



**AUSTRALIAN FOOD & FIBRE
POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN**

NARRABRI COTTON GIN

LICENCE NO. 6957

REVIEWED AND APPROVED: 25/11/2024

Pollution incident response management plan

Licence number: 6957

Approved by: Wayne Towns

Date: 25/11/2024

Position/Title: General Manager Ginning

Purpose:

AFF Properties No 1 Pty Ltd (AFF) holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Narrabri 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: AFF Properties No 1 Pty Ltd
(including ABN)

EPL number: 6957

Premises name and address: Narrabri Gin
21154 Kamilaroi Highway
PO Box 303
Narrabri NSW 2390
Phone 02 6799 14001957

Company or business contact details
Name: Mark Noble
Position or title: Gin Manager
Business hours contact number/s: 0428 991 479
After hours contact number/s: 0428 991 479
Email: mnoble@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: Mark Noble
Position or title: Gin Manager
Business hours contact number/s: 0428 991 479
After hours contact number/s: 0428 991 479
Email: mnoble@australianfoodandfibre.com.au
Alternative person: Acting shift manager

Pollution incident – person/s responsible, continued

Notifying relevant authorities

Name: Mark Noble

Position or title: Gin Manager

Business hours contact number/s: 0428 991 479

After hours contact number/s: 0428 991 479

Email: mnoble@australianfoodandfibre.com.au

Alternative person: Acting shift manager or relative representatives (WHS Manager or Sustainability Manager)

Managing response to pollution incident

Name: Mark Noble

Position or title: Gin Manager

Business hours contact number/s: 0428 991 479

After hours contact number/s: 0428 991 479

Email: mnoble@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 6799 6866
The following individuals and organisations may be needed after a pollution incident		
Fire & Rescue NSW (Including Hazardous Materials Response Unit)		000 or 1300 729 579
Ambulance Service of NSW		000 or 131 233 / 02 - 6777 2293
Department of Primary Industries (NSW Fisheries)		1300 550 474
POISONS Information		131 126
NSW Ministry of Health (Public Health Unit)		(Tamworth) 02 – 6764 8000
Department of Families & Community Services		1800 079 098
State Emergency Service (SES)		132 500
Service NSW		13 77 88
Origin Energy		1800 808 526

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 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. Drainage channels are maintained to minimise weeds.
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 windrows which limits the quantity of trash that would burn. The trash yard is isolated from the main work area and module storage yards. 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. All runoff is captured in a closed drainage system which runs to a lift pump where it is pumped into earthen wall dam.
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> <p>External ignition source.</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.
Bale Pad	Fire – Stored cotton bales	Low	<ul style="list-style-type: none"> Staff are trained on identifying at risk bales and on the procedures to manage

	<p>ignited by fire bales from gin. A fire would generate considerable heat and smoke.</p>		<p>products which may be subject to fire.</p> <ul style="list-style-type: none"> • 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.
Diesel Fuel Storage	<p>Spill. Tank overfilled, hit by passing machinery</p>	Low	<ul style="list-style-type: none"> • Above ground storage. Not located near waterway, equipment available to contain leaking diesel.
Cyclone System	<p>General site dust Potential cyclone malfunction causing gin dust emissions to atmosphere</p>	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	<p>Fire – Release of inert oil of up to 1000lt from transformers.</p>	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.
	<p>Toxic fumes and smoke released to atmosphere.</p>	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
Chemical	Electricity Transformer

Safety equipment

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

Hazard	Equipment
Fire	Isuzu Fire Truck – On western side of Main Gin Building. Water Tanker – Mobile in gin yard. Suppressant Foam – On western side of Bale Storage shed. At Airstrip 200kl water supply – directly beside fire shed and fire pumps. Diesel water pump set – Withing fire pump shed Hydrant and hose reel system – Multiple reel and hydrant stations within the gin & bale and seed storage sheds Fire extinguisher – Multiple within the gin and gin buildings.
Chemical spill	Spill containment kits – located beside all oil storage units, diesel tanks and in chemical shed

Communicating with neighbours and the local community

The Gin 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 Narrabri Ginning representative.
- phone call by a Narrabri 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



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
18/06/2021	Front End Loader on fire in module yard
22/08/2022	Fire in trash yard
23/05/2023	Fire in trash yard with strong winds blowing towards module yard
01/09/2024	Major oil leak main press tank

This PIRMP has undergone a significant update in 2024 as part of a general review of EPLs 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.

Review date	Prepared by	Approved by	Nature of review / amendment
25/11/2024	Kiri Rogan (Sustainability Manager) and Mark Noble (Gin Manager)	Wayne Towns – General Manager, Ginning	General review of PIRMP and alignment to the EPA guidelines.

Actions to be taken during or immediately after a pollution incident

Asses

- Identify the risk or potential risk taking into account:
 - What is the substance being discharged?
 - What is the volume of discharge?
 - What is the risk to health and safety?
- 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;
- 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 cannot be identified evacuate the area and notify relevant stakeholders;
- If the discharge has the potential to cause adverse harm to persons, property or the environment, progress to containment.

Contain

Only proceed to this step if it is 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;

Notify

- Call 000 if applicable, then 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).

Clean up

Only proceed to this step if it is safe to do so

- 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

Close out

- Assist external authorities with any investigations (if applicable);
- Conduct an internal investigation (if applicable);
- Complete internal reporting (if applicable);
- Organise restocking of equipment (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.
- Implement corrective actions to avoid reoccurrence.