5.4	Information and actions from HICAR report forms will be reviewed and reported by the SHEQ Manager to the OHS Committees. MRI's OHS committees can review and monitor HICAR reporting data as well as the corrective actions identified.	**SHEQ Manager**

6. Document Distribution and retention

6.1	The RTW, will on receipt of a reported work related injury or illness: • Send an acknowledgment of notification of injury to the injured employee as required under the Accident Compensation Act 1985. HR maintains a central record of all HICAR Report Forms for MRI.	**SHEQ Manager**
6.2	The register of injuries shall be kept in the workplace in a secure location and known by all persons working in that workplace.	**Manager**

SUPPORTING DOCUMENTATION

Forms and Records Management

Form	Retention Time	Retention Location
HICAR report form		https://customer.mri.com.au/bigbird/hicar/create

APPENDIX

<u>Appendix - VWA notification requirements for notifiable Incidents</u> Part 5 of the OHS Act 2004 requires that an employer or self-employed person notify WorkSafe immediately after becoming aware of an incident at a workplace which results in-

Serious injury is defined in accordance with the OH&S Act 2004 as being:

a) The death of a person; or
b) A person requiring medical treatment within 48 hours of exposure to a substance; or
c) A person requiring immediate treatment as an in-patient in a hospital;
d) A person requiring immediate medical treatment for
   i. The amputation of any part of his or her body
   ii. A serious head injury
   iii. A serious eye injury
   iv. The separation of his or her skin from an underlying tissue (such as de-gloving or scalping)
   v. Electric shock

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vi. A spinal injury
vii. The loss of bodily function;
viii. Serious lacerations;

e) Any other injury to a person or other consequences prescribed by the regulations

An employer or self-employed person must notify WorkSafe immediately after becoming aware of an incident at a workplace which exposes a person in the immediate vicinity to an immediate risk to the person's health & safety through -

A **Dangerous Occurrence** is defined by the OH&S Act 2004 as being one of the following:

a) The collapse, overturning, failure or malfunction of, or damage to any plant that the regulations prescribe must not be used unless the plant is licensed or registered; or

b) The collapse or failure of an excavation or of any shoring supporting an excavation; or

c) The collapse or partial collapse of any part of a building or structure; or

d) An implosion, explosion or fire; or

e) The escape, spillage or leakage of any plant, substance or object; or

f) The fall or release from a height of any plant, substance or object

When reporting a notifiable incident the SHEQ Manager will need to provide:

- The name and address of the place where the incident occurred
- The name of any injured persons
- The details of the injury and a brief description of what happened
- Contact details of a person at the incident site and
- Whether the police, an ambulance or other emergency service is attending or has attended the scene

The SHEQ Manager will notify WorkSafe via phone of the event. A reference number will be issued by Work Safe, which is proof of immediate notification.

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Attachment 7: Site Emergency Plan

MRI (AUST) PTY LTD

NSW

SITE EMERGENCY PLAN

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Preface

A building emergency can develop from a number of causes: fire, bomb threat, earthquake, structural fault, leakage of gas or chemical and others.

MRI (Aust) Pty Ltd established the Emergency Plan in accordance with Australian Standard AS 3745, which sets out minimum standards in the approach to planning and management of emergency situations. The purpose of the plan and the wardens, which is a structured group of people employed at the site that take command, on the declaration of an emergency in the building, facilitate safe and orderly implementation of emergency procedures within the building, including evacuation of occupants, pending the arrival of the fire brigade or other emergency service.

The Site Emergency Work Instructions has been produced as a guide for use on all sites and establishes the administrative structure and procedures for the handling of emergencies at MRI (Aust) Pty Ltd. The procedures can only be a guide as any emergency will have peculiarities that require some changes to suit the circumstances of that emergency. However the basic instructions for advising of an emergency and the conduct of authorised officers during an emergency will not vary.

It is noted that MRI (Aust) Pty Ltd Smithfield NSW recycles E-Waste and stores batteries for recycling on site. The typical and maximum quantities of batteries stored are detail on page 18 of this document.

Authority and Indemnity

During emergency situations or exercises, Wardens shall have absolute authority to issue instructions to evacuate all persons from buildings and / or areas. Such instructions are to be adhered to at all times by all employees and visitors of MRI (Aust) Pty Ltd. Wardens shall be indemnified against civil liability resulting from practice or emergency evacuation of a building where personnel act in good faith and in the course of their duties.

Will LeMessurier
Managing Director.

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Emergency Response Personnel

Emergency Personnel / Contact	Name	Contact Number
Chief Warden	Allan Richardson	0432 705 813
Assistant Warden	John Burke	0409 135 306
Warehouse Warden	Aldon Mclean	0439 614 913
Assistant Warden	TBA	
First Aid Officers	Aldon McLean	0439 614 913
	Chris Golledge Warren Muston	Warehouse staff
Ambulance, Fire Brigade, Police		0-000 - Internal phones 000 - Mobile phones
MRI Melbourne	Will LeMessurier	(03) 9303 1800 0419 302 682
Electrician	Charlie Mai	0400 559 385
Alarm Monitoring Company	Integral Security (Control Room)	(02) 9600 0044
EPA		(02) 9995 5555
Workcover During Office Hours		13 10 50
Workcover After Hours		(02) 9214 9220
Doctor	Symbion Medical Centre, 447B Victoria St, Wetherill Park 2164 NSW	(02) 9756 1344
Hospital	Fairfield District Hospital Polding St, (Cnr Prairie Vale Road) Prairiewood 2176 NSW	(02) 9616 8111
Our Phone Number	MRI (Aust) Pty Ltd	(02) 9732 9850
Our Address	73 Victoria Street, Smithfield. 2164 NSW	

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Emergency Evacuation

IF TOLD TO EVACUATE AN AREA OR BUILDING BY THE CHIEF WARDEN OR THEIR ASSISTANT WARDENS:

1. Follow the directions of your Warden
2. Assist others as directed
3. When evacuation is to proceed, the Chief Warden or Assistant Warden will:
   - Sound the alarm via a hand held Siren

     "All personnel please evacuate the building."
   - Proceed to the Assembly area on Victoria St just west of the main gate.
   - Note the identity of your Warden.
4. The Warehouse Warden or their assistant is to check that the warehouse toilets, Locker rooms and lunchrooms are vacant while the Chief Warden is to check that the office toilets and offices are vacant. The Chief Warden is to ensure the removal the Employee In/Out boards located on the left hand side of the stair leading to the as well as the Visitor Sign in book located on the reception desk.
5. Where possible all power is to be turn off, or if not possible. Check if the main Isolation Switch located in the electrical cupboard on the western side of the main roller door, can be safely accessed and turned off.
6. The Chief Warden is to use their mobile phone to contact Emergency Services.

   - **Dial 000 and give your location 73 Victoria St, Smithfield 2164 NSW**
   - **The nature of the emergency.**
   - **Any injuries or casualties.**
   - **What type of assistance is required**
   - **Any hazards that may be encountered.**
   - **Your name and telephone contact number.**

7. Wardens are to check that everybody has evacuated by referring to the Employee In/Out board and Visitor Sign in book.
8. The Chief Warden is to inform neighbouring premises of the emergency situation.

   Refer to page 5
9. The Chief Warden is to contact the Melbourne office and if required the EPA and Workcover NSW.

MRI Melbourne Office	Ph: (03) 9303 1800
EPA	Ph: (02) 9995 5555
Workcover NSW	Ph: 13 10 50 After hours (02) 9214 9220
10. **Do Not** move from the assembly point until authorised by the Chief Warden
11. Wardens are to liaise with the Emergency services that attend.
12. Complete the Emergency Evacuation Check List and the Information sheet to assist in any investigations that maybe required.
13. When the "all clear" has been given by emergency services, the chief warden is to notify neighbouring premises and the relevant MRI office that the all clear has been given.
14. Under no circumstances is anyone to re-enter the building until the situation is declared safe by the relevant external authority or Chief Warden

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Emergency Contacts For Neighbours

NSW ONLY

West of MRI	BH	AH
Shop on Corner of Victoria & O'Connell St's Gardenia Gourmet	9725 2325	
Unit 1 / 43 O'Connell St Auto Engineers P/L	8798 2356	
Unit 2 / 43 O'Connell St Quality Auto Repairs	9757 3887	0419 728 777
Unit 3 / 43 O'Connell St Reno's Floor Coverings	9609 1233	0413 965 212
East of MRI		
71 Victoria Street Cylinder Head Rebuilders P/L	9609 1543	0408 238823

Emergency Checklist

Name of warden:_____ Date:_____

[✓] (Tick)

☐ A Fire Warden is to be notified immediately of emergency situation. Chief Warden, Assistant, Warehouse Warden, Assistant.

☐ Injured persons are to be moved to safety.

☐ Warden to decide if the situation can be safely controlled with in-house equipment or not.

☐ Chief Warden to be informed and where possible liaise with other wardens.

☐ Chief Warden to sound Evacuation alarm sounded if required. Verbal command over PA system "All personnel please evacuate the building."

☐ Chief Warden to collect employee In/Out boards located above time clock.

☐ Chief Warden to collect visitor sign in book from reception desk.

☐ Warehouse warden to check warehouse toilets, tech room and locker room are vacant.

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☐ Chief warden to check office toilets and offices are vacant.

