



AUSTRALIAN FOOD & FIBRE
POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

APPROVED JUNE 2024

Pollution incident response management plan

Licence number: 20586

Purpose:

AFF Properties No 1 Pty Ltd (AFF) holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Hay Gin. As per the *Protection of the Environment Operations Act 1997* (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

The PIRMP ensures the comprehensive and timely communication about a pollution incident to staff at the premises, the relevant authorities, and people outside the facility who may be affected. It helps to minimise and control the risk of a pollution incident at the facility and ensures that, if a pollution incident were to occur, staff at the facility understand the risks, controls and their respective responsibilities. In summary, this document aims to:

- Set out the requirements for the notification, response, and management of potential pollution incidents.
- Nominate key staff responsible for the notification, response, and management of incidents, including a description of their responsibilities.
- Minimise and control the risk of a pollution incident at the facility through the identification of hazards and risks and the development of planned actions to minimise and manage those risks.
- Ensure that the plan is implemented effectively by responsible and trained staff and to test the plan regularly for accuracy, currency, and suitability.

The POEO Act defines pollution as either 'water pollution', 'air pollution', 'noise pollution' or 'land pollution'. '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. Notification is required if a pollution incident causes or threatens to cause 'material harm to the environment'. 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.

The POEO Act requires licensees to:

- implement their PIRMP if, in the course of an activity, a pollution incident occurs that causes or threatens to cause material harm (as defined in Box 1.3)
- notify any 'material harm' pollution incidents, in accordance with the requirements set out in the 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.

Environment Protection Licence (EPL) details

Name of licensee:
(including ABN) AFF Properties No 1 Pty Ltd

EPL number: 20586

Premises name and address:
Hay Gin
10991 Lot 21 Cobb Highway
PO Box 267
Hay NSW 2711

Company or business contact details
Name: Kiri Rogan
Position or title: Sustainability Manager
Business hours contact number/s: 0431 018 205
After hours contact number/s: 0431 018 205
Email: krogan@australianfoodandfibre.com.au

Website address: australianfoodandfibre.com.au

Site based activity: Agricultural Processing

Pollution incident – person/s responsible

If a pollution incident occurs at the site or outside the site because of the site activities, the following individuals have been nominated with key responsibilities.

PIRMP activation
If a material pollution incident occurs this person must immediately implement this PIRMP.

Name of person responsible: Harley Hey
Position or title: Gin Manager
Business hours contact number/s: 0455 789 153
After hours contact number/s: 0455 789 153
Email: hhey@australianfoodandfibre.com.au
Alternative person: Acting shift manager

Pollution incident – person/s responsible, continued

Notifying relevant authorities
(excluding EPA)

Name of person responsible: Harley Hey
Position or title: Gin Manager
Business hours contact number/s: 0455 789 153
After hours contact number/s: 0455 789 153
Email: hhey@australianfoodandfibre.com.au

Notifying relevant authorities - EPA

Name of person responsible: Kiri Rogan
Position or title: Sustainability Manager & EPA Liaison
Business hours contact number/s: 0431 018 205
After hours contact number/s: 0431 018 205
Email: krogan@australianfoodandfibre.com.au

Managing response to pollution incident

Name of person responsible: Harley Hey
Position or title: Gin Manager
Business hours contact number/s: 0455 789 153
After hours contact number/s: 0455 789 153
Email: hhey@australianfoodandfibre.com.au

**Managing response to pollution incident –
alternate contact person (in absence of
responsible person)**

Name of person responsible: Wayne Towns
Position or title: General Manager - Ginning
Business hours contact number/s: 0428 991 480
After hours contact number/s: 0428 991 480
Email: wtowns@australianfoodandfibre.com.au

Notification of relevant authorities

It is a requirement to **immediately** notify the following regulatory authorities where a pollution incident has or is likely to occur.

Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

Fire and Rescue NSW / Rural Fire Service	Contact number/s:	000
EPA	Contact number/s:	131 555
NSW Health	Relevant Area Health Service:	Albury
	Contact number/s:	02 6933 4800
SafeWork NSW	Contact number/s:	131 055
Local Council	Contact number/s:	02 6990 1100

The following individuals and organisations may be needed after a pollution incident

SES Rescue Squad	Contact number/s:	02 6932 9199 (CC)* 13 25 00 (HDO)** 0429 038 777
Regional EPA (Griffith) – Darren Wallet	Contact number/s:	02 6969 0700 0427 255 214
SafeWork NSW (Griffith) – Stuart Larkin	Contact number/s:	131 050
Fire Brigade – General Business (Hay)	Contact number/s:	02 6993 1101
Bush Fire Brigade	Contact number/s:	02 6993 4213
Local Police (Hay)	Contact number/s:	02 6993 1100
Local Hospital (Hay)	Contact number/s:	02 6990 8700

The POEO Act requires verbal notification to each relevant authority followed by notification in writing within 7 days of the date on which the incident occurred. The initial verbal notification and written notification report must include the following information, if known:

- Time, date and duration of the incident;
- Duration of the event;
- Locations where pollution is occurring or is likely to occur;
- Nature, estimated quantity or volume and concentration of any pollutants involved, if known*;
- Circumstances in which the incident occurred (including the cause of the incident, if known)*; and
Action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution

Internal reporting of a pollution incident

In the event of a pollution incident, site personnel must notify the Gin Manager or the acting Shift Manager who will then contact the following personnel:

- General Manager - Ginning
- Work, Health & Safety Manager
- Sustainability Manager

Details about the incident and management response will be escalated to the CEO and CFO.

Description and likelihood of hazards

Site/Facility	Hazard	Likelihood	Pre-emptive actions
LPG Storage tank	Rupture of tank or fill hose during filling operation.	Low	<ul style="list-style-type: none"> • Tank is located a reasonable distance from the main gin building and office. • Tank undergoes regular maintenance. • Tank is filled and maintained by a reputable LPG supplier. • Tank is designed with a pressure sensor to continuously monitor pressure inside the tank and to indicate the point at which the tank is considered full or nearing capacity. • Tank is designed with an auto-shut off system, once the pressure within the tank reaches or exceeds a specified threshold or if a potential hazard such as a leak or rupture occurs, the auto shut-off system will be activated.
	Fire resulting from leak and external ignition source.	Low	<ul style="list-style-type: none"> • Fire hoses and fire extinguishers are provided and maintained at tank. • Fire truck is in close proximity to tank and other key infrastructure. • Area surrounding tank is maintained be free of vegetation and ignition sources.
Trash Yard	Fire resulting from burning trash from gin. Fire could be transported and dumped into the trash yard from the Gin Mote, setting alight stored trash.	Low	<ul style="list-style-type: none"> • Cotton trash remains on site and is processed into mulch/compost via organic breakdown. • Trash is stored in long windrows which limits the quantity of trash that would burn. • The trash yard is isolated from the main work area and module storage yards. • A trash yard fire would generate a reasonable amount of smoke but would not put people in danger. • Windrows to be kept at distance from each other to eliminate cross fire risk.
	Contaminated runoff from yard after rain.	Low	<ul style="list-style-type: none"> • Drainage ditches have been developed to manage the flow of potential run off in a high rainfall or flooding event, which diverts run off water from the trash yard to an onsite storage dam. This drainage system is continually maintained. • There is little chance of contaminants from the compost contaminating surface water such as a river due to the distance from these water sources.
Module Yard	<p>Fire resulting from stored cotton modules could be set on fire through a number of avenues:</p> <p>A “hot” module that is delivered to the yard and ignites.</p>	Low	<ul style="list-style-type: none"> • The Company has a comprehensive firefighting manual and procedures. • AFF has an extensive investment in firefighting equipment. • The module yard is separated from the main work areas and a fire would generate a reasonable amount of smoke but would not put people in danger. • Any fire out-break would be quickly contained and extinguished. • Any module that is suspect to being “hot” is to be isolated in designated area.

