

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

FOR: Recycle Assist Pty Ltd

AT: 25 Bromley Road, Emu Heights

REF: 21-0004

Revision History	Detail	Date	Authorised by:
1	First draft for Submission to EPA	20/09/2021	Paul Gibbins
2	Final Draft issued to client	17/10/2021	Paul Gibbins



Rev 2. 17/10/2021

CONTENTS

CONTENTS	1
INTRODUCTION Background Purpose Objectives and Seens	3
Purpose, Objectives and Scope Objectives Scope Environmental Protection Licence (EPL) details	3 3 4 4
STAKEHOLDERS AND RESPONSIBILITIES Roles and Responsibilities Neighbours and Community Groups	5 5 5
OPERATION AND SITE DESCRIPTION Site Overview Risk Assessment Hazard Description and Risk Assessment Pre-emptive Actions	6 7 7 7 8
POLLUTION INCIDENT RESPONSE AND MANAGEMENT Management Training Testing the Plan Continual Improvement Pollution Incident Response Immediate Pollution Incident Response Actions	12 12 12 12 12 12 12
APPENDIX A Site Plan	15
APPENDIX B Neighbouring Land Plan	16
APPENDIX C Training Records Register	17
APPENDIX D PIRMP Testing Register	18
APPENDIX E Specific Pollution Incident Response Procedures	19

Author Statement

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Paul has 10 years of experience working in management/supervisor roles in civil construction and in environmental consultancy roles. Paul's expertise is in contaminated land investigation, management and remediation, specifically relating to heavy metals and asbestos in buildings and soils.

Paul Gibbins

Environmental Scientist, CEnvP #1410

INTRODUCTION

Background

In accordance with the Environmental Protection Licence #21507 issued by the New South Wales (NSW) Environmental Protection Authority (EPA) on 10th of September 2021 under the Protection of the Environment Operations Act 1997 (POEO) and in accordance with part section 153A of the POEO Act, Recycle Assist Pty Ltd (Recycle Assist) are required to prepare, keep, test and implement a Pollution Incident Response Management Plan (PIRMP). The PIRMP is required to comply with all of the requirements of Part 5.7A of the POEO Act in relation to the activity for which the licence relates.

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises, or where the activity takes place in the case of mobile plant licences and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or if there is no such website, by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in clause 98D of the Protection of the Environment Operations (General) Regulation 2009.

NOTE: This plan must be developed in accordance with the *Protection of the Environment Operations Act* 1997 and the Protection of the Environment Operations (General) Regulation 2009.

Licensees should also refer to the EPA's Guideline: Pollution incident response management plans.

Purpose, Objectives and Scope

The purpose of this plan is to facilitate the appropriate and effective management of any pollution incident that may occur at the resource recovery facility located at 25 Bromley Road, Emu Heights, owned by Recycle Assist and operating under EPL #21507.

Objectives

The key objectives of this plan are to:

- identify the roles and responsibilities of key stakeholders should a pollution incident occur at the site
- detail the notification process to relevant authorities and key stakeholders who may be involved in controlling a pollution incident should such an incident occur
- identify neighbours who may be affected should a pollution incident occur at the site
- identify likely hazards which would be the most likely to contribute to a pollution incident
- provide an inventory of pollutants kept at the site with the potential to contribute to a pollution incident
- identify the safety equipment kept at the site which minimises or mitigates the risk to human health and/or the environment should a pollution incident occur or have the potential to occur.
- detail a procedure for immediate response to a pollution incident including:
 - immediate actions to control the incident

- o immediate actions to minimise risk to human health
- o immediate actions to minimise risk to the environment
- o actions taken to ensure remediation of the pollution incident is undertaken effectively.
- ensure that the PIRMP is periodically tested and improved to facilitate a fit for purpose incident response plan.