☐ Chief Warden to organize the turning all power off if possible.

☐ Chief Warden to organize main isolation switch located on eastern wall in sales area is to be turned off if possible.

☐ Chief Warden to contact emergency services if required from a mobile phone. Dial "000" for Fire, Police and Ambulance.

You must give your location to the operator:
73 Victoria Street, Smithfield, NSW. 2164.
The nature of the emergency.
Any injuries or casualties.
What type of assistance is required.
Any hazards that may be encountered.
Your name and telephone contact number.

☐ Chief Warden to check all persons on premises have evacuated to assembly point located on grass area between the north and south gates on Bentley St. Refer to employee in/out boards and visitor sign in book for personnel on premises. If there are missing persons, the Chief Warden shall find out where the persons were last seen. If the Chief Warden deems it safe to re-enter the premises a search may be organised to locate the missing person. If it is unsafe, Emergency Services are to be instructed of the situation and the last known whereabouts of the missing persons immediately upon their arrival.

☐ Chief Warden to inform neighbouring premises of situation.
Refer to page 5

☐ Chief Warden to inform Melbourne MRI office of situation Ph: (03) 9305 4611

☐ Chief Warden if required inform EPA Ph: (02) 9995 5555
Workcover Ph: 13 10 50 or after hours : (02) 9214 9220

☐ Wardens to liaise with emergency services that attend.

☐ When all clear has been given by emergency services, Chief Warden is to notify neighbouring premises and Melbourne MRI office that the all clear has been given.

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Emergency Incident Report Records

On Site Information

Time incident was reported. _____

Time Emergency Services were Notified._____

All persons accounted for? Yes / No

Persons Missing.

_____
_____
_____
_____

Time Emergency Services arrived on site._____

Type and number of Emergency Services.

_____
_____
_____
_____
_____

Name of Emergency Service Person(s) in charge.

_____
_____
_____

Time "all clear" was given. _____

Nature of incident.

_____
_____
_____
_____

Notes of incident.

_____
_____
_____
_____

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IN THE EVENT OF FIRE

1. Ensure no one is in immediate danger, if they are, warn others of the situation before helping persons in danger.

2. Injured persons are to be assisted out of danger.

3. Inform a Warden of the situation.

4. The Warden is to assess the situation as to whether it can be bought under control with in-house equipment or Emergency services need to be contacted.

Note: only employee's who are trained are to use Fire Fighting Equipment.

5. Stay calm **DO NOT** shout FIRE

6. The Warden is then to inform the Chief Warden or their assistant to begin the evacuation process and sound the alarm.

7. Telephone from mobile phone 000 (State the exact location and details of the fire)

8. Contact MRI Melbourne Office.

If you decide to fight the fire

1. Select the appropriate equipment
2. Switch off the electricity
3. Cut off any potential fuel
4. Have an escape route

IF YOUR ESCAPE ROUTE IS UNDER THREAT DUE TO SMOKE, HEAT FATIGUE OR GROWTH OF THE FIRE OR ANY OTHER REASON THAT MEANS YOU CAN NO LONGER FIGHT THE FIRE

What you should do next

1. Safely evacuate the area
2. Close all doors and windows
3. Go to evacuation point

REMEMBER:

SMOKE IS AS FATAL AS FLAME

If confronted by heavy volumes of smoke, crawl to safety the clear air is near the floor

Should your clothing catches on fire:

STOP - where you are, do not run

DROP - to the floor

ROLL - to smother the flames

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TYPES OF PORTABLE FIRE EXTINGUISHERS

Fire Extinguisher Chart

Extinguisher		Type of Fire				
Colour	Type	Solids (wood, paper, cloth, etc)	Flammable Liquids	Flammable Gasses	Electrical Equipment	Cooking Oils & Fats
	Water	✓ Yes	✗ No	✗ No	✗ No	✗ No
	Foam	✓ Yes	✓ Yes	✗ No	✗ No	✓ Yes
	Dry Powder	✓ Yes	✓ Yes	✓ Yes	✓ Yes	✗ No
	Carbon Dioxide (CO2)	✗ No	✓ Yes	✗ No	✓ Yes	✓ Yes

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MEDICAL EMERGENCY

What to do

1. **STAY CALM** - The worst thing you can do in any emergency medical situation is panic. For the sake of the victim and your colleagues, try to remain calm, cool and collected. You will be more effective and efficient this way.
2. **ASSESS THE SITUATION** - Quickly assess the scope of the injuries and collect information. If an injured person is conscious, ask them to tell you if anything hurts and observe where on their body they may be physically injured. Do not move an injured person, especially if they are reporting pain, unless there is imminent danger.
3. **FIRST AID OFFICER** – Get your First Aid Officer, and report incident to your Supervisor or Manager.
4. **ADMINISTER FIRST AID** - If required, CPR or first aid should be performed by a person who is trained in its administration. If there is no skilled person, wait for emergency professionals. Do not administer medical attention or medications unless you are trained to. Be careful not to come in contact with blood, vomit or other bodily fluids.
5. **CALL 000** - If a person is badly injured, call 000. If there is any doubt as to whether emergency services are needed, it is better to be safe than sorry. Stay calm and provide your address, location in the building, phone number, name and any information you have gathered about the injuries.
6. **CONTROL THE SCENE** - Avoid unnecessary conversation with or about the ill or injured person. You might add to the person's distress or fears, increasing the risk of medical shock. Limit your conversation to quiet reassurances. Keep onlookers away from the scene, if they are not assisting in the situation they should not be there.
7. **AFTER THE INCIDENT IS OVER** - After the person has been taken care of and the incident is over, remain available to help the Supervisor or Manager with the gathering of information for the incident investigation.

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IN THE EVENT OF A PHONE OR BOMB THREAT

1. ABOVE ALL:

KEEP CALM AND DO NOT ALARM EMPLOYEES AND VISITORS.

2. IF THREAT IS BY TELEPHONE:

- Prolong call - keep person talking and ask:
  - Location of Bomb
  - Time Set to Explode
- Record information for Police as well as any other relevant information as shown on the Phone Threat Checklist

3. REPORT CALL TO THE OPERATIONS MANAGER

ADVISE A WARDEN

4. IF OBJECT FOUND:

- Do not touch
- Report find
- Keep areas clear

5. BASIC RULES:

- Treat as genuine
- Record exact information (using checklist if possible)

6. EVACUATION:

- Evacuate in a calm and orderly manner
- Any bags / articles brought into building on entry should remain
- On evacuation **DO NOT** assemble near vehicles.

Police / Ambulance / Fire Brigade – 0-000

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Phone Threat Checklist KEEP CALM

General Questions to Ask

1. What is it?

.....

2. When is the bomb going to explode? OR
   When will the substance be released?

.....

3. Where did you put it?

.....

4. What does it look like?

.....

.....

5. When did you put it there?

.....

6. How will the bomb explode? OR
   How will the substance be released?

.....

.....

7. Did you put it there?

.....

8. Why did you put it there?

.....

.....

.....

Chemical/Biological Threat Questions

1. What kind of substance is in it?

.....

2. How much of the substance is there?

.....

3. How will the substance be released?

.....

4. Is the substance a liquid, powder or gas?

.....

Bomb Threat Questions

1. What type of bomb is it?

.....

2. What is in the bomb?

.....

3. What will make the bomb explode?

.....

Exact Wording of Threat

.....

.....

.....

.....

.....

Caller's Voice

Accent (specify) .....
Any impediment (specify) .....
Voice (loud, soft etc) .....
Speech (fast, slow etc) .....
Diction (clear, muffled etc) .....
Manner (calm, emotional etc) .....
Did you recognise the caller? .....
If so, who do you think it is? .....
Was caller familiar with the area? .....

Threat Language

Well spoken .....
Incoherent .....
Irrational .....
Taped .....
Message read by caller .....
Abusive .....
Other .....

Background Noises

Street .....
House .....
Aircraft .....
Voices .....
Music .....
Machinery .....
Other .....
Local call .....
STD call .....

Notes

.....

.....

.....

.....

.....

.....

.....

Other

Gender of caller ..... Male / Female Estimated age .....

Call Taken

Date ..... Time .....
Duration of call .....
Number called .....

Action (Obtain details from Supervisor)

Reported call immediately to .....
Phone number .....

Please report these details to Warden as soon as possible

Use additional paper as required

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IN THE EVENT OF A HOLD-UP

1. NOTE AND REPORT SUSPICIOUS PERSONS

2. IF CONFRONTED, OBEY INTRUDERS INSTRUCTIONS

3. OBSERVE CAREFULLY:

ANY ARTICLES TOUCHED BY INTRUDER(S)
PHYSICAL DETAILS AND ATTIRE
POINTS WHICH MAY AID DESCRIPTION INCLUDING MANNERISMS AND WEAPONS
DIRECTION THAT INTRUDERS LEAVE THE AREA

4. RECORD INFORMATION FOR POLICE

CONTACT ADMINISTRATION MANAGER AND PROVIDE DETAILS OF INCIDENT

IN THE EVENT OF MAJOR CHEMICAL INCIDENT

In the event of a major spillage, contamination to personnel or other emergency situation (e.g. fire) the following procedure shall be followed:

1. The immediate area shall be evacuated at once.

2. The immediate emergency actions are as follows :
   - Treat any persons that may be contaminated by washing with copious amounts of water and removing contaminated clothing
   - Inform a Warden
   - Inform Chief Warden of situation
   - Determine the identity of the substance(s) and obtain their Material Data Safety Sheets

3. Isolate the affected area by erecting a temporary barricade and prevent other persons entering the area. Refer to WI-OPS-A.5-01 Use of Oil Absorbent or WI-OPS-A.5-03 Use of Chemical Absorbent depending on the spill, also WI-OPS-A.8-01 Storm Water Protection (Sydney).

