BEGA CHEESE LIMITED (NSW Sites) PIRMP

Lagoon Street, Ridge Street, Buckajo road and Angledale road

GPS CO-ORDINATES

Lat - 36°40’05.73” S Long - 149°49’48.45” E

Lat - 36°39’59.60” S Long - 149°49’22.63

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN Lagoon Street, Ridge Street, Buckajo road and Angledale road

LICENCE NUMBER: 1511

Approved by Robert Cronk

Position/Title: Group Manager - Safety and Environment

Drafted by Manjit Randhawa

Signature: 

Date: 23 Aug 2021

PURPOSE:

Bega Cheese Limited NSW sites hold an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for Lagoon Street, Ridge Street, Buckajo Road and Angledale Road. As per the Protection of the Environment Operations Act 1997 (the POEO Act), the holder of an Environment Protection Licence needs to 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.

This plan covers various situations which may arise due to the nature of the business operation and the types of materials stored and handled at the facility. This plan also considers the possible negative impact of a fire in the neighbouring premises.

The objectives of the plan are:

1. To control or limit any effect that an incident or potential incident may have on-site, on neighbouring areas or the environment:
2. To facilitate incident response and to provide such assistance on the site as is appropriate to the occasion.
3. To ensure communication of all vital information as soon as possible.
4. To facilitate the re-organisation and any necessary reconstruction activities so that normal operations can be resumed.
5. To provide training so that a high level of preparedness can be continually maintained; and
6. To provide a basis for updating and reviewing PIRMP procedures.
7. To comply with legal requirements including notification and reporting.

This plan applies to all employees and contractors and all environmental incident types which may cause harm to human health, property, or the environment.

'Environment' includes soil, water, air, plants, and animals that are on or beyond Bega Cheese's premises

LOCATIONS:

A copy of this plan is kept at various locations on the licensed premises. Table1

LOCATION	VERSION UPDATED
MAIN SITE ENTRANCE (Lagoon Street)	October 2026
ADMINISTRATION BUILDING (Lagoon Street)	October 2026
BEGA FIRE BRIGADE (Lagoon Street)	October 2026
MAINTENANCE OFFICE (Lagoon Street)	October 2026
BEGA CHEESE INTRANET	October 2026
MAIN GATE – P1 (Ridge Street)	October 2026
REAR GATE – P4 (Ridge Street)	October 2026
MAIN EMPLOYEE ENTRANCE (Ridge Street)	October 2026
BEGA FIRE BRIGADE (Ridge Street)	October 2026

Environment Protection Licence (EPL) Details	
Name of licensee: (including ABN)	**Bega Cheese Limited** **81 008 358 50**
EPL number:	**1511**
Premises name and address:	**Bega Cheese Limited** **23-45 Ridge Street BEGA NSW** **13 Lagoon Street BEGA NSW** **Lagoon Street, Ridge Street, Buckajo Road and Angledale Road**
Company or business contact details	**Name: Bega Cheese Limited** **Position or title: Manager Business hours contact number/s 02 64991884 After hours contact number/s: 0421475917 Email:** manjit.randhawa@bega.com.au
Website address:	https://www.begacheese.com.au/
Scheduled activity/activities on EPL:	Agricultural Processing
Fee-based activity/activities on EPL:	Dairy Processing

Pollution incident – person/s responsible	
PIRMP activation	**Name of person responsible:** Manjit Randhawa **Position or title:** Manufacturing manager (NSW) **Business hours contact number/s: 02 64991884** **After hours contact number/s: 0421475917** **Email:** manjit.randhawa@bega.com.au **Name of person to contact:** Carolyn Woodland **Position or title:** Safety & Environment Advisor **Contact number/s: 0458343739** **Email:** Carolyn.woodland@bega.com.au

Pollution incident – person/s responsible	
Notifying relevant authorities	**Name of person responsible:** Manjit Rhandhawa **Position or title:** Manufacturing manager (NSW) **Business hours contact number/s: 02 64991884** **After-hours contact number/s: 0421475917** **Email:** manjit.randhawa@bega.com.au **Name of person to contact:** Carolyn Woodland **Position or title:** Safety & Environment Advisor **Contact number/s: 0458343739** **Email:** Carolyn.woodland@bega.com.au
Managing response to pollution incident	**Name of person responsible:** Matthew Taylor **Position or title:** Site Manager DPU **Business hours contact number/s:** 02 64917708 **After hours contact number/s:** 0448250109 **Email:** Matthew.Taylor@bega.com.au **Name of person responsible: Leon Garner** **Position or title:** Site Manager Ridge Street **Business hours contact number/s:** 02 64917707 **After hours contact number/s:** 0418483570 **Email:** Leon.garner@bega.com.au

Notification of relevant authorities

Relevant authorities include:

Authority	Contact AH	Contact number
Merimbula Fire Station		(02) 6495 3062
Bega Fire station		(02) 6492 1775
Emergency Assistance (all hours)		000
Bega Hospital		(02) 6492 9111
Bega Police		(02) 6492 9999
Environment Protection Authority	Environment Line	13 1555
Bega Valley Shire Council	A/H 0428484460	(02) 6499 2222
Ministry of Health Goulburn Office	A/ H 6080 8900	(02) 4824 1840
Poisons Information Centre		13 11 26
WorkCover Authority SafeWork NSW		13 10 50
State Emergency Service		13 25 00
Roads & Traffic		13 22 13
Electricity Supply		13 23 80
Nelson Protective Services		(02) 4473 5081 0498 868 152
Water NSW		1300662077
Major Customer (BRC, Yum, McDonald's)	Quality Manager	Various

Notification of neighbours and the local community

Neighboring Business	Contact AH	Contact number
Caltex		(02) 6492 1833
Boral Concrete		(02) 6492 5277
Bega Truck and Tractor		(02) 6492 5335
Bega Self Storage		(02) 6492 2625
Bega Motorcycles		(02) 6492 3122
Bega and Cobargo Veterinary Hospital		(02) 6492 1837
GH Mechanical		(02) 6492 5247
Home Straight Smash Repairs		(02) 6413 5408
FIMAC Engineering		(02) 6492 2805
Reeves Storage		(02) 6494 7138

NOTIFYING AUTHORITIES PROCEDURE

PURPOSE

This procedure describes the method for reporting pollution incidents and complying with the notification requirements under section 148 of the Protection of the Environment Operations Act. The procedure is publicly available on the Bega Cheese website.

NOTIFICATION

Immediately (promptly without delay) notify the authorities listed in Table 2 of pollution incidents causing or threatening to cause material harm to the environment.

A pollution incident

- Includes a leak, spill or escape of substance, or circumstances in which this is likely to occur.
- Includes contaminating land.
- Includes noise or odour where it is combined with another form of pollution. When noise or odour occurs on its own, it does not need to be notified.

