

# POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Cool Off Pty Ltd  
EPA Licence No. 11867



Contents

1. Purpose ..... 3

2. Overview ..... 3

3. Definition ..... 4

4. Documentation ..... 4

5. Evaluation ..... 4

6. Hazard, Likelihood and Pre-emptive action to prevent pollution incident risks ..... 5

6.1. Overview ..... 5

6.2. Pollution Types ..... 5

7. Risk assessment and Control Measures (pre-emptive actions) ..... 6

7.1. Identification of Risks and Risk Rating ..... 6

7.2. Risk Matrix Table ..... 8

8. Map ..... 9

9. Management and Responsibilities ..... 11

10. PIRMP Management staff and Responsibilities ..... 11

11. Incident Management ..... 12

12. Inventory of potential pollutants stored/used at site ..... 13

13. Procedure to be followed for Combating the Pollution Caused by a Spill Incident ..... 13

14. Site Evacuation Procedures ..... 14

15. Early Warnings and Communications to Neighbours ..... 14

16. Emergency Incident Response Procedures ..... 14

17. Testing, Review and Maintenance ..... 15

18. Training (All Staff & Contractors) ..... 16

19. Availability and Location of This Plan ..... 16

20. Testing of plan ..... 17

## 1. Purpose

Cool-Off Pty Ltd holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for 271 Jude Rd Howlong NSW 2643. 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.

If a pollution incident occurs during 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.

A copy of this plan must be kept at the licensed premises, or where the activity takes place and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website. The sections of the plan that are required to be publicly available are set out in section 74 of the Protection of the Environment Operations (General) Regulation 2022.

This plan has been developed in accordance with the Protection of the Environment Operations Act 1997 and the Protection of the Environment Operations (General) Regulation 2022.

CoolOff has also referred to the EPA's Guideline: Pollution incident response management plans in the development of this plan.

The PIRMP will be implemented only if material harm to human health or the environment occurs or threatens to occur.

It is to clearly define the requirements of Cool Off Pty Ltd, and related entities, Murray River Pet Food, HIVE and Staughton Group staff to report and respond to pollution incidents in accordance with the 2011 and 2012 changes to the POEO Act 1997 and the POEO (General) Regulation 2010

## 2. Overview

Cool-Off Pty Ltd operates a petfood processing which operates under the conditions of EPA licence no. 11867. This document outlines Cool-Off Pty Ltd.'s requirements under the Protection of the Environment Operations Act (POEO Act 1997) in response to potential pollution incident. Cool-Off Pty Ltd has approval to process the following scheduled activities:

Scheduled Activity	Fee Based Activity	Scale
Livestock processing activities	General animal products production	0 - 100000 T annual production capacity
Livestock processing activities	Rendering or fat extraction	0 - 4000 T annual production capacity

### Site identification

- Address: 271 Jude Rd, Howlong, NSW 2643 Australia.
- Real property description: LOT 10 DP 753744, LOT 66 DP 753744, LOT 67 DP 753744, LOT 68 DP 753744, LOT 69 DP 753744, LOT 93 DP 753744, LOT 94 DP 753744
- [Co-ordinate: -35.976922, 146.657240](#)
- Owner: Cool-Off Pty Ltd (BHJ) and its related entities
- Local Council Area: Federation Shire Council
- Present use: Livestock processing activities
- Environment Protection Licence: 11867

### 3. Definition

- EPA Environmental Protection Authority
- PIRMP Pollution Incident Response Management Plan
- POEO Protection of the Environment Operations Act 1997
- EPL Environment Protection Licenses
- CO Cool-Off Pty Ltd

#### Pollution Incident

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 notified if there is a risk of '[material harm](#) to the environment', which is defined in section 147 of the POEO Act as:

- (a) harm to the environment is material if:
  - (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
  - (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$50,000 (or such other amount as is prescribed by the regulations), and
- (b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment
- (c) For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs

There are new associated offences, for individuals and corporations, for not preparing a plan, not keeping the plan at the premises to which it relates, not testing the plan in accordance with the Regulations and not implementing the plan in the case of an incident.

### 4. Documentation

The environmental incident register is used to record and monitor all environmental incidents within the Cool Off Pty Ltd Site including that of the Murray River Pet Food Operations. The register will assist with record keeping, reporting and determining improvements to incident response and review of the Plan.

#### [Incident Register](#)

The environmental hazard register is used to identify, risk assess, and outline controls used in the event of said event.

#### [Hazard Register](#)

The Chief Executive Officer, is responsible for monitoring and measuring the effectiveness of incident management and of this Plan.

