



MAN-006

POLLUTION INCIDENT RESPONSE
MANAGEMENT PLAN (PIRMP)

Environmental Protection Licence: 10890

The Quays Marine Centre
1856 Pittwater Road
Church Point NSW 2105
www.thequays.com.au

Revision History

Revision	Date Issued	Authorised By	Comment
1	12/03/2021	S. Hosking D. O'Callaghan	Revision of PIRMP issued for use in new format.

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Appendices

Appendix 1. The Quays Marina PIRMP Public Information

1 Purpose

The Quays Pty Ltd holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for The Quays Marina. In accordance with *Protection of the Environment Operations Act 1997* (POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP). The PIRMP will be made available in hard copy at the premises so it can be made readily available to person(s) responsible for implementing the PIRMP and provided to an authorised EPA officer on request.

Appendix 1 provides information that must be made publicly available within 14 days after the PIRMP has been prepared and this section shall be uploaded to The Quays Marina website.

The purpose of the PIRMP is to:

- Identify risks and controls to minimise the risk of a pollution incident occurring as a result of operations and activities at The Quays Marina;
- Established clear and effective notification, action, and communication procedures to ensure the right people are notified, warned and quickly provided with updates and information they may need to act appropriately; and
- Provide up to date incident management information and training to employees to ensure the potential impact of a pollution incident is minimised; and
- Comply with legislative requirements of the POEO Act and Protection of the Environment Operations (POEO) (General) Regulation 2009.

2 Scope

This document applies to employees, contractors, tenants and visitors utilising all areas located at The Quays Marina and Q Service, including:

- Q Service yard;
- Marina office;
- Retail area;
- Tenant areas;
- Car park;
- Berths and wharf; and
- Moorings.

This Manual will be kept in the Marina Office and is supported by the following documentation:

- MAN-001 Integrated Management System Manual;
- MAN-003 Health, Safety and Environmental Manual;
- MAN-004 Emergency Manual;
- FRM-050 Emergency Contacts;
- FRM-057 Quick Reference Emergency Response Plan;
- FRM-058 Pollution Incident Response Plan Test;
- REG-001 Risk Register; and

- REG-003 Compliance Register.

3 Definitions and Acronyms

Term	Meaning
Contractor	Any person contracted or requested to conduct work at The Quays Marina or Q Service on behalf of Management or subcontracted by The Quays Marina tenants or customers.
Emergency	Any event which arises internally or from external sources which could adversely affect the safety of persons, damage to the environment, and/or property that requires an immediate response.
Hazard	A hazard is anything that has the potential to cause injury or harm to people, damage to the environment, property, plant or equipment.
Incident	Any occurrence that leads to, or might have led to, injury or illness to people, danger to health and/or damage to property or the environment. In this document the term 'incident' is used as an inclusive term for injuries/illnesses, accidents or near misses.
Management	The Quays Marina management team consisting of Director, Marina Manager and Assistant Marina Manager.
Material Harm	<p>POEO Act defines material harm as:</p> <p>'(a) harm to the environment is material if: (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and</p> <p>(b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.'</p>
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
Pollution Incident	<p>POEO Act defines pollution incident as:</p> <p>'an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.'</p>
Q Service	Managed by The Quays Marina, Q Service is a company that provides repairs and servicing to boats at The Quays Marina.
Risk	The likelihood that a hazard will result in injury or harm to people, damage to the environment, property, plant or equipment and the potential consequences of that injury, illness, loss or damage.
Tenants	Businesses who have entered into a lease agreement with The Quays Pty Ltd to conduct business operations at The Quays Marina.
The Quays Marina	The Quays Pty Ltd trading as The Quays Marina.

