

Appendix C

Euroley Complaints and Incident Management Strategy





global environmental solutions

Euroley Poultry Production Complex
Intensive Livestock Agriculture
Complaints and Incidents Management Strategy

Report Number 610.14072

6 March 2015

ProTen Limited

PO Box 1746

North Sydney, NSW 2060

Australia

Version: Final

Euroley Poultry Production Complex

Intensive Livestock Agriculture

Complaints and Incidents Management Strategy

PREPARED BY:

SLR Consulting Australia Pty Ltd
ABN 29 001 584 612
10 Kings Road
New Lambton NSW 2305 Australia
(PO Box 447 New Lambton NSW 2305 Australia)
T: +61 2 4037 3200 F: +61 2 4037 3201
newcastleau@slrconsulting.com www.slrconsulting.com

This report has been prepared by SLR Consulting Australia Pty Ltd with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with the Client. Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of ProTen Limited.
No warranties or guarantees are expressed or should be inferred by any third parties.
This report may not be relied upon by other parties without written consent from SLR Consulting.

SLR Consulting disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.

DOCUMENT CONTROL

Reference	Status	Date	Prepared	Checked	Authorised
610.14072	Draft 1	6 March 2015	Loren Yallop	Nicole Armit	Nicole Armit

Table of Contents

1	INTRODUCTION	4
2	ENVIRONMENTAL INCIDENTS	6
2.1	Performance Objective	6
2.2	Responsibility	6
2.3	Procedure	6
3	ENVIRONMENTAL COMPLAINTS	8
3.1	Performance Objective	8
3.2	Responsibility	8
3.3	Receival of Complaints	8
3.4	Procedure	8
4	CONTACT DETAILS	10
5	COMPLAINTS AND INCIDENTS REGISTER	11

FIGURES

Figure 1	Poultry Development Layout.....	5
----------	---------------------------------	---

APPENDICES

- Appendix A Environmental Incident Report Form
- Appendix B Environmental Complaint Report Form

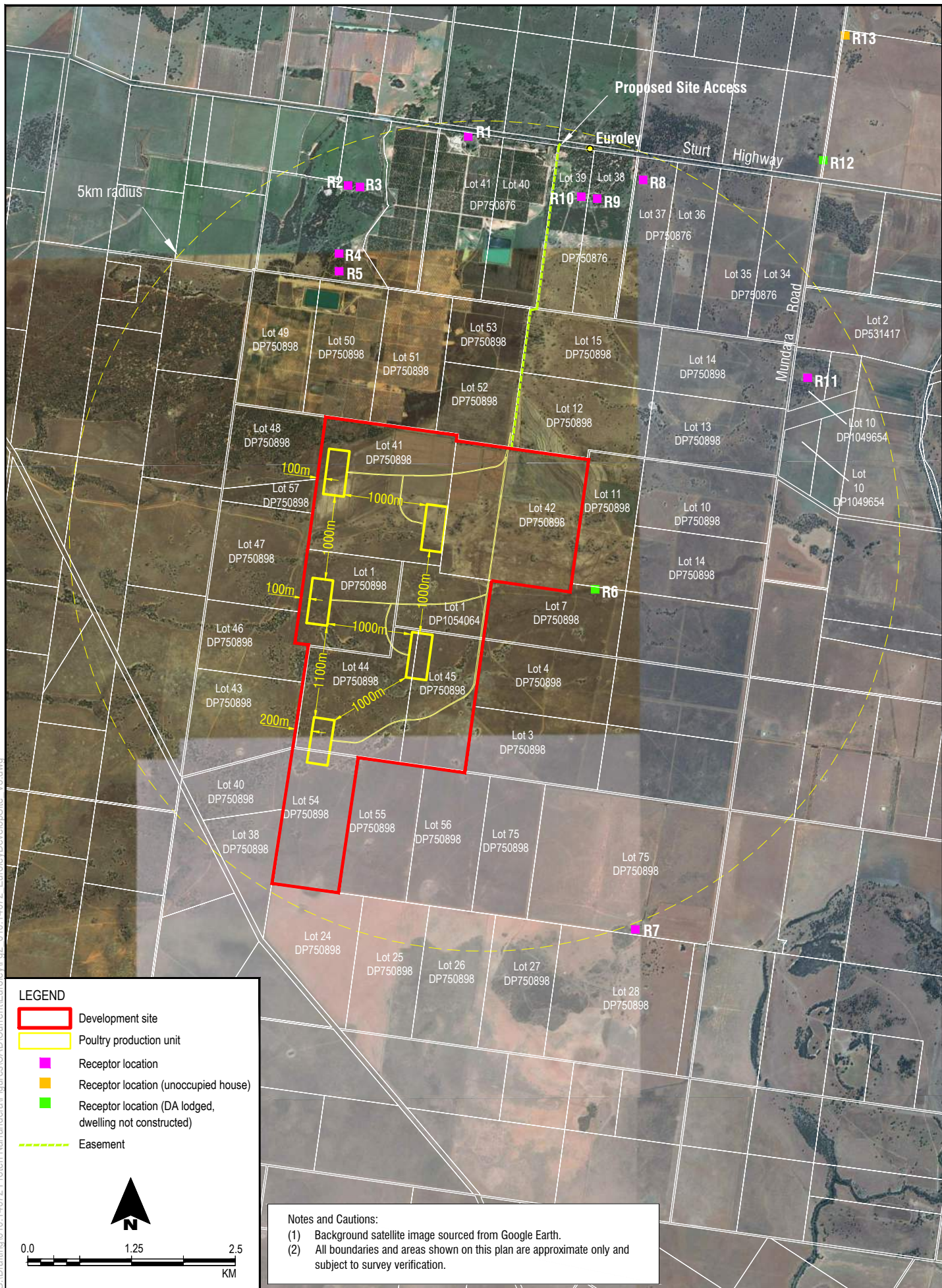
(DO NOT DELETE SECTION BREAK)