Scope

The scope of this plan is limited to:

- the resource recovery facility located at 25 Bromley Road, Emu Heights operated by Recycle Assist.
- the management of and response to pollution incidents.
- pollution incidents that occur on the site premises, as defined in the site plan attached as Appendix
- pollution incidents that are associated with a visiting vehicle once it has entered the resource recovery facility
- pollution incidents that are associated with a vehicle that has left the resource recovery facility for any purpose, has not visited any other premises and is located within 100 metres of the site.

Environmental Protection Licence (EPL) details

The EPL details are noted in table 1.

Table 1: EPL Details

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Identifier	Description			
Name of Licensee (including ABN)	Recycle Assist Pty Ltd ABN: 322 687 61295			
EPL Number	21507			
Premises Address	25 Bromley Road, Emu Heights NSW 2750			
Primary Contact	Afram Hanna Operations Manager 02 9030 5999 0418 203 077 info@recycleassist.com.au			
Scheduled Based Activities on EPL	Resource Recovery Waste Storage			
Fee-based activities on EPL	Recovery of General Waste Waste Storage			

STAKEHOLDERS AND RESPONSIBILITIES

Roles and Responsibilities

The roles and responsibilities of Recycle Assist management are described in Table 2.

Table 2: Recycle Assist Roles and Responsibilities

Table 2. Recycle Assist Roles and Responsibilities					
Responsibility	Responsible Person				
PIRMP Activation	Afram Hanna Operations Manager 02 9030 5999 0418 203 077 afram@recycleassist.com.au				
Notification of Relevant Authorities	Afram Hanna Operations Manager 02 9030 5999 0418 203 077 afram@recycleassist.com.au				
Managing Response to Pollution Incident	Afram Hanna Operations Manager 02 9030 5999 0418 203 077 afram@recycleassist.com.au				

The contact details of relevant authorities which may require contact in the event of a pollution incident are detailed in table 3.

Table 3: Recycle Assist Roles and Responsibilities

Authority	Contact Details
Fire & Rescue NSW / Rural Fire Service	02 4721 5575 or 000
Environmental Protection Authority (EPA)	02 9995 5555 or 131 555
NSW Health (Penrith Public Health Unit)	02 4734 2022 or 4734 2000 (after hours)
SafeWork NSW	131 050
Penrith City Council	02 4732 7777
Sydney Water	132 092

Neighbours and Community Groups

Affected neighbours are identified in Table 4. The neighbours are identified on the neighbouring land plan attached as Appendix B. If a pollution incident should occur, all neighbours will be contacted by phone in the first instance if possible, and will be followed up with a door knock if required. Sensitive neighbours will be prioritised and will be notified within four hours of the pollution incident occurring.

All other neighbours will be notified within 12 hours of the pollution incident occurring.

REF: 21-0004 Rev.2 - 17/10/2021

Table 4: Affected Neighbours

Identifier	Address	Occupier Name	Contact Details
1	13 Bromley Road, Emu Heights	VITRAGROUP	02 4735 4122
2	16 Bromley Road, Emu Heights	Billington Group Services Pty Ltd	02 4735 7599
3	17 Bromley Road, Emu Heights	Product Fillers Australia Pty Ltd	02 4735 4011
4	18 Bromley Road, Emu HEights	B.S.B. Brushes & Signs	1300 661 739
5	19-21 Bromley Road, Emu Heights	The Made Creative	0407 252 087
6	23 Bromley Road, Emu Heights	Emu care Care	02 4735 4100
7	27 Bromley Road, Emu Heights	Nepean Metal	02 4776 1062
8	29 Bromley Road, Emu Heights	The Kuisine Company	02 4735 8200
9	31 Bromley Road, Emu Heights	Peak Scaffolding	02 4721 0008
10	33 Bromley Road, Emu Heights	Mick King Automotive	02 4735 3057
11	35 Bromley Road, Emu Heights	TIPM Automotive	02 4735 3386

REF: 21-0004 Rev.2 - 17/10/2021

OPERATION AND SITE DESCRIPTION

Site Overview

Recycle Assist 25 Bromley Road, Emu Heights recycling facility is authorised to accept 26,600 tonnes of construction and demolition waste in any 12-month period to separate and recover recyclable materials. The maximum allowable combined quantity of separated and unseparated waste allowed on the site at any given time is 600 tonnes.