4 Notification

4.1 Pollution Incident Contact Details

4.1.1 PIRMP Activation

Name of persons responsible	Stephen Hosking (primary)	Dee O'Callaghan (alternate)
Position	Marina Manager	Assistant Marina Manager
Business hours contact number	9997 2800	9997 2800
After hours contact number	0411 766 009	0405 245 562
Email	stephen@thequays.com.au	dee@thequays.com.au

4.1.2 Notifying Relevant Authorities

Name of person responsible	Stephen Hosking (primary)	Dee O'Callaghan (alternate)
Position	Marina Manager	Assistant Marina Manager
Business hours contact number	9997 2800	9997 2800
After hours contact number	0411 766 009	0405 245 562
Email	stephen@thequays.com.au	dee@thequays.com.au

4.1.3 Managing Responses to Pollution Incident

Name of person responsible	Stephen Hosking (primary)	Dee O'Callaghan (alternate)
Position	Marina Manager	Assistant Marina Manager
Business hours contact number	9997 2800	9997 2800
After hours contact number	0411 766 009	0405 245 562
Email	stephen@thequays.com.au	dee@thequays.com.au

4.2 Notification of Relevant Authorities

The following table lists authorities that must be notified in the event of a notifiable pollution incident which causes or threatens to cause 'material harm to the environment'. Material harm is defined in section 147 of the POEO Act as:

- a) harm to the environment is material if:
 - (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

Notification is required even where 'harm to the environment is caused only in the premises where the pollution incident occurs', as specified in section 147(2). Section 148 of the POEO Act sets out additional pollution incident notification requirements.

The person responsible (refer to Section 4.1.2) shall notify the relevant authorities as required. Notification is not required if the person responsible is aware that the incident has already come to the notice of each person or authority required to be notified.

Emergency Contact	Type of Emergency	Number
Authority that must be notified of pollution incident (in order of notification)		
Fire and Rescue NSW, Police, Ambulance	Emergency Services Assistance	000
Environment Protection Agency (EPA)	Pollution/Environmental Incident 24 hours	131 555
Hornsby Public Health Unit (Northern Sydney LHD)	Health Notification – ask for Public Health Officer on call	9485 6911 (BH) 9477 9123 (AH – Hospital)
SafeWork NSW	Employee / Work Related Incident	131 050
Northern Beaches Council	Incident Notification	1300 434 434
Other organisation/agency that may require notification if affected		
Sydney Water	Stormwater/Drains Pollution 24 hours	132 090
Transport for NSW / Roads and Maritime	Vessel Pollution / Marine Incident	131 256
	Road Incident and Hazard Reporting	131 700

In the event of a notifiable incident, phone numbers for tenants and contractors are available to all employees. Phone numbers for tenants and contractors are listed on FRM-050 Emergency Contacts (01 Integrated Management System/4 Forms/Emergency/ FRM-050 Emergency Contacts) and a hard copy is available in the Emergency Kit located in the Marina Office.

Relevant information shall be provided to Authorities and others (listed in the above table) when notifying of a pollution incident in accordance with section 150 of *Protection of the Environment Operations Act 1997*. The following relevant information shall be provided:

- 1) The time, date, nature, duration and location of the incident.
- 2) The location of the place where pollution is occurring or is likely to occur.
- 3) The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known.
- 4) The circumstances in which the incident occurred (including the cause of the incident, if known).
- 5) The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

If 3, 4 or 5 are not known at the time of notification, they are to be notified immediately after it becomes known.

Immediate verbal notification is to be followed by notification in writing to each relevant authority within 7 days of the incident date as per section 101 of the POEO (General) Regulation 2009.

4.3 Notification of Neighbours and Community

Where offsite environmental impacts and/or human health is threatened, the Emergency Response Team shall be enacted, and the following notification process shall be carried out to provide information, relevant to the incident, to affected persons.

- 1) All customers, visitors, tenants and contractors will be notified in person or by phone by the Marina Manager (primary) or Assistant Marina Manager (in the event the Marina Manager is not available)

Pollution Incident Response Management Plan

or delegated members of the Emergency Response Team (depending on the scale and level of emergency).

- 2) Surrounding community and businesses (offsite) shall be notified via the website, social media and/or letter drop (whichever is deemed more effective at the time) which shall be coordinated by Marina Manager (primary) or Assistant Marina Manager (in the event the Marina Manager is not available).

In the event of a notifiable incident, phone numbers for tenants and contractors are available to all employees. Phone numbers for tenants and contractors are listed on FRM-050 Emergency Contacts (01 Integrated Management System/4 Forms/Emergency/ FRM-050 Emergency Contacts) and a hard copy is available in the Emergency Kit located in the Marina Office.

Customers will be emailed directly, or notifications can be sent out via SMS.

