



Pollution Incident Response Management Plan (PIRMP)

Stubbings Poultry Production Farm

**ProTen Hanwood and Lethbridge Pty Ltd as trustee for,
ProTen Hanwood and Lethbridge Trust**

1061 Crawford Road,
Hanwood NSW

Prepared by:

ProTen

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Revision: V2

Document Control

Issue	Date	Description
Version 1	Oct 2021	Initial PIRMP authorised by ProTen
Version 2	July 2024	The PIRMP has been updated to address the updated Protection of the Environment Operations Act 1997 (POEO Act), specifically Protection of the Environment Operations (General) Regulation 2022 addressed within the EPA's Guideline: Pollution Incident Response Management Plans (2022).

Basis of Report

This report has been prepared by Proten Pty Limited and SLR Consulting Australia (SLR) with all reasonable skill, care, and diligence, and taking account of the timescale and resources allocated to it by agreement with ProTen Hanwood and Lethbridge Pty Ltd as trustee for ProTen Hanwood and Lethbridge Trust (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.

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Acronyms and Abbreviations

ARA	Appropriate Regulatory Authority
CLC	Community Liaison Committee
DP	Deposited Plan
EPA	Environment Protection Authority
EP	Environment Protection Licence
PELA Act	<i>Protection of the Environment Legislation Amendment Act 2011</i>
PIRMP	Pollution Incident Response Management Plan
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
POEO(G) Regulation	<i>Protection of the Environment Operations (General) Regulation 2009</i>
PPU	Poultry Production Unit
SDS	Safety Data Sheet



1.0 Introduction

1.1 Background and Scope

The *Protection of the Environment Legislation Amendment Act 2011* (PELA Act) received assent on the 16 November 2011 resulting in changes to the *Protection of the Environment Operations Act 1997* (POEO Act). The intent of the PELA Act is to improve the way pollution incidents are reported and managed. The specific requirements for a Pollution Incident Response Management Plan (PIRMP) are set out in Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act) and the Protection of the Environment Operations (General) Regulation 2022 (POEO(G) Regulation). In summary, this legislation requires the following:

- All holders of an Environment Protection Licence (EPL) must prepare a PIRMP (section 153A, POEO Act);
- The PIRMP must include the information detailed in the POEO Act (section 153C) and the POEO(G) Regulation (clause 72) and be in the form required by the POEO(G) Regulation (clause 71);
- Licensees must keep the PIRMP at the premises to which the EPL relates, or, in the case of trackable waste transporters and mobile plant, where the relevant activity takes place (section 153D, POEO Act);
- Licensees must test the PIRMP at least every 12 months and after a pollution incident in accordance with the POEO(G) Regulation (clause 75); and

If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened within the meaning of Part 5.7 of the POEO Act, licensees must immediately implement the PIRMP (section 153F, POEO Act).

As the holder of EPL 21551, the Stubbings Poultry Production Farm (Stubbings Farm), which is owned and operated by ProTen Hanwood and Lethbridge Pty Ltd as trustee for ProTen Hanwood and Lethbridge Trust, is required to comply with the POEO Act. As such, this document has been developed to satisfy the PIRMP requirements. This PIRMP covers the key actions to minimise the occurrence of a pollution incident and manage a pollution incident if one occurs (both during and after the incident). It also details the procedures for notification of pollution incidents resulting in or having the potential to cause material harm to the environment. **The notification of environmental incidents under this PIRMP is only required for those incidents causing or threatening to result in material environmental harm (a material harm incident) as defined in the POEO Act (Section 1.3).** While the PIRMP has been prepared for managing the impact to human health (employees and nearby neighbours) and the environment (onsite and offsite), it does not have procedures for the treatment of injured persons or the remediation of the environment following a pollution incident.

1.2 Availability of the PIRMP

In addressing the requirements of section 153D of the POEO Act and clauses 71 and 74 of the POEO(G) Regulation, a copy of this PIRMP shall be kept in written form at the EPL premises (i.e. the Stubbings Farm) and shall be made readily available to all personnel responsible for implementing the PIRMP and to any authorised officer (as defined in the POEO Act) on request.

The PIRMP will be made publicly available within 14 days of finalisation via the ProTen website www.ProTen.com.au.



1.3 Definition of a Pollution Incident

The POEO Act provides the following definitions:

Pollution – means –

- a) Water pollution, or
- b) Air pollution, or
- c) Noise pollution, or
- d) Land pollution.

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 licensee is required to notify the relevant regulatory authorities of a pollution incident 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*

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.

(2) 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.

1.4 Regulatory Requirements

Table 1 outlines the structure of the PIRMP, as per the requirements of the POEO Act.

Table 1: Document Directory

Section 153C	Detail Required	Section in PIRMP
(a)	The procedures to be followed by the holder of the relevant EPL, or the occupier of the relevant premises, in notifying a pollution incident to: <ol style="list-style-type: none"> 1. The owners or occupiers of premises in the vicinity of the premises to which the EPL or the direction under section 153B relates, and 2. The local authority for the area in which the premises to which the EPL relates; and 3. Any persons or authorities required to be notified by Part 5.7 (of the POEO Act). 	Sections 3.1, 3.2 and 3.3
(b)	A detailed description of the action to be taken immediately after a pollution incident, by the holder of the relevant EPL, or the occupier of the relevant premises, to reduce or control any pollution.	Section 4.3



Section 153C	Detail Required	Section in PIRMP
(c)	The procedures to be followed for co-ordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and, in particular, the persons through whom all communications are to be made.	Section 3.0
(d)	Any other matter required by the regulations	See below
Clause 72 of the General Regulation		
	<i>(a) a description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity),</i>	Sections 2.2 and 2.4, and Appendix A
	<i>(b) the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,</i>	Section 2.2 and Appendix A
	<i>(c) details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity,</i>	Section 2.3 and Appendix A
	<i>(d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity,</i>	Section 2.4
	<i>(e) the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates,</i>	Section 2.4
	<i>(f) A description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident,</i>	Section 2.5
	<i>(g) The names, positions and 24-hour contact details of those key individuals who:</i> <i>(i) are responsible for activating the plan, and</i> <i>(ii) are authorised to notify relevant authorities under section 148 of the Act, and</i> <i>(iii) are responsible for managing the response to a pollution incident,</i>	Section 3.1
	<i>(h) The contact details of each relevant authority referred to in the Act, section 148</i>	Section 3.2
	<i>(i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the licence relates or where the scheduled activity is carried on,</i>	Sections 3.3 and 4.3, and Appendix A
	<i>(j) the arrangements for minimising the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on.</i>	Section 3.4
	<i>(k) a detailed map (or set of maps) showing the location of the premises to which the licence relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises,</i>	Figures 1, 2, 3 and 4
	<i>(l) 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,</i>	Section 4 and Appendix A
	<i>(m) the nature and objectives of any staff training program in relation to the plan,</i>	Section 5.1
	<i>(n) the dates on which the plan has been tested and the name of the person who carried out the test,</i>	Appendix D
	<i>(o) the dates on which the plan is updated,</i>	After TOC ¹
	<i>(p) the manner in which the plan is to be tested and maintained.</i>	Section 5.2
Clause 74 of the General Regulation		
	1) A PIRM plan must be made readily available to an authorised officer on request, and to a person who is responsible for implementing the PIRM plan at the premises—to which the relevant licence relates, or where the activity takes place.	Section 1.2