4. Staff who have been trained to deal with the situation may attempt to decontaminate the area.

5. In the case of fire every effort must be made to prevent undue spreading of contamination. However, fire fighting must take precedence over the control of contamination.

6. Normal work must not be resumed until the Chief Warden is satisfied that it is safe.

NOTE: IF THERE IS ANY DOUBT CONCERNING THE ABOVE PROCEDURES, ADVICE AND RULINGS MUST BE SOUGHT FROM THE CHIEF WARDEN.

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IN THE EVENT OF HIGH WINDS

During recent years a number of storms have produced winds high enough to cause damage to trees and buildings; presenting a danger to staff and visitors to the site. These measures are designed to provide for a higher level of safety during these events.

During periods of high wind warning, staff and visitors should not access the buildings outside of normal office hours.
The following procedures are provided for your safety and welfare at the site in periods of high wind warning:

NO WARNING – CAUGHT OUTSIDE DURING A WIND STORM AT WORK

1. Move to open areas away from trees and building lines. Trees and building areas are more dangerous due to the possibility of falling tree limbs and building roofs and tiles.
2. If safe, proceed to the nearest building and stay at ground floor level and away from windows and glassed areas.
3. Stay put until danger of flying debris has abated.

NO WARNING – CAUGHT INSIDE DURING A WIND STORM AT WORK

1. Close all doors and windows in your immediate vicinity. Turn off computers and other electrical items if time permits.
2. Proceed to a safe area within your building, preferably at ground floor level and away from windows and glassed areas.
3. Close windows and blinds to minimize risks of flying glass should the window be struck by a flying object during the storm. Keep staff from looking out of windows.
4. If available, have torches or other battery powered lighting ready should the power fail.
5. Remain inside until the storm has passed.

SHORT NOTICE OF WIND STORM WHILE AT WORK

1. Site Wardens to take control.
2. Arrange for loose objects to be collected from outside building.
3. Arrange to have torches or other battery powered lighting ready should the power fail.
4. All staff or visitors to secure individual areas or rooms – close windows and pull blinds, turn off all electrical appliances and close doors.
5. Proceed to a safe area within your building, preferably at ground floor level and away from windows and glassed areas.
6. Remain inside until storm has passed.

ADVANCED WARNING OF WIND STORM WHILE AT WORK

1. Chief Warden to arrange for any nominated buildings to be evacuated and secured.
2. Arrange for service crew to be placed on stand -by.
3. First Aid Officer to prepare for a coordinated first aid response. First Aid Officer to check kits are readily available.
4. All staff to secure individual work areas – turn-off all electrical appliances and close doors
5. Staff to be ready to move to a safe area, preferably away from windows and glassed areas, when advised by Chief Warden.
6. Remain inside until storm has passed.

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IN THE EVENT OF FLOODING

When there are heavy periods of rain that can lead to flash flooding, roof failure and building damage; presenting a danger to staff and visitors to the site. These measures are designed to provide for a higher level of safety during these events.

During periods of severe warnings, staff should not work outside.

The following procedures are provided for your safety and welfare at the site in periods of severe weather warnings:

Work outside should be reduced to an absolute minimum and supervisors or another staff member should be aware that someone is working outside for if the weather turns bad quickly.

Any lose objects should be secured

In case of severe weather staff should stay inside and monitor weather until it is safe to go outside.

In the case of flooding occurring inside due to heavy rain and leaks occur inside the building power should be turned off to any electrical equipment near the leak and move it away from the area
ONLY IF IT IS SAFE TO DO SO. If necessary turn the power off at the main power board to the area.

Ensure all staff move to a safe location in the building or warehouse and only are to return when it has been deemed safe.

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TYPICAL AND MAXIMUM QUANTITIES OF DANGEROUS GOODS STORED ON SITE

Goods Area	UN Number	Common Name	Class	Packaging Group	Typical Quantity	Maximum Quantity
Battery Sort Area	2794	Lead Acid Vented Batteries	8	III	800Kg	1000Kg
Battery Sort Area	3028	Alkaline Batteries	8	III	400 Kg	800 Kg
Battery Sort Area	3028	Ni-Cad Sealed Batteries	8	III	800 Kg	1000 Kg
Battery Sort Area	2795	Ni-Cad Liquid Batteries	8	III	500 Kg	1000 Kg
Battery Sort Area	3028	NiMh Sealed Batteries	8	III	800 Kg	1000 Kg
Battery Sort Area	3480	Lithium Ion Batteries	9	II	800 Kg	1000 Kg
Battery Sort Area	3090	Lithium Metal Batteries	9	II	800 Kg	1000 Kg
Class 8 Storage	3028	Alkaline Batteries	8	III	1000 Kg	1600 Kg
Class 8 Storage	3028	Ni-Cad Sealed Batteries	8	III	9000 Kg	21000 Kg
Class 8 Storage	2795	Ni-Cad Liquid Batteries	8	III	5000 Kg	8000 Kg
Class 8 Storage	3028	NiMh Sealed Batteries	8	III	4000 Kg	5000 Kg
NOTE – PLEASE ENSURE MINIMUM OF 5 METRES BETWEEN LEAD ACID & OTHER BATTERY TYPES						
Class 8 Storage	2794	Lead Acid Sealed Batteries	8	III	5000 Kg	10000 Kg
Class 9 Storage	3480	Lithium Ion Batteries	9	II	5000 Kg	8000 Kg
Class 9 Storage	3090	Lithium Metal Batteries	9	II	2000 Kg	3000 Kg

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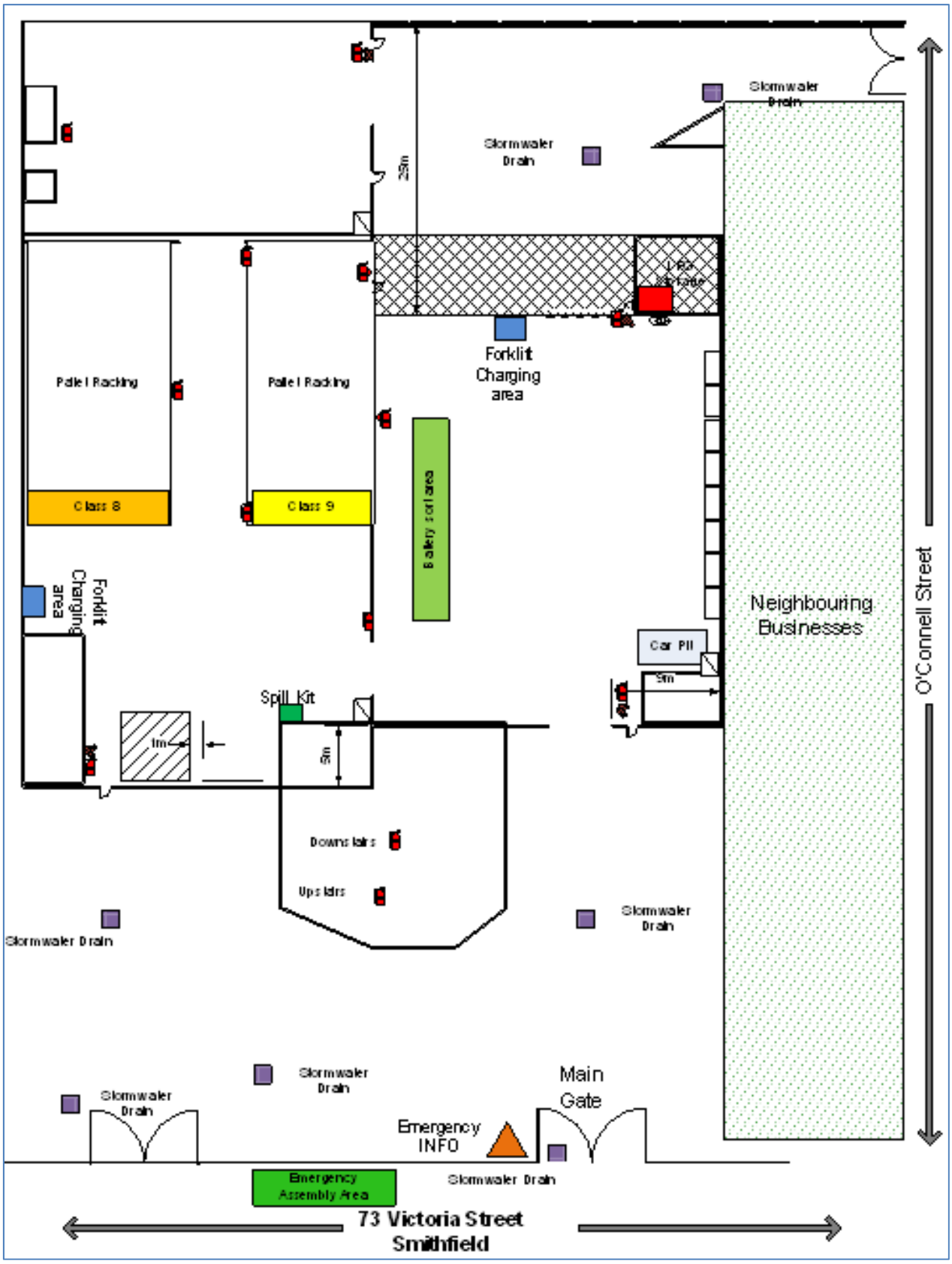
Site Dangerous Good in Storage, Emergency & Spill kit Location Plan