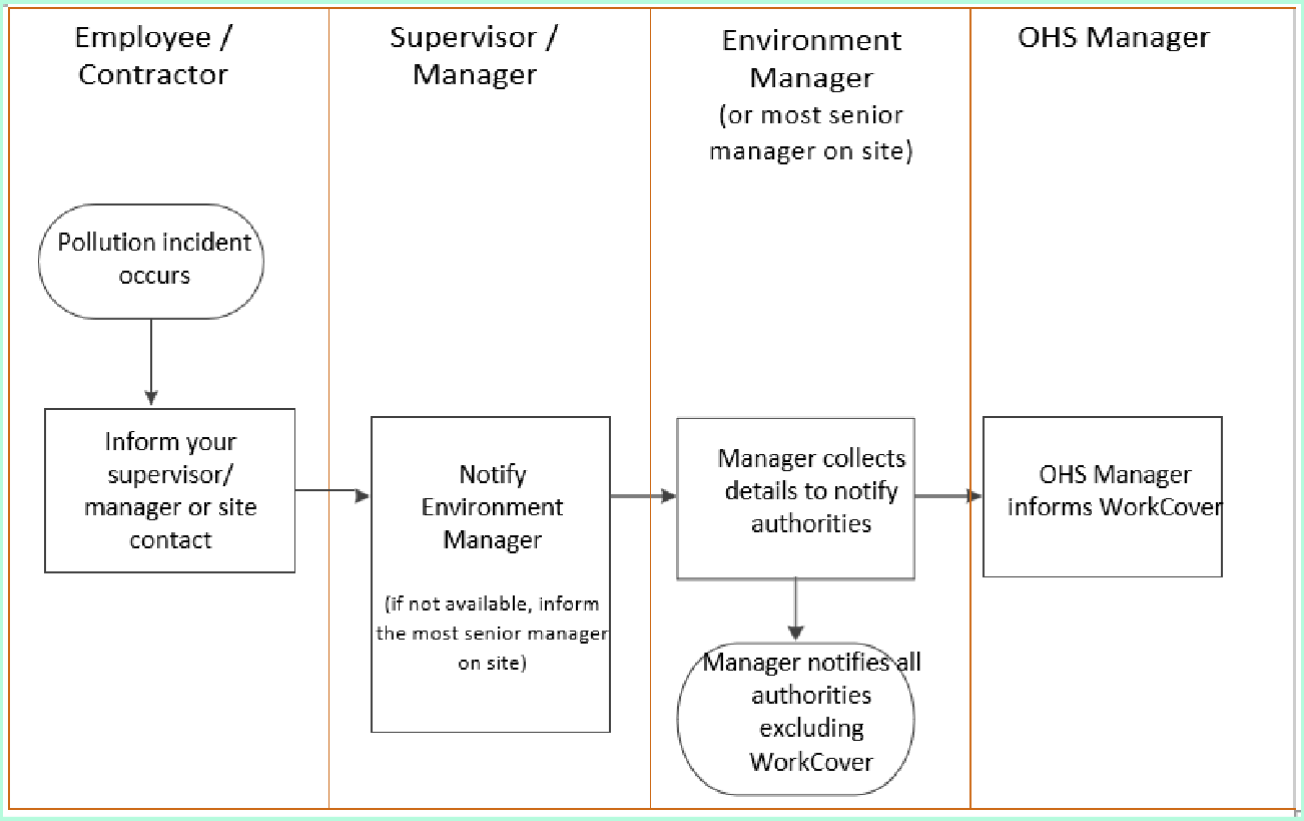
Material harm is.

- harm that is 'not trivial', or
- harm that results in actual or potential loss of more than $10,000 through property damage or cost to prevent, mitigate or fix the harm.

Who notifies?

Any employee or contractor of Bega Cheese who causes, or becomes aware of an incident, must follow the notification responsibility flowchart. This enables the Environment & Sustainability Manager (or the most senior manager on site) to be informed, who then notify the relevant authorities.

Notification responsibility flowchart



Notification Process & Numbers

If the incident presents an immediate threat to human health or property, contact the Emergency Services on 000, followed by each of the other authorities as ordered in table 2 The authorities will coordinate action to prevent or limit harm if necessary.

If the incident does not require emergency services to attend the site, notify the emergency services on the alternative 1300 number in Table 2.

Phone numbers for relevant authorities

Table 2

Authority	Business Hours Contact	After Hours Contact
Emergency Services: • Fire and Rescue • Police • Ambulance	000	000
Environment Protection Authority, Environment Line	131 555	131 555
Ministry of Health, Goulburn Office	4824 1840	6080 8900
Workcover Authority*	13 10 50	9214 9220
Bega Valley Shire Council	6499 2222	0428 484 460

* Safety Manager contacts Workcover, Environment & Sustainability Manager contacts other authorities.

What information is provided?

Sufficient details of the incident must be provided to enable appropriate follow-up action and includes:

- The time, date, nature, duration, and location of the incident.
- Location of the place where pollution is occurring or is likely to occur.
- Nature estimated quantity or volume and concentration of any pollutants.
- Circumstances in which the incident occurred including the causes if known.
- Action taken (or proposed) to deal with the incident and any resulting (or threatened) pollution.

Penalties

Failing to report a pollution incident posing material harm to the environment is an offence under the Protection of the Environment Operations Act. Maximum penalty is $2,000,000 for corporations or $500,000 for individuals.

Other types of 'external' emergencies

Natural Events

Grass/Bush Fire - Nearby vacant grass area is kept well maintained. Earthquake - Unlikely event

Flood – Likely

*It is noted that response from emergency services i.e. Fire Brigade, Ambulance and Police is less than 5 minutes from this site.

Impact Events

Road Vehicles - Strict speed limit on site, security fence / gates kept closed after hours Railway - No possible access

Aircraft - Site is not on any flight path - unlikely event.

Civil Disturbances: Riots - Unlikely event and not further considered.

Bomb Threats - Unlikely event, however instructions to deal with this are in place.

Description and likelihood of hazards/ Pre-emptive actions

Table 2:

Area of Operation	Possible Initiating Events or type of emergencies and Incidents that increase likelihood	Possible Consequences	Inherent Risk	Available Safeguards/Pre-emptive actions	Risk after safeguards
1. General Site	Fire at neighbouring facilities due to ignition from - – Smoking – Unrestricted hot work – Exposed wiring – Welding and cutting operations. – Loss of containment - flammable goods – Ignition of combustible materials – Fire in grass or landscaped areas Or Fire in BEGA CHEESE Facility due to any of the above	• Propagation of fire to Bega Cheese facility. • Potentially hazardous heat radiation. • Release of potentially hazardous (toxic) smoke. • Contaminated fire water may be released off-site. • Fire may impact on stored chemicals causing violent rupture of containers.	A5 High	• Well maintained grounds reduce risk of external fires. • Most of flammable liquids are stored in flammable cabinet at BEGA CHEESE • Good housekeeping maintained throughout facility. • The facility equipped with fire hose reel and portable fire extinguishers. • No hot work at all without permit. • Staff are trained in chemical handling and firefighting. • No smoking permitted outside the designated area. • Response plan in place. • Spill retention and clean up equipment in place. • Refer to: LS-EF-0601 LS-EF-1001 • Refer to: LS-EF-1801	A4 Medium
2. Gas leak	– Ammonia leak – Flammable gas leak	• Human & animal health risk from release of potentially hazardous gas including but not limited to evacuation	A4 Medium	• Ammonia alarm	A2 Low
3. Chemicals' Depots and Yard Areas	Loss of Containment due to - – Vehicle collision with DG package. – Damage of DG package by forklift truck. – DG package dropped from height. – Faulty packaging.	• Spillage in chemical depots or yard areas. • Toxic or corrosive vapour evolution from pool of liquid. • Poisoning or burns to operators. • Released vapours may impact on persons off-site.	C4 High	• Careful handling by operators. • Licensed fork-lift driver. • Different classes of DG separated from each other by more than aisle width. • Well ventilated chemical depots. • Perimeter of chemical depot is bunded. • Spill retention and clean up	C2 Low

