AUSTRALIAN FOOD & FIBRE

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

HSE-PL-01-01

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1 Facility Details

The Koramba Ginning facility details are as follows:

Licensee: AFF Properties No 1 Pty Ltd

Scheduled Activity: Agricultural Processing

Facility Address: 5539 Boonangar Rd Boomi NSW, 2405 (Talwood Road, Boomi NSW, 2405)

Facility Name: “Koramba Ginning”

EPL Number: 11283

2 Purpose

As the purpose of the Pollution Incident Response Management Plan (PIRMP) is to mitigate the likelihood and to improve the management of pollution incidents should they occur.

The PIRMP covers the Koramba Ginning facility known as the Koramba Gin.

The purpose of the PIRMP is to:

- minimize and control the risk of a pollution incident at the facility by identifying pollution incident risks and eliminate or minimize pollution risks should they occur.
- ensure the timely communication of a pollution incident to staff at the facility, the Environmental Protection Authority (EPA), other relevant Authorities and community members who may be impacted by the pollution incident.
- ensure the PIRMP is properly implemented by qualified and trained staff; and
- ensure the PIRMP is reviewed annually and regularly tested for currency.

The PIRMP must be in written form, be available at Koramba Gin and be provided to an authorised EPA officer or any person who is responsible for implementing the PIRMP upon request.

3 Pollution Incident

The definition of a pollution incident is:

"pollution incident" means 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".

A pollution incident is required to be reported to the EPA if there is a risk of "material harm" to the environment, which is defined in section 147 of the Protection of the Environment Operations Act 1997 (POEO) Act as:

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

4 Legislative Context

The specific requirements for PIRMPs are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009. In summary, these provision require the following:

- All holders of environment protection licenses must prepare a pollution incident response management plan (section 153A, POEO Act);
- The plan must include the information detailed in the POEO Act (section 153C)
- Licensees must keep the Plan at the premises to which the Environment Protection License relates or, in the case of trackable waste transporters and mobile plant, where the relevant activity takes place (sec. 153D POEO Act).
- Licensees must test the plan (sec, 153E POEO Act); and
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the Plan (sec.153F, POEO Act).

5 PIRMP Training

To ensure that the PIRMP is properly followed in the event of a pollution incident, training shall be provided to relevant employees so that they have an understanding of their roles and responsibilities. Employees shall receive training appropriate to the level of their expected involvement. The following is the general training program which is to be implemented in support of the PIRMP:

5.1 Training Level

Employees will receive training in the general PIRMP procedures and Standard Operating Procedures related to the PIRMP.

Training shall cover routine pre-emptive inspections, incident discovery and management, (standard operating procedures), notifications, incident response and best practice management.

5.2 Supervisor Training

Supervisors will receive additional training, beyond that received by employees or other site personnel, dealing with actions that are necessary for the safety of employees, facility users and contractors, the protection of facility assets and the management of pollution incidents generally.

5.3 PIRMP Drills & Exercises

To ensure that the PIRMP will meet current conditions and that all stakeholders will respond appropriately, the PIRMP will be tested on an annual basis. The testing will include at least the following:

- Reaction and accountability of facility personnel; and
- Adherence to PIRMP procedures.

All drills and exercises of the PIRMP will be documented along with recommendations for PIRMP updates.

Previous PIRMP Scenario's;

- 16/03/2021 – Fire in cyclone auger and trash bin
- 28/06/2022 - Moonbuggy collision with diesel storage tank
- 31/07/2023 – Gin trash yard fire, with strong winds directed towards the Gin module yard

6 Relationship with other Emergency & Incident Response Plans

This PIRMP can function as a standalone document, the implementation of which is required to be undertaken to mitigate risk of a pollution incident but also to respond to a likely pollution incident where there is a potential of 'material harm to the environment'. If other plans, procedures and protocols provide for enhanced, ancillary or complementary actions, then they may need to be implemented concurrently.

7 Nature and Likelihood of Pollution Incidents

Notwithstanding Koramba Ginning's commitment to preventing conditions which might give rise to a pollution incident, it is not possible to negate all situations or conditions.

Possible pollution incidents associated with the operation of the facility are:

- fire within facility activity areas;
- explosion of gas bottles;
- spill of chemical, fuels, oils or other hazardous materials;
- leachate discharge off site into surface / groundwater; or
- litter, dust or sedimentation.