Section 153C	Detail Required	Section in PIRMP
	<p>2) A PIRM plan must be made publicly available in the following way within 14 days after it is prepared— in a prominent position on a publicly accessible website of the person who is required to prepare the PIRM plan. if the person does not have a website—by providing a copy of the PIRM plan, without charge, to a person who makes a written request for a copy.</p>	Section 1.2
Clause 75 of the General Regulation		
	<p>1) A PIRM plan must be tested— routinely at least once every 12 months. if a pollution incident occurred during an activity to which an environment protection licence relates, which caused or threatened material harm to the environment, within the meaning of the Act, section 147—within 1 month of the incident occurring.</p>	Section 5.2
	<p>2) The test must be carried out in a way to ensure the following— the information included in the PIRM plan is accurate and up to date, the PIRM plan is capable of being implemented in a workable and effective way</p>	Section 5.2

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2.0 Premises Details

2.1 Site Details

The Development Site is a single parcel of land identified as Lot 80 in Deposited Plan (DP) 751686 in the Griffith local government area (see **Figure 1**). It comprises approximately 166 hectares and is located approximately 10 kilometres (km) south of Griffith and 6 km south of Hanwood. Crawford Road forms the Development Site's eastern boundary and provides vehicular access to the Site and connection to Kidman Way to the east and Millis Road to the north.

The topography of the Site is relatively flat ranging between approximately 120 and 126 metres Australian height datum. Mirrool Creek flows north-westerly within a drainage reserve adjoining the Development Site to the west. The Site generally drains from the higher ground in the east to the west where overland flows discharge to Mirrool Creek. The Development Site is not mapped as bushfire prone land.

This site encompasses ProTen's Farm Stubbings Poultry Production Farm, where birds are grown for human consumption. The Farm comprises 20 tunnel-ventilated climate-controlled poultry sheds, with associated support infrastructure and staff amenities. The site houses up to 1,269,400 broiler birds at any one time.

Farm Stubbings operates 24 hours a day with all activities besides bird transport undertaken between 7:00 am and 7:00 pm. As the birds reach their desired slaughter weight they are removed from the sheds and transported from the site. Removal of birds is conducted throughout the day but is generally undertaken when it is cooler and the birds are more settled

2.1.1 Environment Protection Licence

Stubbings ProTen operates under the provisions of EPL 21551 for the scheduled activity of "livestock intensive activities". It covers the fee-based activity of "bird accommodation" to a scale of greater than (>) 1,000 tonnes.

2.2 Description and Likelihood of Hazards

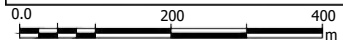
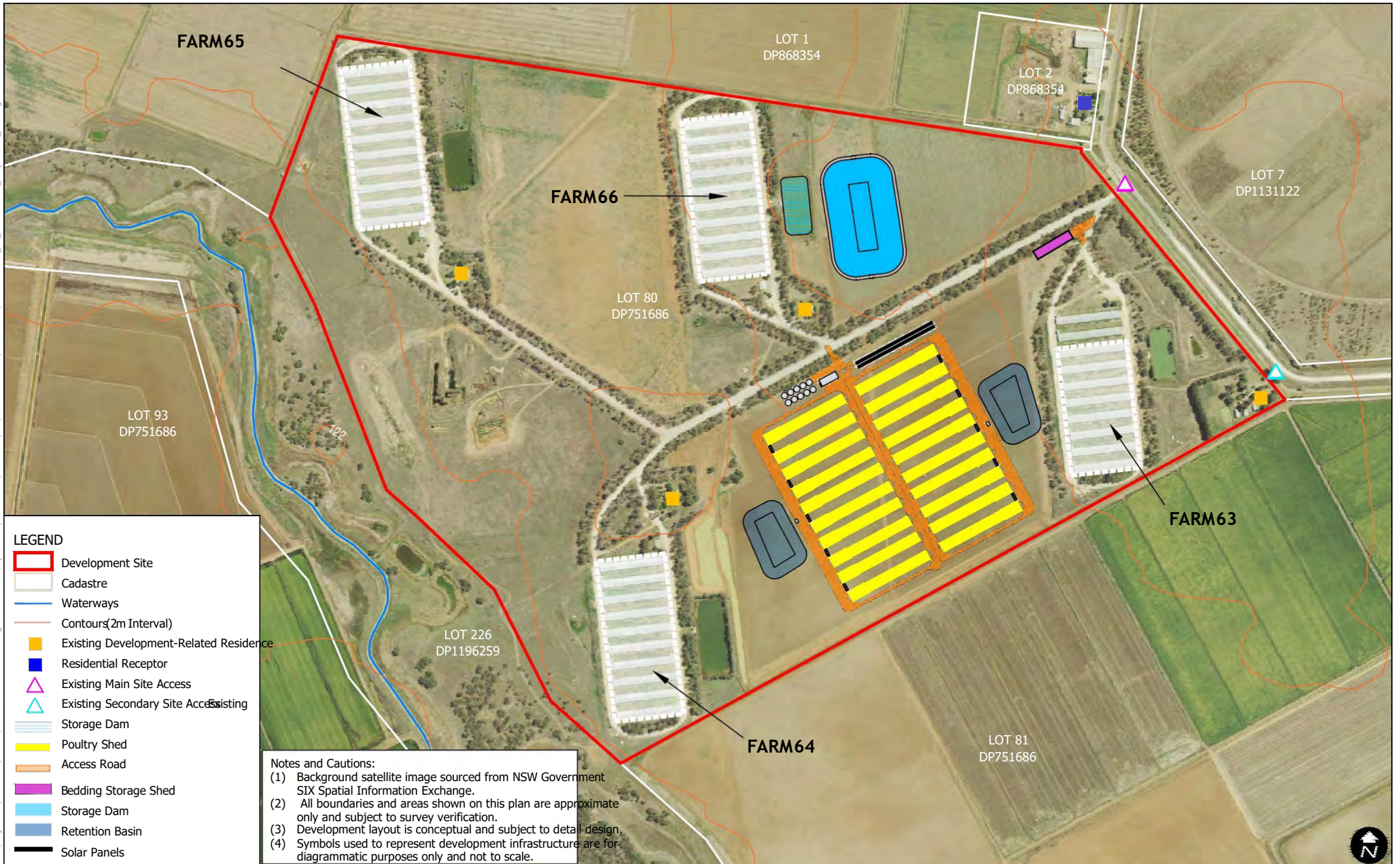
The likelihood of major environmental hazards occurring at the Stubbings Farm has been captured via a Risk Assessment (**Appendix A**). It is noted that the Likelihood of Occurrence and Risk Rating is nominated based on residual risk (in consideration of controls). The purpose of the risk assessment was to identify the potential major hazards and/or risk(s) posed by the poultry production operation, the controls necessary to effectively mitigate and/or manage these risks and the key pollution response measures.

