

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

CoolOff Pty Ltd
EPA Licence No. 11867



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1. Overview

This Pollution Incident Response Management Plan (PIRMP or Plan) has been written to comply with the legislative requirements under the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2009*.

Industry is now required to report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council. "Immediately" has its ordinary dictionary meaning of promptly and without delay. These strengthened provisions will ensure that pollution incidents are reported directly to the relevant response agencies so they will have direct access to the information they need to manage and deal with the incident in a faster time.

Under the legislation referred to above, the EPL also requires a PIRMP to clearly document pollution risks, communication procedures to authorities and community regarding pollution incidents, and testing and training for pollution response. If there is a pollution incident involving material harm or threatened material harm to human health or the environment, the PIRMP will be implemented.

The PIRMP contains the following sections as required by the regulation:

- Background describes main features of the regulation
- Hazard, likelihood and pre-emptive actions to prevent pollution incident risks – describes type of pollution incidents that may be possible and lists procedures that are already in place to minimise and manage pollution. Ranking of risks is included in appendices
- Maps – map of project to show location of potentially affected neighbours and environmentally sensitive areas
- Emergency incident response procedures – what to do in case of material harm
- Early warnings and communication to neighbours –when to contact neighbours in case of pollution incidents and info required for website
- Training – information to be passed on to staff and contractors
- Updating of plan – frequency of updates
- Testing – frequency of drills to test effectiveness of PIRMP
- Implementing of plan – reference to legislation requirement to carry out aspects of the plan during a pollution incident

2. Definition

EPA	Environmental Protection Authority
PIRMP	Pollution Incident Response Management Plan
POEO	Protection of the Environment Operations Act 1997
EPL	Environment Protection Licenses

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 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 \$10,000 (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.

3. Purpose

This PIRMP is to improve the way pollution incidents are reported, managed and communicated to the general community.

The purpose of this plan is to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Ministry of Health, SafeWork NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident.
- Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks
- Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

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

This Plan is to clearly define the requirements of 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

4. Documentation

The environmental incident register is used to record and monitor all environmental incidents within the CoolOff Pty Ltd Site including that of the Dried and True Operations. The register will assist with record keeping, reporting and determining improvements to incident response and review of the Plan. The register is kept on the P drive.

The Group Manager Compliance and Regulatory Affairs, 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). CoolOff 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 our sister company Dried & True Pty Ltd, a wholly Australian owned company.

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

- Odour emitting from the process.
- Gas leak from bulk gas tank
- Ammonia leak
- Fuel spill (diesel) from bulk tank
- Noise impacting on the neighbouring residents.
- 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 and environmental systems are 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 environmental types which could cause potential incidents at the premises because of the Staughton Group Howlong site operation.

- Water
- Odour
- Chemical
- Noise

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

Table 6.3.1 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.

Identified Risk / Situation	Possible Hazard(s) to the Environment	Possible hazard(s) to human health	Safety Controls	Risk Rating
Pasture Irrigation operations failure resulting in	Odour	Nil	GPS and Irrigation Operation alarm system. Pasture / Irrigator Inspections	Low
Rendering Plant operations failure	Odour	Nil	Bio Scrubber Technology	Low
1:100 Year Storm event	Water	Nil	Reduction in effluent output through operations management Regular maintenance of irrigation system	Low
Discharge of hazardous material :Ammonia gas	Chemical	Minor	Maintenance and refrigeration resources trained in Ammonia management. Gas detectors in operation on site, Regular maintenance work carried out on the refrigeration system. Ability to vent to atmosphere	Medium
Discharge of Hazardous Materials – Liquid chemicals	Chemical	High	Chemical segregated appropriately in storage area. MSDS available. Bunded chemical storage Chemical clean up	Medium
Degradation of pasture soil and water table	Land	Nil	Daily irrigation/pasture inspection Monthly pasture water sampling and testing Annual Performance Report Annual Performance Report Action Plan	Low

A complete Environmental Risk Register can be found at the following location .