Local groups to be notified are:

- Scotland Island Residence Association (SIRA) - contact@scotlandisland.org.au; and
- Bayview Church Point Residence Association (BCPRA) - bvcpra@gmail.com

5 Hazards

5.1 Description and Likelihood of Hazards

The Quays Marina have assessed hazards in accordance with the risk management process in MAN-001 Integrated Management System Manual. The following table lists the main potential hazards to human health or the environment from activities and services at The Quays Marina and likelihood of the hazard occurring. Likelihood ratings are residual ratings (after controls are implemented) and have been derived from REG-001 Risk Register and are described in the table below.

Likelihood of risk

Level	Descriptor	Description	Estimated Probability
1	Rare	Theoretically such an event is possible but not expected to occur during an activity or the life of the contract.	An estimated probability of less than 5%
2	Possible	Possible that such an event may occur once during an activity or the life of the contract.	An estimated probability between 5% and 10%
3	Occasional	Such an event may occur slightly more than twice during an activity or the life of the contract.	An estimated probability between 10% and 25%
4	Likely	Such events may occur frequently during an activity or the life of the contract.	An estimated probability between 25% and 50%
5	Almost Certain	Such events are expected to occur routinely during an activity or the life of the contract.	An estimated probability of greater than 50%

Potential Hazard	Activity	Controls	Likelihood (Residual Rating)
Release of hydrocarbons	<ul style="list-style-type: none"> Storage of unleaded and diesel fuel in underground tanks and associated pipelines Transfer of fuel from truck to underground tanks 	<ul style="list-style-type: none"> Double wall fibreglass lined tanks Contractor to maintain fuel systems Pipeline pressure testing Tank integrity testing Visual inspection of pipeline Tanks dipped and ullage determined prior to filling Daily stock reconciliation Weekly water testing Spill kits on site and trucks Emergency power shut off located in breezeway Emergency isolation valves on pipelines MAN-002 Operations Manual SWP-11 Refuelling 	2
Release of hydrocarbons	<ul style="list-style-type: none"> Provision of unleaded and diesel fuel to vessels from bowsers located on the wharf 	<ul style="list-style-type: none"> Only trained staff allowed to refuel vessels No locking pins on hand piece Emergency Stop available Emergency power shut off located in breezeway Refuelling procedures Bowsers are locked when not in use Inspection, testing and maintenance of fuel infrastructure carried out by contractor Early detection of leaks/equipment failure from daily inspection Spill kits on fuel wharf Meter calibrations and daily fuel reconciliation MAN-002 Operations Manual SWP-11 Refuelling 	2
Release of oils, flammable liquids, contaminated water or chemicals	<ul style="list-style-type: none"> Boat maintenance and repair Storage of waste oil Plant and equipment maintenance 	<ul style="list-style-type: none"> Work to be undertaken on hardstand which slopes toward central discharge point Waste water from hardstand direct discharges to water treatment system Strainer emptied weekly Collection tanks pumped out periodically Inspection and maintenance of waste water treatment system periodically Water testing in compliance with Sydney Water Licence Hazardous waste removed by licenced contractor Waste oil stored separately and removed by licenced contractor Spill trays used for liquids Spill kits available on site 	3
Release of dust and airborne contaminants	<ul style="list-style-type: none"> Boat maintenance and repair 	<ul style="list-style-type: none"> Vacuum used to capture dust emissions when sanding boats Wet sanding methods used Hardstand swept daily No sanding to be done whilst unsuitable environmental conditions (e.g. windy) 	2

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Release of sullage/ sewerage	<ul style="list-style-type: none"> Pump out facility 	<ul style="list-style-type: none"> Operation of pump out facility is restricted to employees only Pump out facility is locked when not in use Sullage / sewerage is pumped direct to sewer A drain for spilt waste surrounds pump out and drains direct to sewer Periodic inspections on the pump out infrastructure to ensure hose is in good condition 	1
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5.2 Pre-emptive Actions to be Taken

Pollution prevention and management and mitigation measures are detailed in MAN-003 Health, Safety, Environmental Manual for the following activities:

- Boat maintenance and repair activities;
- Fuel storage and bowser infrastructure;
- Sullage pump out facilities;
- Generation of airborne contaminants / irritants;
- Antifouling and defouling;
- Contaminated waste;
- Waste water from boat maintenance and repairs.