The potential major hazards that have been identified at the Stubbings Farm are:

- Gas leaks;
- Chemical Spill;
- Petrol or Diesel Spill; and Fire in or around the poultry sheds.
- Failure of the various waste management systems.
- Failure of the surface water management system.
- Mass mortality event.



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2.3 Pre-Emptive Action to be Taken

Pre-Emptive Actions to be Taken to minimise or prevent any risk of harm to human health or the environment arising from the activities undertaken at the premises has been captured via the Risk Assessment (**Appendix A**).

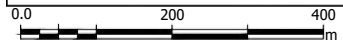
Figure 2 shows the sites water bodies and discharge locations.



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Notes and Cautions:
 (1) Background satellite image sourced from NSW Government SIX Spatial Information Exchange.
 (2) All boundaries and areas shown on this plan are approximate only and subject to survey verification.
 (3) Development layout is conceptual and subject to detail design.
 (4) Symbols used to represent development infrastructure are for diagrammatic purposes only and not to scale.



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2.4 Inventory of Pollutants

Appendix C provides a summary of the potential pollutants (hazardous materials) stored and/or used onsite at the Stubbings Farm. The location of these pollutants is shown on **Figure 3**.

2.5 Safety Equipment

Table 2 lists the safety equipment kept onsite at the Stubbings Farm.

Table 2: Inventory of Safety Equipment

Product Name	Location(s)	Calibration/Maintenance Requirement
Fire Hydrants & Fire Extinguishers	Poultry sheds	Checked every 6 months
SDSs	Staffroom	When a new chemical is brought on site or the SDS is update/revised
First AID Kits	Staffroom	As required
Personal Protective Equipment (PPE)	Workshop/office/staffroom	As required and needed
Eye Wash Stations	Chemical Shed	Checked monthly and maintenance as required
Spill Kits	Chemical Shed	Checked every 6 Months and restock as required

Figure 4 illustrates the location of fire safety and first aid equipment stored across the site.





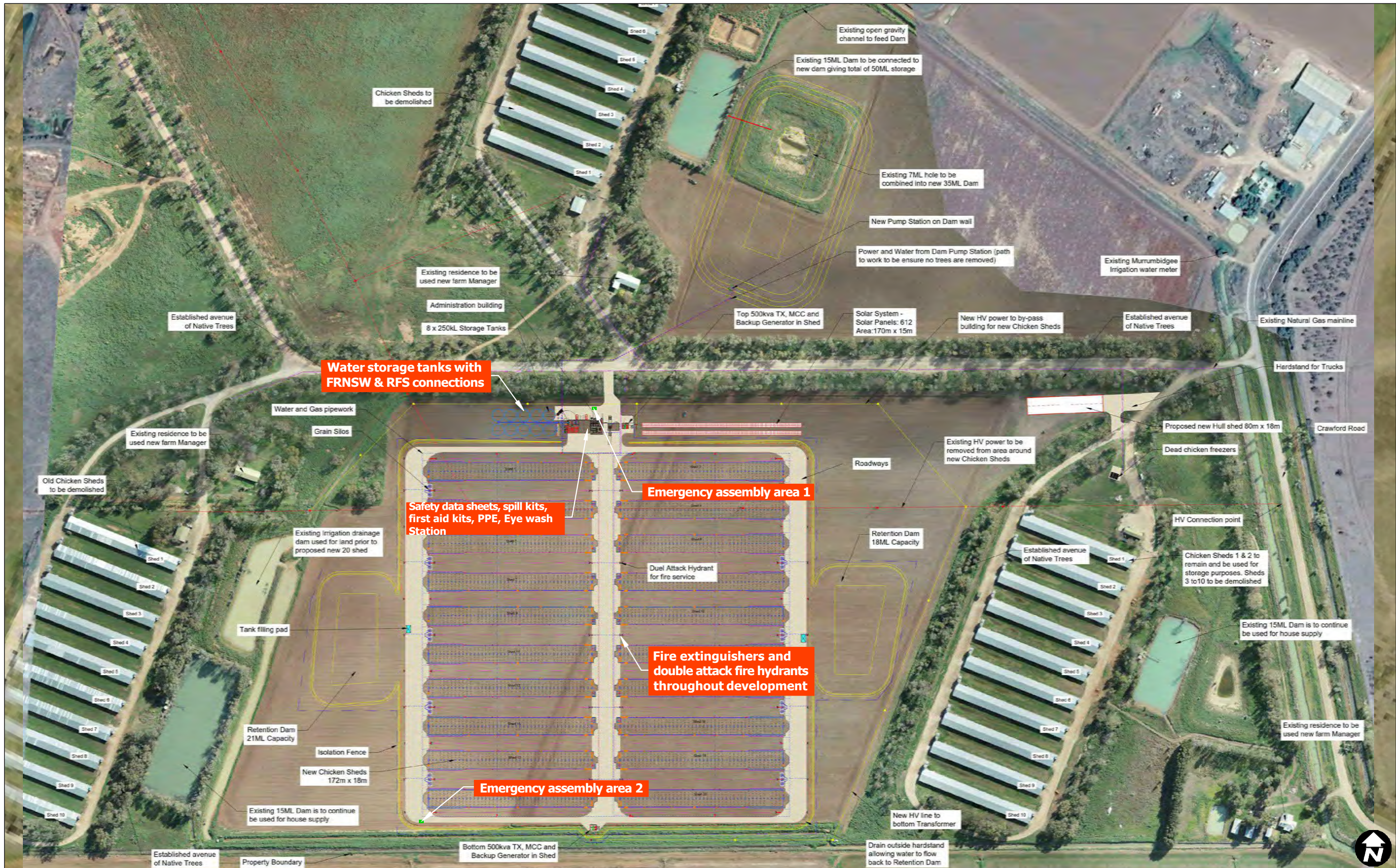
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3.0 Management and Responsibilities

3.1 Stubbings Contact Details

The management and implementation of this PIRMP is to be undertaken by the key individuals listed in **Table 3**. These individuals are responsible for activating the PIRMP and managing the response to the incident. It is the responsibility of the CEO to authorise who will notify the relevant authorities following an incident.