Additional Information

Effective date: 1st of December 2014

Review date: Annual

### 5. Evaluation

This Pollution incident Response management Plan (the Plan) complies with the requirements under the:

- POEO Act 1997 Part 5.7A Duty to Prepare and implement Pollution Incident Response Management Plans

- POEO (General) Regulation 2009 Part 3A

The requirements under the legislation are supported by the [Environmental Guidelines: Preparation of pollution incident response management plans](#), which provides additional advice from the EPA on Plan preparation.

Plan preparation is a requirement for holders of Environment Protection Licenses (EPLs). Cool Off Pty Ltd operates under EPL no.11867 and is therefore required to prepare a PIRMP and implement the PIRMP if and when an incident occurs.

Key areas which this Plan covers are described in table 1 PIRMP Requirements.

## 6. Hazard, Likelihood and Pre-emptive action to prevent pollution incident risks.

### 6.1. Overview

This chapter deals with the POEO (General) Regulation 2009's sections 98(a) to 98(f) and partially covers s98(j). These sections deal with the hazard, likelihood and pre-emptive actions which are similar processes to undertaking a risk assessment and providing appropriate control measures to proven or minimise these risks.

Cool Off Pty Ltd is Australia's premier supplier to the pet food manufacturing industry. Operating for over 30 years, Cool Off has specialised in red meat offal sourcing, chilling, and quality control and processing. The dried treats and chews are manufactured in partnership with Cool Off by Murray River Pet Food Pty Ltd.

The most likely environmental emergencies that may be encountered include, but not limited to:

- Odour emitting from process
- Gas leak from bulk gas tank
- Ammonia leak
- Fuel spill (diesel) from bulk tank
- Excessive noise impacting on the neighbouring residents
- Trade Waste / Wash Down Water from the factory impacting on public land
- Chemical entering storm water drains
- Product (Raw / Finished) spill during transport

Overall considerable design is in place to effectively minimise the likelihood and impact of a pollution incident. However, such incidents despite the best design and management methods can occur. Such accidental events are also covered in the Plan by the use of incident response methods.

### 6.2. Pollution Types

Pet Food Manufacture by its nature has a limited list of typical pollution types which are required to be considered under the PIRMP. This list covers the main types of waste which could cause potential incidents found on the premises as a consequence of the Cool Off Howlong site operation.

- Water
- Chemical
- Odour
- Organic Material
- Noise <sup>\*refer note</sup>

Note: Noise is not classified as a pollution incident under section 148 of the Protection of the Environment Operations Act 1997 (POEO Act). The Act defines a pollution incident as the leak, spill, or escape of a substance causing or threatening material harm to the environment, which excludes sound or vibration. Noise is managed separately under the POEO Act and the Noise Control Regulation 2017 and is therefore not covered by this Pollution Incident Response Management Plan.

## 7. Risk assessment and Control Measures (pre-emptive actions)

### 7.1. Identification of Risks and Risk Rating

Assessment analysis and control measures to minimise or prevent any risk of harm to the environment arising out of the relevant activity.

#### Land / Water

Item Number	Sub Category	Hazard	Cause	Likelihood	Consequence	Rating	Controls	Residual Risk
HZR0007	Land	Degradation of pasture soil and water table	Contamination of soil and water table due to the excessive minerals in the factory wash down water	C	3	Moderate	1. Daily irrigation/pasture inspection 2. Monthly factory washdown water sampling and testing 3. Annual Performance Report 4. Annual Performance Report Action Plan	Low
HZR0099	Land	Bi product to ground	Not sufficient equipment or process to capture and secure waste fluid to ground	C	2	Moderate	1. Bunded Chem Units 2. Use of portable bunding for IBCs' 3. Spill Kits 4. irrigation process	Low
HZR0017	Water / Land	Chemical Spill.	Chemical escape to drains / land during operational use (receiving, storage, production).	D	2	Major	1. Receivals managed via approved licenced logistics carriers. 2. Bunded self contained storage cabinets 3. Spill kits and procedure. 4. Chemical Handling Training 5. MSDS available	Low
HZR0019	Water / Land	Flooding impacting land and water	1 in a 100 year flood Event	D	1	Moderate	1. External redirection of trade waste via tanker 2. Pasture irrigation area.	Moderate

#### Noise

Item Number	Sub Category	Hazard	Cause	Likelihood	Consequence	Rating	Controls	Residual Risk
HZR0008	Noise	Condenser Equipment noise	Doors of the compressor rooms left open	C	3	Moderate	Operator Observation Keep the doors closed	Low
HZR0097	Noise	Excessive noise from operations	Truck brakes	C	3	Moderate	1. Transport Contractors made aware of brake type to be used	Low
HZR0098	Noise	Excessive noise from operations	Bins being dropped or moved by scrapping along the ground	C	3	Moderate	1. Operations receivals teams being made aware of the issues	Low