		• Spillage may contact other incompatible D.G. causing dangerous reaction. • Release of materials to storm water or factory reuse water collection system with potential damage to biophysical environment.		equipment in place. • Appropriate PPE in place. • Response Plan in place. • Storm water drains marked. • Weekly site inspection in place	
4. Milk storage silos	Loss of containment due to - – Vehicle collision – Failure of equipment	• Spill to lagoon or soil via stormwater drain • Surface water contamination • Ground water contamination • Soil contamination • Offensive Odour	C4 High	• Spill retention and clean up equipment in place. • Response Plan in place. • Spill kits in place • Storm water drains marked. • Risky areas diverted to wastewater	B4 Medium
5. Factory Reuse Water and Wastewater	Loss of containment of factory wastewater tanks due to – – Tank failure – Subsidence during flooding – Irrigation with wastewater – Breach of irrigation infrastructure – Under maintained irrigation infrastructure	• Spill to lagoon • Surface water contamination • Ground water contamination • Soil contamination • Offensive Odour	C5 High	• Spill retention (bunding) and clean up equipment in place. • Response Plan in place. • Annual soil testing • Spill kits in place • Bore water testing. • Wastewater dilution with irrigation • Soil conditioner application • Cleanaway contract for suction truck	C4 High
6. Milk despatch	Loss of containment when filling milk tanker due to Hatch being open	• Spill to lagoon or soil via stormwater drain	A4 Medium	• Spill retention and clean up equipment in place. • Response Plan in place. • Storm water drains marked	A3 Low

7. Hazardous waste storage	Loss of containment due to mishandling during storage or loading onto truck	• Spill to lagoon or soil via stormwater drain	B5 High	• Spill retention and clean up equipment in place. • Response Plan in place. • Storm water drains marked	B4 Medium
8. General operations	Spill of chemical, oil, wash water, contaminant	• Spill to lagoon or soil via stormwater drain	B5 High	• Spill retention and clean up equipment in place. • Response Plan in place. • Storm water drains marked	B4 Medium
9. Emergency clean-up water	Emergency response Fire suppression activity in the factory	• Spill to lagoon or soil via stormwater drain	A6 High	Direct to factory reuse water drains Spill retention and clean up equipment in place. Response Plan in place. Storm water drains marked. Refer to: LS-CM-1201	A4 Medium
10. Boiler	Excessive smoke O2 concentration in chamber High moisture in saw dust Operational failure on the boiler	• Breach of EPA licence limits • Respiratory irritation • Shortness of breath	A6 High	Visual constant camera stream on stack Alert Alarm in place for staff Refer to: Procedure LS-EF-1501 operation of Boiler	A4 Medium

RISK Matrix

Likelihood Level							
	F	Medium	Medium	High	Very High	Very High	Very High
	E	Low	Medium	High	High	Very High	Very High
	D	Low	Medium	Medium	High	Very High	Very High
	C	Low	Low	Medium	High	High	Very High
	B	Low	Low	Medium	Medium	High	Very High
	A	Low	Low	Low	Medium	High	High
		1	2	3	4	5	6
		Consequence Level					

Inventory of pollutants

SUMMARY OF DANGEROUS GOODS HELD AT THE PREMISES

Dangerous Goods Class (DPU)	Quantity
Class 2.1 (gas)	70,000L
Class 3 (liquid)	570L
Class 5.1 (liquid)	4000 L
Class 8 (liquid)	75,200L

Appendix 1: Update list from chem alert for DPU and PPU

Safety equipment

The following Personal Protective Equipment is to be provided and used when attending to clean up chemical spills.

- One use coveralls
- Knee high chemical resistant boots (Wellingtons)
- Chemical resistant gauntlet gloves
- Non-vent, clear chemical goggles
- 250ml minimum eyewash solution (full and ready for use)
- Suitable respirator if necessary – consult MSDS's prior to commencement.
- Spill kits at various locations (Stocked and audited by third party service provider)
- Two-way radios, satellite phone and mobile phones
- Diphoterine

*Replacement stock of the above item**s** must always be kept on hand.*

Communicating with neighbors and the local community

COMMUNITY ENGAGEMENT PROCEDURE

PURPOSE

This procedure describes Bega Cheese's process to engage the community during an environmental incident. NSW EPA regulations require that the document be publicly available on the Bega Cheese website.

CONSIDERATIONS

Potentially affected areas and the site in relation to the greater Bega area is shown in Figure 14.

Community members possibly affected by an environment incident at the Dairy Processing Unit at Lagoon Street include residents in the small North Bega residential area located 300m from the rear of the site, visitors to The Heritage Centre located at the East of the site, and businesses in the North Bega Industrial Area.

Impact on the community depends on the type of incident, intensity, location on site and meteorological conditions. Bega Cheese will engage with neighbours in a timely manner based on potential harm.

The method of notifying the community can vary and depends on the nature of the incident and impact. Community safety is the driving factor in determining actions under this procedure.

