Tomago SPL Processing Facility Capacity Expansion

Hazard Audit Report Recommendations Implementation Program

Application Number

The Project is the subject of NSW Department of Planning, Industry and Environment (DPIE) Major Project Approval MP06_0050 as modified MOD 2 dated 22 August 2019 (MP06_0050 MOD 2).

Document Control

Version	Date Issued	Purpose	Reviewed by	Approved by
1.1	31 Mar 2025	Issued for submission to DPHI with with Hazard Audit Report	K Cooper NSW Manager	B. Cooper Director

Report prepared by:

Regain Services Pty Ltd

www.regainmaterials.com

Regain

Table of Contents

1.   Executive Summary

This Implementation program has been prepared to following a Hazard Audit of the project which incorporates increased processing capacity of the Spent Potlining Recycling Facility located inside the boundaries of the Tomago Smelter, Tomago NSW. The facility operates under NSW Department of Planning, Industry and Environment Major Project Approval MP06_0050 dated 7th August 2009. The expanded capacity process plant is the subject of NSW Department of Planning, Industry and Environment (DPIE) Major Project Approval MP06_0050 as modified MOD 2 dated 22 August 2019 (MP06_0050 MOD 2).

A Hazard Audit has been conducted in accordance with condition 16B of MP06_0050 MOD 2. Condition 16B (c) requires that the hazard Audit Report must be accompanied by a program for the implementation of all recommendations made in the audit report.

2.   Introduction

2.1.   Project Name

MP06_0050 Spent Potlining Recycling Facility at Tomago Road, Tomago.

2.2.   Project Address

Spent Potlining Recycling Facility located inside the boundaries of the Tomago Smelter, Tomago Road, Tomago

2.3.   Project Phase

Operations

2.4.   Hazard Audit Report Reference

The Hazard Audit was completed by Mr Steve Sylvester of RiskCon Engineering Pty Ltd (Report No: RCE-25133[Regain-HA]-RPTFinal(Rev0)-28Mar25).

3. Recommendations Implementation Program

The Implementation Program which commences on the following page:

- identifies the recommendations made in the Hazard Audit Report

- sets out the compliance monitoring methodology used to assess compliance with each compliance requirement

- sets out the type of data or evidence that is to be provided as evidence of compliance

- the status of each compliance requirement applicable during the reporting period.

Implementation Program

Item No.	Hazard Audit Report Recommendation	Implementation Actions	Evidence and comments	Target Date
R25/1	The document control system was reviewed and it was identified that document control identification has been developed and is printed on each document. However, it was noted that whilst there is an issue date for the document included in the document identification, there is no document validity of date for review included, hence, it is not possible to confirm that the document is within its currency date (i.e. valid). It is recommended that Regain consider implementing a review date and author in their document control panel to assist ion overall document control.	The following columns to be added to the document control panel on Regain controlled documents that are subject to period review: a) Next scheduled review date b) Name of person responsible for review of the document to ensure that it has been prepared correctly and is recommend for approval c) Name of person with authority that authorised issue of the current version of the document.	Modify document control for key MOD 2 documents: a) Safety management System b) Operational Environmental Management Plan	30 Apr 2025
			Other controlled documents	Progressively as documents are subject to scheduled reviews
R25/1	It was identified that Pre-Startup Reviews are conducted both for significant changes to the plant and for normal operations. As there have been no significant changes to the plant since the commencement of operations, following the Capacity Expansion Upgrade, there have been no Pre-Startup Reviews performed. It is recommended that the where significant changes occur within the next three years, the Pre-Startup Review application to the plant be reviewed at the next audit (2028).	Ensure that Pre-Startup Review requirements are identified in the Management of Change Review as part of 2028 Hazard Audit	See item R25/3 below	30 Sep 2025
R25/3	A review of the Management of Change (MoC) system at Regain identified that full application of the MoC standard at the site was applied based on the change being a "Significant Change". Minor or temporary changes are documented in updated versions of relevant controlled documents. The review identified that there was no guidance or clear definition between a minor and significant change. It is recommended that regain provide some definition within the MoC process on how to identify what a constitutes a minor vs significant change so that the appropriate MoC process can be applied.	Review Management of Change procedure to: a) Explicitly define the difference between minor and significant change b) Include requirements for Pre-Startup review.	Revised management of Change Standard	30 Sep 2025
R25/4	A review of the training system within Regain identified that a Training Matrix had been developed and was under review and update at threw time of the audit. Whilst it was evident that a training matrix was in the process of update, it was not possible to confirm its effectiveness. Hence, it is recommended that Regain complete the Training Matrix update and implement the matrix at the site. The application of the matrix and its effectiveness is recommended to be reviewed at the next Audit (2028).	Complete review of Training Matrix Review as part of 2028 Hazard Audit	Updated Training Matrix issued	30 June 2025

Item No.	Hazard Audit Report Recommendation	Implementation Actions	Evidence and comments	Target Date
R25/5	An Emergency Response Plan (ERP) has been developed for the site and is available within the site control room and offices. A review of the plan validity date indicated that it was due for review and update in December 2024. The validity date on the plan reviewed remained at December 2024. Site management indicated that the plan was currently under review and update and will be completed by the end of the first quarter of 2025. It is recommended that the ERP validity dates be reviewed at the next audit to confirm the ERP is being effectively reviewed (2028).	Complete review of ERP after inclusion of site layout plan as recommended in item R25/6 Review as part of 2028 Hazard Audit	Updated revision of EP issued	30 Apr 2025
R25/6	The site ERP contains a number of diagrams and evacuation instructions, however, the ERP does not include a diagram of the location of safe assembly points. It is recommended that a site layout plan be included within the ERP showing both the primary assembly point and the secondary assembly point (in the event the primary assembly point is impacted by the emergency event).	Adapt site layout plan and generate version for inclusion in ERP showing primary assembly point and the secondary assembly point	EHC Act Licence Annual Reports Audit reports	30 Apr 2025