Responsible Entity Risk, Consequence and Contingency (RERCC) Plan –

optional template

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Document conventions

The following template includes both prescribed information in accordance with section (s) 74F of the *Circular Economy (Waste Reduction and Recycling) Act 2021* (CE Act) and regulations 6 – 12 of the Circular Economy (Waste Reduction and Recycling) (Risk, Consequence and Contingency Plans and Other Matters) Regulations 2023 (CE RCCP Regulations) and non-prescribed information.

Conventions have been applied to guide readers using ‘signpost’ headings in the narrative sections and colour coding the non-prescribed sections of tables. This information is optional. Look for the explanation below and the indicators used throughout the template.

**Legend:**

|  |  |  |
| --- | --- | --- |
| Content style |  |  |
| Example | [Example] information |  |
|  | For mandatory information | For optional information |
| Narrative | Heading: The following information is **mandatory** | Heading: The following information  is **optional** |
| Tables | No shading | Grey shading |

[Entity Name]

The [Entity name] Responsible Entity Risk, Consequence and Contingency (RERCC) Plan has been prepared in accordance with s 74F of the CE Act,regulation 12of the CE RCCP Regulations and the Guidelines for Responsible Entity Risk, Consequence and Contingency Plans: Identifying as a Responsible Entity and meeting your obligations (the guidelines).

[Entity accountable officer name] with substantial control is pleased to provide the Head, Recycling Victoria with the [Entity name] Responsible Entity Risk, Consequence and Contingency Plan.

**The following information is mandatory:**

## Document information

**Plan preparation and approval details**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Version | Action | Detail of change | Approved by  Name / title | Preparation date |
| [Example]  Final V1 | Approval | Development of inaugural RERCC Plan |  | 25 August 2024 |
| [Example]V2 2025 | Review | Update for RERCC Plan 2025 including:   * notifications * CERCC Plan sector risks * update to key risks * progress of risk mitigations | Tom Smith, Chief Executive Officer | 26 August 2025 |
|  |  |  |  |  |

Part 1: Entity overview

**The following information is mandatory:**

## 1.1 Entity details for all relevant services

|  |  |  |
| --- | --- | --- |
| Entity Details | Content | |
| Entity name (registered) |  | |
| ACN or ABN | ACN | ABN |
|  |  | |
| Registered address of entity |  | |
| State | Postcode |
| Site location(s) | Site address(es) of any other sites where the responsible entity operates | |
|  | |
|  | |

**The following information is optional:**

|  |  |  |
| --- | --- | --- |
| Entity Details | Content | |
| Nature of entity | Pty Ltd ☐ Trust ☐ Partnership ☐ Other ☐  Other (please specify): | |
| If other, please specify |  | |
| Postal address (if different from registered address) |  | |
| State | Postcode |

**The following information is mandatory:**

## 1.2 Officers with control or substantial control over the management of the entity

Contact details of officers who have control or substantial control over the management of the company, business or entity– including directors, chief executive officer, chief financial officer, the secretary or any other officer who has control or substantial control. Please indicate a primary contact (optional).

|  |  |  |
| --- | --- | --- |
| Role/title | Full name | Contact details (phone number) |
|  |  |  |
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|  |  |  |

## 1.3 Details of any notifications to the Head, Recycling Victoria

**The following information is mandatory:**

The following provides the details [# number of] notifications submitted to the Head, Recycling Victoria for the period outlined in this document.

|  |  |  |  |
| --- | --- | --- | --- |
| CE Act section | Notification type | Notification date  (DD/MM/YYYY) | Details of any notification to Head, Recycling Victoria  Under s 74D(3) or s 74H(3) of the CE Act) |
| [Example]  74D(3) | Failure to comply with the CERCC Plan that is in force. | 31/07/2024 | Platypus Processing is unable to comply with the regular control effectiveness testing on control 2 for the containment CERCC risk due to the recent flood emergency. |
| 74H(3) | Failure to comply with RERCC Plan |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