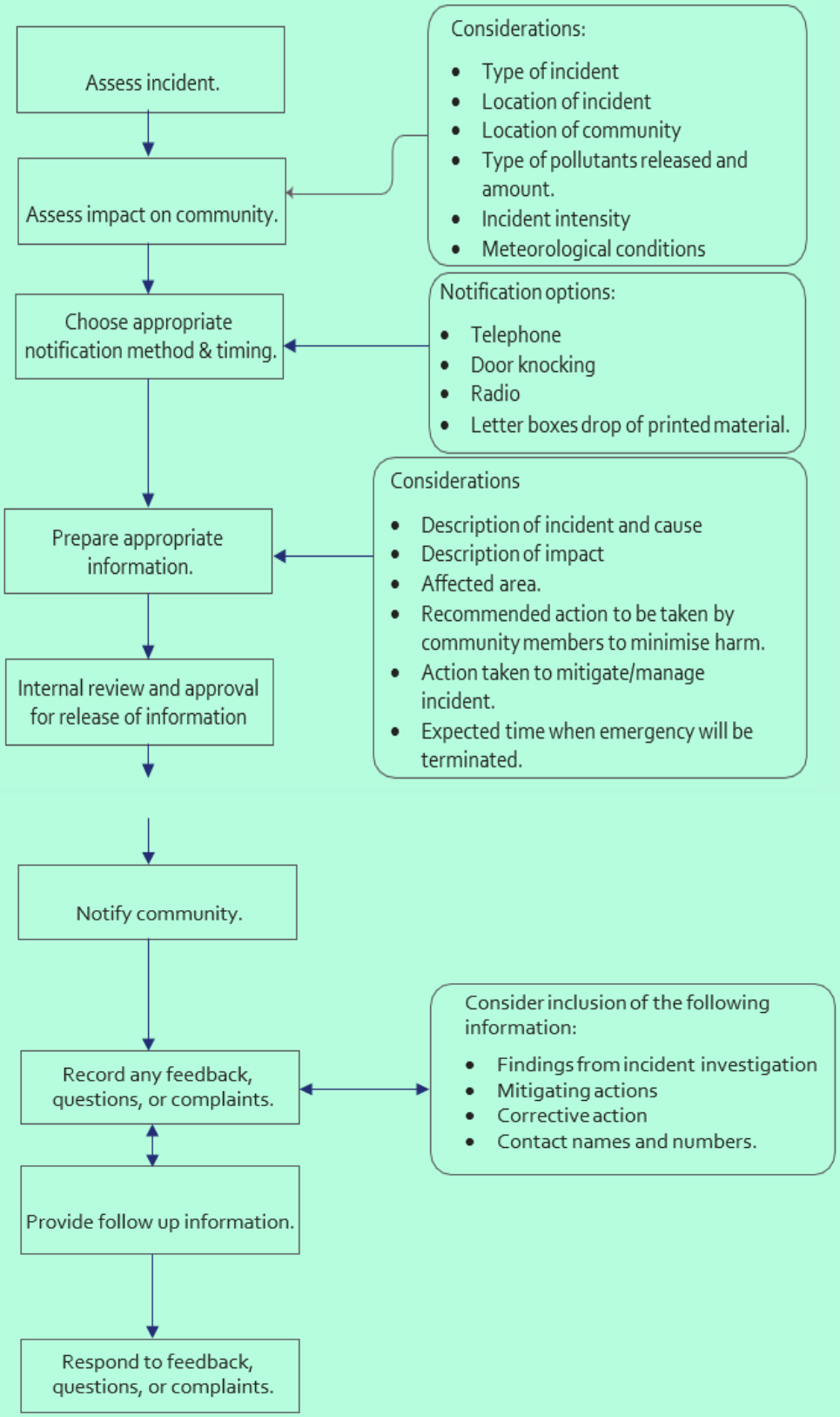
PROCEDURE

The process flow diagram shows the method of impact assessment and community engagement.

REVIEW & APPROVAL

The Chief Executive Officer or Executive Chairman must authorise notification of the community and the content of the notification.

Process for Informing Community During an Incident



Minimising harm to persons on the premises

Following actions are taken to prevent the impact of the pollution incident.

- Prevent spills, fire hose water, retardant or clean up water from running off-site and direct to holding tanks 1 and 2, if possible, via wastewater drains.
- Stop irrigation if holding tanks 1 and 2 are contaminated or likely to become contaminated.
- Divert irrigation water to the buffer tank at the wet weather storage dam if needed to prevent overflow of tanks 1 and 2 into the lagoon. If the buffer tank is full, divert into the dam.
- Do not release substances from holding tanks until disposal method has been approved by the Environment Manager.
- Prevent contamination of stormwater drains by creating bunds around them or covering them with drain covers.
- If stormwater drains at the West end of the site are contaminated, the fluid will drain to the lagoon:
- Plug the stormwater pipe exit points to prevent the spill from entering the lagoon.
- Place absorbent material or hay bales around the pipe exit
- Do not release substances contained in stormwater drains and pipes until disposal method has been approved by the Environment Manager.
- If stormwater drains at the East end of the site are contaminated, the fluid will drain to soil and the ditch at the North-East corner of the site.
- Check the drainage valve to the lagoon is closed.
- Do not release substances contained in the ditch until disposal method has been approved by the Environment Manager.
- If the factory reuse water tank 1 or 2 fails:
- Place booms on the lagoon around the spill entry point to contain floating fat and solids.
- Pump reuse water contained in the bunded area to the wet weather storage dam.
- If the spill is slow, stop production from generating wastewater and pump the contents of the tanks to the wet weather storage dam.

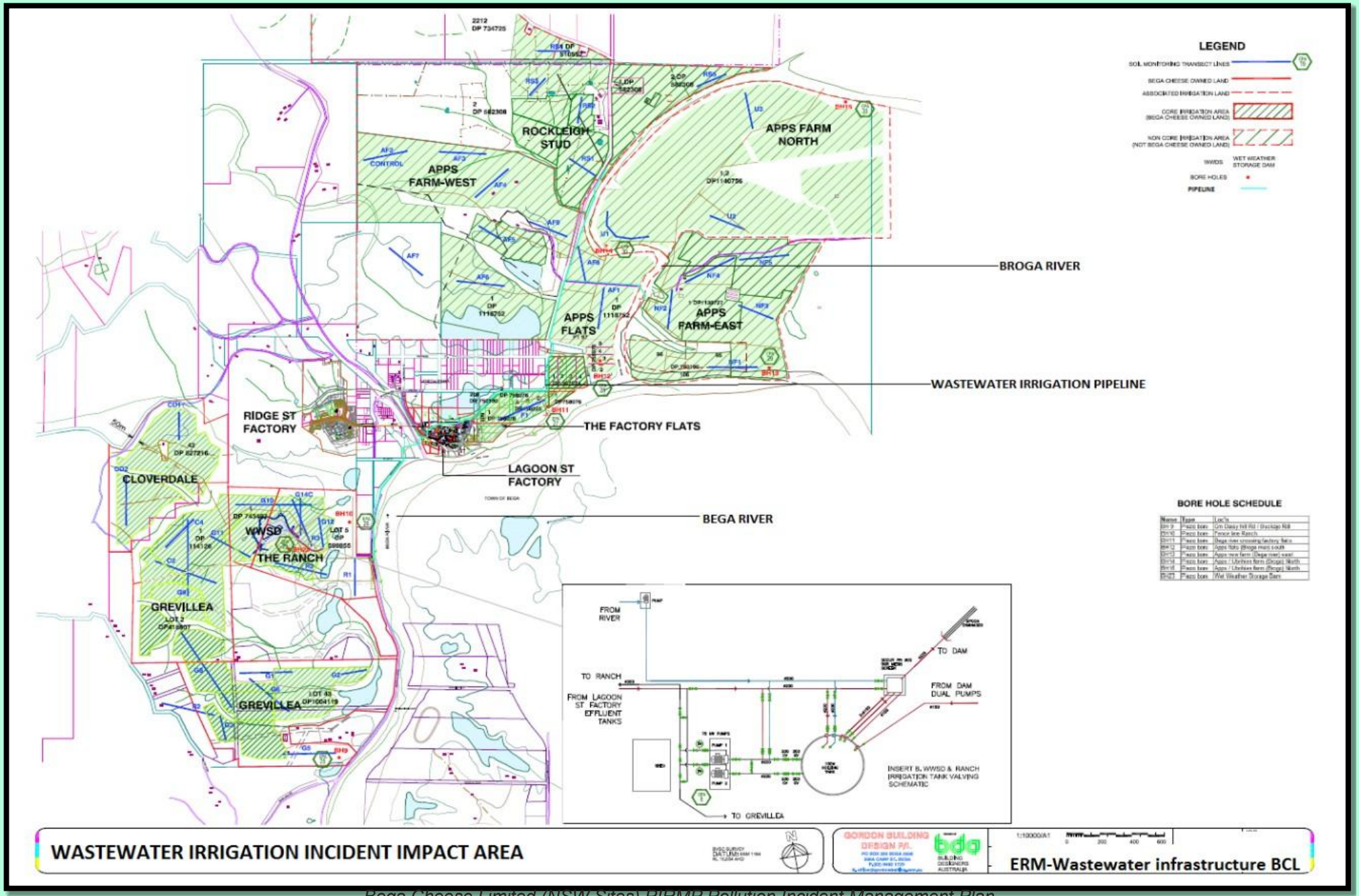
All incidents must be formally reported so that equipment and materials can be replaced.