Trucks with waste for disposal at Recycle Assist are weighed at the site weighbridge upon entry to site, and inspected loads are tipped at the 'tip and turn inspection area' area. The site plan attached as Appendix A details the areas of the site discussed in this PIRMP.

Inspected waste is fed into the trommel screen to separate fines from the larger recoverable material. separated material is then hand picked and sorted into unique waste streams (concrete, steel, timber, paper and cardboard, gyprock etc.)

recovered waste streams are exported from the site and sent to recycling facilities so the materials can be reprocessed and reused.

Risk Assessment

The following risk assessment matrix has been developed and applied to the known hazards at the site. Assessing the likelihood of a hazard having an effect on the environment and the environmental consequence should this event happening enables Recycle Assist to appropriately manage the risk of environmental incidents occurring by pre-planning mitigations which limit the likelihood and or consequence of the hazard eventuating.

It is considered an acceptable risk by Recycle Assist where the post mitigation risk is Moderate or Low. Where the risk assessment score cannot be made less than High even with mitigations in place, an alternative method should be developed for completing the task resulting in an acceptable risk.

The risk matrix is detailed in table 5.

Hazard Description and Risk Assessment

The hazards on the site are documented in table 6. The table also details the risk of the hazard to the environment by assessing the likelihood and the consequence potential of the hazard in accordance with the risk matrix in Table 5. The risk assessment is undertaken in consideration of the hazards potential to impact the environment and the specific mitigation measures implemented by Recycle Assist to minimise the likelihood of any environmental incident occurring and to minimise any environmental consequences should an environmental incident occur.

REF: 21-0004

Rev.2 - 17/10/2021

				Consequence					
				Minor	Moderate	Major	Catastrophic		
			No effect	Local short term effect	Short term effect to wider environment	Environmental damage requiring significant resources to rectify and potential enforcement action	Irreversible environmental damage requiring significant resources to manage, and enforcement action		
Likelihood	Certain	Happens several times per year in company	5 Moderate	10 High	15 Extreme	20 Extreme	25 Extreme		
	Likely	Has happened before in company	4 Moderate	8 High	12 High	16 Extreme	20 Extreme		
	Possible	Has happened in local company	3 Low	6 Moderate	9 High	12 High	15 Extreme		
	Unlikely	Rarely happens in the industry	2 Low	4 Moderate	6 Moderate	8 High	10 High		
	Rare	Never heard of in industry	1 Low	2 Low	3 Low	4 Moderate	5 Moderate		

Pre-emptive Actions

Pre-emptive actions for the prevention of pollution incidents include:

- refuelling in designated and contained areas only
- maintenance and servicing of plant and equipment in designated areas only
- inspection of imported materials in accordance with the Standard for Managing Construction Waste in NSW
- rejection of contaminated loads and record on the rejected load register
- appropriate maintenance and management of stormwater drains
- appropriate management of dust and application of dust suppressants (mist)
- appropriate training of all site staff in the prevention and management of pollution incidents
- storage of waste materials in covered areas