	External ignition source.		
Bale Pad	Fire – Stored cotton bales ignited by fire bales from gin. A fire would generate considerable heat and smoke.	Low	<ul style="list-style-type: none"> • Staff are trained on identifying at risk bales and on the procedures to manage products which may be subject to fire. • Identified fire bales are segregated from the stored bales for a period of fourteen days. • Comprehensive firefighting manual and procedures. • Extensive investment in firefighting equipment. • Fire truck is located in close proximity to the bale pad.
Cyclone System	General site dust Potential cyclone malfunction causing gin dust emissions to atmosphere	Low	<ul style="list-style-type: none"> • Dust is visually monitored by operations team. • If required, water trucks can be used for dust control. • Cyclones are located externally to the work area and pose minimal health risk.
Transformer Yard	Fire – Release of inert oil of up to 1000lt. from transformers.	Low	<ul style="list-style-type: none"> • The transformers are owned and maintained by Essential Energy and undergo an inspection and maintenance program. • Transformer yards located in areas away from main work areas.
	Toxic fumes and smoke released to atmosphere.	Medium	<ul style="list-style-type: none"> • Exposure to fumes and smoke could cause serious health problems. • Essential Energy will be contacted immediately upon identification of any potential risk of fumes and/or smoke being released.

Inventory of pollutants

The following list outlines the pollutants stored or held on the premises:

Pollutant	Location(s)
LPG	LPG Storage Tank
Cotton Trash	Trash Yard
Gin Dust	Cyclone Rack
Diesel Fuel	Diesel Storage Shed
Oil/Toxic Fumes	Electricity Transformer – Gin 11
Chemical	Electricity Transformer – Gin 11

Safety equipment

The following list outlines the specified safety equipment needed for specific types of hazards.

Hazard	Equipment
Fire	<p>Isuzu Fire Truck – At fire storage shed. On edge of bale pad exclusion zone</p> <p>Water Tanker – At fire storage shed. On edge of bale pad exclusion zone</p> <p>Suppressant Foam – Within fire storage shed</p> <p>200kl water supply – directly beside fire shed and fire pumps</p> <p>Diesel water pump set – Withing fire fighting shed</p> <p>Hydrant and hose reel system – Multiple reel and hydrant stations within the gin. Located beside exits for safe use.</p> <p>Fire extinguisher – Multiple within the gin. Located beside exits for safe use</p>
Chemical spill	Spill containment kits – located beside any oil storage unit