## Air

Item Number	Sub Category	Hazard	Cause	Likelihood	Consequence	Rating	Controls	Residual Risk
HZR0001	Air	Pasture emitting odour	Factory Wash down water pooling and omitting odour on evaporation and degradation of water nutrients as a result of irrigator break down	C	3	Moderate	1. GPS tracking of irrigators, alerts and escalations 2. Four irrigators installed and commissioned with two operating at any time 3. Pasture Management (daily surveillance)	Low
HZR00010	Air	Rendering Plant emitting odour	Out feed air from stack emitting odour	C	3	Moderate	Treatment via Bioscrubber	Low
HZR0002	Air	Pasture emitting odour	Factory Wash down water pooling and omitting odour on evaporation and degradation of water nutrients as a result of increased bacterial load	C	3	Moderate	1. Pooling and water stagnation controlled by GPS management of irrigators 2. Pasture Response (use of lime) 3. Pasture Management (daily surveillance)	Low
HZR0003	Air	Rendering Plant emitting odour	Out feed air emitting odour due to Bioscrubber performance loss	C	3	Moderate	1. Bioscrubber monitoring and maintenance program 2. Odour surveillance program	Low
HZR0004	Air	Rendering Plant emitting odour	Out feed air from stack emitting odour due to Bioscrubber breakdown	C	4	Low	1. Bioscrubber monitoring and maintenance program 2. Maintenance Escalation System	Low
HZR0005	Air	Rendering Plant emitting odour	Off spec product being process	C	3	Moderate	1. Operator training in suitable raw material 2. Outsource off spec product for rendering or re purpose to off site worm farm (fertiliser production) 3. Odour surveillance program	Low
HZR0006	Air	Factory wash down water emitting odour	Waste water tanks overflowed.	C	3	Moderate	1. Inspection of bund area 2. Inspection of wash down area 3. Waste Water Treatment Plant Alarms	Low
HZR0011	Air	Rendering Plant emitting odour	Out feed air from stack emitting odour	C	3	Moderate	Purchase and installation of particle identification probe in outfeed stack. This shuts the plant down in the event of increased particles being exhausted. (TBA)	Low
HZR0012	Air	Co Product Waste	Factory Co Product Processing Waste aging and deteriorating	C	4	Low	1. Odour surveillance program 2. Waste located at east away from township. 3. Use of cool room facilities to maintained product quality. 4. Disposal to EPA approved off site waste facility as required	Low

**Air (continued)**

Item Number	Sub Category	Hazard	Cause	Likelihood	Consequence	Rating	Controls	Residual Risk
HZR0013	Air	Aged Co Product processing	Deterioration of product prior to processing	C	3	Moderate	1.Processing speed 2.Capacity to hold, cover and chill prior to processing 3. Odour surveillance program	Low
HZR0014	Air	Baking plant emitting odour	Odour risk unlikely	D	4	Low	Odour surveillance program	Low
HZR0018	Air	Discharge of Ammonia gas	Breach in ammonia lines / system	C	2	Major	1. Maintenance and refrigeration personnel trained in Ammonia management. 2. Gas detectors in operation on site. Refrigeration rooms / personnel (Personal portable monitors) 3. Preventative MP maintenance on the refrigeration system. 4. Vent to atmosphere (Outdoors) 5. Amonia Response Plan	Medium