Table 6: Hazard Identification and Risk Assessment

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Location (Refer to Site Plan)	Hazard / Aspect	Max. Quantity	Potential Effect	Mitigations	Likelihood	Consequence	Risk Rating
Processing and Sorting Area	Above Ground Storage Tank containing Diesel	5000 L	Diesel spill entering stormwater system and discharging off site	 Designated refuelling area Secondary containment of 110% tank capacity Interceptor installed on site to separate any spills prior to water discharging from the site 	Possible	Minor	Moderate
Processing and Sorting Area	Storage of grease / oil / hydraulic fluids		Spill entering stormwater system and discharging off site.	 Designated hazardous substances storage area Interceptor installed on site to separate any spills prior to water discharging from the site 	Possible	Minor	Moderate
Tip and Turn Inspection Area	Unloading waste		Impact on stormwater if there is a spill outside of the tip and turn inspection area	 Designated tip and turn inspection area Direction from site staff Interceptor installed on site to separate any spills prior to water discharging from the site 	Unlikely	Negligible	Low
Tip and Turn Inspection Area	Unloading waste		Impact on air quality if waste is tipped outside of the ttip and turn inspection area	 Designated tip and turn inspection area Direction from site staff Manual hose for dust control 	Unlikely	Negligible	Low
Tip and Turn Inspection Area	Unloading waste		Discovery of asbestos containing material at tip and turn inspection area	 Inspections in accordance with the Standard for Managing Construction Waste in NSW Initial visual inspection at weighbridge Secondary inspection once waste has been tipped on tip and turn inspection area Additional inspection once waste has been spread on tip and turn inspection area Rejected load procedure 	Possible	Negligible	Low
Tip and Turn Inspection Area	Unloading waste		Discovery of asbestos contaminated soils within the tip and turn inspection area	 Inspections in accordance with the Standard for Managing Construction Waste in NSW Initial visual inspection at weighbridge Secondary inspection once waste has been tipped on tip and turn inspection area Additional inspection once waste has been spread on tip and turn inspection area Rejected load procedure 	Unlikely	Moderate	Moderate

10

Tip and Turn Inspection Area	Unloading waste		Discovery of waste which is not accepted at the resource recovery facility at the tip and turn inspection area	Inspections in accordance with the Standard for Managing Construction Waste in NSW Initial visual inspection at weighbridge Secondary inspection once waste has been tipped on tip and turn inspection area Additional inspection once waste has been spread on tip and turn inspection area Rejected load procedure	Moderate
Processing and Sorting Area	Filling up fuel tank		Impact on stormwater if spill occurs	Designated refuelling area Secondary containment of 110% tank capacity Interceptor installed on site to separate any spills prior to water discharging from the site Unlikely Minor	Moderate
Processing and Sorting Area	loading skip bins for export		Spill and dust entering the stormwater system	Closed system within the sorting and processing area with no pathway to the stormwater system Rare Negligible	Low
Processing and Sorting Area	loading skip bins for export		Dust generated inside the working area which could affect workers health	Ventilation systems installed Dust suppressant system operating Manual hose for dust control Rare Negligible	Low
Tip and Turn Inspection Area	Raw waste storage	600 tonne	More than maximum allowable volume of waste stored on the site	 Weighbridge software accounting for volume of waste on site at any given time Unlikely Minor	Moderate
Tip and Turn Inspection Area	Raw waste storage		Dust generated from materials stored in the tip and turn inspection area	Dust suppression system engineered to minimise dust Unlikely Minor	Moderate
Processing and Sorting Area	Waste processing		Dust generated from waste passing through the trommel screen	Dust suppression system engineered to minimise dust Operating inside the building Unlikely Negligible	Low
Processing and Sorting Area	Waste generation		Generation of non-recyclable waste as a by-product of the resource recovery process	Dispose of at a facility that is authorised to accept waste of this kind. Separate waste appropriately as part of the resource recovery process The inspection process ensures that minimal non-recyclable material is imported to the facility.	Low

11

Processing and Sorting Area	Storage of separated waste	600 tonne		•	Weighbridge software accounting for volume of waste on site at any given time	Unlikely	Minor	Moderate
Maintenance Service Area	Routine maintenance activities		Hydraulic fluid / grease / oil spills entering the stormwater system during maintenance and servicing	•	Designated maintenance and servicing area Servicing and maintenance undertaken in dry areas, undercover Service and maintenance is undertaken by suitably trained workers	Possible	Minor	Moderate
Maintenance Service Area	Routine maintenance activities		Appropriate disposal of waste oils and fluids	•	Waste fluids and oils are appropriately labelled and disposed of at suitably licensed facilities	Rare	Negligible	Low
Tip and Turn Inspection Area and Processing and Sorting Area	Dust control equipment		Dust and fluids entrained in water from dust suppressant system entering the stormwater system	•	Dust suppression system engineered to minimise surface run-off Interceptor system fitted in internal stormwater system prior to off site discharge Manual adjustment for more or less water	Rare	Negligible	Low

POLLUTION INCIDENT RESPONSE AND MANAGEMENT

Management

Training

All staff shall be briefed on the requirements and contents of this PIRMP as part of their onboarding process. Relevant staff who may need to respond to pollution incidents should be trained in the practical elements of managing a pollution incident, including simulations of pollution incident response and management in accordance with this plan. The training can be undertaken as part of the annual test of the PIRMP.