Part 2: Operating context

**The following information is mandatory:**

## 2.1 Responsible entity self-assessment summary

In accordance with regulations 6(1) and 12(e) of the CE RCCP Regulations, provide a description of how the entity meets the criteria in the table below.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Entity name | Prescribed essential waste, recycling or resource recovery service type (reg 6(1)(a)) | Responsible entity criteria description. (Note: only one is required) | | | | |
| Market share | | Value of total combined government contract(s) per service type  (reg 6(1)(b)(ii)) | Declared regions | |
| Waste type(s) as published in the CERCC Plan | Percentage of market share per service type or that service for a type of waste  (reg 6(1)(b)(i)) | Number and name of declared regions serviced per service type  (reg 6(1)(b)(iii)) | Service interval per service type per region (reg 6(1)(b)(iii)) either ongoing or at regular intervals. |
| [Example]  Platypus Processing | Landfill | putrescible | 25% | $75 million | 2 regions  Goulburn Valley, Loddon Mallee | Regular – weekly |
| [Example] | Landfill | solid inert | 22% | 2 regions  Goulburn Valley, Grampians Central West | Regular – monthly |
| [Example] | Residual waste | kerbside residual waste | <20% | <$50 million | 5 regions  Goulburn Valley, North-East, Loddon Mallee, Metropolitan and Grampians Central West | Regular - fortnightly |
|  |  |  |  |  |  |  |

## 2.2 Essential waste recycling or resource recovery services provided

**The following information is mandatory:**

Provide a description of the services provided, including the relevant service type categorised using Column 2 of Schedule 1 – Table of essential waste, recycling or resource recovery services of the CE RCCP Regulations and service delivered.

|  |  |
| --- | --- |
| Essential waste, recycling or resource recovery service | Description of the service including service type. (such as collect, transport, store, treat, deposit, process, sort or recycle) |
| [Example]  Landfill | Receives and deposits putrescible, solid inert and hazardous waste to land with gas and leachate management |
| [Example] Recycling (commingled) | Collection, transport and sorting of municipal recycling |
|  |  |

## 2.3 Upstream services

Upstream services refer to those services waste, recycling and resource recovery sector entities receive and rely upon, at specified service intervals and related to the delivery of the service or type of waste to which the responsible entity meets the relevant criteria.

Consider the following:

* Transport networks such as roads, freight and logistics companies.
* Third party providers such as information technology, offsite processors, chemical suppliers, equipment suppliers, and facilities owners.
* Public entities such as regulators for licensing and Victoria Police for high consequence transport operations.

Focus only on those providers that are key to service continuity.

Information requested in the grey columns of the table below is relevant content that responsible entities **may** wish to include and report on. It is recommended that the optional grey columns are completed as well, which will allow better understanding of key supply chains in Victoria’s waste, recycling and resource recovery marketplace.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **The following information is mandatory** | | **Optional information** | | | |
| Vendor/supplier | Service frequency:   * ongoing (at least 12 months) or * At regular intervals (at least once every 2 months). | What is the service provided? | Is the vendor/supplier specialised or a single point of failure?  (vendor continuity) | Could the responsible entity still operate if this vendor failed?  (criticality) | What allows the responsible entity to continue operation should the vendor fail? For example:   * alternative supplier in the market * alternative business processes until supply is resumed.   (business continuity) |
| [Example]  Logistics company name | Ongoing | Freight management | Specialised | Yes – possible short term down time | Alternative supplier |
|  |  |  |  |  |  |
|  |  |  |  |  |  |

## 2.4 Downstream services

Downstream services refer to the services that responsible entities deliver to their customers, the end users of their relevant services, at specified service intervals and related to the delivery of the service or type of waste to which the responsible entity meets the relevant criteria.

Which customers will be affected if the responsible entity is unable to deliver their services? Consider the following:

* Is the responsible entity a single service provider for any of the waste types listed above?
* Are those who are dependent on the responsible entity’s services within the same region, spread across multiple regions or span the state?

Information requested in the grey columns of the table below is relevant content that responsible entities may wish to include and report on. Completion of the information in the grey columns is strongly encouraged as this information contributes to understanding and improving the resilience of waste and recycling supply chains in Victoria.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **The following information is mandatory** | | | **Optional information** | | | | | | |
| Customer | Service frequency:   * ongoing (at least 12 months) or * at regular intervals (at least once every two months). | | What is the waste service managed to the end customer? | | Are those who are dependent on the services:   * in the same region * spread across multiple regions * state-wide?   (Regional distribution) | | Is the responsible entity the single point of failure for the customer?  (Alternative service) | | Could the customer continue operation if the responsible entity was unable to deliver their service?  (Criticality) |
| [Example]  Royal Melbourne Hospital | Ongoing | Clinical waste management | | Spread across multiple regions | | No alternative services available | | Short term stockpiling could be an option with appropriate approvals | |
|  |  |  | |  | |  | |  | |
|  |  |  | |  | |  | |  | |
|  |  |  | |  | |  | |  | |

Part 3: Risk assessment criteria

Responsible entities with preprepared risk criteria may supply that in their RERCC Plan as an appendix and then reference the appendix here.