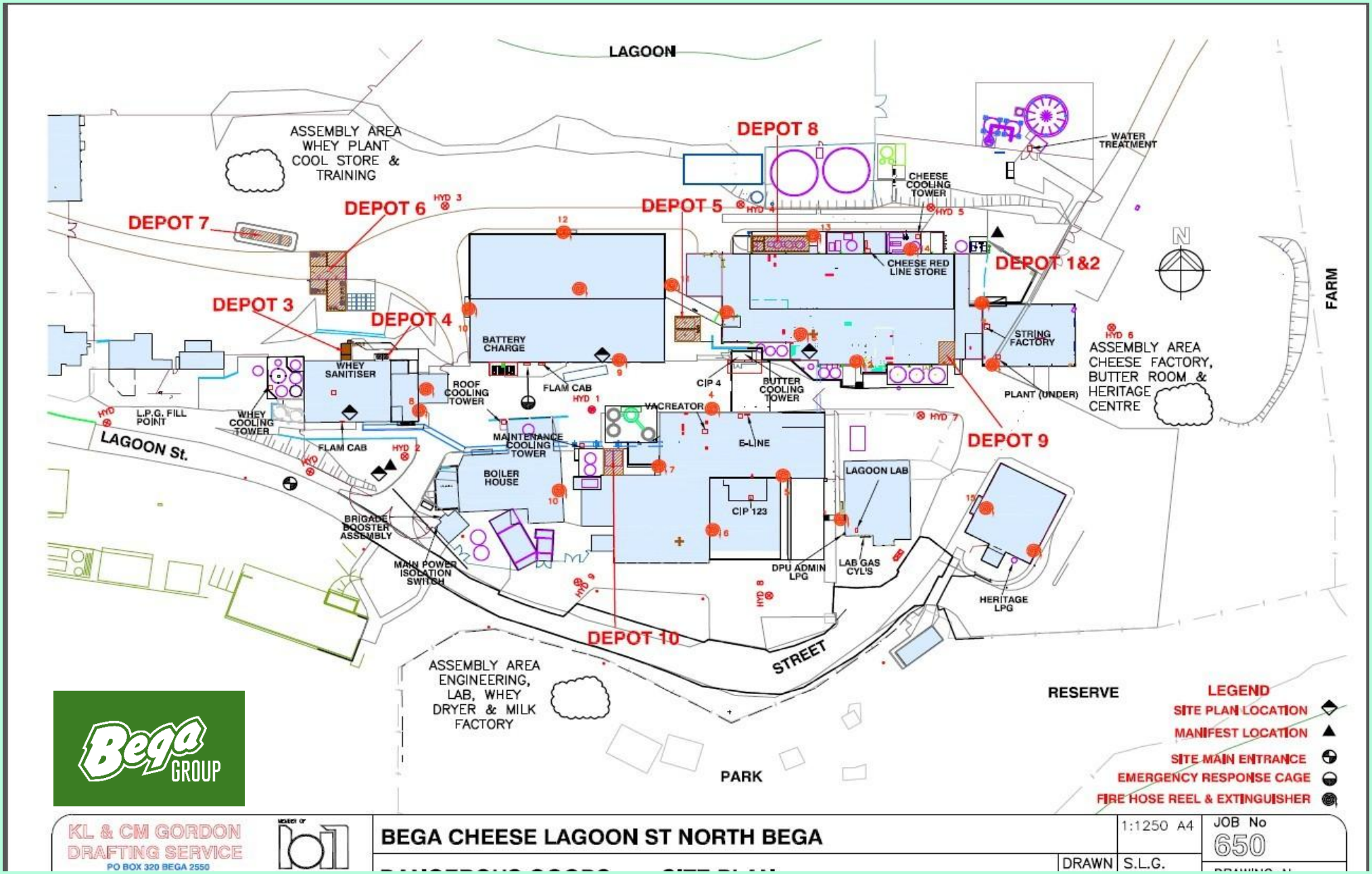
Maps

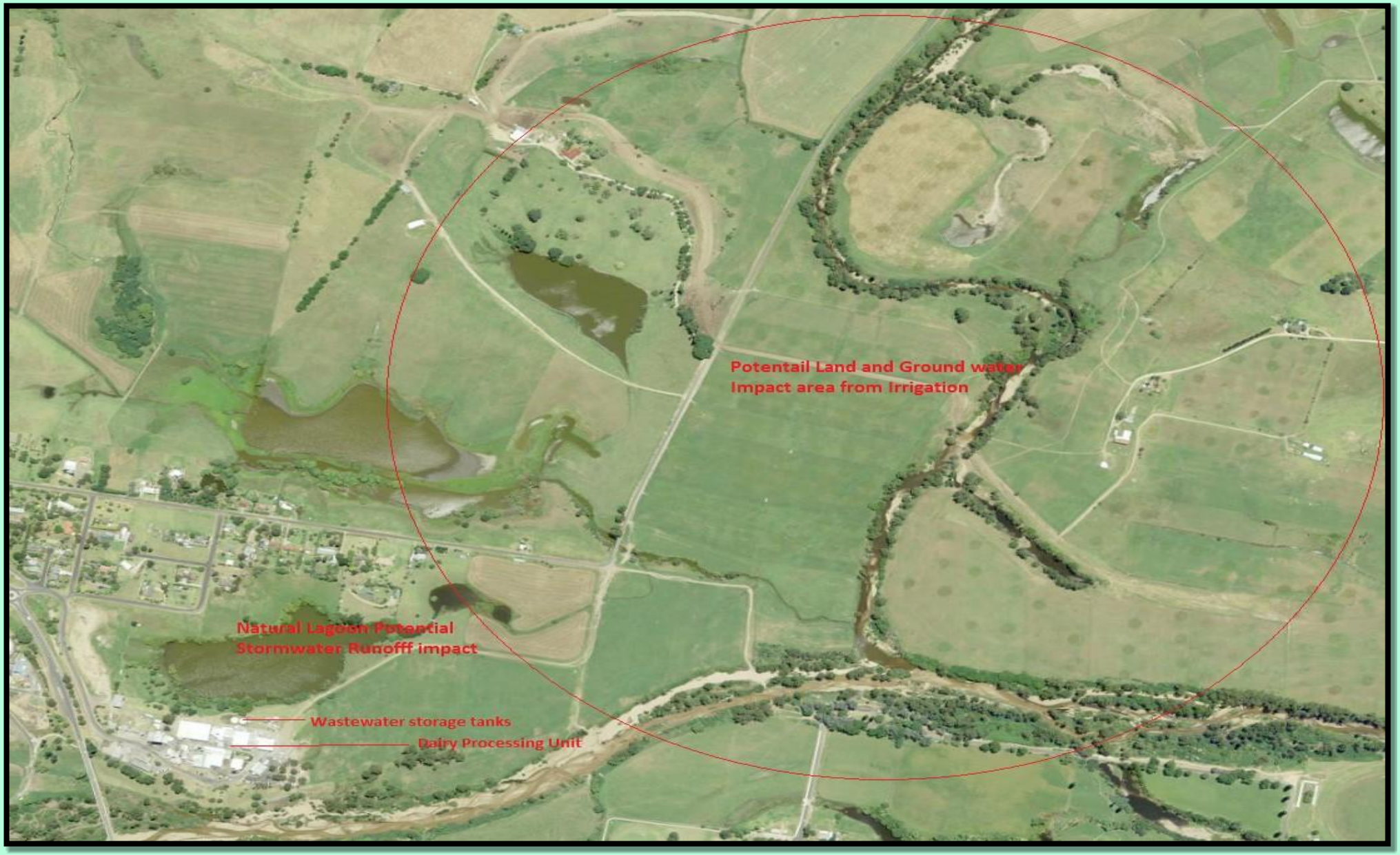
Maps showing the:

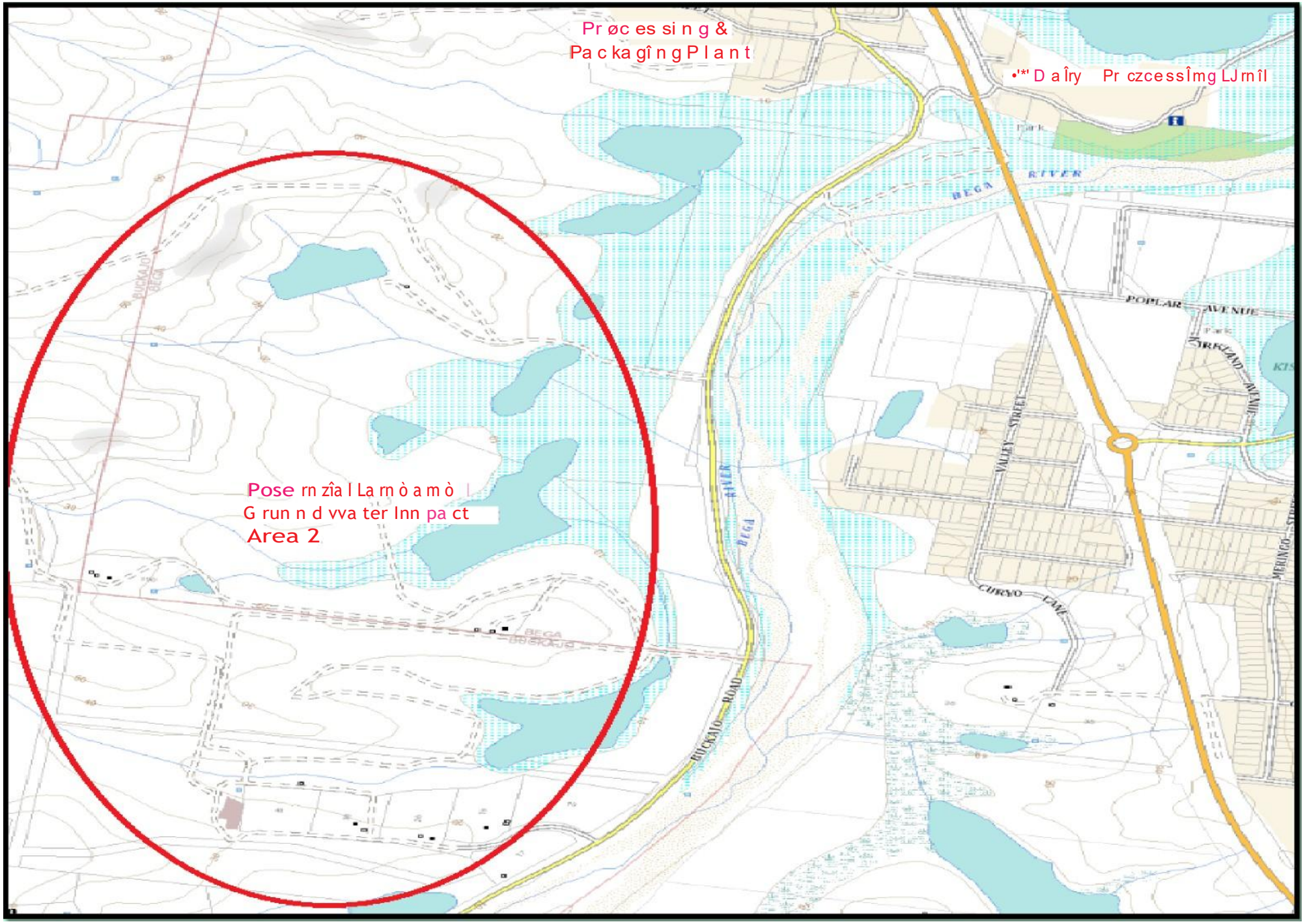
- location of the premises to which the licence relates.
- surrounding area likely to be affected by a pollution incident.
- location of potential pollutants on the premises
- location of any stormwater drains on the premises. (Gordon's)