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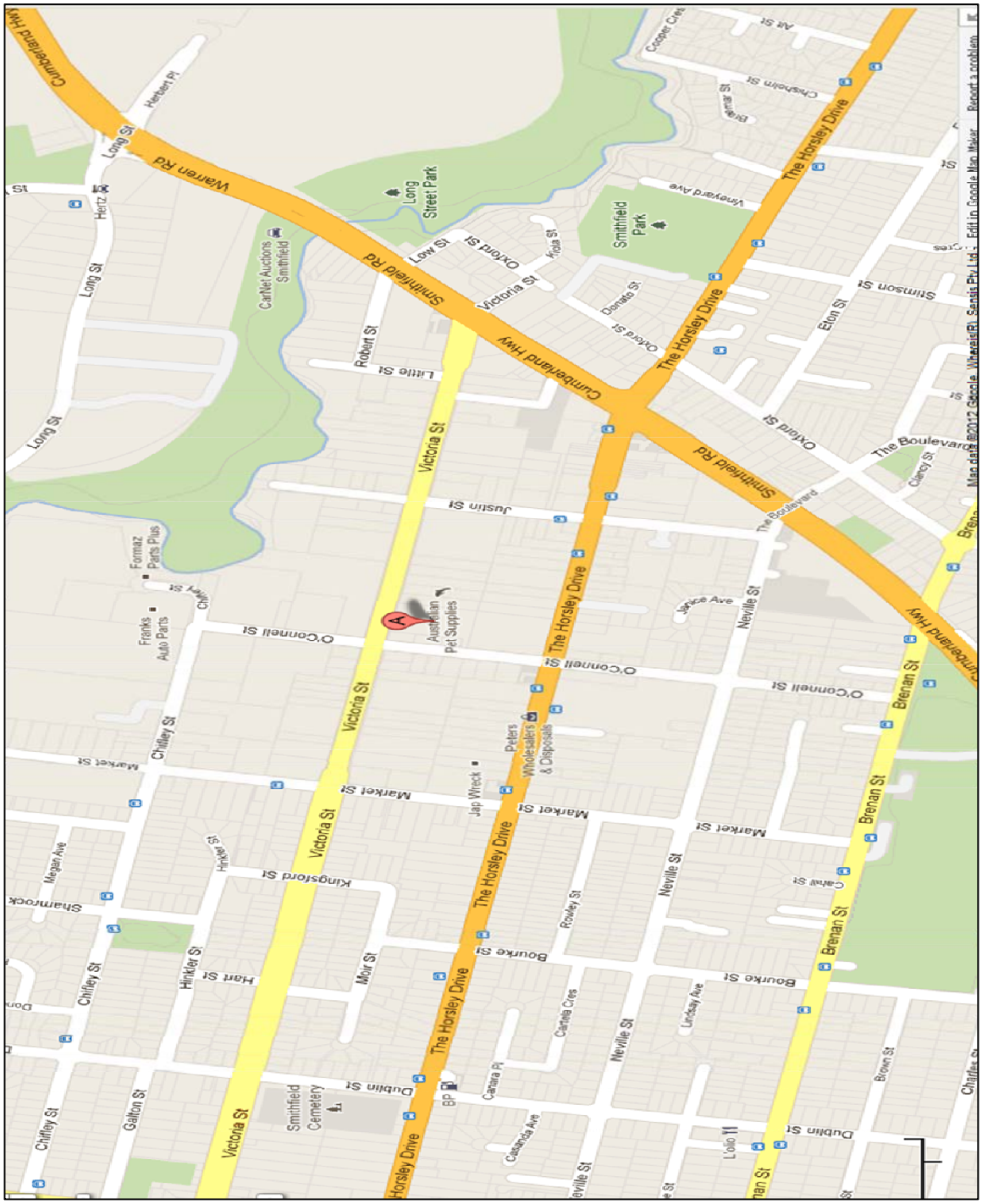
SITE LOCATION MAP

73 Victoria Street, Smithfield 2164 NSW



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SUMMARY SHEET

KEEP THIS NEAR YOU IN A PROMINENT PLACE

THESE PROCEDURES ARE FOR 24 HOURS EACH DAY IN AN EMERGENCY

1. Inform a Warden.

2. Immediately the emergency is known, phone **0-000**

2. Then contact MRI Melbourne Office
   During office hours **(03) 9303 1800**
   Outside office hours (Wills Mobile) **0419 302 682**

To ensure an orderly evacuation in any emergency, await directions from your Wardens. (only if it is safe to do so!)

Your Wardens and emergency personnel are:

Chief Warden	**Allan Richardson**	**0432 705 813**
Assistant Warden	**John Burke**	**0409 135 306**
Warehouse Warden	**Aldon McLean**	**0439 614 913**
Assistant Warden	TBA	
First Aid Officers (Warehouse staff)	**Chris Golledge** **Warren Muston**	
Assembly Point	**Located on Victoria Street just west of the main gate.**	

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Attachment 8: WI-OPS-A.8-01 Stormwater Drains Inspection Process

Purpose

This work instruction provides the correct procedure for maintaining the storm water drains to prevent contaminants entering the storm water system.

Forms used

F-OPS-A.5-01 Stormwater Drain Checklist - Sydney

Related documents

WI-OPS-A.5-03 Chemical Spill Containment and clean-up process
WI-SHEQ-1.6-01 Emergency Evacuation process overview
PR-SHEQ-1.9-01 Emergency Preparedness & Response overview.

Procedure

Uncontaminated storm water discharge from the premises must not contain visible oil, grease, scum, litter or any other objectionable matter.

In the case of an emergency, where contaminants are likely to enter the storm water system a Storm Water Drain Seal is provided and located next to the Spill Kit in the factory outside the Operations Office.

All spill incidents are to be contained immediately and then reported to you supervisor and a Hazard Incident Corrective Action Report (HICAR) is to be raised.

Any incidents where contamination passes through to the drain(s) shall be reported immediately to your Supervisor and the SHEQ Co-ordinator who will take appropriate action as per procedure PR-SHEQ-1.9-01

Contaminated material is to be placed in a marked plastic contaminated waste bag which is then sealed and then transferred to the marked waste disposal bin for later disposal through an EPA licensed contractor.

After rainfall drains must be checked and if required maintenance must be carried out.

On the first working day of every month trained personal are to perform maintenance on the stormwater drains and must have the Storm Water Drain Log (F-OPS-A.5-01), complete all sections and sign off.

Any material that has been removed from the storm water pit that is not contaminated is to be placed in the normal waste disposal bin.

Records

Completed F-OPS-A.5-01 Stormwater Drain Checklist must be given to the SHEQ Co-ordinator for filing in the folder marked Storm Water Drain Log located in the office.

Maintenance

Maintenance is to be carried out on the first working day of each month.

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Attachment 9: F-OPS-A.5-01 Stormwater Drains Checklist

MRI e-cycle solutions	Stormwater Drains Checklist - Sydney	Doc No: F-OPS-A.5-01
		Rev: 00

DATE

Only Trained personal may perform this Procedure.	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Front Yard Drains 1, 2, 3, 4 & 5 - Visual Check.☑																															
Remove metal cover & contaminate on drain.																															
Check condition of "Drain Guards" - clean or replace if necessary.																															
Cleaning ☑																															
Remove any sediment in the bottom of drain & place in waste bin.																															
Rear Yard Drains 1, 2, & 3 - Visual Check.☑																															
Remove metal cover & contaminate on drain.																															
Check condition of "Drain Guards" - clean or replace if necessary.																															
Cleaning ☑																															
Remove any sediment in the bottom of drain & place in waste bin.																															
Report ☑																															
Condition OK																															
Check Stock of Spill Kit is complete (Refer Contents list on Spill Kit)																															
Check that this form is complete and report any faults to the EMC.																															
Signature																															

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Attachment 10: Workplace Inspection Process

Purpose

This work instruction provides the procedure for undertaking inspections of the workplace areas including all operational areas, storage areas and external areas to ensure that a high standard of housekeeping is maintained.

Forms used

Workplace Inspection Checklist – Sydney (Doc No: TBA)

Related documents

WI-OPS-A.5-03 Chemical Spill Containment and clean-up process
WI-SHEQ-1.6-01 Emergency Evacuation process overview
PR-SHEQ-1.9-01 Emergency Preparedness & Response overview.

Procedure

A sample Workplace Inspection Checklist is provided and needs to be completed and recorded on a daily basis. This information is used to check compliance and ensure due diligence. It is also used to determine whether action must be taken to rectify issues that have arisen that may have the potential to cause environmental harm.

The Production Manager is responsible for ensuring that any actions required are implemented. The appropriate column of the checklist to indicate that these actions have been adequately undertaken is also the responsibility of the Production Manager or delegate.