**7.2. Risk Matrix Table**

**Catastrophic** - An event or impact that causes irreversible, widespread, and severe environmental damage

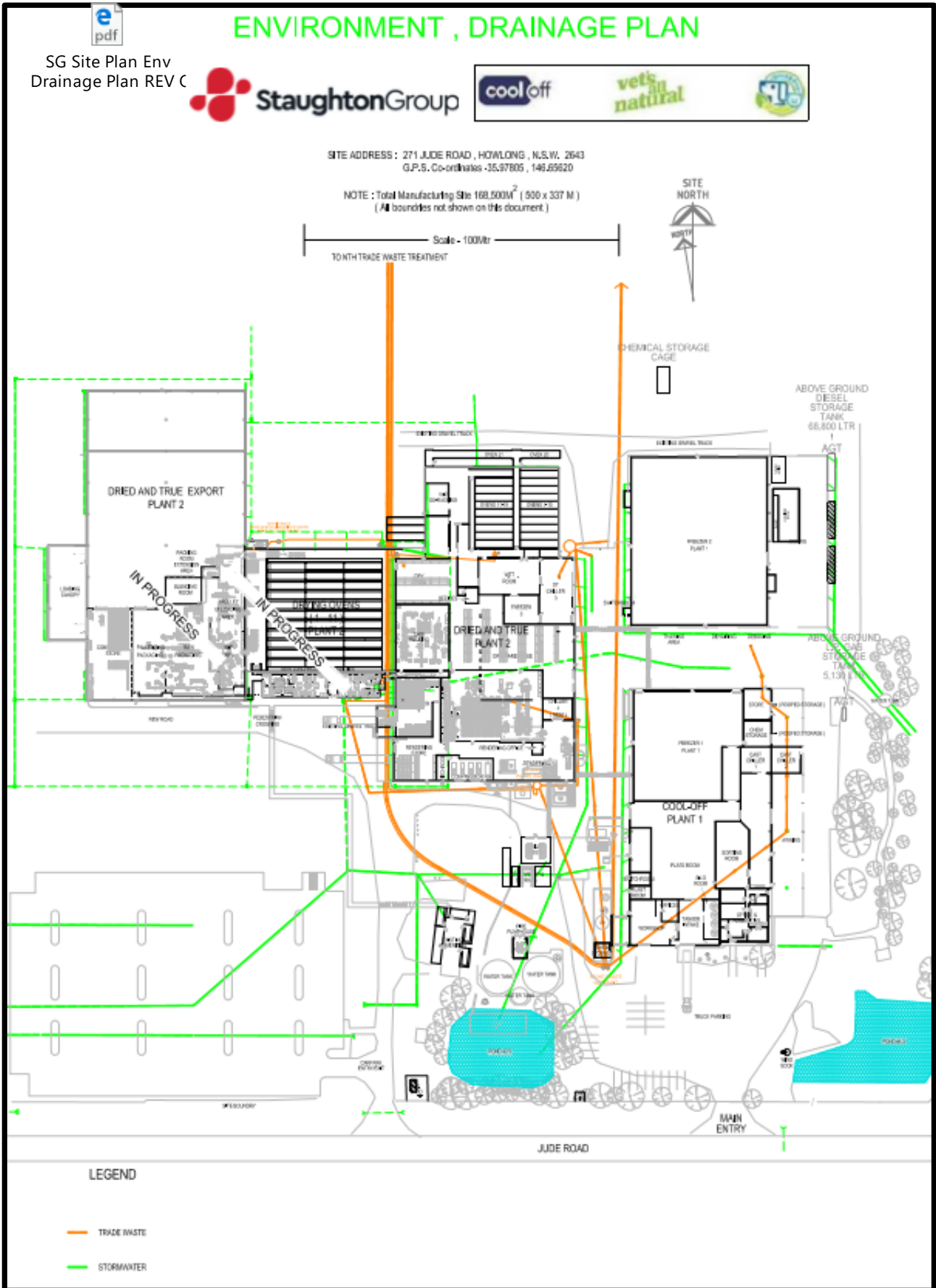
**Major** –An event that results in significant environmental harm, but recovery is possible over time with substantial remediation.

**Moderate** – An event causing localized and temporary environmental impact, which can be managed and remediated with routine measures.

**Minor** – An event with negligible or very limited environmental impact, easily controlled and corrected..

LIKELIHOOD	CONSEQUENCE			
	1 Catastrophic	2 Major	3 Moderate	4 Minor
<b>A - Very Likely</b>	High	High	High	Medium
<b>B - Likely</b>	High	High	Medium	Medium
<b>C - Unlikely</b>	High	Medium	Medium	Low
<b>D - Very unlikely</b>	Medium	Medium	Low	Low