Having regard to the nature of the operations at the Koramba Ginning facility, the level of risk posed by the possible pollution incidents to the environment and the need and priority for management action is qualified using the following methodology.

Inherent risk is assessed by combining the *likelihood* and *consequence* of the identified potential risks. In determining the likelihood and consequence, the following rating process has been utilised.

Likelihood

Determination of the probability or likelihood of environmental harm, damage or loss occurring as a result of a pollution incident is represented in the following table.

Likelihood	Almost certainly will occur	Good chance it could occur	Likely to Occur	Unlikely to Occur	Extremely Unlikely to Occur
	Expected to occur on a weekly basis or more frequently	Expected to occur more than once in 3 months, but less than once a week	Expected to occur more than once a year, but less than once in 3 months	Consequence expected to occur more than once in 3 years, but less than once a year	Consequence has not occurred and is expected to occur less than once in 3 years

Consequence

Determination of the consequence of the potential environmental harm, damage or loss occurring as a result of a pollution incident is represented in the following table.

Consequence	Safety	Environment
Disastrous	Fatality	Prosecution & Directors / Senior Managers jailed on criminal charges by Regulatory Authority
Critical	Disabling injury, i.e. Amputation and/or permanent loss of bodily function	Prosecution & maximum penalty / fine imposed by Regulatory Authority; Environmental impact extends well beyond site boundary; Major public alarm, attracting media attention; Major disruption to public activities.
Serious	An injury resulting in more than 1 week off normal duties	Prosecution & maximum penalty / fine imposed by Regulatory Authority; Environmental impact extends well beyond immediate site boundary; Serious public alarm; Serious disruption to public activities.
Significant	An injury resulting in less than 1 week off normal duties	Warning notice issued by Regulatory Authority; Environmental impact contained within site boundary; Negligible public alarm; Negligible disruption to public activities.
Minor	Minor first aid injury	No action from Regulatory Authority; Environmental impact localised to area of occurrence; No public alarm; No disruption to public activities

Risk Evaluation

Individual evaluation of the management priority for each potential pollution incident using the risk priority matrix is presented in the following table.

Risk Assessment Matrix					
Likelihood / Consequence	Almost certainly will occur	Good chance it could occur	Likely to occur	Unlikely to occur	Extremely unlikely to occur
Disastrous	25	24	22	19	15
Critical	23	21	18	14	13
Serious	20	17	12	9	6
Significant	16	11	8	5	3
Minor	10	7	4	2	1

Risk Evaluation Definition and Action

Level of Risk & Risk Score	Recommended Action	Hierarchy of Control	
High Level 20-25	Immediately notify the Supervisor/ Manager, immediately implement interim controls before the task commences long term control strategies to be implemented	**Elimination**	Remove the hazard entirely from the workplace
		Substitution	Use something less hazardous than the original e.g. Water based products instead of solvent based chemicals
Moderate Level 13 - 19	Immediately notify the Supervisor/ Manager , communicate hazard details to affected personnel, control hazard before task commences	**Isolation**	Use barriers to shield or isolate the hazard, e.g. enclosures
		Engineering	Design and install equipment to counteract the hazard, e.g. an exhaust ventilation system to extract dangerous fumes or dusts
Low Level 7 - 12	Notify Supervisor/ Manager, communicate hazard details to affected personnel, implement controls where possible	**Administration**	Arrange work to reduce the time people are exposed to the hazard e.g. Job rotation
		PPE	Wear appropriate protective equipment whilst exposed to the hazard e.g. ear plugs, eye goggles, safety boots
Very Low Level 1 - 6	Notify Supervisor/ Manager, raise team awareness before task commences		

For the purposes of this PIRMP:

- HIGH risks will be eliminated or minimised;
- MODERATE risks will be monitored; and
- LOW and VERY LOW risks will be accepted.