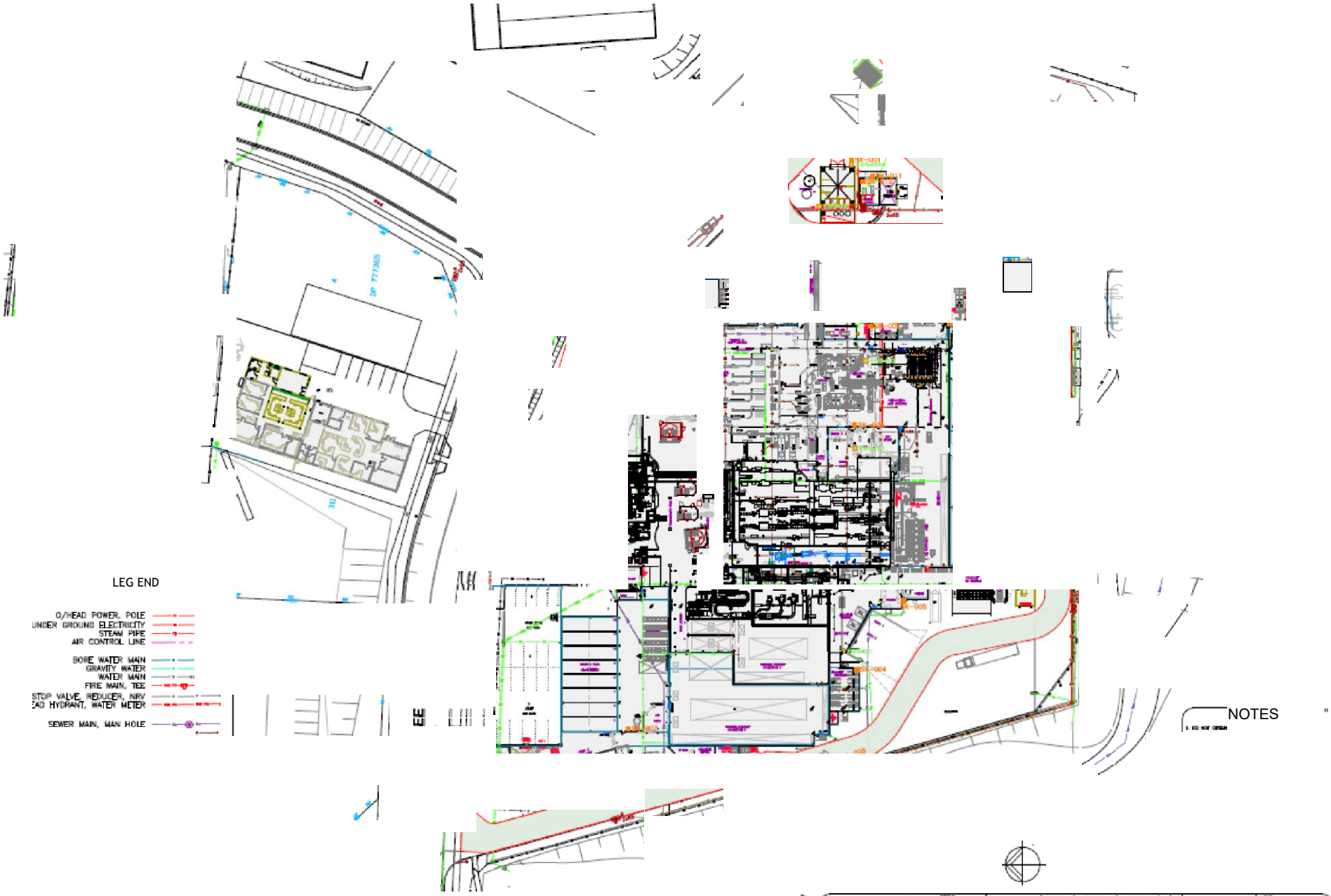

Lagoon Operations
Ridge
N
Parrabell St
Healey St
Bridge St
Jasper St
Anderson St
Valley St
Princes Hwy
John St
Ridge St
West St
Buckajo Rd
Old Highway St
297 m
© 2010 MapData Sciences PtyLtd, PSMA
Image © 2010 DigitalGlobe
©2009 Google
Imagery Date: Oct 4, 2006
36°39'55.19" S 149°49'40.94" E elev 19 m
Eye alt 1.04 km


LEGEND
SOIL MONITORING TRANSECT LINES
BEGA CHEESE OWNED LAND
ASSOCIATED IRRIGATION LAND
CORE IRRIGATION AREA (BEGA CHEESE OWNED LAND)
NON CORE IRRIGATION AREA (NOT BEGA CHEESE OWNED LAND)
WWDS WET WEATHER STORAGE DAM
BORE HOLES
PIPELINE
ROCKLEIGH STUD
APPS FARM-WEST
APPS FARM NORTH
APPS FLATS
APPS FARM-EAST
BROGA RIVER
WASTEWATER IRRIGATION PIPELINE
THE FACTORY FLATS
RIDGE ST FACTORY
LAGOON ST FACTORY
BEGA RIVER
CLOVERDALE
WWSD
THE RANCH
GREVILLEA
GREVILLEA
BORE HOLE SCHEDULE
FROM RIVER
TO DAM
TO RANCH
FROM DAM DUAL PUMPS
FROM LAGOON ST FACTORY EFFLUENT TANKS
INSERT B. WWSD & RANCH IRRIGATION TANK VALVING SCHEMATIC
TO GREVILLEA
WASTEWATER IRRIGATION INCIDENT IMPACT AREA
ERM-Wastewater infrastructure BCL


LAGOON
ASSEMBLY AREA WHEY PLANT COOL STORE & TRAINING
DEPOT 8
DEPOT 7
DEPOT 6
DEPOT 5
DEPOT 3
DEPOT 4
DEPOT 1&2
DEPOT 9
DEPOT 10
WATER TREATMENT
CHEESE COOLING TOWER
CHEESE RED LINE STORE
STRING FACTORY
ASSEMBLY AREA CHEESE FACTORY, BUTTER ROOM & HERITAGE CENTRE
PLANT (UNDER)
FARM
BATTERY CHARGE
WHEY SANITISER
ROOF COOLING TOWER
FLAM CAB
CIP 4
BUTTER COOLING TOWER
VACREATOR
L.P.G. FILL POINT
WHEY COOLING TOWER
LAGOON St.
MAINTENANCE COOLING TOWER
E-LINE
BOILER HOUSE
LAGOON LAB
CIP 123
BRIGADE BOOSTER ASSEMBLY
MAIN POWER ISOLATION SWITCH
DPU ADMIN LPG
LAB GAS CYL'S
HERITAGE LPG
STREET
ASSEMBLY AREA ENGINEERING, LAB, WHEY DRYER & MILK FACTORY
RESERVE
PARK
N
LEGEND
SITE PLAN LOCATION
MANIFEST LOCATION
SITE MAIN ENTRANCE
EMERGENCY RESPONSE CAGE
FIRE HOSE REEL & EXTINGUISHER
Bega GROUP
KL & CM GORDON DRAFTING SERVICE
PO BOX 320 BEGA 2550
BEGA CHEESE LAGOON ST NORTH BEGA
1:1250 A4
JOB No 650
DRAWN S.L.G.


Potentail Land and Ground water
Impact area from Irrigation
Natural Lagoon Potential
Stormwater Runofff impact
Wastewater storage tanks
Dairy Processing Unit