5.3 Inventory of Pollutants

Location	Max Qty	Pollutant	Characteristics
Underground tank located in the front car park near exit gate	13,500 litres	Unleaded fuel	Unleaded Petrol (ULP) is a flammable liquid with a flash point below 23°C. The fuel vaporises readily at ambient temperatures forming a flammable vapour above the surface of the liquid, igniting readily in the presence of ignition sources. ULP has a density of about 700 kg/m ³ and will therefore float if released on water. In the event of a release, ULP may impact the biophysical environment with the potential to cause harm to marine species and flora on the shore of water bodies.
Underground tank located in the front car park near exit gate	13,500 litres	Diesel fuel	Diesel fuel is a combustible liquid with a flash point above 60.5°C. The fuel does not vaporise readily and therefore flammable vapours do not form above the liquid at ambient temperature and pressure and the fuel is difficult to ignite. The liquid is classified as combustible with a category C1 by AS1940. Diesel has a density of about 750 kg/m ³ and will therefore float if released on water. In the event of a release, diesel fuel may impact the biophysical environment with the potential to cause harm to marine species and flora on the shore of water bodies.

Location	Max Qty	Pollutant	Characteristics
Flammables cabinets in Workshop	~400 litres	Antifoul paint, primer and propspeed	Antifoul paint is classified as Hazardous (Safe Work Australia), a Dangerous Good (ADG Code) and a marine pollutant (IMDG). It is flammable with a flash point of around 30°C. If released into water, it is immiscible and is classified as dangerous for the environment (GHS criteria). Special restrictions in place for the site include the prohibition of antifoul paint containing tributyltin. Antifoul primer is classified as Hazardous (Australian WHS Regulations), a Dangerous Good (ADG Code) and a marine pollutant (IMDG). The liquid and vapour are flammable and is toxic to aquatic life with long lasting adverse effects on the environment. The components of Propspeed vary in characteristics from combustible C1 to highly flammable. Most are completely miscible with water and harmful or toxic to aquatic life.
Workshop	~130 litres of 2 stroke oil and 20 litres of turbo oil	Oil (various)	Oil is hydrocarbon based that will burn if preheated. Flash point occurs for individual types between approximately 130°C and >200°C. Liquid oils are viscous with an approximate density of 0.9 g/mL while grease has a density of 0.9 kg/m ³ and will float on water. Oil is insoluble in water and if released, can generally be considered harmful to aquatic life with long lasting adverse effects. Components of the oil are not readily biodegradable i.e., may persist in the environment.
Path (eastern corner of service yard)	160kgs	Liquified petroleum gas	Gas is stored under pressure in a cylinder where it becomes liquid. LPG vapour when released is heavier than air causing it to accumulate at ground level and can become a fire or suffocation hazard. The butane component of LPG has the potential to cause toxic effect.
Adjacent to amenities	N/A - direct discharge to sewer	Sullage / sewerage	Sewage can have varying effects on the marine environment, depending on habitat types and locations. Some may be able to absorb more sewage, but others could be significantly impacted. Large quantities of nutrient-rich sewage may encourage algal blooms, which deplete the oxygen supply, killing larger marine life. Sewage could also introduce bacteria that cause disease for humans who come into contact with it, or who eat seafood from an affected area.
Flammables cabinet in Workshop	60 litres	Thinners	Thinners is classified as Hazardous (Safe Work Australia) and a Dangerous Good (ADG Code). It is a highly flammable liquid with a flash point of -30°C. Thinners floats on water, is highly mobile, readily biodegradable and is harmful to aquatic life with long lasting effects.

6 Safety Equipment

Safety equipment available on site to minimise the risks to human health or the environment and to contain or control a pollution incident is listed in MAN-004 Emergency Manual and includes:

- 23 portable fire extinguishers;
- 17 fire hose reels;

- 1 break glass emergency alarm;
- Smoke detectors;
- 6 rescue flotation devices;
- Emergency stop buttons and isolation valves on all fuel related infrastructure;
- Emergency assembly areas;
- Designated access pathways for Emergency Services;
- Emergency lighting;
- Exit signs;
- Spill kits; and
- First Aid supplies.

An Emergency Response Kit is stored in the marina office and contains items necessary for an emergency.

The location of emergency systems for the site is included in The Quays Marina Evacuation Diagrams. The Evacuation Diagram shall be displayed throughout the site.