8 Incident Response Protocols

Koramba Ginning is committed to preventing incidents that would call for an emergency response. But, in the event that an emergency response is required Koramba Ginning will:

- identify on and off-site conditions that have the potential to adversely impact site operations;
- using risk management principles identify and assess potential risk and develop mitigation strategies;
- develop emergency response plans;
- communicate emergency response plans to staff; and
- train staff in emergency response procedures;

If a pollution incident occurs the following response protocol should be followed:

8.1.1 Assess the Risk

- Identify the risk or potential risk taking into account:
  - What is the substance being discharged?
  - What is the volume of discharge?
  - Obtain the Safety Data Sheet to determine the risk to health and safety?
  - Is there the appropriate response equipment such as fire fighting or personal protective equipment available to manage the situation?
  - Are there sufficient trained personnel to manage the situation?
- Assess the potential for off-site impacts to the community and the environment;
- Ensure the safety of all persons on the site, evacuate if required;
- If the discharge cannot be identified evacuate the area and notify relevant stakeholders;
- Call 000 if the incident presents an immediate threat to the health or safety of persons or poses a significant threat to an asset;
- If the discharge has the potential to cause adverse harm to persons, property or the environment, progress to containment.

8.1.2 Contain (only if safe to do so)

- If safe to do so confine the source of the discharge to limit the spread of its effect without endangering personnel;
- Utilise barriers (e.g. absorbent booms, absorbent, banks of soil) to prevent the discharge from spreading; or
- Divert the flow and/or excavate temporary retention dams to withhold the discharge;

8.1.3 Notifications

Notify the following stakeholders:

- Persons responsible for activating the PIRMP, refer to section 9.1;
- External authorities if the pollution incident is a material harm incident in accordance with definition in (refer to sec. 3).
- Call 000 if applicable, then the Gin Operations Manager or the Koramba Operations Manager will notify the relevant authorities in the following order.
  1. Environmental Protection Authority (EPA);
  2. NSW Health via the local Public Health Unit;
  3. SafeWork NSW;
  4. Community members via the Community Notification Protocol (only if required).

Refer to section 9.2 for external contact details.

8.2 Post Pollution Incident Activities

8.2.1 Clean Up

- Clean up and remedial actions to restore the environment are to be in accordance with EPA regulations; and
- Disposal of pollutants are to be in accordance with EPA regulations;
- Conduct an impact assessment to determine the extent of damage to facilities and/or the environment resulting from the incident, identify repairs or restoration that must be initiated to minimise further damage and restore the facility for operational use or to rehabilitate the environment

8.2.2 Post Incident

- Assist external authorities with any investigations (if applicable);
- Conduct an internal investigation (if applicable):
- Complete internal reporting (if applicable);
- Conduct an incident debriefing to inform employees about any hazards that may still remain on the facility property following the incident and to identify unsafe conditions that may still exist.

8.2.3 After Action Review & PIRMP Update

An After Action Review (AAR) will occur within 30 days of any pollution incident. The AAR will analyse the actions that took place during the pollution incident (both good and bad) and will seek to identify opportunities to improve the effectiveness of the PIRMP, through Prevention, Preparation, Response and Recovery procedures.

The AAR findings will produce corrective actions to amend, modify or may determine no change requirements are necessary for the PIRMP.

7. Documentation

Documentation is of critical importance following a pollution incident. All records and forms used during the incident to document activities along with testing and amendments to the PRIMP will be retained for future reference in Koramba Ginning Management System.

Name	Position	Contact details	Notification Responsibility	Communication Responsibility
Shaun Wade	Gin Manager	swade@aff-limited.com.au 0491201272	eg Contact external authority	eg Emergency Services, Neighbouring property owners
Jeff Rutter	EPA Liason	jrutter@australianfoodandfibre.com.au 0419 591780	eg Contact external authority	eg Emergency Services, Neighbouring property owners
John Lowe	Human Resources	jlowe@australianfoodandfibre.com.au 0459 049836	Eg Contact external authority	eg Liaison – Injured employees and families: Counselling arrangements
Joe Robinson	CEO	jrobinson@aff-limited.com.au 0427539572	Eg Contact external authority	Eg Emergency Services Neighbouring property Owners

9 Pollution Incident Notification Procedures and Contacts

This section sets out the communication protocols to be adopted for a pollution incident requiring notification.

9.1 Internal Communication & Notification

If a pollution incident occurs at the site or outside the site as a consequence of the site activities, the following individuals are responsible for activating the PIRMP.

The above details are to be verified annually and updated whenever a change in personnel or responsibility has occurred.