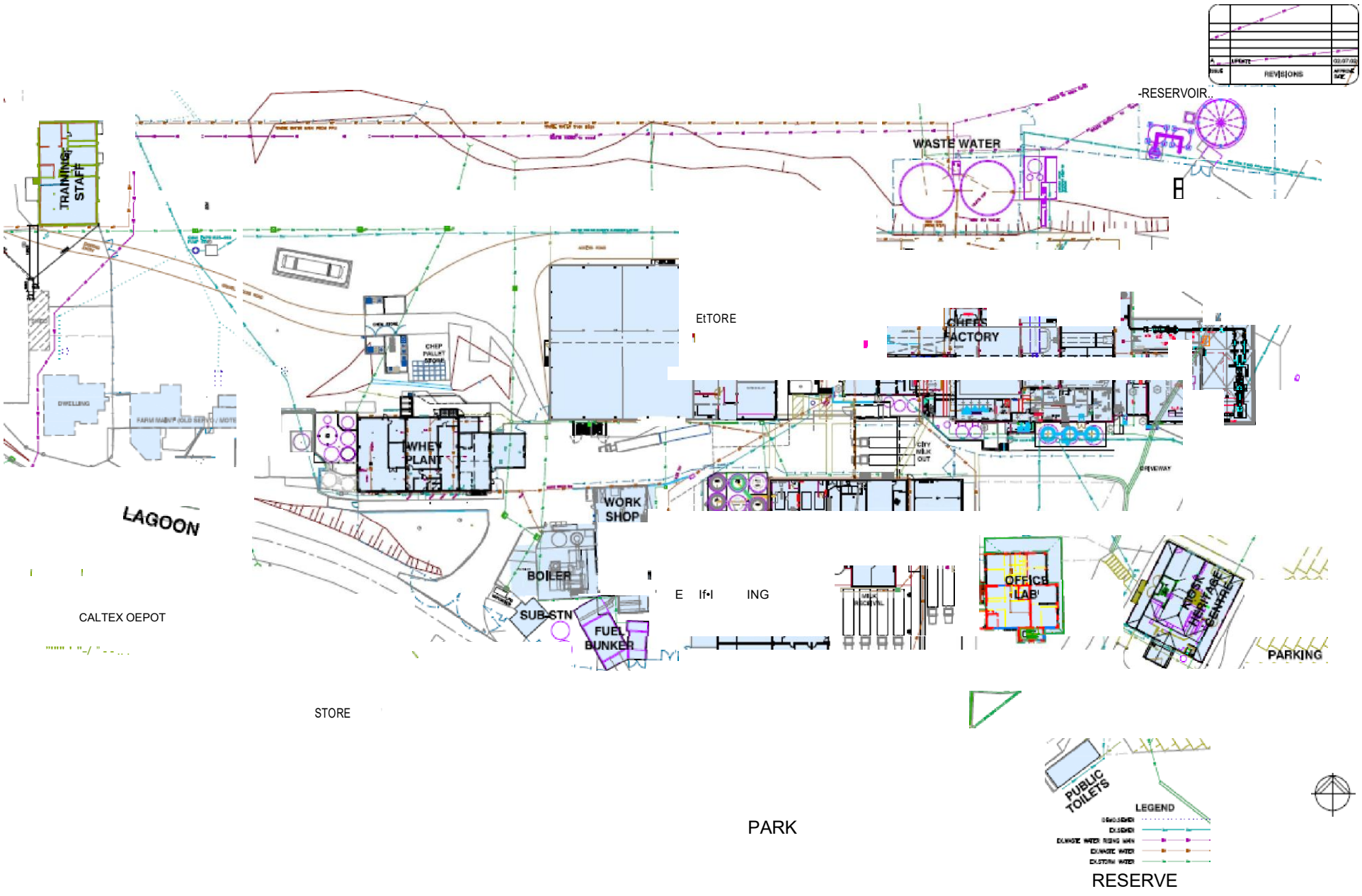

Pr øc es si n g &
Pa c ka gî n g P l a n t
•'*' D a Îry Pr czcessÎmg LJmîI
Pose rn zîa l La rn ò a m ò
G run n d vva ter Inn pa ct
Area 2
BEGA RIVER
POPLAR AVENUE
STREGGAND AVENUE
VALLEY STREET
CURVO DAM
BUCKAJO ROAD
BUCKAJO BEGA
BEGA



PROPOSED ADDITIONS AND ALTERATIONS TO BEGA CHEESE
CUTTING AND PACKAGING PLANT RIDGE ST NDRTH BEGA

KL & CM GORDON
DRAFTING SERVICE

1:400A1 | W.A.E. 2017 | JOB 3366
SITE PLAN - SERVICES
DRAWN S.L.G.
DATE 05/08
DRAWING SP.01



BEGA CHEESE LAGOON ST FACTORY NORTH BEGA

KL & CM GORDON DRAFTING SERVICE

1:400A1 0 10 20 30

W/WATER ,S/WATER & SEWER

ISSUE A

DRAWN S.L.G.

DATE 01/04

JOB 650

DRAWING E-SP01


Bega Town Centre
Dairy Processing Unit
Nearest Residence
Industrial Area North
Bega
Processing &
Packaging Plant

Actions to be taken during or immediately after a pollution incident

Develop a detailed description of the actions to be taken immediately after a pollution incident to reduce or control any pollution. These should include as a minimum, early warnings, updates, and actions to be taken during and after an incident:

Described in table 2

Develop a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates, and the action to be taken during or immediately after a pollution incident to reduce that risk:

Impact and aspect register in IRIS.

Described in table 2

Identify any actions to be taken in combating the pollution caused by the incident and how any clean-up and associated funding resulting from an incident will be undertaken:

Described in table 2

Coordinating with people

- If the incident presents an immediate threat to human health or property, contact the Emergency Services on 000, followed by each of the other authorities as ordered in table 2 The authorities will coordinate action to prevent or limit harm if necessary.
- If the incident does not require emergency services to attend the site, notify the emergency services on the alternative 1300 number in Table 2.

What information is provided?

- Sufficient details of the incident must be provided to enable appropriate follow-up action and include:
- The time, date, nature, duration, and location of the incident.
- Location of the place where pollution is occurring or is likely to occur.
- Nature estimated quantity or volume and concentration of any pollutants.
- Circumstances in which the incident occurred including the causes if known.
- Action taken (or proposed) to deal with the incident and any resulting (or threatened) pollution.

Immediately as far as practicable report a pollution incident to EPA NSW pollution line, with follow up email to EPA Regional office with in 24hrs, Follow the internal escalation procedure to escalate the incident to EGM.

Written details of pollution incidents R3.3 report must be provided to the Environment Protection Authority within 7 days or as requested by EPA. **The sooner the better**. This report may be required by one or more statutory authorities including Local Government and Environment Protection Authority.

- The report should be included.
- Cause of the incident
- Type of incident
- Name, Address, and business hours telephone number of employees or agent off the licence
- Name address of every person who witnessed the event.
- Action taken and follow-ups or contact with any complainants.
- Measure taken to prevent and mitigate against reoccurrence of any such event.
- Any other relevant information

Penalties

- Failing to report a pollution incident posing material harm to the environment is an offence under the Protection of the Environment Operations Act. Maximum penalty is $2,000,000 for corporations or $500,000 for individuals

Identify the person/s through whom all communications are to be made:

Safety Manager contact Workcover Environment & Sustainability contact with other authorities

Staff training

On-going training will be provided for all persons who could be involved in an emergency on- site.

Some specialist training may be required, i.e. firefighting, first aid, use of self-contained breathing apparatus etc. Records of training will be kept.

Evaluation of the PIRMP will be ongoing via simulated emergency exercises and following any real emergency. Plans will be tested at least once every 12 months.

In addition to evaluation arising from training exercises or real emergency situations, the plan will require on-going amendments to consider any significant changes affecting the plan, i.e., increased staffing levels, increases in quantities of storage, changes in types of products stored and handled etc.

Any reviews or amendments to the plan will be conducted by: (Table 1).

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.

Detail the way the plan is to be tested and maintained to ensure the information included in the plan is accurate and up-to-date and the plan is capable of being implemented in a workable and effective manner:

Details on how the testing is documented and recorded (this must include the testing dates and the names of all staff members who carried out the testing):

Date of the review

Detail the dates on which the plan was updated:

Table 1

PIRMP testing details

Date tested	*Tested by*	*Details of test*	*Finding of test, including issues identified*	*Next scheduled testing date*
20/01/2025	*Mick Curtis* *Matthew Taylor* *Jason Baisler* *Grant Collins* *Ryan Kosolofski* *Patricia Westaway* *Trent Barber* *Russell Garner* *Leon Garner* *David Hackett* *Sonia Dehnert* *Laura Marsh* *(Team members)*	*Ammonia leaks in the plant.*	*No issues recorded, Plan work in conjunction with BCP.*	*16/01/2026*

PIRMP update details

Date update occurred	*Reason for update*	*Details of updates*	*Date the updated version*	*Date of completion*
21/09/2026 *23/01/25*	*Annual Review*	*Contact details and review of regulations*	*Uploaded to Intelex* *uploaded to INTELEX*	*21/09/2026* *23/02/25*
	Auditor requirements	*Updated page 3 with the auditor details.* *Manager's details updated*		