Training for staff on the requirements of this plan and incident response management should be re-delivered to staff annually, and in addition any time an update to the PIRMP is made.

Training records must be kept by Recycle Assist, and an induction and training register is available in Appendix C.

Testing the Plan

The PIRMP must be regularly tested at intervals of a minimum of 12 months. Additionally, the plan must be tested within one month of the occurrence of any pollution incident at the site. The PIRMP Testing register is attached as Appendix D.

Continual Improvement

This plan should be revised as required, based on outcomes from pollution incidents and changes to legislative requirements and/or industry best practice guidelines. The PIRMP should be reviewed and updated annually to ensure compliance with regulatory obligations and that plan is maintained as fit for purpose.

Pollution Incident Response

The response to each specific pollution should follow a basic process which enables the respondents to suitably manage the incident. The basic pollution incident response process is detailed in Figure 1.

Although the response should always follow the same process, the specifics of any individual response may be unique. The anticipated hazards and the expected risks to the environment should any hazard eventuate are assessed in table 6 of this PIRMP. Appendix E details the specific procedure for managing any pollution incident arising from the hazards identified as part of this PIRMP.

The basic pollution incident response process is summarised in the bullet points below:

Immediate Pollution Incident Response Actions

Pollution incident minimisation and control

as soon as it is safe to do so, stop work and stop the process causing the the environmental incident

- assess the risk, and if possible contain the pollution source to limit any additional contaminant release.
- Isolate the area from workers, the public, visitors etc. by erecting barricades to ensure there is no unauthorised access to the pollution incident and exposure is limited.
- Activate secondary containment points to ensure any contaminant release outside of the immediate incident area is further contained.