The Workplace Inspection must cover all production and external areas including:

- The front and rear external areas including car parking areas, roadways, landscaped areas and gardens, stormwater drains and boundaries;
- Dangerous goods, chemical and waste storage areas;
- Each work production area and storage areas; and
- Office areas and amenities;

The Workplace Inspection Checklist must be updated as required. Site management may prefer to update the checklist so it is more specific to each area.

Records

Completed Worplace Inspection Checklist must be given to the SHEQ Co-ordinator for filing in the folder marked Workplace Inspection located in the office.

Maintenance

Maintenance is to be carried out on the first working day of each month.

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Attachment 11: Workplace Inspection Checklist

MRI e-cycle solutions	Workplace Inspection Checklist - Sydney	Doc No: TBA Rev: DRAFT FOR REVIEW

DATE

Only Trained personal may perform this Procedure.	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Front Yard Inspection **- Visual Check.☑**																															
Remove any litter and loose material present.																															
Cleaning ☑																															
Sweep area if deemed required (in presence of leaves, dust, grit etc on hardstand areas and driveways).																															
Rear Yard Inspection **- Visual Check.☑**																															
Remove any litter and loose material present.																															
All waste container lids closed																															
Cleaning ☑																															
Sweep area if deemed required (in presence of leaves, dust, grit etc on hardstand areas and driveways).																															
Dangerous Goods Storage Area Inspection **- Visual Check.☑**																															
Remove any litter and loose material present.																															
Dangerous goods located in correct storage area																															
Batteries stored in accordance with WI-OPS-4.5.3-05 Bulk Battery Processing																															
Check drums / crates contain correct DG label																															
Dismantled components within enclosed containers																															
All walkways clear of items. Remove any items																															
Signage is correct and clearly visible																															
Cleaning ☑																															
Sweep area if deemed required.																															
Clean up any spills or leaks using spill kits.																															
Work Area Inspection **- Visual Check.☑**																															
Remove any litter and loose material present.																															

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MRI e-cycle solutions	Workplace Inspection Checklist - Sydney	Doc No: TBA
		Rev: DRAFT FOR REVIEW

DATE

Only Trained personal may perform this Procedure.	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
All walkways clear of items. Remove any items																															
Evidence of air emissions from CRT extraction system.																															
Any excessive noise? (Unusual sources louder than normal operations) Investigate and report source of noise																															
Any excessive or unusual sources of dust or odour? Investigate and report sources.																															
Fire fighting equipment is easily accessible and available. Check servicing is up to date.																															
Check all safety signs are visible and in good condition																															
Cleaning ☑																															
Sweep area if deemed required.																															
Office and Amenities Inspection - Visual Check.☑																															
Remove any litter and loose material present.																															
All signage visible and in good condition																															
Report ☑																															
Condition OK																															
Details of cleaning required:																															
Check that this form is complete and report any faults to the EMC.																															
Signature																															

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Attachment 12: WI-OPS-A.5-03 Chemical Spill Containment and Clean-up Process

Purpose

This work instruction provides the correct procedure for the use of Chemical Absorbent/Neutralizer material in the event of a Chemical spill and to carry out environmental safety measures in case of an emergency.

Areas affected

All areas used in the storage, handling and processing of batteries, including the yard, transport equipment and storm water outlets.

Forms used

HICAR – MRI Hazard Incident Corrective Action Report

Related documents

PR-SHEQ-1.9-01 Emergency Preparedness & Response overview
WI-SHEQ-1.6-01 Emergency Evacuation process Overview

Reference

Sydney Water Act.
Clean Waters Regulation.

Definitions and Acronyms

SHEQ manager Safety Health Environment and Quality Manager

Safety and General Rules

Only persons trained in Spill Response are to assist in the operation of spill cleanup.

All staff must be adequately clothed and equipped with general safety equipment for example: -

- Steel Capped Boots.
- Overalls.
- Chemical resistant gloves.
- Chemical resistant apron.
- Eye Protection.
- High visibility clothing

Procedure

The emergency spill kits must be placed in a convenient location during the operation of handling and processing of Wet Cell batteries.

In the event of a chemical spill operators are required to check that the closest storm water drain is bunded or sealed and any other drain in the vicinity is not in danger.
Operators are to wear all protective equipment as listed above when containing and clean a chemical spill.
In the event of a chemical spill operators are required to cover the spill with the appropriate type of chemical neutralizer/absorbent (there is one for Acid & one for Alkaline) and mixed through until spill appears dry.
Remove used product with stiff broom and shovel.
Dispose of all waste (rags, booms & absorbent) into the plastic bags provided and arrange for prescribed

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waste to be disposed off through an EPA licensed contractor.
All spills shall be cleaned up immediately where there is no risk to the operator and chemical neutralizer/absorbent material must not be left on the ground for extended periods of time.
Should the chemical spill be large the use of absorbing booms may be required to contain the spill.

Emergency Preparedness and Response

Any chemical spill shall be dealt with immediately where there is no risk to the operator and supervisors notified.

In any of the above emergency situations / accidents, the actions taken shall be recorded on the HICAR MRI Hazard Incident Corrective Action Report by the SHEQ manager.

Records

HICAR – MRI Hazard Incident Corrective Action Report

Maintenance

Check stocks of Chemical absorbent & any other items used to clean up spill and ensure order for replacement stocks is placed.

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Attachment 13: WI-OPS-A.5-01 Oil Spill Containment and Clean-up Process

Purpose

This work instruction provides the correct procedure for the use of oil absorbent material in the event of an oil spill and to carry out environmental safety measures in case of an emergency.

Areas affected

All areas used in the storage, handling and processing of oil filled plants including bunded areas, the yard, transport equipment and storm water outlets.

Forms used

HICAR – Hazard Incident Corrective Action Report

Related documents

WI-OPS-4.5.4-01– Oil Filled Plant Processing (Vic Only)
WI-OPS-A.5-02– Storm Water Protection Valve (Vic Only)
WI-SHEQ-1.6-01– Emergency Evacuation Process Overview
PR-SHEQ-1.9-01– Emergency Preparedness & Response Overview
Environment Improvement Plan – PCB's. (Vic Only)

Reference

EPA License & SEPP Water

Procedure

1. The emergency spill kits must be placed in convenient location during the operation of handling and processing of oil filled plants.
2. (Vic Only)In the event of an oil spill operators are required to check the storm water shutoff valve is closed according to WI-OPS-A.5-02 - Storm Water Protection Valve.
3. In the event of an oil spill operators are required to cover the spill with biodegradable absorbent and mixed through until spill appears dry.
4. Remove used product with stiff broom and shovel.
5. Dispose of all waste (rags, booms & absorbent) into the marked waste bags in the spill kit or into (Vic Only) either of the two 6 x 4 prescribed waste bins on the eastern wall of the factory.
6. All spills shall be cleaned up immediately and biodegradable material must not be left on the ground for extended periods of time.
7. Should the spill be large the use of oil absorbing booms may be required to contain the spill.

Records

HICAR – Hazard Incident Corrective Action Report

Maintenance

F-OPS-4.5.4-01 - Oil Filled Plant maintenance daily check list (Vic ONLY)

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Attachment 14: WI-OPS-4.5.3-05 Bulk Battery Processing

1. PURPOSE

1 This work instruction covers work undertaken on receiving, processing, storage and dispatch of batteries.
2 This work instruction establishes a minimum standard of conduct to ensure all staff are adequately trained and supervised.
3 All battery containers must conform to EPA vehicle transportation and storage regulations.
ie. Hazchem labelling, container max weight and drum insulation liners.

2. RELATED DOCUMENTS

HICAR Hazard Incident Corrective Action Report system in Big Bird
PR-SHEQ-1.9-01 Emergency Preparedness & Response Overview
WI-OPS-A.5-03 Chemical Spill containment and clean-up process
WI-SHEQ-1.6-01 Emergency Evacuation Process Overview
WI-OPS-A.5-02 Stormwater Protection Valve Melbourne
WI-OPS-A.8-01 Stormwater Drains Inspection Process Sydney
WI-OPS-4.1-01 Creating a shipment and pallet Ids
TR-WD-4.5.3-01 Packing guidelines for used handheld batteries

3. SAFETY & GENERAL RULES

General Safety

a. All staff must be adequately clothed and equipped with general safety equipment for example
- Steel Capped Boots.
- Overalls.
- Chemical resistant gloves.
- Chemical resistant apron.
- Eye Protection. or face shield
- High visibility clothing

b. Staff used on processing batteries shall complete a basic “Processing batteries course”

c. Any person who is either not qualified or is being used in an unfamiliar role shall be supervised at all times

4. EMERGENCY PREPAREDNESS AND RESPONSE

In the event of a spill, the following emergency procedures should be initiated depending of the spill type, only if there is no risk to the employee taking the action.

WI-OPS-A.5-03 Chemical Spill containment and clean-up process
WI-OPS-A.5-02 Stormwater Protection Valve Melbourne
WI-OPS-A.8-01 Stormwater Drains Inspection Process Sydney
MRI (Aust) Pty Ltd Emergency Evacuation Plans
In any of the above emergency situations / accidents, the actions taken shall be recorded in
HICAR – Hazard Incident Corrective Action Report system in Big Bird

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5. PROCEDURE

HANDLING BATTERIES

Batteries will be delivered to site and off loaded trucks on site by a forklift.