7 Maps

The following maps include:

- Location of the premises to which the licence relates;
- Surrounding area likely to be affected by a pollution incident;
- Location of potential pollutants on the premises; and
- Location of any stormwater drains on the premises.



Figure 1. Location of The Quays Marine Centre on Pittwater (circled in orange) and surrounding neighbours

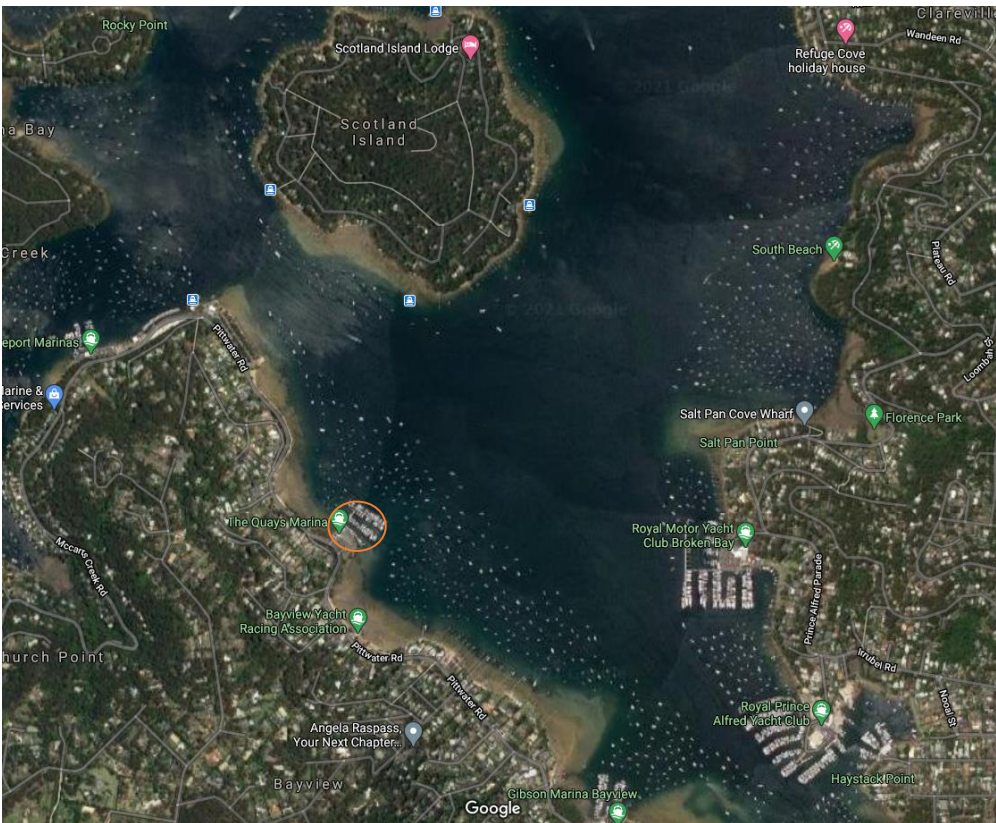


Figure 2. Location of The Quays Marine Centre on Pittwater (circled in orange) in a regional context