Table 3: Primary Contacts for the Stubbings Farm

Key Contact	Contact Details	Position
		ProTen CEO
		Griffith and Hanwood Regional Operations Manager
		National SHEQ Manager
		SHEQ Officer
		Stubbings Manager

Whilst personal contact details are listed in the controlled version of the PIRMP maintained onsite, they do not appear in the public document under provision of the *Privacy and Personal Information Protection Act 1998*.

3.2 Relevant Authorities

Table 4 lists the contact details for the relevant authorities that should be notified in the event of a pollution incident at the Stubbings Farm. **Table 4** also lists the contact details for emergency services.

Table 4: Relevant Authorities Contact Details

Appropriate Authority	Key Contact	Contact Details
Environment Protection Authority		Environmental Line – Ph: 131 555 <i>This will result in the incident being recorded and the appropriate person being contacted.</i>
NSW Health	Murrumbidgee Local Health District Population Health Unit - Wagga Wagga	Ph: 026933 9100



Appropriate Authority	Key Contact	Contact Details
SafeWork NSW		Incident Notification Hotline (Response Management Team) - Ph: 131 050
		<i>Select Option 3 to report a 'Serious Incident or Fatality' - this will result in the incident being recorded and the appropriate person being contacted.</i>
Local Authority (Council)	Griffith City Council - Environment Manager	Ph: 0269628100
		<i>After office hours, emergency calls are diverted to Council's after hours service (on the same phone number).</i>
Emergency Services (Fire and Rescue NSW and NSW Police)		Emergency - Ph: 000
		Fire & Rescue - Ph: 1300 729 579
Department of Primary Industries	General enquiries	Ph: 02 6391 3100
	Agriculture	Ph: 1800 808 095
		Email: nsw.agriculture@dpi.nsw.gov.au

3.3 Communication with Neighbours and the Local Community

Stubbings is located within a rural setting that is removed from any populated areas, with the nearest being the village of Hanwood approximately 6 km to the north. The Site also has a relatively low density of surrounding residences, with the nearest identified on **Figure 1**.

In the event of a pollution incident, ProTen have established the following processes for contacting the local community:

- Site Management will consult with the regulatory authorities to determine if the community is to be notified of the pollution incident and will discuss the most appropriate communication strategy with the regulatory authorities (for example, media release or direct contact with those potentially impacted).
- When determining the appropriate response and notification process for a particular pollution incident, all aspects of the pollution event will be taken into consideration, e.g., the type and extent of pollution. Notification strategies may include door knocking, letter drop, phone calls, SMS, or email where contact details are available, notifications on social and mass media as appropriate to the circumstances.
- Notification of neighbouring properties shall be undertaken at the determination of Site Management. Determination will be risk based on considering materiality of the event, incident type and prevailing conditions.

The following notification methodology is proposed to be utilised as required:

- Immediate contact during an incident for neighbours at risk of downstream / flow-on impacts.
- Early warnings: same day telephone notification to landholders who may be affected by the incident over the subsequent 24-hour period.
- Updates: follow up phone calls to all landholders who may have been notified by the initial early warning.
- Updates are to be provided to the broader local community in affected areas via information sheets or newsletters, ProTen website, media statements or any other



strategy as deemed necessary. Information provided to the community will be relevant to the incident and may include the following details:

- a) Type of incident that has occurred.
- b) Type of pollutant.
- c) Prevailing winds.
- d) Magnitude of the emission.
- e) The likelihood of the pollutant reaching ground level.
- f) Potential impacts on any sensitive receptors, the local landholders, and the community.
- g) Site contact details.
- h) Advice or recommendations based on the incident type and scale.

A list of community contact details is available on-site should notification be required.

3.4 Minimising Harm to Persons on the Premises

All staff and contractors are inducted and trained prior to completing any work on site. The induction covers procedures for minimising the chance of a pollution incident occurring, notification processes, managing a pollution incident and actions following a pollution incident. Records of staff training are kept onsite.

Minimising the impact to persons at the Stubbings Farm during a pollution incident must be the highest priority. In the event that a pollution incident requires the evacuation of the site, actions will be completed in accordance with ProTen's Standard Operating Procedure titled 'Emergency Procedures'. In the event of an evacuation:

- The notification system will be sounded;
- The Warden is to contact emergency services if required;
- The Warden (or other staff member nominated by the Warden in his/her absence) is the only person to coordinate with the emergency services;
- Employees are to promptly stop work and move to the nearest emergency assembly area and remain there until instructed to leave;
- The Warden (or other staff member nominated by the Warden in his/her absence) is to perform a role call;
- Once the Warden gives the all clear employees are able to return to work; and
- ProTen's Regional Operations Manager is to be notified as soon as possible following an actual emergency event.

All staff are informed of the location of Emergency Assembly Areas through site inductions, signage and on-going training. As part of the preparation of the PIRMP, the key aspects of the PIRMP will be provided to staff and contractors. The PIRMP will be tested every twelve months as detailed in **Section 5.2**.

3.5 Legal Duty to Notify

All employees, contractors and sub-contractors at the Stubbings Farm are responsible for alerting Site Management to hazards and potential hazards that may result in an environmental incident, regardless of the nature or scale.



Notification responsibilities are detailed in section 148 of the POEO Act, and these can be categorised broadly as:

- The duty of an employee or any person undertaking an activity:
Any person engaged as an employee or undertaking an activity (at Stubbings) must, immediately after becoming aware of any potential incident, notify their relevant manager of the incident and all relevant information about it. This is to be undertaken as per **Section 3.0**; and
- The duty of the employer or occupier of a premises to notify:
An employer or occupier of the premises on which the incident occurs, who is notified (or otherwise becomes aware of) a potential pollution incident, must undertake notification to the appropriate regulatory authorities of any “material harm incidents”, as defined in **Section 1.3**, including relevant information. Notification shall be undertaken by Site Management (with prior authorisation from ProTen CEO) as per **Section 3.0**.



