

## Environmental Impact & Procedures to Comply with Legal and Environmental Obligations

Peter Rowland Group (PRG) operates under a structured compliance framework designed to meet and exceed all applicable environmental, trade waste and statutory obligations relevant to Catering.

### 1. General Environmental Duty (Environmental Protection Act 2017 – Victoria)

PRG recognises the General Environmental Duty (GED) requirement to eliminate or minimise risks of harm to human health and the environment so far as reasonably practicable.

Our procedures include:

- **Formal Environmental Risk Assessments** for all sites prior to commencement
- Identification of pollution risks (wastewater, food waste, chemicals, refrigerants, litter, noise)
- Documented control measures and mitigation plans
- Clear assignment of environmental responsibilities within site management structures
- Annual compliance review against EPA Victoria guidelines

Environmental risk registers are maintained and reviewed quarterly.

### 2. Trade Waste Compliance

PRG maintains strict trade waste management procedures aligned with local water authority requirements (e.g. City West Water / Greater Western Water where applicable).

Procedures include:

- Installation and maintenance of compliant grease arrestors
- Scheduled grease trap servicing by licensed contractors
- Wastewater discharge monitoring
- Use of approved cleaning chemicals
- Prohibition of fats, oils and grease (FOG) discharge into sewer systems
- Documentation of service records and waste transport certificates

Trade waste servicing schedules are embedded into site preventative maintenance plans.

### 3. Waste Management & Resource Recovery

To comply with EPA waste transport and waste classification requirements, PRG:

- Engages licensed waste contractors
- Verifies contractor EPA registration
- Tracks waste streams (general, organics, recyclables, cooking oil)
- Maintains waste diversion reporting
- Implements contamination reduction procedures

All used cooking oil is recycled through licensed collectors with certificates retained for audit.

#### 4. Dangerous Goods & Chemical Handling

PRG complies with Dangerous Goods (Storage and Handling) Regulations through:

- SDS (Safety Data Sheet) registers maintained onsite
- Approved chemical storage cabinets
- Spill kits located in all food preparation areas
- Staff chemical handling training
- Secondary containment where required

Cleaning chemicals are selected based on environmental safety and trade waste compatibility.

#### 5. Refrigeration & Refrigerant Management

To mitigate environmental harm and comply with Ozone Protection and Synthetic Greenhouse Gas regulations:

- Refrigeration maintenance is conducted by licensed technicians
- Leak detection and preventative servicing schedules are implemented
- Low-GWP refrigerants are prioritised for new equipment
- Refrigerant loss incidents are logged and investigated

#### 6. Noise, Litter & Wildlife Risk Management - PRG implements:

- Litter migration prevention strategies
- Secured waste containment systems
- Outdoor waste management audits
- Wind risk assessment for lightweight materials

#### 7. Governance & Oversight

Environmental compliance is governed through:

- COO oversight at executive level
- Operations Manager site accountability
- Procurement ESG screening of suppliers
- Quarterly ESG compliance reporting
- Internal audit program
- Incident reporting and corrective action system

Non-compliance triggers immediate rectification protocols and documented corrective actions.

#### 8. Staff Training & Awareness

Environmental compliance forms part of:

- Staff induction training
- Food Safety & Compliance Manager oversight
- Annual refresher training
- Trade waste awareness training for kitchen staff
- Waste segregation education

## 9. Continuous Improvement

PRG maintains a continuous improvement framework that:

- Reviews legislative updates
- Aligns with EPA Victoria guidance notes
- Tracks environmental KPIs
- Benchmarks performance across comparable sites

Environmental compliance is not treated as a static obligation but as an evolving governance responsibility.

### Summary

PRG ensures compliance through structured risk assessment, licensed contractor engagement, documented servicing schedules, governance oversight, staff training and regular auditing.

We do not rely solely on contractor assurances — we retain accountability for environmental performance and legal compliance across all ACF operations.

Legislative / Regulatory Obligation	Key Risk Area	PRG Compliance Procedure	Monitoring & Evidence	Responsibility
<b>Environmental Protection Act 2017 (Vic)</b> – General Environmental Duty (GED)	Pollution risk to land, water, air and wildlife	• Site-specific environmental risk assessments prior to commencement • Environmental Risk Register maintained • Implementation of “reasonably practicable” control measures • Incident response and corrective action protocols	• Quarterly risk register review • Incident reporting logs • Annual compliance review	COO (Strategic) Operations Manager (Site)
<b>EPA Victoria – Waste Management Regulations</b>	Improper waste disposal, contamination, landfill impact	• Licensed waste contractors only • Waste stream separation (general, organics, recyclables, oil) • Waste diversion tracking • Cooking oil recycling program	• Waste contractor certificates • Diversion reporting • Oil collection dockets retained	Operations Manager
<b>Trade Waste Agreements (Relevant Water Authority)</b>	Fats, oils and grease (FOG) discharge into sewer	• Grease arrestor installation and maintenance • Scheduled servicing by licensed contractors • FOG management procedures • Approved cleaning chemicals only	• Grease trap service logs • Contractor compliance certificates • Maintenance schedule tracking	Operations Manager Facilities Lead
<b>Dangerous Goods &amp; Chemical Storage Regulations</b>	Chemical spills, environmental contamination	• SDS register onsite • Approved chemical storage cabinets • Spill kits in all prep areas • Staff chemical handling training	• SDS register audit • Training attendance records • Spill incident logs	Site Manager
<b>Ozone Protection &amp; Synthetic Greenhouse Gas Regulations</b>	Refrigerant leakage and greenhouse emissions	• Licensed refrigeration technicians only • Preventative maintenance schedules • Leak	• Refrigeration service logs • Maintenance contracts •	Operations Manager

Legislative / Regulatory Obligation	Key Risk Area	PRG Compliance Procedure	Monitoring & Evidence	Responsibility
		detection protocols • Low-GWP refrigerants prioritised	Equipment specifications	
<b>Climate Active Alignment (Voluntary – Carbon Neutral Support)</b>	Scope 1, 2 & 3 emissions	• Annual carbon inventory • 35% emissions reduction target (5 years) • Energy efficiency program • Sustainable procurement integration	• Quarterly ESG dashboard • Emissions reporting • Supplier environmental declarations	Sustainability Lead
<b>Waste &amp; Resource Recovery Compliance</b>	Organic waste to landfill, litter risk	• ≥90% organics diversion target • Waste audits • Packaging lifecycle assessment • Wildlife-safe waste containment	• Waste audit reports • Packaging certification verification	Operations Manager
<b>Local Government Health &amp; Environmental Regulations</b>	Public health & environmental breaches	• Food Safety Program (Class 2 compliant) • Environmental cleaning schedules • Pest control contracts	• Food safety audit results • Pest control reports	Food Safety & Compliance Manager
<b>Noise &amp; Litter Control (EPA &amp; Local Council)</b>	Wildlife disturbance, environmental nuisance	• Secured waste containment • Litter patrol protocols • Wind risk assessment for packaging	• Site inspection logs • Incident records	Site Manager
<b>Supplier ESG &amp; Environmental Due Diligence</b>	Supply chain environmental harm	• Tier 1 supplier environmental declaration requirement • Sustainable seafood certification • Local sourcing targets	• Procurement records • Supplier compliance statements	Procurement Manager