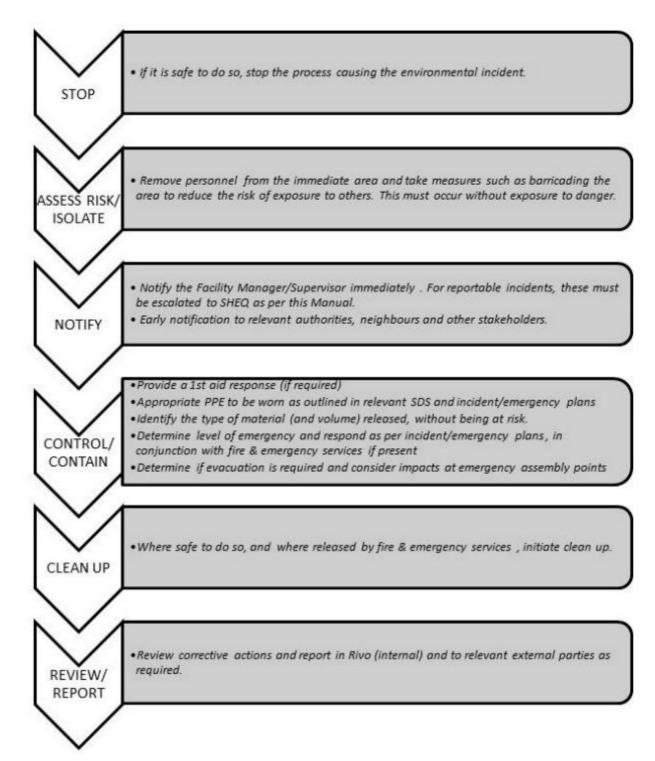


Figure 1: Basic Pollution Incident Response Process

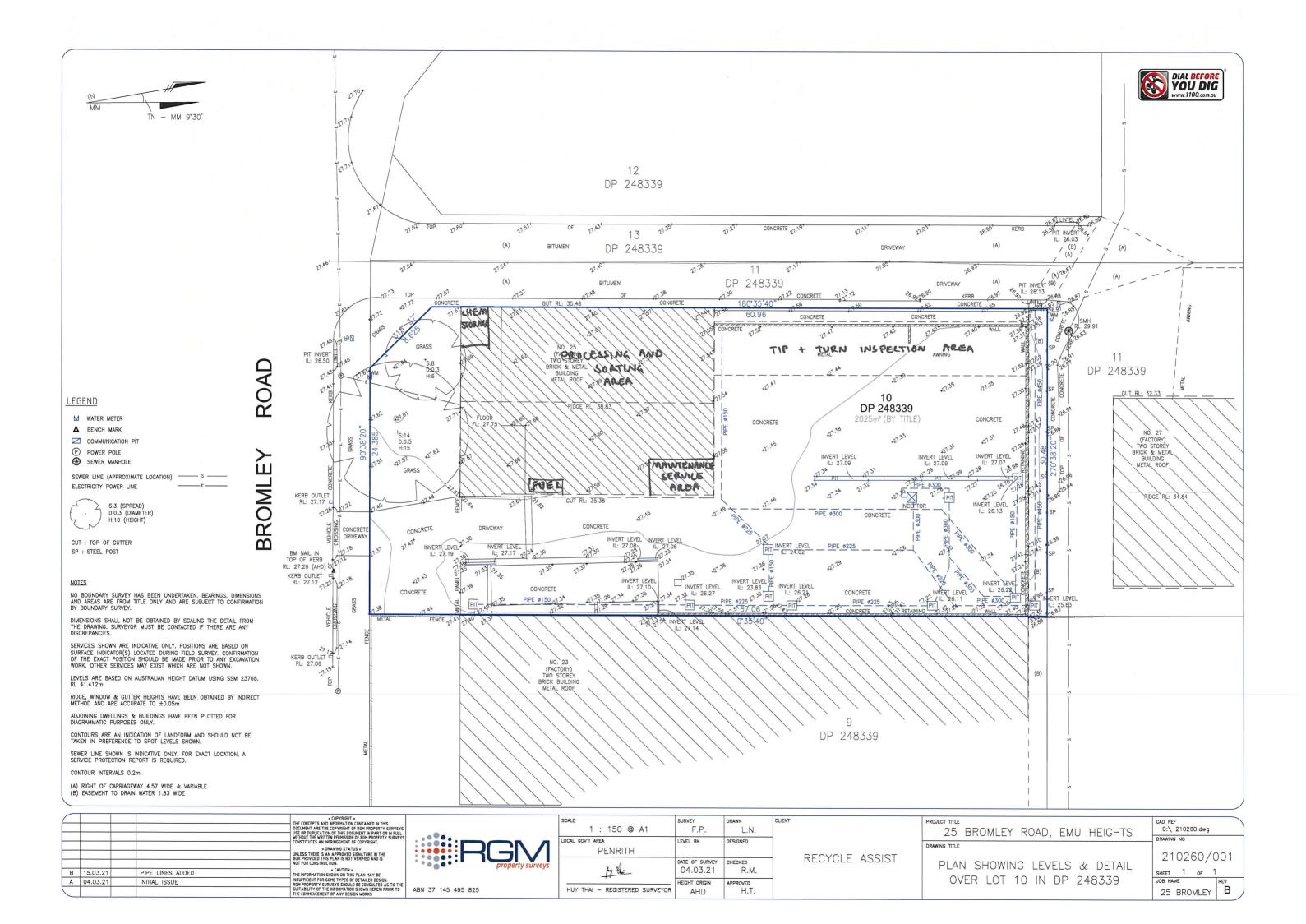
Mitigation of risk to human health from pollution incidents

- Notify the Operations Manager of the pollution incident to initiate the notification responsibilities.
- Assess the risk to human health in the area where the pollution incident has taken place. If required and it is safe to do so, provide any first aid response that is necessary. A third party should know that you are administering first aid if you are entering the pollution incident area.
- ◆ Suitable PPE/RPE should be worn in accordance with the requirements of Appendix E for specific pollution incidents, or in accordance with available SDS or other management plans for unexpected pollution incidents.