1 INTRODUCTION

This *Complaints and Incidents Management Strategy* relates to the poultry broiler production farm proposed by ProTen Holdings Pty Ltd (ProTen) to be developed within a rural property near Euroley, around 4 kilometres off the Sturt Highway, approximately 26 kilometres north-west of Narrandera and 48 kilometres south-east of Griffith in south-western New South Wales (NSW). As shown on **Figure 1**, the proposal comprises the development of five poultry production units (PPUs) where broiler birds will be grown for human consumption. Each PPU will comprise 16 tunnel-ventilated fully-enclosed climate-controlled poultry sheds, with associated support infrastructure and staff amenities. Each shed will have the capacity to house a maximum of 49,000 broilers at any one time, equating to a PPU population of up to 784,000 broilers and a total site population of up to 1.568 million broilers.

The *Complaints and Incidents Management Strategy* outlined below will be implemented to ensure that all complaints and incidents relating to the intensive poultry operation are promptly and effectively addressed. Appropriate documentation of incident/complaint handling will assist in identifying and implementing measures to negate the possibility of re-occurrence in the future.

G:\Drafting\610_14072_Proten Narrandera\Figures\CAD\Current\Euroley\Fig2_610_14072_EuroleyDevelopSite_V3.dwg



LEGEND

- Development site
- Poultry production unit
- Receptor location
- Receptor location (unoccupied house)
- Receptor location (DA lodged, dwelling not constructed)
- Easement

N

0.0 1.25 2.5
KM

Notes and Cautions:

- (1) Background satellite image sourced from Google Earth.
- (2) All boundaries and areas shown on this plan are approximate only and subject to survey verification.

To be printed A4

2 ENVIRONMENTAL INCIDENTS

2.1 Performance Objective

To ensure that any environmental incident caused by or relating to the operation of the poultry broiler development is effectively responded to, and any resulting adverse environmental and/or community impact is promptly prevented or effectively managed.

2.2 Responsibility

Site Management is to coordinate the handling procedure in the event of an environmental incident and ensure that staff members working in critical areas are appropriately trained.

All staff members are to take immediate action to notify Site Management of any environmental incident and take immediate action (where it is safe to do so) to prevent, stop, contain and/or minimise the environmental impact of the incident.

2.3 Procedure

Upon becoming aware of an environmental incident, Site Management is to undertake the following:

1. Preventative Action

Where possible and it is safe to do so, immediate action should be taken to prevent, stop, contain and/or minimise the environmental impact of the incident.

2. Assistance

Where assistance is required handling the situation, ProTen's National Operations Manager should be contacted.

Where the incident is reported via a government authority, such as Narrandera Shire Council or the Environment Protection Authority (EPA), the National Operations Manager must be notified immediately (even if outside of normal business hours).