<P:\SEQ\Environment\SG Environmental Hazard Register.xlsx>

Table 6.3.2 Risk Matrix Table

Risk Matrix		Consequence			
		Extreme	Major	Moderate	Minor
Likelihood R1	Almost certain (<i>Occurred before/expected</i>)	High (H)	High (H)	Significant (S)	Significant (S)
	Likely (<i>Probably will occur</i>)	High (H)	Significant (S)	Significant (S)	Significant (S)
	Moderate (<i>May occur at some time</i>)	High (H)	Significant (S)	Low (L)	Low (L)
	Unlikely (<i>Unusual or rare situation</i>)	Significant (S)	Low (L)	Low (L)	Low (L)

High (H) – cease exposure immediately until protection, approved at senior management level, implemented.

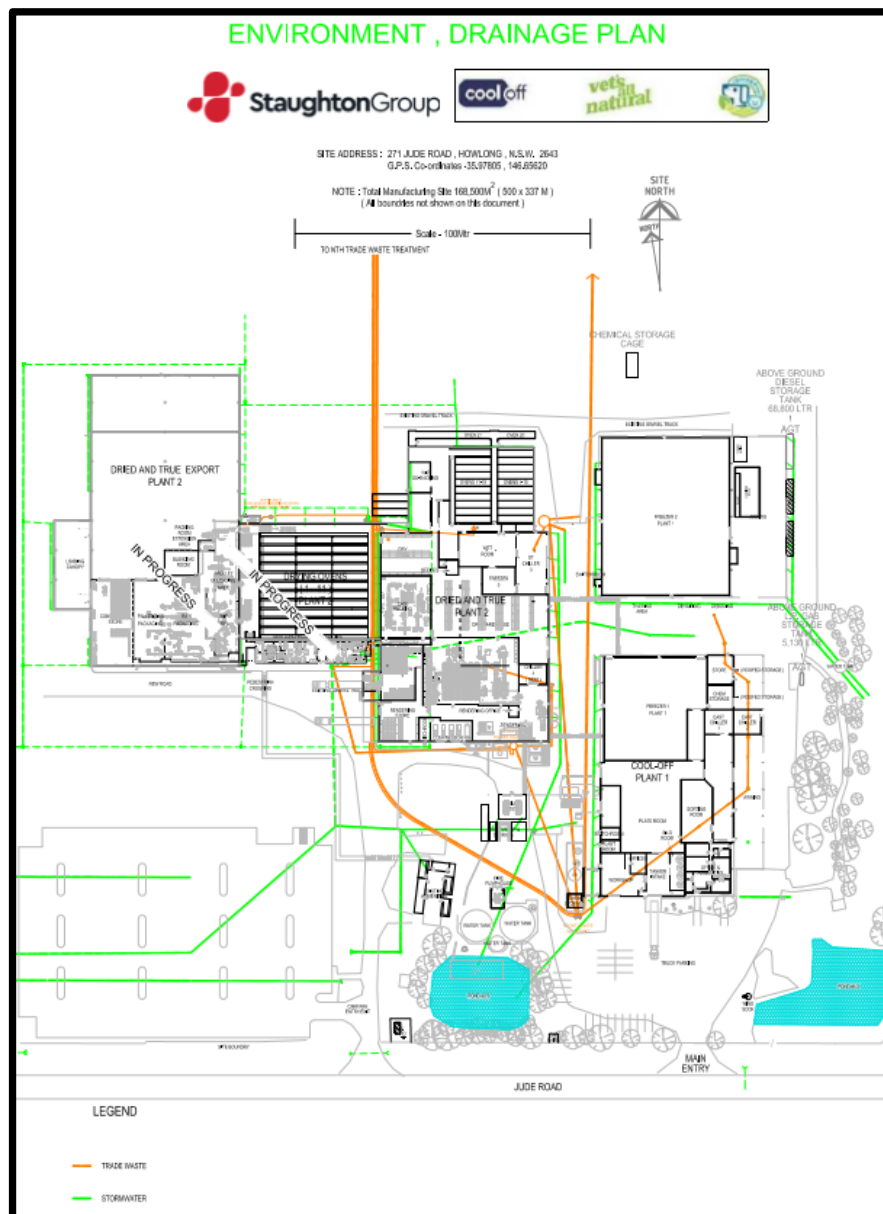
Significant (S) – procedures alone may not be enough, senior management attention required.