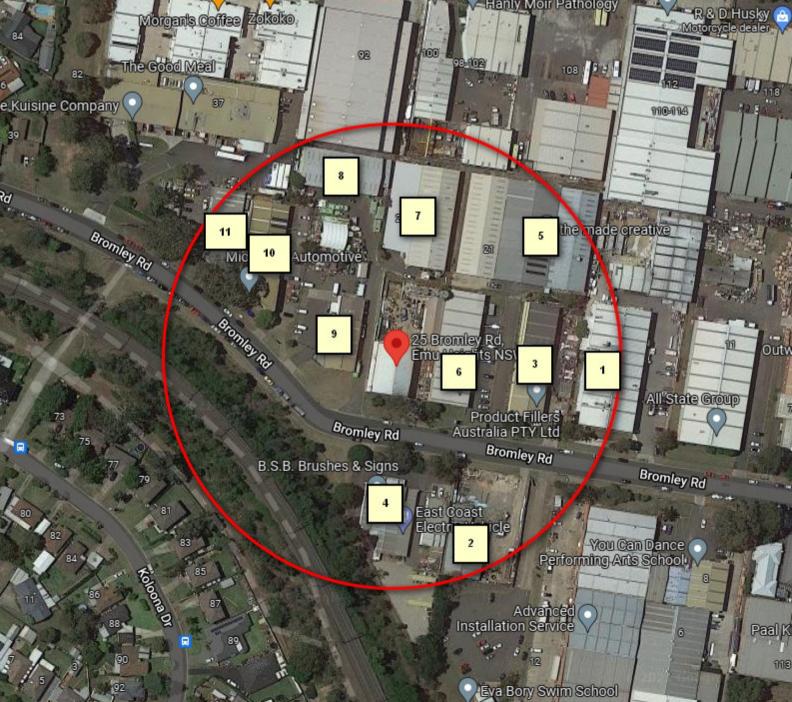
Clean up, remedial action and review

- wait for direction that it is safe to enter the incident area from any involved authorities responsible for your safety, eq. fire and emergency.
- when safe to do so, initiate the elimination of the source, and clean up of the immediate spill area eliminating any ongoing pollution
- when safe to do so, initiate the clean up of the affected areas both on and off site
- report the incident to any required stakeholders that have not yet been alerted
- review the incident, and document any improvement actions to minimise the likelihood of a repeat incident

APPENDIX A Site Plan



APPENDIX B Neighbouring Land Plan



APPENDIX C Training Records Register

Induction and Training Register Recycle Assist - 25 Brompley Road	l, Emu Heights				REF: 21-0012 Rev. 1 19/09/2021
Name	Date	Training Completed	Satisfactory	Notes	Refresher Due
eg. John Smith	#######	PIRMP Briefing	Yes	Good understanding	19/09/2022

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APPENDIX D PIRMP Testing Register

PIRMP Testing Register Recycle Assist - 25 Bron	nley Road, Emu Heights		REF: 21-0015 Rev. 1 19/09/2021	
Date	Participants	Scenario	Corrective Actions	Update to PIRMP Required
19/09/2021	John Smith, Jimmy Jones, Wendy James	Diesel Spill	Spill Kits required	Yes
13/03/2021	Sames	Bieser opin	opiii illio required	100

