

# ProTen

## Pollution Incident Response Management Plan (PIRMP)

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**Jeanella South Poultry  
Production Farm** – Mid-Western  
Highway, Goolgowie NSW



20/9/25

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PROTEN PTY LTD

Prepared by: ProTen

Revision: Version 10



## Document Control

| Issue/Version | Date           | Description                                                                                                                                                                                                                                                                                |
|---------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1             | November 2015  | Final PIRMP for approval.                                                                                                                                                                                                                                                                  |
| 2             | October 2016   | Update of PIRMP testing history and contact details.                                                                                                                                                                                                                                       |
| 3             | September 2017 | Update of PIRMP testing history and contact details.                                                                                                                                                                                                                                       |
| 4             | September 2018 | Update of PIRMP testing history and contact details.                                                                                                                                                                                                                                       |
| 5             | September 2019 | Update of PIRMP testing history and contact details.                                                                                                                                                                                                                                       |
| 6             | September 2020 | Update of PIRMP testing history and contact details.                                                                                                                                                                                                                                       |
| 7             | September 2021 | Update of PIRMP testing history and contact details.                                                                                                                                                                                                                                       |
| 8             | September 2022 | Update of PIRMP testing history and contact details.                                                                                                                                                                                                                                       |
| 9             | June 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). |
| 10            | September 2025 | Update of PIRMP template, testing history and contact details.                                                                                                                                                                                                                             |

## Basis of Report

This report has been prepared by ProTen Pty Ltd with all reasonable skill, care and diligence. Information herein is based on the interpretation of data collected, which has been accepted as being accurate and valid.

## Contents

|                                                                  |           |
|------------------------------------------------------------------|-----------|
| <b>Document Control</b> .....                                    | <b>1</b>  |
| <b>Basis of Report</b> .....                                     | <b>2</b>  |
| <b>Acronyms and Abbreviations</b> .....                          | <b>5</b>  |
| <b>1.0 Introduction</b> .....                                    | <b>6</b>  |
| 1.1 Background and Scope .....                                   | 6         |
| 1.2 Availability of the PIRMP .....                              | 7         |
| 1.3 Definition of a Pollution Incident .....                     | 7         |
| 1.4 Regulatory Requirements .....                                | 8         |
| <b>2.0 Premises Details</b> .....                                | <b>11</b> |
| 2.1 Site Details .....                                           | 11        |
| 2.1.1 Environment Protection Licence .....                       | 11        |
| 2.2 Description and Likelihood of Hazards .....                  | 11        |
| 2.3 Pre-Emptive Action to be Taken .....                         | 13        |
| 2.4 Inventory of Pollutants .....                                | 15        |
| 2.5 Safety Equipment .....                                       | 15        |
| <b>3.0 Management and Responsibilities</b> .....                 | <b>18</b> |
| 3.1 Jeanella South Contact Details .....                         | 18        |
| 3.2 Relevant Authorities .....                                   | 18        |
| 3.3 Communications with Neighbours and the Local Community ..... | 19        |
| 3.4 Minimising Harm to Persons on the Premises .....             | 20        |
| 3.5 Legal Duty to Notify .....                                   | 21        |
| <b>4.0 Incident Management</b> .....                             | <b>22</b> |
| 4.1 Immediate Notification of a Pollution Incident .....         | 22        |
| 4.2 Actions During a Pollution Incident .....                    | 22        |
| 4.3 Actions Following a Pollution Incident .....                 | 24        |
| <b>5.0 Training, Testing and Communications</b> .....            | <b>25</b> |
| 5.1 Staff Training .....                                         | 25        |
| 5.2 Testing of the PIRMP .....                                   | 25        |
| 5.3 Review .....                                                 | 25        |
| 5.3.1 Time Based .....                                           | 26        |
| 5.3.2 Event Based .....                                          | 26        |
| <b>6.0 References</b> .....                                      | <b>27</b> |
| <b>Appendix A Risk Assessment</b> .....                          | <b>28</b> |

**Appendix B    Environmental Incident Report Form..... 29**

**Appendix C    Chemical Register ..... 30**

**Appendix D    PIRMP Testing History..... 31**

**Tables in Text**

Table 1      Document Directory ..... 8

Table 2      Inventory of Safety Equipment ..... 15

Table 3      Primary Contacts for Jeanella South Farm ..... 18

Table 4      Relevant Authorities Contact Details ..... 18

**Figures in Text**

Figure 1      Location Plan .....12

Figure 2      Onsite Waterbodies.....14

Figure 3      Potential Pollutants .....16

Figure 4      Fire Safety and First Aid Equipment .....17

## **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 20725, the Jeanella South Poultry Production Farm (Jeanella South Farm), which is owned and operated by ProTen Limited (ProTen), 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 Jeanella South Farm) and shall be made readily available to all personnel responsible for implementing the PIRMP and to any authorized officer (as defined in the POEO Act) on request.