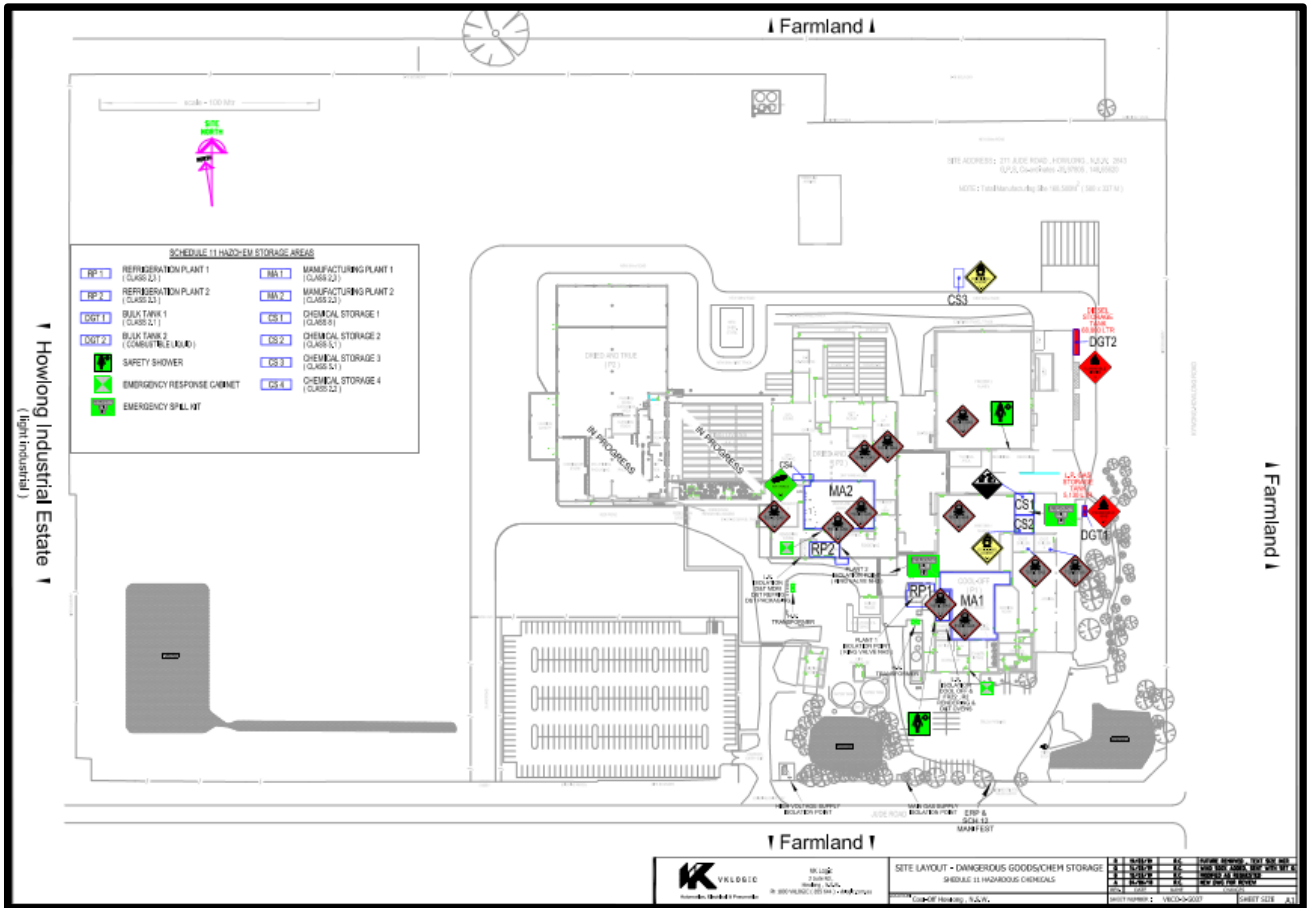
Low (L) – may be managed by routine procedures, some risks in this category may be acceptable.

