



AUSTRALIAN FOOD & FIBRE
POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN
TRANGIE GIN
LICENCE NO. 11204
REVIEWED AND APPROVED: 25/11/2025

Pollution incident response management plan

Licence number: 11204

Approved by: Wayne Towns

Date: 25/11/2025

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 Trangie 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: 11283

Premises name and address: Trangie Gin
Mitchell Highway Trangie
PO Box 160
Warren NSW 2824

Company or business contact details
Name: Sam Freeth
Position or title: Gin Manager
Business hours contact number/s: 0427 277 391
After hours contact number/s: 0427 277 391
Email: sfreeth@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: Sam Freeth
Position or title: Gin Manager
Business hours contact number/s: 0427 277 391
After hours contact number/s: 0427 277 391
Email: sfreeth@australianfoodandfibre.com.au
Alternative person: Acting shift manager

Pollution incident – person/s responsible, continued

Notifying relevant authorities

Name: Sam Freeth

Position or title: Gin Manager

Business hours contact number/s: 0427 277 391

After hours contact number/s: 0427 277 391

Email: sfreeth@australianfoodandfibre.com.au

Alternative person: Acting shift manager or relevant representatives (WHS manager and Sustainability manager)

Managing response to pollution incident

Name: Sam Freeth

Position or title: Gin Manager

Business hours contact number/s: 0427 277 391

After hours contact number/s: 0427 277 391

Email: sfreeth@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: | Western NSW |
| | Contact number/s: | 02 6809 8600 |
| SafeWork NSW | Contact number/s: | 131 055 |
| Local Council | Relevant LGA: | Narromine Shire Council |
| | Contact number/s: | 02 6888 7661 |

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 |
| Trangie Fire Station | 02 6888 7422 |
| Trangie Police Station | 02 6870 2370 |
| 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 |
| 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, if known

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.

Potential pollutants and pre-emptive actions

| Site/Facility | Hazard | Likelihood | Pre-emptive actions |
|---|--|------------|--|
| Diesel storage tank | Rupture of tank or fill hose during filling operation. | Low | <ul style="list-style-type: none"> • Tank is bunded to eliminate the risk of an uncontrolled leak. • Fire extinguisher is provided and maintained at tank. • Spill kit is provided and maintained at tank. • Fire tanker is near tank and has easy access to the site. • Area surrounding tank is maintained to be free of vegetation and ignition sources. |
| | Fire resulting from leak and external ignition source. | Low | |
| Gin facility and other storage areas | Chemical or oil spill from ruptured or leaking storage containers. | Medium | <ul style="list-style-type: none"> • Chemical, battery and oils are kept in bunded storage areas. • Minimum quantities are retained on site. |
| | Failure of mobile plant hydraulic lines. | Low | <ul style="list-style-type: none"> • Routine inspection and servicing. • Fire extinguisher is provided and maintained in area. |
| Trash yard | Ignition of cotton in trash yard. | Low | <ul style="list-style-type: none"> • Cotton trash remains on site and is processed into compost on site. • 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. • Windrows to be kept at distance from each other to eliminate cross fire risk. |
| Module yard | Fire resulting from stored cotton modules could be set on fire through a "hot" module that is delivered to the yard and ignites, or an external ignition source. | Low | <ul style="list-style-type: none"> • Any module that is suspect to being "hot" is to be isolated in designated area. |
| Bale pad | Stored cotton bales ignited by fire bales from gin. | 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. • Fire tanker is located in close proximity to the bale pad. |
| Cyclone system | General site dust and potential cyclone malfunction causing gin dust emissions. | Low | <ul style="list-style-type: none"> • Dust is visually monitored by the ginning team. • If required, water tanker can be used for dust control. • Cyclones are located externally to the work area. • Cyclones are regularly serviced and maintained. |
| Roads | Dust created by general site traffic. | Low | <ul style="list-style-type: none"> • If required, water tanker can be used for dust control. |
| Local waterways | Contaminated runoff | Low | <ul style="list-style-type: none"> • Drainage ditches have been developed to manage the flow of potential runoff in a high rainfall or flooding event, which diverts runoff water from the property to onsite storage dams. |

Inventory of pollutants

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

| Pollutant Substance | State | Classification | UN No | Quantity | Location | Containment | Risk Factors | Control |
|-------------------------|--------|---|-------|---------------|------------------------|----------------------|--|--|
| Used Motor Oil | Liquid | - | - | minimal | Old seed shed | 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 Shed | 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 | 14,500 litres | Located around the Gin | Above ground storage | Ground contamination from a leaking tank, Bunded Large tank. | Storage tanks to be inspected for damage and subsequent leaks |
| LPG | Gas | Flammable Gases: Category 1 | 1075 | 60,000 Litres | Gas tanks area | Large tanks Qty x 2 | Possible contribution to ozone depletion from leaking bottle | Inspected regularly, fire hose real nearby and fire tanker. |

Safety equipment

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

| Hazard | Equipment |
|----------------|--|
| Fire | Water Tanker – Parked at Seed Shed No 4 400kl water supply – directly beside fire shed and fire pumps Diesel water pump set – Withing fire fighting shed Hydrant and hose reel system – Multiple reel and hydrant stations within the gin. Located beside exits for safe use. Fire extinguisher – Multiple within the gin. Located beside exits for safe use |
| Chemical spill | Spill containment kits – located beside any oil storage unit |

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 Trangie Ginning representative;
- phone call by a Trangie 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 |
|------------|---|
| 25/08/2021 | Front end loader on fire in module yard |
| 17/08/2022 | Moonbuggy collision with diesel storage tank |
| 13/10/2023 | Gin trash yard fire, with strong winds directed towards the Gin module yard |
| 25/11/2024 | Seed shed fire |
| 14/10/2025 | Trash yard fire |

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 & Sam Freeth – Gin Manager | Wayne Towns – General Manager, Ginning | General review of PIRMP and alignment to the EPA guidelines. |
| 25/11/2025 | Kiri Rogan – Sustainability Manager | N/A | Annual review – minor updates (review of contact details, updated pollution scenario tests). |

Actions to be taken during or immediately after a pollution incident