6. MAIN BATTERY TYPES AND FIRE EXTINGUISHING MEDIA

The main types of batteries MRI receives are

NiCad sealed NiCad vented Lithium Ion Lithium Primary

Nickel Metal Hydride Lead Acid Alkaline

These battery chemistries appear commercially as below.

Battery chemistry types	MSDS recommended fire extinguishing media
Battery Alkaline	Dry chem, CO_2, great deal of water
Battery Alkaline Cylinder Maganese Dioxide -Zinc	All types
Battery Alkaline Minature	All types
Battery Fluid, Alkali	Dry chem, CO_2, great deal of water, foam
Battery Lead Acid GEL Wet, sealed Batteries	Dry chemical, foam, CO_2
Battery Lead Acid Wet, non-spillable	All types
Battery Lead Acid Wet, vented	All types
Battery Lithiated Nickel Oxide	All types
Battery Lithium LiFeS2	Dry chem, CO_2, great deal of water
Battery Lithium LiMnO2 coin	Dry chem, CO_2, great deal of water
Battery Lithium Primary Button Cell (Maganese Dioxide)CR	Avoid water, Co2 not suitable, metal fire extinction powder, rock salt, dry sand
Battery Lithium Primary Thionyl Chloride (LI-SOCL2)	Dry chem, CO_2,BCF
Battery Lithium Sulfur Dioxide	All types
Battery Lithium-Ion Rechargeble (Polymer)	All types
Battery Nickel Cadmium Rechargeble Alkaline Vented	All types
Battery Nickel Cadmium sealed	Avoid water. Dry chem, CO_2, dry sand
Battery Nickel Cadmium Vented	All types
Battery Nickel Metal Hydride	METL-X, sand, dry ground dolomite, soda ash, flood with water
Battery Nickel Metal Hydride secondary sealed cells	All types
Battery Nickel Oxyhydroxide	All types
Battery Silver Oxide Button cells	All types
Battery Silver Oxide Zinc	All types
Battery Zinc Air	All types
Battery Zinc Air Alkaline	All types
Battery Zinc Carbon	Dry chem, CO_2, great deal of water
Battery Zinc Chloride	All types

The common material safety data sheet accepted fire extinguishing media is “all types”.

All types of media refer to water, CO_2, Dry chemical, BCF fire extinguishers.

MRI maintains CO_2, Dry Chemical, Foam fire extinguishers and water fire hydrants in the Victoria site.

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Although CO_2 is the preferred extinguisher for battery fires, recent reports from the FFA and Fire Prevention Research Institute indicate that water is effective. See below.
"UPDATE 8/9/2013: Reports from the Fire Prevention Research Institute and the FAA indicate that lithium ion battery fires do not require a Class D extinguisher—water works effectively to extinguish the flames and cool the cells to prevent further thermal runaway If your device is plugged into an electrical outlet, it may be wise to unplug it, if possible, prior to extinguishing with water."

7. DANGEROUS GOODS AREAS

Batteries are to be processed and stored in the designated "Dangerous Goods Area's".
These are:

NSW

Lead acid Batteries are to be processed in the battery sort area and then stored in the "Class 8 Dangerous Goods Storage Area" to await pickup by Orbitas for recycling.
Refer to NSW Dangerous Goods in Location Plan on the last page of this document.

NICAD Wet Cell batteries are to be placed directly in "Dangerous Goods Class 8 Storage Area" to await shipment to MRI Melbourne for processing and recycling

All other types of batteries are to be processed in "Battery sort area" and then stored in the Class 8 or Class 9 Dangerous Goods Storage area depending of their dangerous goods class to await shipment to MRI Melbourne to be exported for recycling.

VIC

Lead acid Batteries are to be processed in No 26 Dennis Street and stored in the main factory in the at the southern end to await dispatch for recycling.

NICAD Wet Cell batteries are to be stored in No 24 Dennis Street to await processing in the NICAD processing area in the main factory
All other types of batteries are to be processed and stored in No 26 Dennis Street to await export for recycling.

Packaging

Packaging may be MRI supplied or customer supplied.
Packaging must meet TR-WD-4.5.3-01, packing guidelines for used handheld batteries
Packaging will be include

- Packing in 5L or larger pails
- Bulk packing. (Crates, Pallets or Plastic lined Drums)
- 50L black tubs

8. RECEIVING BATTERY SHIPMENTS

Product received should be

Weighed as pallets and recorded as shipment on "Bigbird Data Base" as per normal operations

- Segregated as separate shipment as stored as outlined above.
- Stored in progress area for temporary storage and subsequent processing

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9. STORAGE, HEALTH & SAFETY

Batteries will be transported to the undercover area inside the factory.
It is important that batteries are handled with care as they can short circuit and cause a fire.
Any spilt electrolyte should be dealt with as per Work Instruction listed above where there is no risk to the employee.
Spilt electrolyte must be dealt with promptly and use of PPE is essential.
Sealed Batteries will be processed undercover. Larger ventilated batteries will be processed in the loading bay.
Any damaged and or leaking batteries must take priority.
It is important that the operator avoids contact with the electrolyte and minimizes damage to the batteries, as there is the possibility of chemical burns from the electrolyte and remote chance of heavy metal contamination.
Because of the potential of heavy metal contamination, all be it the concentrations will be low, all staff working on batteries must wear chemical resistant gloves, chemical resistant apron and eye protection.

10. SORTING

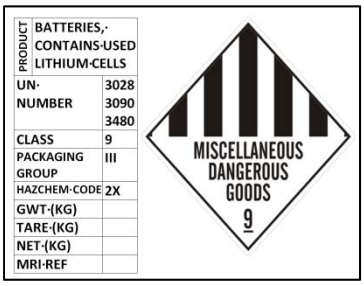
Product will then be opened and sorted into the various categories listed.

Batteries

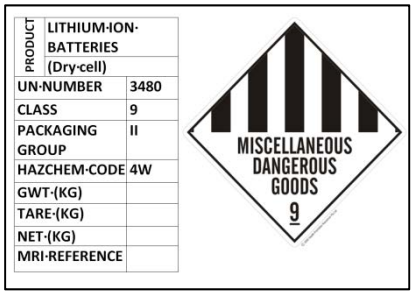
NiCad	NiMh Hydride	Lithium Ion	Lithium Primary	Lithium Polymer
Lead Acid	Alkaline			

All 205 litre plastic lined drums and wooden crates must be labelled with the correct Dangerous Goods Lables.
The labels are located in Mriims 2.0, DOC types, Labels.
If there is confusion, seek only the advice from the SHEQ for the site.

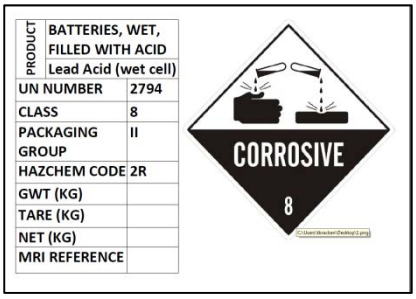
Examples of Hazchem labels and battery chemistry types



Mixed batteries containing Lithium batteries



Lithium Ion batteries only



Lead Acid wet batteries

Batteries shall be sorted in to the chemistries detailed above and stored in plastic lined and lidded 205 litre drums which are label as to contents using correct shipping label.
Eg Dangerous Goods class, packaging group, etc

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Lead Acid Vented Batteries

Lead Acid vented batteries are to be stacked onto pallets with the vent holes face skyward.
The pallets shall be in good condition and made of hardwood. "Chep" and "Loscam" are good examples of pallets strong enough to bear the loads. Pallets that are obviously damaged shall not be used.
Batteries shall be separated into sizes so batteries in each layer on the pallet are approximately the same height.
Batteries shall only be stacked two (2) layers high.
Perspex cased industrial batteries must not be mixed with polypropylene cased batteries.
Polystyrene foam (Styrofoam) shall NOT be used between layers. Masonite or cardboard is recommended for placing between layers to stop short circuiting.
Once pallet has been stacked as directed above, each layer shall be horizontally strapped, with high strength polyester/ nylon straps. It is preferred to vertically strap also.
Once batteries have been strapped the pallets must be plastic wrapped (stretch or shrink-wrapped) the full height of the pallet stack.
Plastic wrapping or vertical wrapping alone is unsafe and the stacked batteries will collapse.

All Other Sealed Batteries

Sealed batteries will be

- Sorted by type for each pallet and form part of reconciliation
- Weighted for each pallet by type
- Stored in plastic lined 205 litre drums by type
- Drums marked clearly as to contents and gross and net weights
- Stored on pallets until there is sufficient for forwarding or processing

Due to the size and weight of the plastic lined 205 litre drums of batteries and bulk bins of other components, care must be taken during relocation and positioning. Staff involved in this procedure must exercise all necessary care with regards to their own safety and the safety of others, and ensure that loads are kept as close to the ground as possible

Electrolyte or battery fluid

- Almost odourless
- Corrosive.

The electrolyte maybe contaminated with heavy metals and should not be allowed to come into contact with the skin. The tests for heavy metals are precautionary but as heavy metals are a health hazard, we must treat it as though it is present. Chemical Resistant Gloves, Chemical Resistant Apron and Eye Protection must be worn wherever contact with electrolyte is likely.
Should you get electrolyte on your hands then wash immediately with water and an appropriate degreaser such as soap dishwashing liquid or Solvol.
Broken or damaged batteries may react with other batteries and there maybe flammable gases given off.