7. Map



SG Site Plan Env
Drainage Plan REV C





8. 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.

8.1. PIRMP Management staff and Responsibilities

Name	Position	Contact	Responsibility
Edward Staughton	Managing Director	+61 4 1101 9350	<ul style="list-style-type: none"> Responsible for authorising the PIRMP and all future updates Responsible for notifying authorities in the event of an incident
Derrick Addison	Group Manager Compliance and Regulatory Affairs	+61 4 3949 6433	<ul style="list-style-type: none"> Responsible for notifying authorities in the event of an incident Responsible for coordinating the response to a pollution incident Responsible for arranging testing and updating of the PIRMP Communication of the PIRMP to site personnel. Facilitate site personnel in implementing the PIRMP
Russell Steddar	WHS Manager		<ul style="list-style-type: none"> Responsible for notifying authorities in the event of an incident. Responsible for coordinating the response to a pollution incident
All Supervisors/Managers			<ul style="list-style-type: none"> Report all pollution incidents immediately to the GM Compliance & Reg Affairs / WHS Manager

9. 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 and environmental reporting training during their site induction. All staff undergo 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

9.1. Inventory of potential pollutants stored/used at site

Updated May 2023

Product	Dangerous goods class	Quantity nominally held	SDS	Product location
Diesel UN3082	CL1	81,800 litres *	Yes	Fuel bunkers
Ammonia UN1005	Class 2.3/8.0	20,000 litres *	Yes	Rear of maintenance workshop
LPG UN1075	Class 2.1 (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	Reference Chemical Register Appendix 3 ..\..\Quality Assurance\Procedures\Quality\Forms\QUAL_F_118 Chemical Register.xlsm * Maximum Stock Held			

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

For incidents involving material harm, the fire brigade/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 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.

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.

10. Site Evacuation Procedures

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

Please refer to the Staughton Group emergency evacuation policy / procedure

<P:\Quality Assurance\Procedures\Safety\SOP\SAFE SOP 100 Emergency Response Plan.docx>

In the event that alarm 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 your manager or the WHS Manager should the Fire Brigade or Ambulance be required. Dial 4005 for front office or 4003 for Director on internal site phones or 000 for emergency services. 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 or front gate (Entrance). 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 recommend 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.

11. Early Warnings and Communications to Neighbours

CoolOff 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.

12. 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 Company Director or their nominee from Staughton Group 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.

- | | |
|---------------------------------------|-----------------------|
| 1. Environmental Protection Authority | 131555 |
| 2. Department of Health | 02 6080 8900 24 hours |
| 3. SafeWork NSW | 13 10 50 |
| 4. Local Council (Federation Shire) | 02 6023 8999 |
| 5. Fire and Rescue | 000 |
| 6. Chant Holdings Pty Ltd | 0407 954 546 |

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.

Neighbours to be contacted

Please refer to Management

Do not publish these details in the WEB version

13. 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:

Doc: ENV_P_100 PIRMP	Version 10	Updated 15 May 2023	Doc Owner : DAddison	Page 13 of 15
\\COSER01.cooloff.local\Public\Quality Assurance\Environment\ENV_P_100 PIRMP.docx				

- 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.

14. Training

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,

Current staff undergo training programs to minimise the likelihood of a pollution incident. These include a site induction focusing on safety and environmental issues related to day to day activities on site, along with all existing protocols relating to chemical handling where relevant to the position.

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

15. 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 CoolOff 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

16. Staff training

All staff employed at the time of the commencement of this plan will be trained in its implementation and use with 30 days of the plan's commencement date.

All Staughton Group staff will be trained as part of induction to site / employment.

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. Waste disposal process (irrigation)

17. Testing of plan

This plan will be fully tested by the staging of a realistic training scenario within 90 days of the commencement date.

Last Conducted: 15 May 2023

Conducted By: Derrick Addison (GM Compliance & Regulatory Affairs)

Type: Desk top

Present: Russel Steddard (WHS Manager), Shayne Newell (Cool Off Operations Manager), Jordon Serdity (Learning & Development Business Partner)

Amendments: As per Document Change Tracking