If adequate resources are not available and the incident threatens public health, property or the environment, Fire and Rescue Service NSW should be contacted on 000 for emergency assistance and/or the EPA can be contacted on 131 555 (Environment Line). If the Fire and Rescue Service is called, they may notify the EPA if they consider the environment or public health to be threatened. Notification by the NSW Fire Service does not negate the notification requirements outlined below.

Relevant contact details are listed in **Section 4.0**.

3. Notify

Under the provisions of the *Protection of the Environment Operations Act 1997* (POEO Act), there is a duty to notify any incident that has caused or threatens to cause material harm to the environment and all relevant information about the incident. This duty extends to the following:

- 1) A person engaged as an employee must, immediately after becoming aware of the incident, notify the employer of the incident and all relevant information. If the employer cannot be contacted, the person is required to notify each relevant authority and provide all relevant information; and

- 2) An employer who is notified of an incident or who otherwise becomes aware of an incident must, immediately after becoming aware of the incident, notify each relevant authority and provide all relevant information.

Under the POEO Act, the 'relevant authority' means any of the following:

- the appropriate regulatory authority;
- if the EPA is not the appropriate regulatory authority – the EPA;
- if the EPA is the appropriate regulatory authority - the local authority for the area in which the pollution incident occurs;
- the Ministry of Health;
- the WorkCover Authority; and
- Fire and Rescue NSW.

Again, relevant contact details are listed in **Section 4.0**.

In the event of a serious incident or emergency, it is more than likely that the Fire and Rescue NSW and/or the EPA will take control and manage the required investigation and remedial activities. Any instructions issued must be strictly adhered to.

4. Investigate

Undertake immediate investigative work to determine the cause of the incident.

5. Remedial Action

Undertake appropriate remedial action to address the cause of the incident and mitigate any further environmental impact. In some instances, outside resources may be required.

It is imperative that an honest assessment of the situation is carried out and documented in order to minimise the potential for similar events in the future. On this basis, every environmental incident is to be recorded on the *Environmental Incident Report Form* contained within **Appendix A**. A copy of the completed form should be maintained for at least four years.

Once the incident has been suitably handled, appropriate measures should be identified and implemented to negate the possibility of re-occurrence.

3 ENVIRONMENTAL COMPLAINTS

3.1 Performance Objective

To ensure that all environmental complaints regarding the operation of the poultry broiler development are promptly and effectively received, handled and addressed.

3.2 Responsibility

Site Management is to coordinate the handling procedure in the event of a complaint.

All staff members who take receipt of a complaint, either verbal or written, are to immediately notify Site Management.

3.3 Receival of Complaints

Complaints regarding the poultry broiler development can be received by ProTen via a number of ways. These include:

- Any ProTen company or site office;
- ProTen Environmental Hotline – 1800 776 994;
- ProTen Internet enquiry – www.proten.com.au; and/or
- Through the relevant regulatory agency, being either Narrandera Shire Council or the EPA.

3.4 Procedure

Upon becoming aware of a complaint, Site Management is to undertake the following:

1. Receive

In the normal course of events, the first contact for complaints will usually be made in person or by telephone. While this should instigate investigative action, a formal written complaint should be requested.

Where the initial contact reaches a staff member who is not a representative of Site Management, the call should be directed to Site Management. If unavailable, the complainant's details should be taken with a view to returning the contact once Site Management is in a position to discuss the matter.

The complainant's name, address and contact details, along with the nature of the complaint, must be requested. If the complainant refuses to supply the requested information, a note should be made on the form and complainant advised of same.

2. Assistance

Where assistance is required handling the situation, ProTen's National Operations Management should be contacted.

Where the incident is reported via a government authority, such as Narrandera Shire Council or the EPA, the National Operations Manager must be notified immediately (even if outside of normal business hours).

Relevant contact details are listed in **Section 4.0**.

3. Investigate

A field investigation should be initiated in an attempt to establish the legitimacy of the complaint and the cause of the problem. The daily service report(s) and any additional recorded details regarding the operation of the development at and around the time of the complaint should be reviewed for any abnormality or incident that may have resulted in the complaint. Details may include stocking densities, flock ages, shed conditions, heavy vehicle activity, equipment and machinery activities, etc.

If the complaint is in relation to odour, the meteorological conditions at and around the time of the complaint should also be obtained from the on-site weather station. It is particularly important that wind conditions and direction is known.