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APPENDIX E Procedures

Specific Pollution Incident Response

Specific Pollution Incident Response Procedures Recycle Assist - 25 Bromley Road, Emu Heights			REF: 21-0017 Rev. 1 17/10/2021
Pollution Incident Scenario	Required Equipment	Required PPE	Pollution Incident Response Procedure
Soild waste spill	Silt socks, dust suppressants, water gun, absorbant pads	Gloves, safety glasses, boots, RPE available	Assess 1. Assess the immediate risk to yourself, site workers and the public 2. Assess whether anyone was impacted form the event that needs immediate attention 3. Assess whether a signilifcant risk to the receiving environment is immenent 4. Notify the site manager to implement the notification procedure as required by the PIRMP 5. Assess whether the source of the pollution be stopped/isolated 6. Isolate the area as best as is reasonably practical Control 1. Place silt socks around the spilt waste 2. Apply water as a dust suppresant to minimise dust 3. Assess liquid leaching from waste to determine whether absorbtion is required 4. Inspect waste and determine whether load can be accepted. Ensure thorough inspection for asbestos or asbestos containing materials is completed 5. If acceptable push to tip and turn inspection area - if not acceptable reload truck and reject load Prevent Prevent any run-off to the stormwater system to minimise impacts on the receiving environment Reporting If considred notifiable, the pollution incident should be documented and reported to the EPA, and other regulators as appropriate. The outcomes of the pollution incident and any learnings should be incorporated into the next revision of the PIRMP

Specific Pollution Incident Response Procedures Recycle Assist - 25 Bromley Road, Emu Heights			REF: 21-0017 Rev. 1 17/10/2021
Pollution Incident Scenario	Required Equipment	Required PPE	Pollution Incident Response Procedure
Liquid Chemcial Spill	Silt socks, sandbags, spill kit, absorbant pads, sand, earth	glasses, boots, RPE available	Assess and initial control
			1. Assess the immediate risk to yourself, site workers and the public
			2. Assess whether anyone was impacted form the event that needs immediate attention
			3. Assess whether a signiifcant risk to the receiving environment is immenent
			4. Place silt socks around the spilt waste as soona s possible to minimise spill area and run-off
			5. Notify the site manager to implement the notification procedure as required by the PIRMP
			6. Assess whether the source of the pollution be stopped/isolated
			7. Isolate the area as best as is reasonably practical
			Prevent and Control
			Ensure there as no uncontrolled pathway for the liquid to enter the stormwater system, discharge offsite, or to contaminate processed waste
			2. Contain and control liquid spill by applying abosorbant pads, abosorbant socks, sand, earth or any other suitable abosrbant material that is available
			3. Place waste into a suitable container or bin in accordance with local legislation. Ensure all controls for transporting waste are fulfilled
			4. Replenish spent materials utilised form spill kits or stock
			Disposal
			1. Dispose of at a facility licensed to accept the type of waste.
			2. Ensure records of disposal are kept and filed with the records of the pollution incident/spill
			Reporting
			If considered notifiable, the pollution incident should be documented and reported to the EPA, and other regulators as appropriate. Regardless of the scale of the spill, the incident should be internally reported and corrective actions/outcomes of the pollution incident and any learnings should be incorporated into the next revision of the PIRMP

Specific Pollution Incident Response Procedures Recycle Assist - 25 Bromley Road, Emu Heights			REF: 21-0017 Rev. 1 17/10/2021
Pollution Incident Scenario	Required Equipment	Required PPE	Pollution Incident Response Procedure
Dust Discharge	Dust suppressants, water gun, absorbant pads	Gloves, safety glasses, boots, RPE available	Assess
			1. Assess the immediate risk to yourself, site workers and the public
			2. Assess whether anyone was impacted form the event that needs immediate attention
			3. Assess whether a significant risk to the receiving environment is immenent
			4. Notify the site manager to implement the notification procedure as required by the PIRMP
			5. Assess whether the source of the pollution be stopped/isolated
			6. Isolate the area as best as is reasonably practical
			Control
			1. Ensure process causing dust has been stopped
			2. wet down exposed surfaces causing dust discharge with spray hose
			3. Assess liquid leaching from waste to determine whether additional absorbers are required
			Prevent
			Prevent any run-off to the stormwater system to minimise impacts on the receiving environment
			Reporting
			If considred notifiable, the pollution incident should be documented and reported to the EPA, and other regulators as appropriate. The outcomes of the pollution incident and any learnings should be incorporated into the next revision of the PIRMP