**The following information is mandatory:**

## 3.1 Risk assessment criteria

#### Likelihood table

Refer to Part 3 of the guidelines for expected content. For example:

| Rating | Likelihood | Rate of occurrence |
| --- | --- | --- |
| (1) Rare | 0-10% | Conceivable but only in extreme circumstances / once in every 10 years |
| (2) Unlikely | 11-30% | Hasn’t happened yet but could / once in every 5 years |
| (3) Possible | 31-50% | Could happen or known to happen / once a year |
| (4) Likely | 51-75% | Could easily happen / once a month |
| (5) Almost Certain | 76-100% | Often occurs / once a week |

#### Consequence table

Refer to Part 3 of the guidelines for expected content. For example:

| Level of harm | Consequence domains | | | | |
| --- | --- | --- | --- | --- | --- |
| People | Financial | Operational service delivery | Legal | Environment |
| (1) Negligible | Insignificant, no first aid or medical treatment required | Budget variance <=5% or financial cost < [insert $ value] | Negligible impact on ability to deliver critical services  No inconvenience to customers | Non-compliance with legislation identified resulting in review | Negligible effect on the natural and/or built environment  Contained locally within a single site or area |
| (2) Minor | First aid, physical or mental medical assessment with no treatment required | Budget variance >5 and <10% or financial cost >= [insert $ value] and < [insert $ value] | <3 days impact on ability to deliver critical services | Non-compliance with legislation or breach of a duty identified and resolved or resulting in civil action with minor compensation or negative precedent | Limited effect on the natural and/or built environment.  Limited to a single township or locality |
| (3) Moderate | Physical or mental treatment by a medical practitioner requiring time-limited treatment | Budget variance >=11 and <20% or financial cost >= [insert $ value] and < [insert $ value] | >3 and <5 days impact on ability to deliver critical services | Non-compliance with legislation or breach of a duty resulting in an improvement notice and/or short-term suspension | Moderate effect on the natural and/or built environment  Requires environmental recovery for up to 5 years  Impacts on a municipality or multiple localities |
| (4) Major | Physical or mental, immediate admission to hospital as an inpatient | Budget variance >21 and <30% or financial cost >= [insert $ value] and < [insert $ value] | >6 and <10 days impact on ability to deliver critical services | Non-compliance with legislation or breach of a duty resulting in long term suspension, investigation, civil or criminal action or sanctions imposed by a regulator | Major effect on natural and/or built environment.  Requires environmental recovery for 5 -10 years |
| (5) Extreme | Permanent impairment or fatality | Budget variance >31% financial cost >= [insert $ value] | >10 days impact on ability to deliver critical services | Non-compliance with legislation or breach of a duty resulting in prosecution leading to imprisonment, severe sanctions imposed by a regulator, business closure | Extreme effect on natural and/or built environment  Requires environmental recovery for >10 years |

#### Risk rating table

Refer to Part 3 of the guidelines for expected content. For example:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | Negligible (1) | Minor (2) | Moderate (3) | Major (4) | Extreme (5) |
| Almost certain (5) | **Medium** | **Significant** | **High** | **High** | **High** |
| Likely (4) | **Medium** | **Medium** | **Significant** | **High** | **High** |
| Possible (3) | **Low** | **Medium** | **Medium** | **Significant** | **High** |
| Unlikely (2) | **Low** | **Low** | **Medium** | **Medium** | **Significant** |
| Rare (1) | **Low** | **Low** | **Low** | **Medium** | **Significant** |