If the complaint is due to an environmental incident, the handling procedure outlined above in **Section 2.0** should be followed, and if the incident has caused or threatens to cause material harm to the environment each of the relevant authorities must be immediately notified.

4. Action

Once the legitimacy and cause of the complaint has been established, every possible effort must be made to undertake appropriate remedial action(s) to fix the cause of the complaint and mitigate any further impact.

5. Inform

The investigative work and remedial action should be reported back to the complainant and, if necessary, the relevant authorities. Company confidentiality may preclude the release of some details – advice should be sort from ProTen’s senior management.

It is imperative that an honest assessment of the situation is carried out and documented in order to minimise the potential for similar complaints in the future. On this basis, every complaint received is to be recorded on the *Environmental Complaint Report Form* contained within **Appendix B**. A copy of the completed form should be maintained for at least four years.

Once the complaint has been suitably handled, appropriate measures should be identified and implemented to negate the possibility of re-occurrence.

4 CONTACT DETAILS

ProTen Holdings Pty Ltd	
Environment Hotline (freecall)	Ph: 1800 776 994
Australian Head Office	Ph: 02 9458 1700 Fax: 02 9929 7968
Griffith Office	Ph: 02 6962 1770 Fax: 6962 1745 Email: rwest@proten.com.au
Euroley Site Offices	TBA

Environment Protection Authority	
Environment Line (Sydney)	Ph: 131 555 or 02 9995 5555 Email: info@environment.nsw.gov.au
Griffith Regional Office	Ph: 02 6966 8100 Fax: 02 6966 8180

Narrandera Shire Council	
Narrandera Office	Ph: 02 6959 5510 Fax: 02 6959 1884 Email: council@narrandera.nsw.gov.au

NSW Ministry of Health	
Central Office	Ph: 1800 020 103

Work Cover	
Incident Notification Hotline	Ph: 131 050

Fire and Rescue	
Zone Office Regional South 2 – Southern Highlands	Ph: 02 4822 9395
Emergency only	Ph: 000

5 COMPLAINTS AND INCIDENTS REGISTER

A *Complaints and Incidents Register* will be established and maintained at the poultry development site. This register should contain the following:

- Any work instructions that have been prepared detailing the handling procedures for specific environmental incidents and complaints;
- Site evacuation procedures;
- A copy of the final approved *Complaints and Incident Management Strategy*;
- A separate reference sheet containing the contact details listed above in **Section 4.0**; and

Separate copies of the *Environmental Incident Report Form* and the *Environmental Complaints Report Form* contained within **Appendices A** and **B**.

Environmental Incident Report Form

APPENDIX A

PROTEN HOLDINGS PTY LTD
Euroley Poultry Production Complex

ENVIRONMENTAL INCIDENT REPORT FORM

INCIDENT DETAILS

Date of Incident:- **Time of Incident:-**am/pm

Location:-

Description:-
.....
.....
.....

NOTIFICATION TO REGULATORY AUTHORITY

Has the incident caused or does it threaten to cause material harm to the environment:- Yes / No
If yes, the Environment Protection Authority (EPA) must be notified.

DECCW Notified:- Yes / No **Who:-**

Date:- **Time:**am/pm

Instructions:-
.....
.....
.....

REMEDIAL ACTION

Remedial Action Undertaken:- Yes / No (if no, give reason)

Description:-
.....
.....
.....

Any Further Corrective Action Required:- Yes / No

If Yes, Describe:-
.....
.....
.....

SIGN OFF

Name:- **Title:-**

Signature:- **Date:-**

Environmental Complaint Report Form

PROTEN HOLDINGS PTY LTD

Euroley Poultry Production Complex

ENVIRONMENTAL COMPLAINT REPORT FORM

STAFF MEMBER CONTACTED

Name:-

Date:- **Time:-**am/pm

COMPLAINANT DETAILS

Name:-

Address:-

Contact No.:-

COMPLAINT DETAILS

Date of Event:- **Approx. Time:-**am/pm

Description:-
.....
.....
.....

FIELD INVESTIGATION

Investigation Undertaken:- Yes / No (if no, give reason)

Findings:-
.....
.....
.....
.....
.....

Is Complaint Related to an Environmental Incident:- Yes / No

If yes, complete the Environmental Incident Report Form and, if the incident has caused or threatens to cause material harm to the environment, notify the Environment Protection Authority (EPA).

Is Complaint Related to Odour:- Yes / No

If yes, obtain meteorological data from the on-site weather station at and around the time of the complaint.