11. RECORDS

Bigbird Database
HICAR - MRI Hazard Incident Corrective Action Request in Bigbird

10. MAINTENANCE

Ensure scales used for weighing goods have been calibrated and are not out of date. If calibration is out of date immediately inform your supervisor or the EMR / QMR so as calibration of the scales can be arranged.

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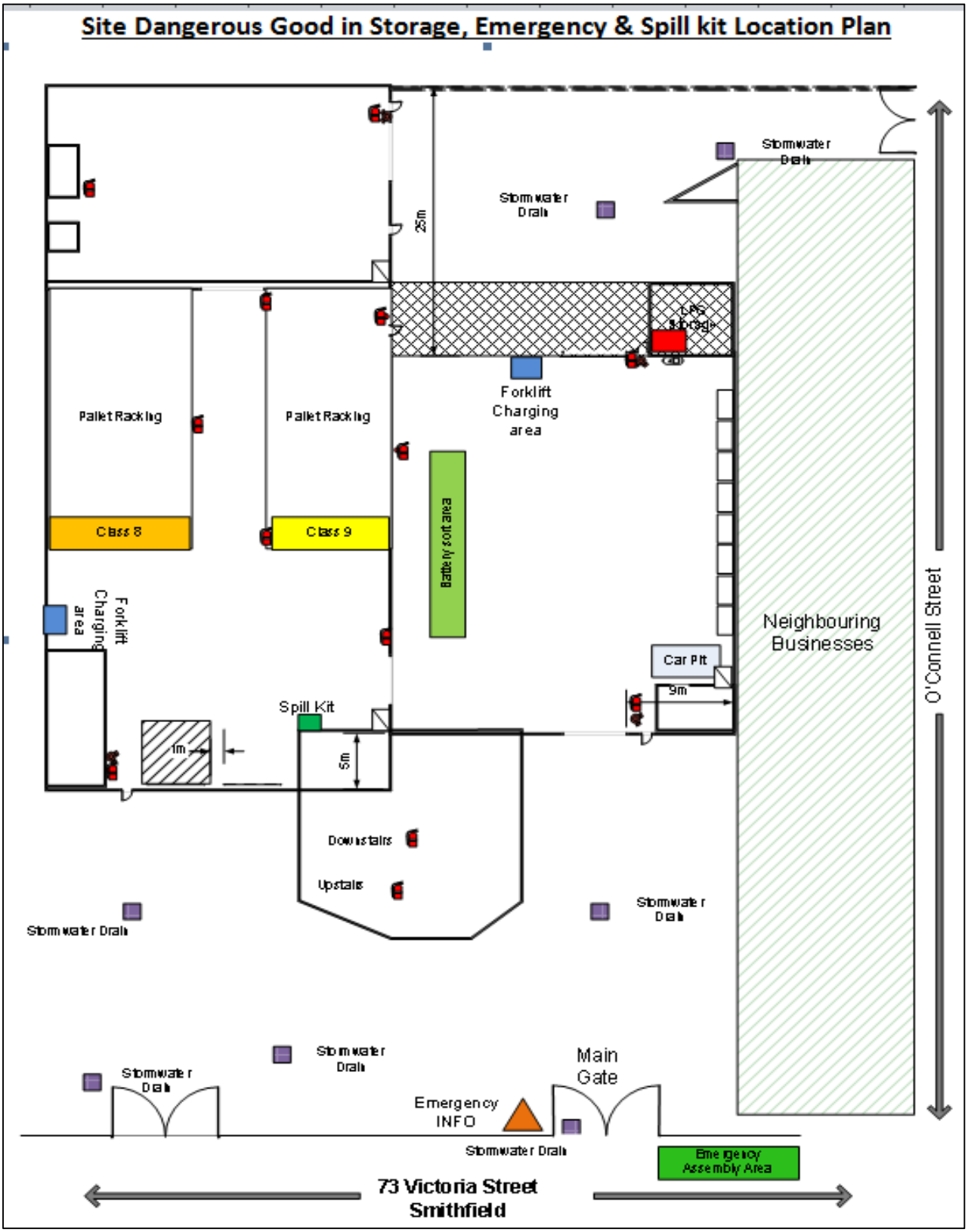
11. BATTERY STORAGE AND PROCESSING AREAS NSW AND VIC

NSW ONLY



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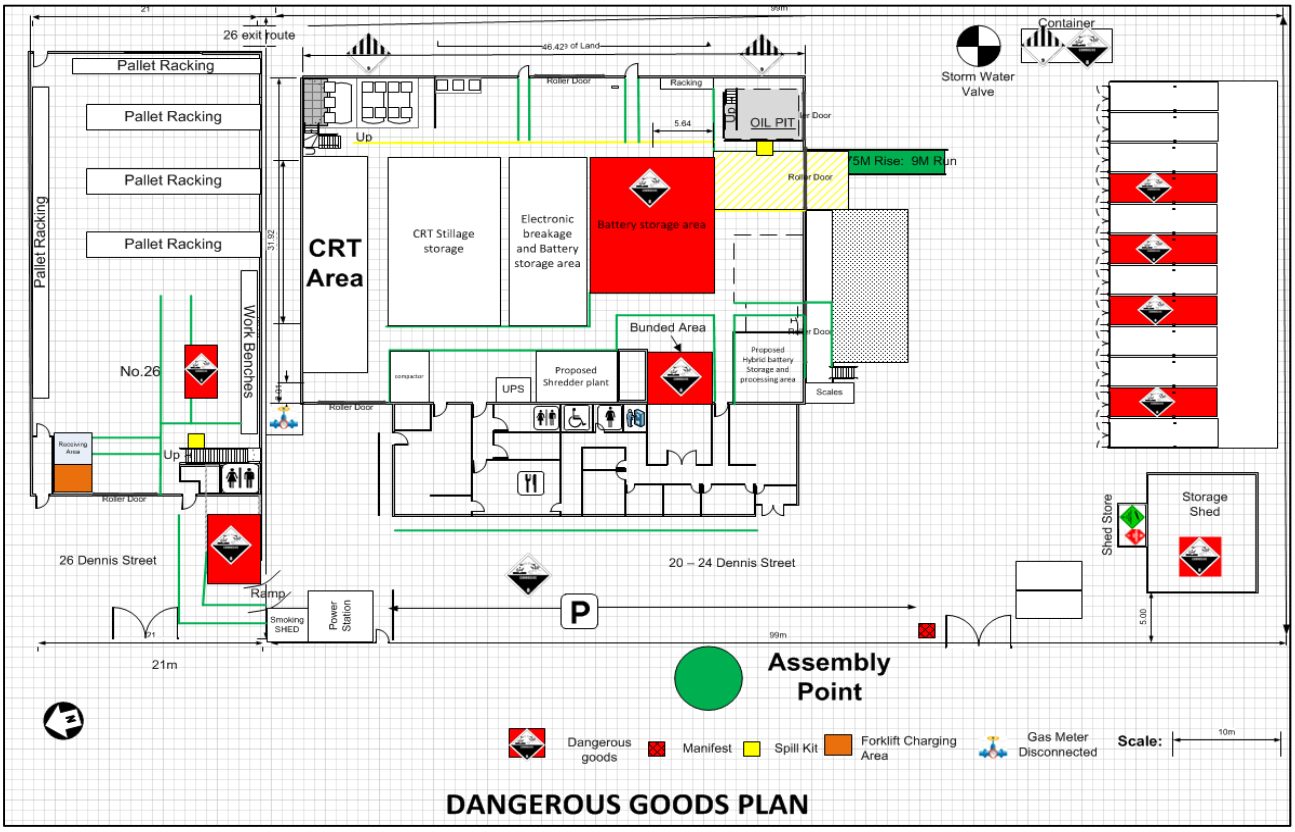
VIC ONLY



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Attachment 15: WI-OPS-4.5-03 Sorting of Materials to be Recycled

Purpose
This work instruction only covers the separation of following types of waste.

Common Waste
Cardboard
Plastic
Polystyrene
PU Foam
Steel
Aluminium
General Waste

Hazardous Waste Include
Front CRT Glass
Back CRT Glass
Batteries

Forms Used
F-OPS-A.3-01 - Waste Conformity Check List
HICAR – Hazard Incident Corrective Action Report

Related Documents
HICAR – Hazard Incident Corrective Action Report
PR-SHEQ-1.9-01 – Emergency Preparedness & Response Overview.
WI-OPS-A.5-02 – Stormwater Protection Valve Melbourne
WI-OPS-A.5-01 – Oil Spill containment and clean-up process
WI-OPS-A.5-03 – Chemical Spill containment and clean-up process
WI-OPS-A.8-01 – Stormwater Drains Inspection Process Sydney
WI-SHEQ-1.6-01 – Emergency Evacuation Process Overview

Safety & General Rules
Ensure appropriate PPE is used ie
Steel capped boots
Fluorescent clothing
Leather gloves if necessary
When handling Batteries the following must also be used.
Leather gloves
Chemical resistant gloves
Chemical resistant apron
Eye Protection

Safe Manual Handling Procedures
Forklift operation – only licensed forklift operators are to use the forklifts.