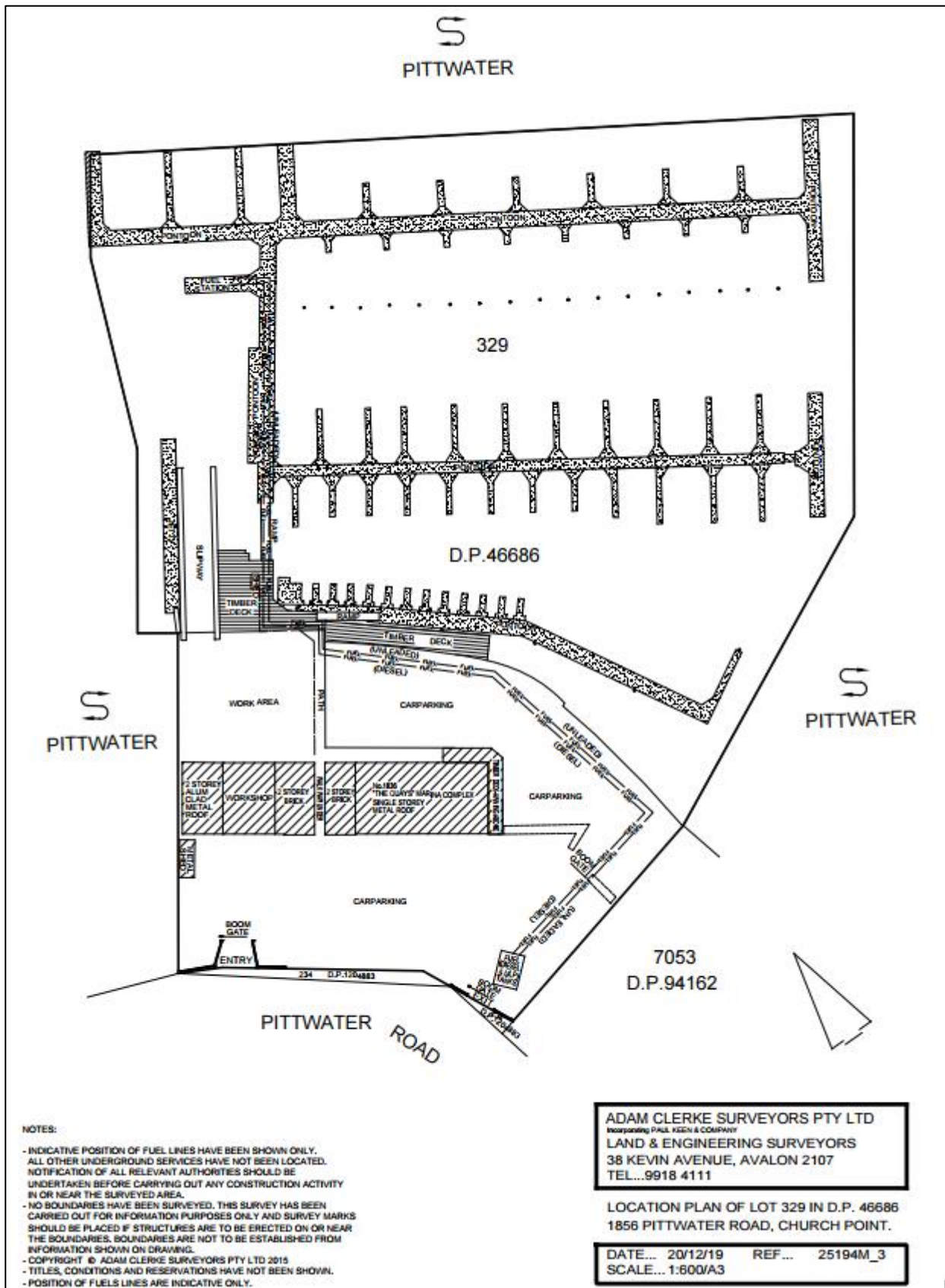


Figure 3. Survey plan of The Quays Marine Centre on Pittwater

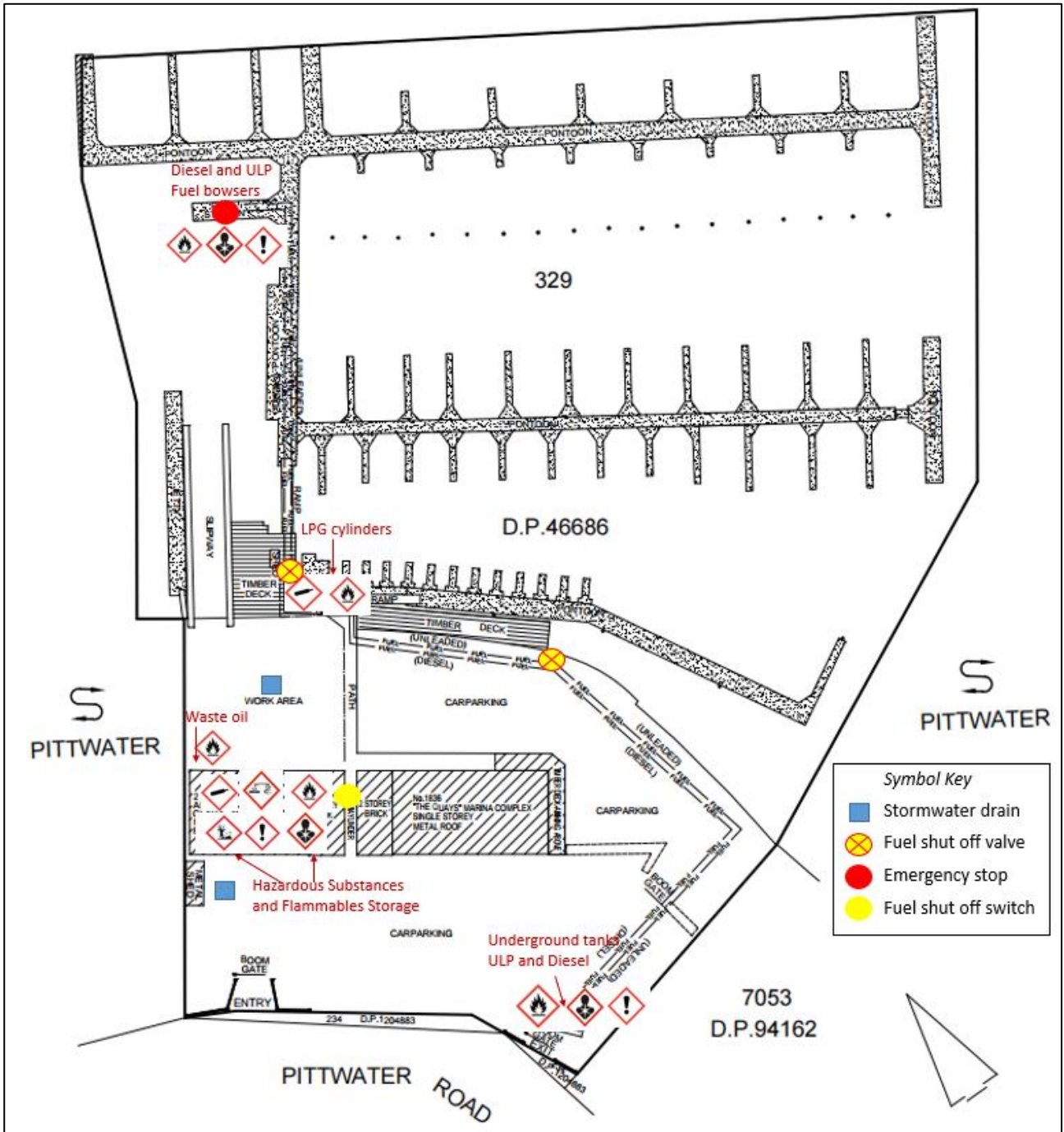


Figure 4. Location of hazardous substances, stormwater drains and emergency fuel shut off

8 Emergency Procedures

The following emergency procedures have been developed for potential pollution incidents on site and are included in MAN-004 Emergency Manual and FRM-057 Quick Reference Emergency Response Plan:

- Evacuation (section 10.1);
- Fire (section 10.2);
- Large spill on land (section 10.3.1); and
- Spill on water (section 10.3.2).

Emergency roles and coordination have been identified in MAN-004 Emergency Manual.

9 Training

An Emergency Response Team (ERT) shall be appointed to attend specific incidents, to contain, control or eliminate the emergency using emergency response equipment. The ERT shall consist of the following pre-determined positions:

- Chief Warden;
- Area Warden; and
- First Aid Officer(s).

Training in emergency incident response shall be provided to persons designated with ERT roles. Descriptions of ERT functions and responsibilities is listed in MAN-004 Emergency Manual (section 8.2).

10 Testing

A desktop review of this PIRMP and a site inspection shall be conducted annually and within one month of any pollution incident. FRM-058 Pollution Incident Response Plan Test must be completed. The purpose of the test is to ensure procedures in place to response to a pollution event can be effectively implemented during an emergency.

Scheduling and completion of the test shall be recorded on REG-003 Compliance Register.

11 Review

This PIRMP will be reviewed annually following the PIRMP test. Updates shall be listed in the Revision History Table and communicated to relevant personnel.

Appendix 1. The Quays Marina PIRMP Public Information

1 Overview

The Quays Pty Ltd holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for The Quays Marina. In accordance with *Protection of the Environment Operations Act 1997* (POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP).