4.0 Incident Management

4.1 Immediate Notification of a Pollution Incident

Licensees must notify all of the relevant authorities of pollution events immediately (contact details can be found in **Table 4**), which, for the Stubbings Farm, are identified as:

- EPA;
- Health NSW;
- SafeWork NSW;
- Griffith City Council; and
- Fire and Rescue NSW.

Note: “immediately” (section 148 POEO Act) means that licensees need to report pollution incidents without delay.

4.2 Actions During a Pollution Incident

ProTen aims to effectively respond to any environmental incident and promptly prevent or reduce any adverse environmental impact. Site Management is responsible for coordinating the PIRMP procedure in the event of an environmental incident and ensuring that staff members working in critical areas are trained appropriately. All staff are instructed to notify Staff Management of any environmental incident and take immediate action (where it is safe to do so) to prevent, contain and/or minimise the environmental impact of the incident.

Upon becoming aware of an environmental incident, Site Management is required to follow these steps:

1 Preventative Action

Where possible and safe to do so, immediate action should be taken to prevent, stop, contain and/or minimise the environmental impact of the incident. The situation should be visually assessed and emergency response undertaken if required.

In the event that a pollution incident requires the evacuation of the site, actions will be completed in accordance with the Site Evacuation Procedure. All staff are informed on the location of Emergency Assembly Areas through site inductions, signage and on-going training.

2 Assistance

Where assistance is required in handling the situation, ProTen’s Regional Operations Manager should be contacted (**Table 3**).

Where the incident is reported via a regulatory authority the Regional Operations Manager must be notified immediately (even if outside of normal business hours).

The person reporting the pollution incident should provide the following key details:

- Location of the pollution incident/emergency;
- Nature of the pollution incident/emergency;
- Their name and contact details; and
- Details of any assistance required.

If adequate resources are not available and the incident threatens public health, property or the environment, Fire and Rescue NSW should be contacted on 000 for emergency assistance and/or the EPA can be contacted on 131 555 (Environment



Line). If Fire and Rescue NSW is called, they may notify the EPA if they consider the environment or public health to be threatened. Notification by Fire and Rescue NSW does not negate the notification requirements outlined below.

3 Notify

Under the provisions of the 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. The specific duties to notify are outlined in Sections 3.5 and 4.1. The relevant authorities required to be immediately notified are listed in Table 4.

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 such as specialist contractors/consultants 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 ProTen's standard Environmental Incident Report Form contained within Appendix B. A copy of the completed form should be maintained for at least four years.

Additional controls for managing chemical spills include:

- Advise relevant regulatory authorities if spill is considered to be significant or threatening material harm, and adhere to any instructions issued by them;
- Recover material into other containers if feasible;
- Where possible, contain spillage onto vermiculite or similar absorbing materials such as those produced by various chemical companies;
- Remove contaminated soil and or/absorption material to an approved disposal site as advised by the EPA or Council;
- Replace with clean soil or material once it has been established that all contamination has been removed; and
- For minor spills the actions indicated in the SDSs relating to spills or leaks should be followed.

4.3 Actions Following a Pollution Incident

In the event of a pollution incident, there will be a detailed incident investigation completed will be completed by a ProTen employee and a report will be sent to Site Management and relevant regulatory authorities. As with all complaints, if ProTen was notified of the pollution incident by a member of the public, the complaint will then be logged as per the Environmental Complaint Record Form. All complaints records will be kept on site in a legible format for a minimum of four years.

Depending on the nature and/or extent of the pollution incident, ProTen will consult with the relevant authorities when determining whether the community will be notified of the pollution



incident. If the community is to be notified, and as outlined in **Section 3.3**, ProTen will decide the most appropriate consultation and/or notification strategy with the relevant authorities.

Within a month following a pollution incident, the PIRMP will be reviewed and tested (Refer **Section 5.0**). ProTen will continue to liaise with the relevant authorities to reduce the likelihood of the pollution incident re-occurring.

All staff and contractors will receive the necessary refresher training, and the key outcomes of the incident investigation will be reported to staff and contractors.



5.0 Training, Testing and Communications

5.1 Staff Training

The requirements of the PIRMP are outlined in the site induction of all new employees and contractors. The objective of this training was to ensure all staff and contractors are aware of the key steps required to respond to and manage a pollution incident. Following a pollution incident, refresher training will be delivered to staff and contractors.

5.2 Testing of the PIRMP

The PIRMP testing will be coordinated by the Farm Manager and undertaken to ensure that the information included in the PIRMP is accurate and up to date, and that the PIRMP is capable of being implemented in a workable and effective manner.

Routine testing of the PIRMP will be conducted annually in September or within 30 days of any pollution incident occurring, and can be completed through the following methods:

- Incident response.
- Simulated environmental emergency.
- Desktop simulations.

Records documenting the date on which the Plan was tested and the name of the staff members who carried out the testing will be maintained (refer **Appendix D**). Each test will be maintained on record for at least 4 years.

5.3 Review

The PIRMP will be reviewed and tested every 12 months in accordance with the General Regulations. Reviews are to be carried out in a manner that ensures the information included in the PIRMP is accurate and current and ensures that the PIRMP is capable of being implemented in a workable and effective manner.

Where PIRMP Reviews identify elements that require the PIRMP to be updated, revisions will be undertaken within 30 days of completing the review. The version number and date of the PIRMP is to be updated within the revision record.

Reviews are to be coordinated by the Farm Manager. The objectives of a review are:

- To maintain compliance with the statutory requirements.
- Consider changes on activities on neighbouring properties.
- To identify opportunities for improvement in the PIRMP.

PIRMP Reviews will be undertaken on event and time-based triggers.

5.3.1 Time Based

This management plan will be reviewed every 12 months in September. The Plan review will include:

- This Document.
- Legislation, Approval and Licence changes.

PIRMP reviews will be undertaken regularly to ensure the PIRMP is current and fit for purpose. Reviews will be coordinated by the Farm Manager with the following objectives:

- Identify and consider changes to site (infrastructure, processes, practices).



- Identify and consider changes to the strategic and statutory context.
- Identify and consider changes to ownership / development status of neighbouring properties.
- Identify and consider opportunities for improvement in the Plan.

5.3.2 Event Based

Events which may trigger a review of this Plan, or its associated documents include:

- Reporting to the nominated parties in accordance with the plan.
- Activating the PIRMP (within 30 days).
- Completing PIRMP Testing (within 30 days).
- Change of operations including significant increase of production capacity, significant new plant and equipment is installed or upgraded and when the layout of the site is changed (e.g., relocation of a chemical storage area), requiring a new risk assessment (prior to operation of the change).
- Modification/Improvement to site processes (prior to operation of the change).



6.0 References

Environment Protection Authority (2022) *Guideline: Pollution Incident Response Management Plans*.