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Emergency Preparedness and Response
In the event of a chemical spillage, the following emergency procedures should be initiated (as per relevant procedures if they exist) if there is no risk to the employee taking the action.

MRI (Aust) Pty Ltd Emergency & Contingency Plans.
WI-OPS-A.5-01 – Oil Spill containment and clean-up process
WI-OPS-A.5-03- Chemical Spill containment and clean-up process
NSW
WI-OPS-A.8-01– Storm Drains Inspection Process Sydney
VIC
WI-OPS-A.5-02 - Storm Water Protection Valve Melbourne

In any of the above emergency situations / accidents, the actions taken shall be recorded on the Bigbird MRI Incident Report System by the system.

Procedure
When sorting product/waste there are the following types that need to be separated into the labelled pallet boxes, bins or bulk bags (containers). Only the product/waste that matches the description on the container is permitted to be placed into that container.

The main categories

Common Waste
Cardboard – including paper
Plastic – this is to be sorted into hard plastic eg. printer casings
CD covers etc and soft plastic eg. shrink wrap, plastic bags etc.
Polystyrene - packaging
PU Foam - packaging
Steel - a magnet can be used to check if it is steel.
Aluminium – including soft drink cans, a magnet can be used to check if it is steel.
Wood – including broken pallets.
General Waste – non-recyclables including cloth, leather and contaminated materials eg. Cardboard with foam attached that is not easily removed.

Hazardous Waste
CRT Front Glass – from CRT recycling process
CRT Back Glass – from CRT recycling process
Batteries – refer to WI-OPS-4.5.3-03 Battery, Handset & Accessory Processing

If you are in any doubt about what type of waste you have encountered refer to your Supervisor for further instruction.

When these products/wastes are dispatched the person loading the truck must check that the label is correct in reference to the contents of the container.

Once the product/waste has been loaded the person dispatching must inspect the containers being filled in the factory, checking that the contents is correct to the label and there is no cross contamination.

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In the event that there is cross contamination, the person inspecting must complete the HICAR Bigbird MRI Incident Report system, referring to procedure PR-SHEQ-1.9-01 Emergency Preparedness and Response Overview.

The container in question is to be re-sorted and the person responsible for the contamination is to be disciplined. If a person repeats contamination of waste further disciplinary action will be taken.

Records

HICAR - Hazard Incident Corrective Action Report

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Attachment 16: WI-OPS-4.5-04 Sorting of Aluminium

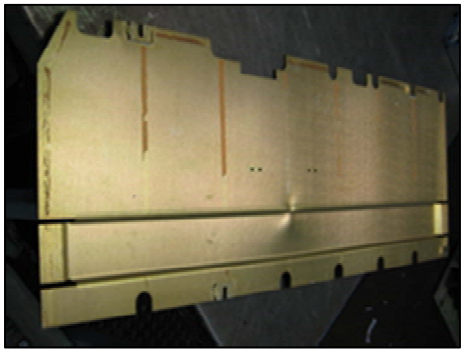
MRI e-cycle solutions	Sorting of Aluminium	Doc No: WI-OPS-4.5-04
		Rev: 00

Purpose: This instruction is to be an aid for the sorting and recycling of aluminium to get the best resale prices.

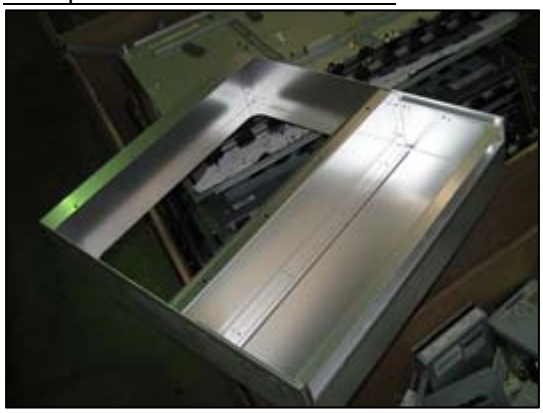
Aluminium can be sorted into groups as below.

SHEETS or PLATE – best return
EXTRUDED
CAST
DOMESTIC
IRONY ALUMINIUM – least return

Examples of sheet or plate aluminium are



Examples of Extruded aluminium



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Examples of Cast Aluminium

Examples of Domestic Aluminium

Examples of Irony Aluminium

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Attachment 17: WI-OPS-4.5.5-01 Reclaiming of Refrigerant Gases

1. PURPOSE.

1 This work instruction covers the Reclaiming of Refrigerant Gases.
2 This work instruction establishes a minimum standard of conduct to ensure all staff are adequately trained and supervised.

2. FORMS USED.

Nil

3. RELATED DOCUMENTS.

AS 4211.3-1996 Gas recovery or combined recovery and recycling equipment – Fluorocarbon refrigerants from commercial/domestic refrigeration and air-conditioning systems.

4. Safety & General Rules.

General Safety.

5. Emergency Preparedness and Response

Nil

6. Procedure

Once normal MRI book in procedures have been completed the following is to take place.

1. A licensed contractor (contractor) is to be employed to "de-gas" pressurised refrigerant vessels. Refer to the "Approved Supplier List" for our licensed contractors.
2. Upon arriving on site the contractor is to report to the office, sign in and request the relevant company representative. The company representative is to photocopy the contractor's Licence or Permit under the national licencing system, to be kept on file for future reference.
3. Upon the contractors first site visit the company representative will then complete the c contractor induction procedure, with the contractor then completing the MRI Contractor Induction and Authorisation to Work form. If the contractor has worked on site before they will have already completed a site induction and therefore not be required to complete the induction again.
4. The contractor is then to be shown to the equipment and area designated for the purpose of "de-gassing" the equipment (the task). This area is to be well ventilated, preferably outside of the factory building.
5. The contractor is to provide their own tested and approved equipment for the task.
6. The contractor is to follow all appropriate safety precautions and procedures as required for the task, including the use of all relevant personal protection equipment as required.
7. Once a unit has been de-gassed the piping is to be cut. This enables MRI staff to dismantle the unit without fear of the unit still being pressurised.
8. Upon completion the contractor is to report to the relevant company representative and show which units have been de-gassed, including that the piping has been cut.

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9. The contractor may then pack his equipment, sign out and leave the site.
10. The contractor is to dispose of the gases in a safe and environmentally sensitive way through Refrigerant Reclaim Australia. This includes forwarding certificates of disposal to MRI.
11. The contractor must follow all instructions given by MRI staff in regards to safety and emergency matters.

7. Records

Bigbird Database.

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Attachment 18: F-OPS-A.8-02 Daily Forklift Checklist

MRI e-cycle solutions	**Forklift Daily Checklist**	**Doc No:** F-OPS-A.8-02 **Rev:** 01

Type of Fork: _____ Registration Number: _____

		Pass	Fail
CLEANLINESS			
DATA PLATES – Legible			
SEAT BELTS			
STRUCTURAL	Cage		
	Overhead guard		
	Forks / attachments		
	Chains, cables & hoses		
TYRES & WHEELS			
LPG SYSTEM			
TURN ENGINE ON			
SAFETY DEVICES	Beepers		
	Flashing lights		
HORN			
LIGHTS			
STEERING			
CONTROLS			
CLUTCH - See That Transmission Disengages			
BRAKES Including Parking Brake			
HYDRAULIC SYSTEM	Lift		
	Tilt		
	Turn		
	Spread		
GAUGES			
LEAKS			
ENGINE BELTS			
Fluid Levels	Radiator – Top Up		
	Transmission – Top Up		
	Engine Oil – Top Up		
	Hydraulic – Top up		
BATTERY CHECK -	Connections – clean corrosion		
	Levels – Top up if required		
HOUR METER	Reading		

COMMENTS

All completed forms to be returned to Operations Manager for review, filing and action if required.

All Maintenance Logs Completed: _____

Name: _____ Signed: _____ Date: _____

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Attachment 19: FM03 Vehicle Weekly Checklist

MRI e-cycle solutions	Vehicle Weekly Checklist	**Doc No:** F-OPS-A.8-03 **Rev:** 00

Type: _____ Registration Number: _____

	Pass	Fail	Comment
CLEANLINESS (Inside and out)			
STRUCTURAL – Damage or loose parts			
SEAT BELTS (e.g. not frayed, buckle engages)			
TYRES & WHEELS wear/damage – Check that tyre pressure to specifications. (includes spare tyre)			
HORN - working			
LIGHTS- working			
STEERING			
CLUTCH – Manual only (See that transmission disengages)			
BRAKES (Including Parking Brake)			
GAUGES – All working			
Accessories e.g.: Fan/Demister, lighter socket, interior lights etc.			
NO LEAKS (Check for water and oil leaks)			
ENGINE BELTS (e.g. not frayed or making noises)			
FLUID LEVELS – CHECK			
- Radiator			
- Windscreen wiper bottle			
- Transmission – Top up			
- Engine oil			
- Brake fluid			
BATTERY - CHECK			
- Mounting			
- Connections			
- Water levels (use distilled water only)			
CURRENT ODOMETER READING			
NEXT SERVICE IS DUE - / /			
Comments:			

Driver_____ **Signed**_____ **Date**_____

All vehicles are to be kept locked while not attended.

Van is to be garaged inside the Factory at night where possible.

All completed forms to be returned every Monday morning for in Vic the Logistics Manager and in the other states to the relevant Facilities Manager for review, filing and action if required.

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