#### Risk acceptance and response table

Refer to Part 3 of the guidelines for expected content. For example:

|  |  |  |  |
| --- | --- | --- | --- |
| Rating | Risk evaluation decision | Risk management response | Monitoring cycle |
| **High** | Not accepted | Extreme-rated risks are not accepted by the organisation. Immediate action must be taken to develop and implement treatments to further reduce this risk. | Fortnightly |
| **Significant** | Not accepted | High-rated risks are not normally accepted. Immediate action must be taken to reduce the risk. However, should there be a situation whereby the inherent risk is ‘high’ and the service must be delivered, provided the risk has controls that are regularly reviewed and assessed for effectiveness, and the risk is closely monitored, there may be rare instances where a high-rated risk may be accepted. | Monthly |
| **Medium** | Accepted | Medium risks would normally be accepted unless there is an emerging condition that is heightening this risk. These risks should be regularly reviewed for changes that may be amplifying the risk. | Twice yearly |
| **Low** | Accepted | Low-rated risks | Annually |

**The following information is optional:**

#### Risk appetite statement

Provide a copy of the entity risk appetite statement, or a summary statement, as an attachment.

Part 4: Risk profile

Responsible entities are encouraged to use existing information in responding to this part. For example, if responsible entities already provide a risk report to their internal audit committee or risk oversight committee, and it meets the requirements of this part, they may wish to provide a high-level summary here, referencing the relevant pages or sections and attach the risk report as an appendix.

|  |
| --- |
| Lightbulb outlineLightbulb outlineRisks may be site specific. Where a site has a specific risk profile, provide the risk information on a site-by-site basis. |

Responsible entities should focus on those risks that may lead to serious failure, disruption or hinderance in waste recycling and resource recovery service delivery, which have the highest risk ratings.

Entities are expected to:

1. provide a summary of their risk profile including explanatory background narrative to further inform the context of the risk profile. For example, briefly highlight any key challenges in the operating environment that is putting pressure on the ability to manage the risks to an acceptable level
2. show the link between CERCC Plan risks and RERCC Plan risks in the risk register
3. append a copy of the risk register in MS Excel format, containing the detail of the risks that comprise the summary. Refer to Part 4.2 for the expected risk information.

**The following information is mandatory:**

## 4.1 Summary of the key risks including the essential mitigations in place to manage risks

The summary may be provided as a heat map or other summary tool showing the overall profile and expected movement in the risk rating over time such as tables or other charts.

The chosen approach should be proportionate to the size and complexity of the entity. For example, large, complex or multi-national organisations should utilise summary reports derived from established risk management systems and processes. Smaller entities without a specific electronic risk management application should summarise information from their manual risk registers.

Key points to consider when developing the summary:

* Only include the highest rated risks that may result in a serious failure, disruption or hindrance to service.
* List this subset of risks from highest to lowest rated and include:
  + the unique risk identifier
  + risk title or event
  + risk owner
  + current risk rating given the controls in place, following the most recent risk review
  + residual risk rating expected once the planned treatments have been implemented
  + the relevant CERCC Plan risk the RERCC Plan risk it relates to, where relevant.
* High level narrative describing how the entity is addressing and implementing the actions required under the CERCC Plan and any key drivers influencing the nature of the risk.

## 4.2 Risk detail including the key mitigations in place to manage risks

Of the risks listed in the summary, provide further detail here. For the purposes of this part, the following information should be supplied as a risk register in MS Excel format that includes:

* risk ID
* date risk was identified
* risk event
* causes
* consequences
* risk owner
* risk category
* controls (including control effectiveness and review dates)
* control owner
* current risk rating (including current likelihood and consequence)
* risk treatment option (risk acceptance)
* treatment title
* treatment owner
* treatment status
* residual risk rating (including residual likelihood and consequence)
* date the risk was last reviewed
* relevant comments about the risk or review of the risk.

Ensure treatments that are also actions from the CERCC Plan are clearly identifiable.

To complete this section, responsible entities should extract the information required above from your existing risk register or as documented using the RERCC Plan Risk Register Template (MS Excel format) and include it as an attachment to this document.

## 4.3 Risk treatments to minimise or prevent risks

Consider the treatments listed in the risk register to further reduce the highest rated risks.

* What are the key treatments the responsible entity has resourced and invested in to further reduce the highest rated risks that are not accepted?
* Indicate which of the treatments are also actions from the CERCC Plan.
* Which of these treatments are delayed, meaning exposures are being carried for longer than anticipated?
* What are the challenges delaying completion of the key treatments and how are these challenges being managed?