9.2 External Communication

The relevant external agencies will be notified of a material pollution incident without delay:

EXTERNAL STAKEHOLDERS		
Agency	**Contact**	**Contact Details**
Environmental Protection Authority (EPA)	EPA Environment Line	131 555
	Armidale Office	02 6773 7000 or 02 9995 5000
Ministry of Health via the local Public Health Unit	Duty Officer	02 6764 8000
SafeWork NSW	Duty Officer	131 050
Police/Fire/Ambulance	Duty Officer	000
Moree Council (Environmental Services)	Duty Officer	02 6757 3222

The following is a list of incident response individuals and organisations that **may be needed** during or after a pollution incident.

EXTERNAL STAKEHOLDERS		
Agency	**Contact**	**Contact Details**
Fire & Rescue NSW (Including Hazardous Materials Response Unit)	Duty Officer	000 or 1300 729 579
Moree Ambulance	Duty Officer	131 233
Moree Fire Station	Duty Officer	02 6752 7620
Moree Police Station	Duty Officer	02 6752 9499
Goondiwindi Police Station	Duty Officer	07 4671 7777
Goondiwindi Fire Station	Duty Officer	07 4671 8115
Goondiwindi Ambulance	Duty Officer	07 4616 1550
Ambulance Service of NSW	Duty Officer	000 or 131 233 / 02 - 6777 2293
Department of Primary Industries (NSW Fisheries)	Reception	1300 550 474
POISONS Information	Duty Officer	131 126
Goondiwindi Hospital	Reception / Duty Nurse	07 4578 2400
Moree Hospital	Reception / Duty Nurse	02 6757 0000
NSW Ministry of Health (Public Health Unit)	Reception	(Tamworth) 02 - 9391 9000
Moree Council	Duty Officer	02 6757 3222
Department of Families & Community Services	Reception	1800 079 098
State Emergency Service (SES)	Duty Officer	132 500
Roads & Traffic Authority	Reception	132 213
Bureau of Meteorology	General Information	1300 659 218
Origin Energy	Duty Officer	1800 808 526

This list is to be verified at least annually and updated annually.

9.3 Community Communication

Koramba Gin Operations and Koramba Operations Manager's must assess if community members or their property may potentially be affected by a material pollution incident. If this is the case then community members must be notified without delay by one of the following methods.

- door knocking by a Koramba Ginning representative;
- phone call by a Koramba Ginning representative; or
- in writing if appropriate for a continuing material pollution incident.

The appropriate method of communication will be determined by the nature of the pollution incident and the communication strategy will be determined by the Gin Operations Manager on a case by case basis or as directed by the relevant agency.

10 Site Specific Safety Equipment

Fire Extinguishers	Located throughout the facility
Fire Hose Reels	Located throughout the facility
3 water truck with fire hoses and pump.	All permanent and season yard staff are trained in fire truck use.
Front End Loader and Loader Operators	2 Front End Loaders and 6 Loader Operators
Water storage for filling water trucks	Northwest point of Gin Yard
Safety Data Sheets	Located at the Weighbridge

11 Documentation

The following company documentation is referenced in this procedure:

12 Evaluation & History

Review of this procedure will occur in accordance with the Document & Data Control Procedure.

Version	Date	Author	Approval	Details of Amendments
02		Debra Dalziel	Shaun Wade	
02.1	24/05/2023	Jeff Rutter	Bernie Chisholm	Review & edit Footer
02.2	25/07/2023	Jeff Rutter	Wayne Towns	Include past Scenario's date and description as advised by EPA
02.3	15/09/2023	Jeff Rutter	Wayne Towns	Include 2023 Scenario date and description

13 Appendices

Appendix A Procedure Compliance Checklist
Appendix B Inventory of Potential Pollutants and Conditions

Appendix A Plan Compliance Checklist

The below checklist can be used to assess compliance to the Plan for Pollution Incident Response Management.

Procedure Compliance	Yes	No	N/A	Comment / Evidence / Required Action
Are employees aware of their responsibilities in accordance with the PIRMP?				
Have employees received training in accordance with the PIRMP?				
Are contact details for internal and external notifications clearly displayed in the workplace?				
Are pollution incidents reported and investigated?				
Are After Action Reviews conducted within 30 days of a pollution incident?				
Has this plan been tabled and discussed at a Management/Safety Meeting?				
Has a Document Control form (or similar) been completed to show all relevant personnel have reviewed this procedure?				

Site: ---------- Date Completed: ----------

Checklist Completed By: ----------

Corrective actions must be raised for any no's that are identified. This checklist should be maintained as evidence for audit purposes.