# 8. Map



↑ Farmland ↓

scale = 100:1



SITE ADDRESS: 271 ADE ROAD, HOWLONG, NJ, JULY 2013  
GPS: 40°49'45.00" N, 74°09'00.00" W

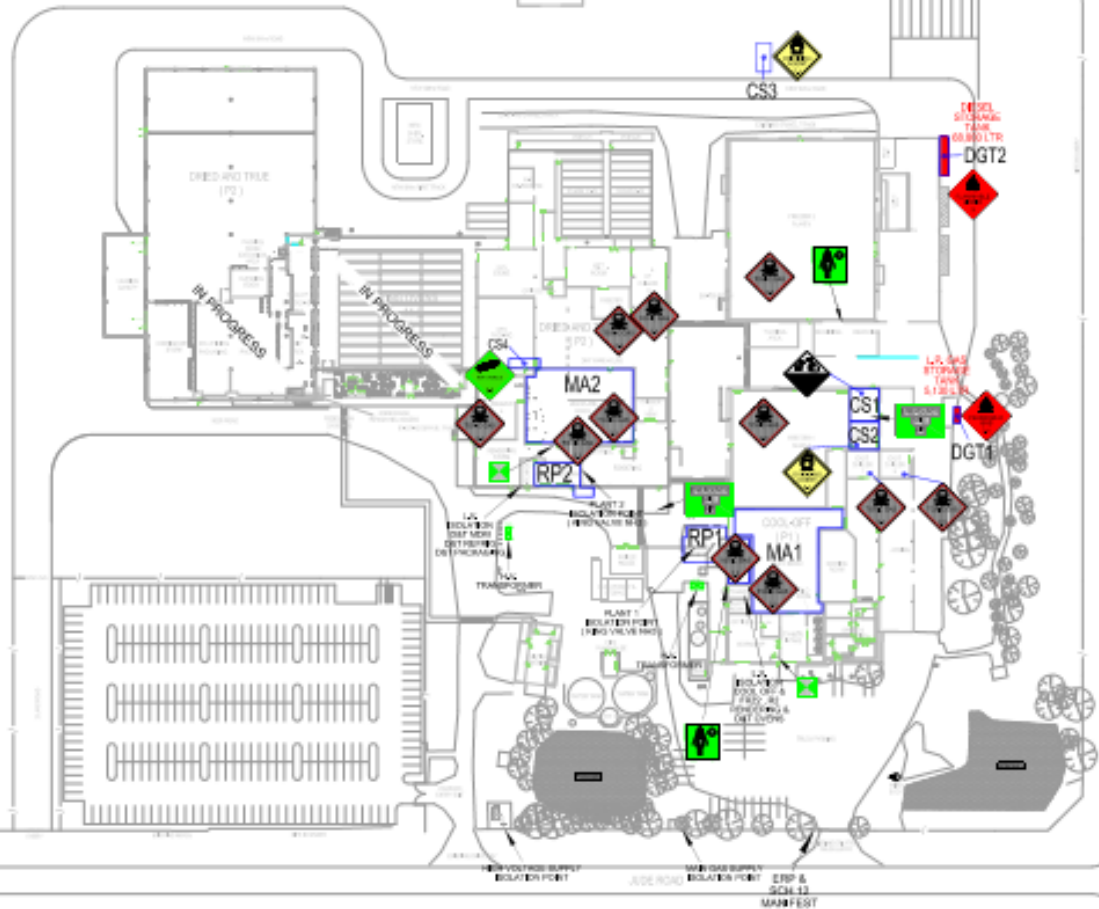
NOTE: Total Manufact. Area = 180,000 sq ft (50' x 327 ft)

**SCHEDULE 11 HAZ-EM STORAGE AREAS**

- |  |  |
|--|--|
| RP-1 REFRIGERATION PLANT 1 (CLASS 2.1) | MA-1 MANUFACTURING PLANT 1 (CLASS 2.2) |
| RP-2 REFRIGERATION PLANT 2 (CLASS 2.1) | MA-2 MANUFACTURING PLANT 2 (CLASS 2.2) |
| DGT-1 BULK TANK 1 (CLASS 2.1)          | CS-1 CHEMICAL STORAGE 1 (CLASS 3)      |
| DGT-2 BULK TANK 2 (COMBUSTIBLE LIQUID) | CS-2 CHEMICAL STORAGE 2 (CLASS 3)      |
| SAFETY SHOWER                          | CS-3 CHEMICAL STORAGE 3 (CLASS 3)      |
| EMERGENCY RESPONSE CABINET             | CS-4 CHEMICAL STORAGE 4 (CLASS 2.2)    |
| EMERGENCY SPILL KIT                    |  |

↑ Howlong Industrial Estate ↓  
(light industrial)