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Treatment description | Treatment owner | Treatment status | Treatment due date | Treatment completed date | RERCC Plan risk | Current risk rating | CERCC Plan risk if relevant |
| [Example]Implement environmental management system | Director | In progress | 31 Dec 2024 | 31 Dec 2024 | Contamination | High |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

## 4.4 Risk treatments programmed for completion in the next reporting cycle

The following treatments are planned for completion in the next reporting cycle.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Treatment description | Treatment owner | Due date | Treatment status | RERCC Plan risk | Current risk rating | CERCC Plan risk if relevant |  |  |  |
| [Example]Staff training on use of environmental management system | Director | 30 Sept 2025 | Delayed | Contamination | High |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |

Part 5: Monitoring and management of residual risks

Information in this part may be provided using lists, tables, charts or narrative or a combination thereof.

|  |
| --- |
| Lightbulb outlineIt is helpful to use a combination of charts, tables and narrative to succinctly communicate the key points. Use the questions below to guide part content based on what is relevant to the size and complexity of the organisation. |

**The following information is mandatory:**

## 5.1 Monitoring and management of residual risks

|  |
| --- |
| Lightbulb outlineCopy the risk summary from Part 4.1 to begin populating this part. Concise summary responses will be suitable when responding to the points below. |

Describe the steps being taken to monitor and manage any inherent and residual risks remaining following application of treatment (actions and contingency measures).

Consider the following points when completing this section:

* Accountability and responsibility for risk monitoring
* Level and frequency of risk and control monitoring routinely applied.
* Include the monitoring frequency for each risk. For example, annual, biannual, quarterly, monthly.
* Have any of the prioritised risks changed since the last RERCC Plan?
  + Have any prioritised risks been closed or has the rating reduced and if so, why?
  + Did any risks increase in rating since the last RERCC Plan and if so, why?
  + Were any new risks identified and assessed as serious since the last report?
* How are accepted risks that exceed the responsible entity’s risk appetite being monitored and by whom?

Responsible entities may wish to adopt the optional table below to complete this section.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Risk ID | Risk title or event | Risk owner | Current risk rating | Residual risk rating | Rating trend | Relevant CERCC Plan risk | Summary risk management narrative | Risk review frequency |
| 1 | [Example]Contamination | Joe Platypus | High | Medium | ⇩⇧⬄ | Contamination | Platypus processing is further mitigating contamination risk through development of a range of treatments focusing on application of new technology for early detection of contaminants and changes to operating procedures. | Bi-monthly by senior executive |
|  |  |  |  |  |  |  |  |  |

## 5.2 Risk reporting

* With whom is risk information shared in the organisation?
* What reports were produced to inform staff, stakeholders or shareholders about risks?
* What activities (decisions) do the risk reports produced above inform?
* How is risk information used by the board, executive or owners to inform key decisions? (noting, information not related to risk information may be redacted from that provided in the RERCC Plans).

## 5.3 Risk escalation process

Refer to Part 5 of the guidelines. Information in this part may be provided as a narrative, a business process, a table or in another relevant manner as appropriate to the size and complexity of the organisation.

Part 6: RERCC Plan preparation

**The following information is mandatory:**

Optional tables are prepopulated below with example information.

The following personnel have contributed to the preparation of and compliance with this plan:

|  |  |  |
| --- | --- | --- |
| Full name of employee | Role | Plan responsibility – preparation and compliance |
| [Example]  Joe Platypus | CEO | Final review and approval  Oversight of risk management actions and compliance. |
| [Example] Peter Poda | Scientist | Risk analysis |
| [Example] Anne Smith | General Manager Operations | Risk treatment program |
|  |  |  |
|  |  |  |
|  |  |  |

This RERCC Plan content was informed by:

|  |  |
| --- | --- |
| Plan part | Documents used in the preparation of the RERCC Plan |
| [Example]  Entity overview | ASIC registration  Annual report |
| [Example] Operating context | Permissions register  Annual report  Corporate plan  Strategic plan |
| [Example] Risk profile | [Entity name] risk framework  [Entity name] risk report to the board  Internal audit report |
|  |  |
|  |  |
|  |  |
|  |  |

Part 7: RERCC Plan monitoring and evaluation

**The following information is mandatory:**

Refer to Part 7 of the guidelines. Information in this part may be provided as a narrative, a business process, a table or in another relevant manner as appropriate to the size and complexity of the organisation.