7.0 Feedback

At SLR, we are committed to delivering professional quality service to our clients. We are constantly looking for ways to improve the quality of our deliverables and our service to our clients. Client feedback is a valuable tool in helping us prioritise services and resources according to our client needs.

To achieve this, your feedback on the team's performance, deliverables and service are valuable and SLR welcome all feedback via <https://www.slrconsulting.com/en/feedback>. We recognise the value of your time and we will make a \$10 donation to our Charity Partner - Lifeline, for every completed form.





Appendix A Risk Assessment

Pollution Incident Response Management Plan (PIRMP)

Stubbings Poultry Production Farm

ProTen Hanwood and Lethbridge Pty Ltd as trustee for, ProTen Hanwood and Lethbridge Trust

16 July 2024

STUBBINGS PIRMP RISK ASSESSMENT

Risk No.	Hazard	Potential Risk	Current Controls	Risk Rating with Current Controls		
				Consequence	Likelihood	Risk Rating
1	Spill	Minor chemical/fuel spill causing impact to the environment and/or human health	<ul style="list-style-type: none"> Chemicals stored and handled in accordance with the relevant AS and EPA requirements. Diesel stored in aboveground bunded tanks, with the minimum bund volume being 110% of the respectively tank capacity. Tanks located away from the chemical store and away from anything else considered flammable. 	3	C	Medium
2		Major chemical/fuel spill causing impact to the environment and/or human health	<ul style="list-style-type: none"> SDSs maintained within the office-workshop and/or chemical store. Spill kits maintained within the office-workshop and/or chemical store. PPE maintained within the office-workshop and/or chemical store. Employees/contractors instructed in the proper use and handling of chemicals/fuels, as well as spill response. 	5	E	Medium
3	Water	Failure of the surface water management system resulting in off-site discharge from retention dams	<ul style="list-style-type: none"> Poultry shed wash down water and rainfall runoff within the farm bounds captured in the engineered surface water management system conservatively designed to cater for a 1% AEP 72-hour event. On-going inspection and maintenance program to ensure the continued integrity and efficiency of the surface water management system. Dry-cleaning practices at the end of cycle maximised within the poultry sheds to minimise the volume of wash water and the amount of poultry litter (and associated sediments and nutrients) in the wash down water. 	3	D	Low
4		Retention dams leak leading to groundwater infiltration	<ul style="list-style-type: none"> Internal surfaces of the retention dams compacted or lined to provide an impermeable surface. 	3	D	Low
5		Failure of the sewage management system servicing the staff amenities leading to surface water and/or groundwater impact	<ul style="list-style-type: none"> AWTS installed providing secondary level treatment for the relatively small volume of sewage to be generated by the staff amenities. AWTS serviced and maintained in accordance with the manufacturer's specifications and Council requirements. 	2	D	Low

Risk No.	Hazard	Potential Risk	Current Controls	Risk Rating with Current Controls		
				Consequence	Likelihood	Risk Rating
6	Waste	Failure of the solid waste management systems leading to on-site stockpiling and/or disposal and associated environmental impact	<ul style="list-style-type: none"> Waste streams will be managed in accordance with the reuse/recycling/disposal methods listed in the EIS (and PIRMP). Waste materials removed from site for reuse/recycling/disposal will be directed to a facility lawfully permitted to accept the respective material. There will not be any on-site stockpiling or disposal of waste, including poultry litter and dead birds. Waste materials generated elsewhere (i.e. outside of the Stubbings site) will not be received on-site for any purpose. 	3	D	Low
7	Mass mortality	Mass mortality event leading to on-site stockpiling and/or disposal of birds and associated environmental impact	<ul style="list-style-type: none"> A range of proven biosecurity measures implemented on a routine basis in accordance with government and industry guidelines. Quarantine, slaughter and disposal procedures detailed in the <i>Biosecurity and Emergency Disposal Plan</i> prepared in compliance with the latest versions of <i>AUSVETPLAN: Operational Manual – Destruction of Animals</i> and <i>AUSVETPLAN: Operational Manual – Disposal</i>. The preferred disposal option in the event of mass mortality is in-shed composting, which has been identified by emergency management agencies as a preferred method of carcass disposal. When undertaken properly in enclosed sheds with sealed flooring (like at Stubbings), in-shed composting should not result in any notable environmental impact. 	4	E	Low
8	Fire	Fire event in and/or around the poultry sheds and ancillaries causing a nearby combustible load to be ignited	<ul style="list-style-type: none"> The walls of the poultry sheds are made of fire-retardant insulated panels. Buildings, including electrical installations and fire provisions, designed, constructed and maintained in compliance with the relevant requirements of the BCA and relevant AS. Diesel tanks located maintained away from the chemical store and away from anything else considered flammable. Water storage tanks (combined 2,500 kL) are interconnected and automatically filled via a pressurised line to remain near capacity. These tanks are available for fire-fighting purposes, with one fitted with a 150 mm large bore suction connection for FRNSW and two 65 mm small bore suction connections for NSW RFS. General housekeeping regularly undertaken to ensure any trees/shrubs in the vicinity of electrical installations are adequately pruned or removed to maintained clearance and the areas around electrical installations are kept clear of any combustible materials. PPE maintained within the office-workshop and/or chemical store 	4	D	Medium

Risk No.	Hazard	Potential Risk	Current Controls	Risk Rating with Current Controls		
				Consequence	Likelihood	Risk Rating
9		Off-site discharge of fire-fighting water runoff	<ul style="list-style-type: none"> • Fire-fighting runoff expected to enter the engineered surface water management system, which has been conservatively designed to cater for a 1% AEP 72-hour event, and be captured in the retention dams. • On-going inspection and maintenance program to ensure the continued integrity and efficiency of the surface water management system. 	3	D	Low

PIRMP Risk Matrix Tool

Step 1 - Consequence Criteria

Level		Description
1	Insignificant	<ul style="list-style-type: none"> • Incident that causes negligible reversible environmental impact requiring very minor or no remediation. • No injuries and no first aid required. • Very low financial impact.
2	Minor	<ul style="list-style-type: none"> • Incident that causes minor reversible environmental impact requiring minor remediation. • Minor spill immediately contained with no off-site impacts. • Minor injuries requiring only first aid treatment. • Low financial impact.
3	Moderate	<ul style="list-style-type: none"> • Incident that has caused moderate reversible environment impact with short-term effect requiring moderate remediation. • Minor spill contained without external assistance. • Injuries requiring medical treatment. • Moderate financial impact.
4	Major	<ul style="list-style-type: none"> • Incident that causes serious environmental impact with medium term effects requiring significant remediation. • Major spill with off-site impacts. • Significant injuries requiring medical treatment. • Major financial impact.
5	Catastrophic	<ul style="list-style-type: none"> • Incident that causes disastrous environmental impact with long term effect requiring major remediation. • Major uncontained spill with off-site impacts. • Permanent disability and/or death. • Huge financial impact.