↑ Farmland ↓



↑ Farmland ↓

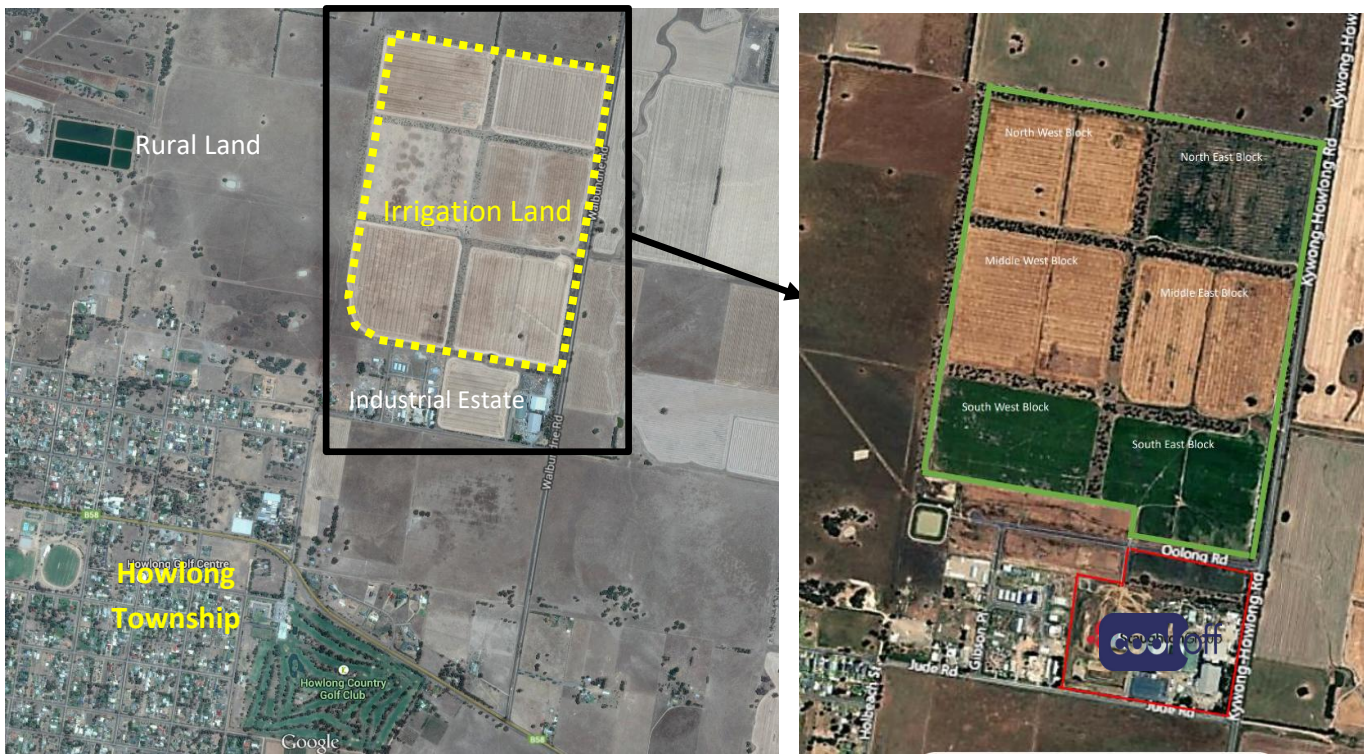


VK LOGIC  
200 N. J. HWY. 100  
SUITE 100  
MILLSBORO, NJ 08063  
TEL: 856-234-1100  
WWW.VKLOGIC.COM

SITE LAYOUT - DANGEROUS GOODS/CHEM STORAGE  
SCHEDULE 11 HAZARDOUS CHEMICALS

DATE: 07/2013  
DRAWN BY: [Name]  
CHECKED BY: [Name]

NO.	DESCRIPTION	DATE	BY
1	ISSUE FOR PERMIT	07/2013	[Name]
2	ISSUE FOR PERMIT	07/2013	[Name]
3	ISSUE FOR PERMIT	07/2013	[Name]
4	ISSUE FOR PERMIT	07/2013	[Name]
5	ISSUE FOR PERMIT	07/2013	[Name]



## 9. Management and Responsibilities

All employees and contractors have a legal duty to notify management personnel to all environmental incidents, or hazards which may result in an environmental incident, regardless of the nature or scale.

Notification responsibilities can be found in the POEO Act (Section 148), which includes all site personnel, including contractors and sub-contractors. All employees including any persons undertaking activities within the site must immediately, once aware of a potential incident, notify the below mentioned managers of the incident and all the relevant information. Employers who are notified or otherwise become aware of a potential pollution incident must notify the appropriate regulatory body of any “Material harm incidents” (section 9). Notification procedures and appropriate contact numbers can be found in section 12.

The specific responsibilities associated with the management and implementation of this PIRMP is outlined in Table 8.1 below.

## 10. PIRMP Management staff and Responsibilities

Name	Position	Contact	Responsibility
Matt Fankhauser	Cool Off Chief Executive Officer	+61 439 370 995	<ul style="list-style-type: none"> <li>Responsible for authorising the PIRMP and all future updates</li> <li>Responsible for notifying authorities in the event of an incident</li> </ul>
Derrick Addison	Compliance & Environment Manager	+ 61 447 287 008	<ul style="list-style-type: none"> <li>Responsible for coordinating the response to a pollution incident</li> <li>Responsible for arranging testing and updating of the PIRMP</li> </ul>

			<ul style="list-style-type: none"> <li>• Communication of the PIRMP to all site personnel.</li> <li>• Facilitate site personnel in implementing the PIRMP</li> </ul>
Jason Ennis	Cool Off Operations Manager	+61 400 683 120	<ul style="list-style-type: none"> <li>• Responsible for notifying authorities in the event of an incident</li> </ul>
Russel Steddar	Work Health and Safety Manager	+61 474 757 753	<ul style="list-style-type: none"> <li>• To enact the Operations Manager duties in the event of absence</li> </ul>
Leona Tooley	Senior R&D and Quality Manager	+61 478 487 588	<ul style="list-style-type: none"> <li>• To enact the Operations Manager duties in the event of absence</li> </ul>

## 11. Incident Management

A pollution incident is defined in the POEO Act as 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

In the case of a material harm incident (refer to Section 12), prior to any other action, the site must contact 000 if the incident presents an immediate threat to human health or property. 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.