Communicating with neighbours and the local community

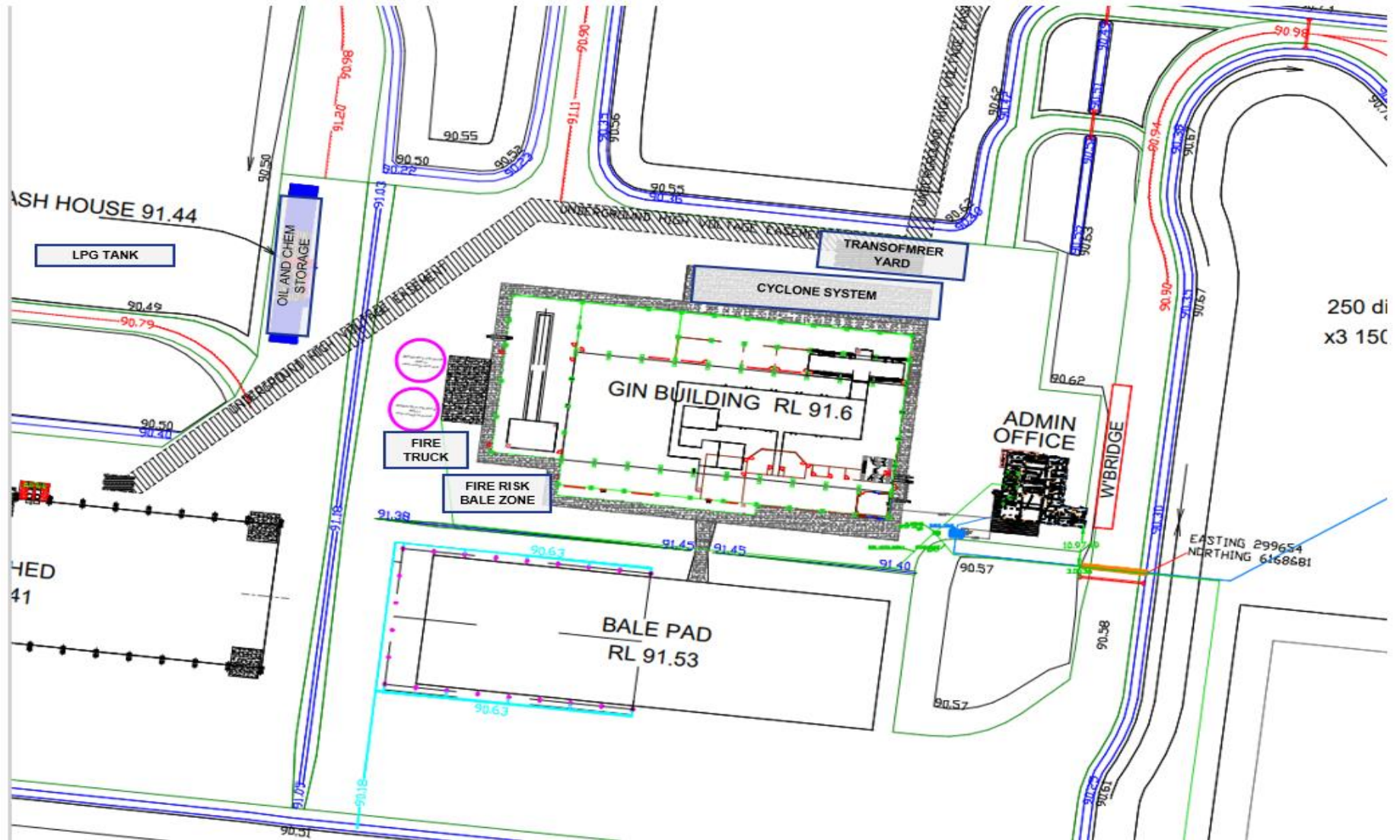
The Ginning Manager and the ginning operations team must assess if neighbours or surrounding community members have potentially been affected by a material pollution incident. If this is the case, then community members must be notified without delay by one of the following methods.

- door knocking by a Hay Ginning representative;
- phone call by a Hay 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 Manager on a case-by-case basis or as directed by the relevant agency.

Maps

A. Key locations



B. Water storage and run off drainage



Staff training

Training is provided to reduce the potential risks of a pollution incident. All staff are required to attend a seasonal induction and training session at the beginning of each Ginning Season. The induction program will include an information and training session on:

- Firefighting procedures,
- Module, Trash Yard and Bale Pad surveillance
- Operate Fire Fighting Equipment
- Fire Drills
- Emergency response procedures.

Management staff are required to attend annual crisis management simulation exercise.

Testing and updating of the PIRMP

It is a legal requirement to test the plan every 12 months and within one month of any pollution incident that caused or threatened material harm to the environment.

Date	Pollution Response Scenario
21/06/2016	Trash Yard Fire
17/05/2018	LPG Storage Tank rupture of tank or fill hose
31/05/2019	Trash Yard Fire
17/06/2020	Bale Pad Fire
02/06/2021	FEL Front End Loader fire in the module yard
21/07/2022	Moonbuggy Collision with Diesel Fuel Tank
17/06/2023	Gin Trash Yard Fire
10/06/2024	Oil spill inside facility

This PIRMP has undergone a significant update in 2024 as part of a general review and alignment to the EPA guidelines. While annual reviews and updates have been performed historically, this is the first review documented as part of this new process and format.

Version	Review date	Prepared by	Approved by	Nature of review / amendment
4.0	27/06/2024	Kiri Rogan – Sustainability Manager	Wayne Towns – General Manager, Ginning and Cara Moore – Chief Financial Officer	General review of PIRMP and alignment to the EPA guidelines.

Actions to be taken during or immediately after a pollution incident