The Quays Marina PIRMP will be made available in hard copy at the premises so it can be made readily available to person(s) responsible for implementing the PIRMP and provided to an authorised EPA officer on request. The following sections provide information from The Quays Marina PIRMP that must be made publicly available.

2 Internal Notification

The Quays Marina contact details are available on the website (www.thequays.com.au) and are as follows.

Marina Manager: Stephen Hosking – stephen@thequays.com.au

Assistant Marina Manager: Dee O’Callaghan – dee@thequays.com.au

Address: 1856 Pittwater Road, Church Point 2105 NSW, Australia

Phone: 9997 2800

Any person who becomes aware of an incident on site must report the incident verbally to Management immediately. This requirement is communicated to employees, contractors and tenants through the induction and ongoing emergency preparedness training procedures.

Management shall assess the nature, extent and potential threat of the incident and activate the Emergency Response Team on site to commence emergency response procedures listed in The Quays Marina’s Emergency Response Plan (MAN-004) and Quick Reference Emergency Response Plan (FRM-057).

3 Notification of Relevant Authorities

If a pollution incident presents a risk of “material harm to the environment” as defined in section 147 of *Protection of the Environment Operations Act 1997*, the following procedure shall be implemented.

- 1) The person responsible for Notifying Relevant Authorities is the Marina Manager (primary) and Assistant Marina Manager (in the event the Marina Manager is not available).
- 2) The person responsible shall notify the relevant authorities (listed in the table below) as required. Notification is not required if the person responsible is aware that the incident has already come to the notice of each person or authority required to be notified.
- 3) Immediate verbal notification is to be followed by notification in writing to each relevant authority within 7 days of the incident date as per section 101 of the *Protection of the Environment Operations (General) Regulations 2009*.

Emergency Contact	Type of Emergency	Number
Authority that must be notified of pollution incident (in order of notification)		
Fire and Rescue NSW, Police, Ambulance	Emergency Services Assistance	000
Environment Protection Agency (EPA)	Pollution/Environmental Incident 24 hours	131 555
Hornsby Public Health Unit (Northern Sydney LHD)	Health Notification – ask for Public Health Officer on call	9485 6911 (BH) 9477 9123 (AH – Hospital)
SafeWork NSW	Employee / Work Related Incident	131 050
Northern Beaches Council	Incident Notification	1300 434 434
Other organisation/agency that may require notification if affected		
Sydney Water	Stormwater/Drains Pollution 24 hours	132 090
Transport for NSW / Roads and Maritime	Vessel Pollution / Marine Incident	131 256
	Road Incident and Hazard Reporting	131 700

Relevant information shall be provided to Authorities and others (listed in the above table) when notifying of a pollution incident in accordance with section 150 of *Protection of the Environment Operations Act 1997*. The following relevant information shall be provided:

- 1) The time, date, nature, duration and location of the incident.
- 2) The location of the place where pollution is occurring or is likely to occur.
- 3) The nature, the estimated quantity or volume and the concentration of any pollutants involved, if known.
- 4) The circumstances in which the incident occurred (including the cause of the incident, if known).
- 5) The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known.

If 3, 4 or 5 are not known at the time of notification, they are to be notified immediately after it becomes known.

4 Notification of Neighbours and Community

Where offsite environmental impacts and/or human health is threatened, the Emergency Response Team shall be enacted, and the following notification process shall be carried out to provide information, relevant to the incident, to affected persons.

- 1) All customers, visitors, tenants and contractors will be notified in person or by phone by the Marina Manager (primary) and Assistant Marina Manager (in the event the Marina Manager is not available) or delegated members of the Emergency Response Team (depending on the scale and level of emergency).
- 2) Surrounding community and businesses (offsite) shall be notified via website, social media and/or email (whichever is deemed more effective at the time) which shall be coordinated by Marina Manager (primary) and Assistant Marina Manager (in the event the Marina Manager is not available).

In the event of a notifiable incident, phone numbers for tenants and contractors are available to all employees and a hard copy is available in the Emergency Kit located in the Marina Office.

Customers will be emailed directly, or notifications can be sent out via SMS.

Local groups to be notified are:

- SIRA, Scotland Island Residence Association. - contact@scotlandisland.org.au; and
- BCPRA, Bayview Church Point Residence Association - bvcpra@gmail.com.