Simultaneously all evacuation procedures should be implemented for guests and non-essential staff. Checking names of current sign in guests in the sign in book (located at the reception area)

If the material harm incident does not pose any threat to human health or property, concurrently with contacting emergency services (000), all possible actions should be taken to control the pollution incident and minimise health, safety and environmental consequences. These actions must be employed to the maximum extent possible to:

- Provide for the safety of people at and within the vicinity of the site; and
- Contain the pollution incident.

Actions to be taken in the event of a pollution incident, including description and location of safety equipment, for minimising risk of harm to people and the environment as result of a pollution incident, and for containing or controlling a pollution incident, are detailed in section 12

This management plan documents the roles and accountabilities of key personnel in the event of an emergency and the contact details for appropriate emergency services. The plan also provides designated evacuation points and procedures in the event of an emergency.

All employees receive emergency response training during their site induction. All staff undergo regular training and operational drills.

In the event of a pollution incident please follow recording procedures listed in section 12 and keep on file for improvement of incident management protocols.

## 12. Inventory of potential pollutants stored/used at site

Product	Dangerous goods class	Quantity nominally held	MSDS	Product location
Ammonia UN1005	2.3	14,000 litres (32.08 Litres capacity)	Yes	Rear of maintenance workshop & South end of Plant 2
Hydrogen Peroxide UN2014	5.1 (8)	3,000 litres	Yes	Effluent Treatment Plant & Chemical Storage Cabinet
LPG UN1075	2 (flammable gas)	5,100 litres	Yes	LPG bulk tank
Factory wash waters	Not applicable	6 mega litres	Not applicable	Irrigated to pasture
Tallow	Not Applicable	20,000 litres (maximum)	Not applicable	Silos 10,000 x2
Raw Product	Not Applicable	Various	Not applicable	Skips, Silos, Tankers, Production Equipment
Chemicals	Refer to Internal Chemical Register			

## 13. Procedure to be followed for Combating the Pollution Caused by a Spill Incident

For incidents involving material harm, the fire brigade or Hazmat would combat the pollution caused by a spill incident and become the emergency controller.

Pollution incidents - Spills A spill can be the release of any chemical or substance (i.e. – production, waste waters, oil, and fuel) that may potentially enter stormwater, creeks, rivers, ground water or contaminate soil.)

### Clean-up Action

All pollution incidents are required to be acted upon immediately. This is a separate action to that of notification. Where possible both should be undertaken concurrently.

The POEO Act definition of a pollution incident is:

Pollution incident means an incident or set of circumstances during or because 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.

POEO Act definition of "clean-up action", in relation to a pollution incident, includes:

(a) action to prevent, minimise, remove, disperse, destroy or mitigate any pollution resulting or likely to result from the incident, and (b) ascertaining the nature and extent of the pollution incident and of the actual or likely resulting pollution, and (c) preparing and carrying out a

remedial plan of action. It also includes (without limitation) action to remove or store waste that has been disposed of on land unlawfully.

## 14. Site Evacuation Procedures

### **In all incidences only act if it is safe to do so**

Please refer to the Cool Off Emergency Response Plan.

In the event that siren is activated, or you are asked to evacuate a building that you are occupying you must do so immediately. All buildings on site have evacuation plans displayed internally or externally so familiarise yourself with these plans in all areas.

In the event of an incident in your workplace, you may evacuate the area at once and notify the front office should the Fire Brigade or Ambulance be required. Be sure to give the correct address as 271 Jude Road Howlong NSW 2643

In the case of this procedure being put in place (Evacuation) please proceed to the evacuation assembly point (front gate).

Alternatively, if there is a major incident you may be asked to move to another location on site i.e. Gate 1, Gate 2, and Gate 3. This will be advised if required.

Any visitors or guests who would not be noted on visitors sign in register should be brought to the attention of the Manager or Supervisor by the staff member sponsoring the visit. They must be noted as either present or missing.

It may be necessary to move vehicles to provide access to emergency vehicles or prevent danger of exploding fuel where possible staff should bring their keys with them to the assembly point. In addition it is recommended that staff who are going to be away from the site for extended periods leave vehicles in an open area away from the main buildings.

## 15. Early Warnings and Communications to Neighbours

Cool Off Pty Ltd has and would continue to undertake community and stakeholder consultation where necessary.

Should there be an incident. Initial advice if required should be passed onto neighbours and followed up after seeking the advice of the incident controller (usually the fire services site controller) all of these communications should be recorded.

## 16. Emergency Incident Response Procedures

All employees and contractors have a legal duty to notify management to all environmental incidents, or hazards which may result in an environmental incident, regardless of the nature or scale

Under Part 5.7 of the POEO Act, there is a duty to notify each relevant authority (identified below) of a pollution incident, where material harm to the environment is caused or threatened. Material harm includes actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial or that results in actual or potential loss (refer definitions) or property damage of an amount over \$10,000.