Step 2 - Likelihood Criteria

Level		Description
A	Almost certain	<ul style="list-style-type: none"> • Incident is anticipated to occur on multiple occasions. • Event is likely to occur more than twice a year.
B	Likely	<ul style="list-style-type: none"> • Incident is likely to occur at least once. • Incident is likely to occur once or twice a year.
C	Possible	<ul style="list-style-type: none"> • Incident may occur. • Incident is likely to occur more than once or twice in a 5 year period.
D	Unlikely	<ul style="list-style-type: none"> • Incident is unlikely to occur. • Incident is likely to occur once or twice in a 10 year period.
E	Rare	<ul style="list-style-type: none"> • Incident is anticipated to occur only in exceptional circumstances. • Incident is likely to occur once or twice in a 20 year period.

Step 3 - Risk Matrix

Likelihood	Consequence				
	5 - Catastrophic	4 - Major	3 - Moderate	2 - Minor	1 - Insignificant
A – Almost Certain	High	High	High	Medium	Medium
B – Likely	High	High	Medium	Medium	Low
C – Possible	High	Medium	Medium	Low	Low
D – Unlikely	Medium	Medium	Low	Low	Low
E - Rare	Medium	Low	Low	Low	Low



Appendix B Environmental Incident Report Form

Pollution Incident Response Management Plan (PIRMP)

Stubbings Poultry Production Farm

**ProTen Hanwood and Lethbridge Pty Ltd as trustee for, ProTen Hanwood and
Lethbridge Trust**

16 July 2024



Section A - Incident Details

Incident Details	
ProTen Farm	
Date	
Time	
Description of incident	
Recorded by	
Investigation	
Has the incident caused, or does it threaten to cause material harm to the environment?	YES / NO If yes, implement PIRMP (NSW) and contact EPA and Authorities as per section B Comments:
Person responsible for investigating and Reporting	
Investigation method	
Findings of investigation	
Action Taken and Close Out	
Remedial Action taken	Yes/No If Yes, Describe:



Further Corrective Action required	Yes/No If Yes, Describe:
Report submitted to EPA	Date Time
Close out	Name: Title: Signature: Date:



Section B – Notification of Authorities for PIRMP

Authority:		Emergency Services – Fire/Police/Ambulance	
Date:		Time:	
Person Spoken to:			
instructions			
Authority:		EPA	
Date:		Time:	
Person Spoken to:			
EPA Incident Number:			
instructions			
Authority:		EPA – Local Office	
Date:		Time:	
Person Spoken to:			
instructions			
Authority:		NSW Health	
Date:		Time:	
Person Spoken to:			
instructions			
Authority:		Safework NSW	
Date:		Time:	
Person Spoken to:			
instructions			
Authority:		Local Council	
Date:		Time:	
Person Spoken to:			
instructions			
Authority:		DPE	
Date:		Time:	
Person Spoken to:			
instructions			



Appendix C Chemical Register

Pollution Incident Response Management Plan (PIRMP)

Stubbings Poultry Production Farm

ProTen Hanwood and Lethbridge Pty Ltd as trustee for, ProTen Hanwood and Lethbridge Trust

16 July 2024

Stubbings - CHEMICAL REGISTER

UPDATED: 18/06/2024

General Use

Product	Description	Preferred Supplier	Hazardous Substance (Y/N)	Dangerous Goods Class	Poisons Standard (SUSMP)	SDS expiry Date	UN#	APVMA#	Unit Weight	Maximum Stock Qty	Storage Location	Usage
ADAMA MCPA 750 selective Herbicide	Herbicide	Adam Australia	Y	9	S6	18/10/2026	3082	68355	5L	5L	Chemical Shed	Control of Weeds
Amoxicillin Trihydrate	Amoxicillin	BAIADA	N	NA	NA	15/12/2026	NA	NA	500g	100kg	Chemical Shed	Animal Health product
Apparent Concussion 540	Herbicide	Griffith Feed and Grain	Y	3 (PG III)	N/A	3/11/2027	1170	N/A	25 L	50 L	Chemical Shed	Control of Weeds
Apparent Oxyfluorfen 240 Herbicide	Broadleaf Herbicide	Griffith Feed and Grain	Y	N/A	S6	18/10/2026	N/A	56310	20L	20L	Chemical Shed	Control of broadleaf weeds
Apparent Paraquat 250	Herbicide	Griffith Feed and Grain	Y	8 (PG III)	S7	1/06/2026	2922	66103	20L	40L	Chemical Shed	Control of broadleaf weeds
Apparent Territory 500 GW	Broadleaf Herbicide	Griffith Feed and Grain	Y	9 (PG III)	S6	1/12/2025	3077	88880	2kg	4kg	Chemical Shed	Control of broadleaf weeds
Barmac Out of Bounds	Insecticide and Termiticide	Griffith Feed and Grain	Y	N/A	S6	1/03/2026	N/A	65703	5 L	5L	Chemical Shed	Control of Spiders and insects
BeetleBETA	Insecticide spray for litter beetle	Meyers	Y	NA	S6	20/07/2026	NA	66448	1L	NA	Chemical Shed <i>Temporary storage during cleanout</i>	Sprayed on empty sheds to Control litter beetle
Citric Acid	Ph reduction	Integra	Y	N/A	N/A	4/06/2025	N/A	N/A	500L	500L	Pump shed	Water pH buffering
ClearFloX 549	Flocculant	Integra	N	N	N/A	22/06/2025	N/A	N/A	1000L	1000L	Pump Shed	Removal of suspended particals in the Water supply
CTC ECO Oral Powder	Poultry Medication	BAIADA	N	N/A	S4	1/11/2024	N/A	N/A	500g	100kg	Chemical Shed	Animal Health product
DEB Instant foam	Hand sanitiser	Rapid Clean	Y	3	N/A	5/05/2025	1987	68355	500ml	25L	Every entrance/Office	Sanitising hands prior to entry to farm and sheds
Diesel	Automotive Diesel Fuel	Caltex	Y	9	C1	23/06/2026	3082	N/A	Generator 1 & 2 - 4500L	9000L	Generator Shed	Fuel for tractor and generators
Elector PSP	Pesticide	Elanco	N/A	N/A	N/A	23/11/2028	3082	59422	1L	N/A	Chemical Shed <i>Temporary storage during cleanout</i>	Sprayed on empty sheds to Control litter beetle
Formaldehyde	Disinfectant Germicide	Meyers	Y	8 (PG III)	S6	1/02/2027	2209	52611	20L	N/A	Chemical Shed <i>Temporary storage during cleanout</i>	Fogging Sheds
FulaFoam Expand Foam	Adhesive	Collier and Miller	N	2.1	NA	8/02/2026	1950	N/A	750gmm	10x750gm	Workshop	Adhesive for filling in gaps
Glutachem Sanitiser	Disinfectant	Meyers	Y	8 (PG II)	NA	3/08/2026	1760	61656/102596	20L	N/A	Chemical Shed <i>Temporary storage during cleanout</i>	Sanitising Sheds before placement
Glutaplus Sanitiser	Disinfectant	Meyers	Y	N/A	NA	3/08/2026	N/A		20L	N/A	Chemical Shed <i>Temporary storage during cleanout</i>	Sanitising Sheds before placement
Glyphosae 450 Herbicide	Herbicide	Titan	Y	N/A	S5	27/05/2027	1170	65087/119892	25l	50L	Chemical Shed	Control of Weeds
Kubota UDT	Tractor Engine Oil	Collier and Miller	N	NA	NA	3/08/2027	NA	NA	20L	20L	Workshop	Engine oil for Powered Mobile plant
Larvabeta	Insecticide spray for litter beetle	Meyers	Y	NA	S6	4/06/2028	NA	84858	1L	NA	Chemical Shed <i>Temporary storage during cleanout</i>	Sprayed on empty sheds to Control litter beetle
Natural Gas	Gas	AGL	Y	2.1	N/A	31/01/2025	1972	N/A	N/A	N/A	Main line	Heating sheds
Oxyfluorfen eg. Cavalier	Broadleaf Herbicide	Griffith Feed and Grain	Y	N/A	S6	1/02/2026	N/A	56310	20L	20L	Chemical Shed	Control of broadleaf weeds
Pestmaster Rat and Mouse Killer	Wax blocks	Griffith Feed and Grain	N	N/A	S6	1/01/2026	N/A		8 kg Buckets	80 kg	chemical shed	Control of Weeds