Appendix B Inventory of Potential Pollutants and Conditions

Potential Pollutants

Potential pollutants kept or used in carrying out activities at Koramba Ginning including the maximum quantity of any potential pollutant that is likely to be stored or held at the premises summarised as follows:

Pollutant Substance	State	Classification	UN No	Quantity	Location	Containment	Risk Factors	Control
Used Motor Oil	Liquid	-	-	minimal	Farm	Ground storage	Ground contamination from a leaking tank	Third party regularly attends site to removed the contaminated waste
Oil / Water based paint	Liquid	-	-	minimal	Maintenance Room	Pressurised cans	Ground contamination from leaking containers	Minimal amount kept on site
Herbicides / Pesticides	Liquid	-	-	minimal	Chemical Shed	Chemical Shed	Ground contamination from leaking containers	Minimal amount kept on site
Lead Acid Batteries	Liquid	Metal Corrosion Category 1, Acute Toxicity (Inhalation) Category 2, Skin Corrosion/Irritation Category 1A, Serious Eye Damage Category 1	2794	minimal	Chemical Shed	Chemical Shed	Ground contamination from leaking batteries - possible acid contamination of aquifer	Minimal amount kept on site
Gas Bottles	Gas	-	-	minimal	Welding Shed	Welding Shed	Possible contribution to ozone depletion from leaking bottle	Minimal amount kept on site
Petrol	Liquid	3	1203	minimal	Chemical Shed	Chemical Shed	Ground contamination from a leaking tank	Minimal amount kept on site
Diesel	Liquid	Category 4 Acute Toxicity (Inhalation) - Category 4 Skin Corrosion/Irritation - Category 2 Carcinogenicity - Category 2 Specific Target Organ Toxicity (Repeated Exposure) (Bone Marrow, Liver And Thymus) - Category 2 Aspiration Hazard - Category 1	3082	100,000	Located around the Gin	Ground and above ground storage	Ground contamination from a leaking tank	Storage tanks to be inspected for damage and subsequent leaks
LPG	Gas	Flammable Gases: Category 1	1075	minimal	Welding Shed	Cylinders	Possible contribution to ozone depletion from leaking bottle	Minimal amount kept on site

Potential Pollutant Conditions

Potential Pollutant Conditions	Risk Factors	Pre Emptive Action	Emergency Level	Risk
Oil / Fuel Spill	* Soil contamination * Explosion/fire * Contamination of adjacent land and / or waterways * Creation of volatile fumes	* Retain minimum quantities on site * Creation of bunded storage areas * Fire Extinguishers * No smoking zone	Site / External	Low
Failure of mobile plant hydraulic lines	* Soil contamination * Explosion/fire * Contamination of adjacent land and / or waterways * Creation of volatile fumes	* Routine plant inspection and servicing. * Fire Extinguishers * No smoking zone	Site / External	Low
Dust / Sediment (Soils & Wastes)	* Dust / sediment migrating off site	* Wet down unsealed trafficable areas and maintain sedimentation systems (if applicable)	Site / External	Low
Litter	* Litter migrating off site	* Provide routine cover to waste * Erect semi-permanent litter fences * Provide mobile litter fence units & relocate to match conditions. * Litter collection activities * Fire Extinguishers * No smoking zone	Site / External	Low
Chemical Spills	* Chemical spill from ruptured or leaking storage containers	* Retain minimum quantities on site * Separation areas between stored chemicals * Creation of bunded storage areas * Use approved chemical storage * Fire Extinguishers * No smoking zone	Site / External	Low
	* Incompatible or incorrect chemical storage	* Retain minimum quantities on site * Separation areas between stored chemicals * Creation of bunded storage areas * Use approved chemical storage * Fire Extinguishers * No smoking zone	Site / External	Low
Ozone depleting gas release	* Global warming	* Routine plant inspection and servicing	Site / External	Low

Cotton modules/ Cotton Trash	* Fire * Smoke	* Fire breaks / roads & segregate module pad. * Fire Extinguishers * No smoking zone	Site / External	Low
Gin Cotton	* Fire * Smoke	* Monitor module moister levels. * Fire Extinguishers * No smoking zone	Site / External	Low
Cotton Bale	* Fire * Smoke	* Monitor module moister levels. * Fire Extinguishers * No smoking zone	Site / External	Low