For the above pollution incidents, the Chief Executive Officer or their nominee from Cool Off will be responsible for reporting to the authorities below without delay.

Immediately call 000 if an incident presents an immediate threat to human health or property. Fire and Rescue, the NSW Police and the NSW ambulance are the first to respond. These bodies are the first responders and are responsible for controlling and containing incidents.

If the incident does not require an initial combat agency, or once the 000 number call has been placed. Then the senior person on site will notify the relevant authorities.

- |   |                              |
|---|------------------------------|
| 2. Murrumbidgee Local Health District                                   | 02 6080 8900                 |
| 3. Safe Work NSW  | 13 10 50                     |
| 4. Local Council (Federation Shire)<br>after hours for emergencies only | 02 6033 8999 or 1800 110 088 |
| 5. Fire and Rescue  | 000                          |
| 6. Chant Holdings   | 0407 954 546                 |
| 7. BHJ Internal Incident Communication                                  |                              |

Early warnings for affected or potentially affected community members for any pollution incident are to be communicated to those members via a door knock process. The Company Director or nominee will be responsible for coordinating the door knock. Ensure advice from Emergency Services are sought prior to any advice is provided to any resident

For air pollution incidents that may affect neighbours, those neighbours will be asked to close their doors and windows and stay indoors until further notice.

For water pollution incidents that may affect neighbours who could access the said water, those neighbours will be asked to avoid use of the water until further notice.

Regular updates of any pollution incidents will be via letterbox drop to the local community, notices in local papers or via door knocks as required.

Please refer to Management
----------------------------

**Do not publish these details in the WEB version**

## 17. Testing, Review and Maintenance

Testing of the PIRMP will be carried out to check the information is accurate and up to date and that the plan is capable of being implemented in an effective manner. Testing of this plan will be carried out in the following ways:

- The PIRMP will be tested by assessing and reviewing it and making any necessary changes. Testing will include all components of the plan and will occur every 12 months; and
- The PIRMP will be reviewed within one month of the date of any pollution incident that occurs in the course of an activity to which the EPL relates. This review will be undertaken in light of the incident, to determine if the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner as required by the Protection of the Environment Operations (General) Amendment 2012 (POEO(G) Amendment).

Records will be kept in accordance with the POEO(G) Amendment. Information to be retained regarding PIRMP testing includes:

- The manner in which the test was undertaken
- Dates when the plan has been tested
- The person who carried out the testing
- The date and description of any update of or amendment to the plan.

## 18. Training (All Staff & Contractors)

All new staff and contractors undergo a site induction. This will include general information relating to emergency response procedures. As part of the site orientation procedure staff are provided with information relating to routine EPA requirements, including the location of this document.

Training will consist of the following:

1. Awareness of site physical layout
2. Types of environmental site risks
3. Reporting of an environmental incident
4. Environmental incident response
5. GMP training including waste colour coding process

Current staff undergo annual refresher training programs and certificates to minimise the likelihood of a pollution incident. These include a site induction focusing on safety issues related to day to day activities on site, along with all existing protocols relating to chemical handling where relevant to the position. All current staff that are required to handle chemicals will have undertaken a chemical handling training. Designated staff are trained in the appropriate use of firefighting equipment.

A training exercise designed to test the adequacy of emergency preparedness and response will be conducted at least once each year

All staff employed at the time of the commencement of this plan were trained in its implementation and use within 30 days of the plan's commencement date

## 19. Availability and Location of This Plan

The POEO (General) Regulation 2009 s98D (1) states:

(1) A plan is to be made readily available: (a) to an authorised officer on request, and (b) at the premises to which the relevant licence relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan.

The availability of this Plan will be made available on the Cool Off Pty Ltd internal online network. Unlike the EPL this Plan is to only be available to those who are to implement the Plan. This is made clear by The POEO (General) Regulation 2009 s98D (3) which States

*4) Any personal information within the meaning of the Privacy and Personal Information Protection Act 1998 is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1).*

If components of the Plan are considered to contain sensitive private information then only those cleared should be permitted access to the full Plan. Alternative Plans with such sensitive information removed (e.g. contact phone numbers and names) can be more widely distributed. Full plans will be made available to the relevant government agencies, on request or during an incident response activity.

## 20. Testing of plan

Last Conducted: 18 Nov 2025

Conducted By: Derrick Addison

Type: Pasture Irrigation Failure

Present: Derrick Addison compliance & Environment Manager  
Jason Ennis Operations Manager  
Shannon Pope Continuous Improvement Manager  
Callum Philpotts Production Manager  
Andrew Pickthall Production Manager

Findings: as per Track Changes

Amendments: as per Track Changes

Next Testing Date: April 2027