Product	Description	Preferred Supplier	Hazardous Substance (Y/N)	Dangerous Goods Class	Poisons Standard (SUSMP)	SDS expiry Date	UN#	APVMA#	Unit Weight	Maximum Stock Qty	Storage Location	Usage
Protosan	Sanitiser – Sheds	Meyers	N/A	N/A	S6	1/02/2027	N/A	39774	20L	N/A	Chemical Shed <i>Temporary storage during cleanout</i>	Spraying inside sheds between batches
Proxitane	Disinfectant	Griffith Feed and Grain	Y	5.1 (PG II)	S6	22/05/2028	3149	47399	20 L	20L	Chemical Shed <i>Temporary storage during cleanout</i>	Sanitising Drinker lines
Ratshot Blue Blocks	Rodenticide Blocks	Griffith Feed and Grain	N	N/A	N/A	30/11/2026	N/A	68762	10kg Buckets	100kg	Chemical Shed	Control of rodents
Ratshot Red Blocks	Rodenticide Blocks	Griffith Feed and Grain	N	N/A	NA	30/11/2026	N/A	69209	10kg Buckets	100kg	Chemical Shed	Control of rodents
Round Up Ultra Max	Herbicide	Griffith Feed and Grain	Y	3 (PG III)	N/A	8/11/2026	1170	68506	25 L	50 L	Chemical Shed	Control of Weeds
Sanitary Grains	Sanitiser for Sanitary Bins		N	N	NA	1/11/2025	N/A	N/A	4kg	10kg	Amenities Block	Sanitiser for Sanitary Bins
Sodium Hypochlorite 12-13%	Liquid Chlorine	Integra	Y	8	N/A	10/06/2025	1791	88600	1000 L	1000 L	Water Treatment Room	Water Sanitation
Stricker Hericide	Herbicide	Griffith Feed and Grain	Y	9 (PG III)	S5	5/04/2028	3082	59090	5L	10L	Chemical Shed	Control of Weeds
Surefire Difenate All Weather Blocks	Rodenticide Blocks	Griffith Feed and Grain	N	N/A	S6	12/10/2025	N/A	69911	10kg Buckets	100kg	Chemical Shed	Control of rodents
Total Kleen	General Cleaner – Washing Sheds	Meyers	N/A	N/A	S5	1/02/2027	N/A	N/A	25L	N/A	Chemical Shed <i>Temporary storage during cleanout</i>	Detergent for washing sheds between batches
Twin Oxide 0.7% Part A	Chlorine Dioxide	Integra	N	NA	S5	23/01/2028	NA	N/A	1000L	1000L	Bulk Tank - Pump Shed	Water Sanitation
Twin Oxide 0.7% Part B	Chlorine Dioxide	Integra	N	NA	S5	23/01/2028	NA	N/A	1000L	1000L	Bulk Tank - Pump Shed	Water Sanitation
Unleaded Fuel	Unleaded Fuel	Yenda Producers	Y	3 (PG I)	S5	13/10/2025	1203	N/A	20L	40L	Workshop	Fuel for farm equipment
Virukill	Sanitiser	Griffith Feed and Grain	Y	NA	NA	11/06/2025	NA	50860	20 L	40L	Chemical Shed and Wheel Wash	Sanitation of equipment and wheels, Cool Cell Sumps

NB. All other Substances may only be kept in minor quantities of less than 5L or 5kg. Any quantity above this will be required to be approved and added to the Chemical Register



Appendix D PIRMP Testing History

Pollution Incident Response Management Plan (PIRMP)

Stubbings Poultry Production Farm

ProTen Hanwood and Lethbridge Pty Ltd as trustee for, ProTen Hanwood and Lethbridge Trust

16 July 2024

Revision	Date	Prepared By	Details of Test/Update	Change Description	Next Review
1	September 2022	Proten	<p>A PIRMP presentation delivered to all farm staff detailing what classifies as a pollution incident and the correct procedure to follow in the event of a pollution incident at the Stubbings Farm.</p> <p>PIRMP quiz completed by all farm staff with signoff by the Farm Manager.</p>	Update of PRIMP testing history and contact details	September 2023
2	September 2023	Proten	<p>A PIRMP presentation delivered to all farm staff detailing what classifies as a pollution incident and the correct procedure to follow in the event of a pollution incident at the Stubbings Farm.</p> <p>PIRMP quiz completed by all farm staff with signoff by the Farm Manager.</p>	Update of PRIMP testing history and contact details	September 2024



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