The PIRMP will be made publicly available within fourteen (14) days of finalization via the ProTen website [www.proten.com.au](http://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 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 practical 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"> <li>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</li> <li>2. The local authority for the area in which the premises to which the EPL relates; and</li> <li>3. Any persons or authorities required to be notified by Part 5.7 (of the POEO Act).</li> </ol> | 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                          |
| (c)                                        | The procedures to be followed for coordinating, 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                            |
| <b>Clause 72 of the General Regulation</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                      |
| (a)                                        | <i>A description of the hazards to human health or the environment associated with the activity to which the licence relates (the <b>relevant activity</b>),</i>                                                                                                                                                                                                                                                                                                                                                                           | Sections 2.2 and 2.4, and Appendix A |
| (b)                                        | <i>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           |
| (c)                                        | <i>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           |
| (d)                                        | <i>An inventory of potential pollutants on the premises or used in carrying out the relevant activity,</i>                                                                                                                                                                                                                                                                                                                                                                                                                                 | Section 2.4                          |
| (e)                                        | <i>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                          |
| (f)                                        | <i>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                          |

| <b>Section 153C</b>                        | <b>Detail Required</b>                                                                                                                                                                                                                                                                                                                                                       | <b>Section in PIRMP</b>              |
|--------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
|                                            | <i>(g) The names, positions and 24-hour contact details of those key individuals who:</i><br><i>(i) are responsible for activating the plan, and</i><br><i>(ii) are authorised to notify relevant authorities under section 148 of the Act, section 148</i><br><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 <sup>1</sup>               |
|                                            | <i>(p) The manner in which the plan is to be tested and maintained.</i>                                                                                                                                                                                                                                                                                                      | Section 5.2                          |
| <b>Clause 74 of the General Regulation</b> |                                                                                                                                                                                                                                                                                                                                                                              |                                      |
| 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                          |
| 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.<br>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. | Section 1.2                          |
| <b>Clause 75 of the General Regulation</b> |                                                                                                                                                                                                                                                                                                                                                                              |                                      |
| 1)                                         | A PIRM plan must be tested –<br>routinely at least every 12 months.<br>If a pollution incident occurred during an activity to which an environment protection licence relates, which caused or threatened material harm to the                                                                                                                                               | Section 5.2                          |

| Section<br>153C | Detail Required                                                                                                                                                                                                         | Section in PIRMP |
|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|
|                 | environment, within the meaning of the Act, section 147 – within 1 month of the incident occurring.                                                                                                                     |                  |
| 2)              | The test must be carried out in a way to ensure the following –<br>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. | Section 5.2      |

1 – Table of Contents

## 2.0 Premises Details

### 2.1 Site Details

ProTen received Development Consent DA 2016/009 on the 20 October 2015 from Carrathool Shire Council (Council) to develop the Jeanella South Poultry Production Farm (the “Development”) within a rural property approximately 6.5 kilometres southwest of Goolgowi and approximately 46 kilometres northwest of Griffith in south-western New South Wales (NSW).

As shown on Figure 1, the Development comprises one Poultry Production Unit (PPU) where broiler birds are grown for human consumption. The PPU comprises 16 tunnel-ventilated fully-enclosed climate-controlled poultry sheds, with associated support infrastructure and staff amenities. Each shed has the capacity to house 53,500 birds, equating to a site population of up to 856,000 birds. The Development’s disturbance footprint (including access roads, servicing infrastructure and support infrastructure) is relatively small at approximately 25 hectares and the commercial activity associated with the poultry operation is largely confined to the PPU. It is intended to continue using the land outside of the disturbance footprint within the Development Site for continued agricultural production purposes under some form of lease or share farming arrangement.

Construction of the Development commenced in November 2015, with operations scheduled to commence in December 2015.

#### 2.1.1 Environment Protection Licence

Jeanella South ProTen operates under the provisions of EPL 20725 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.

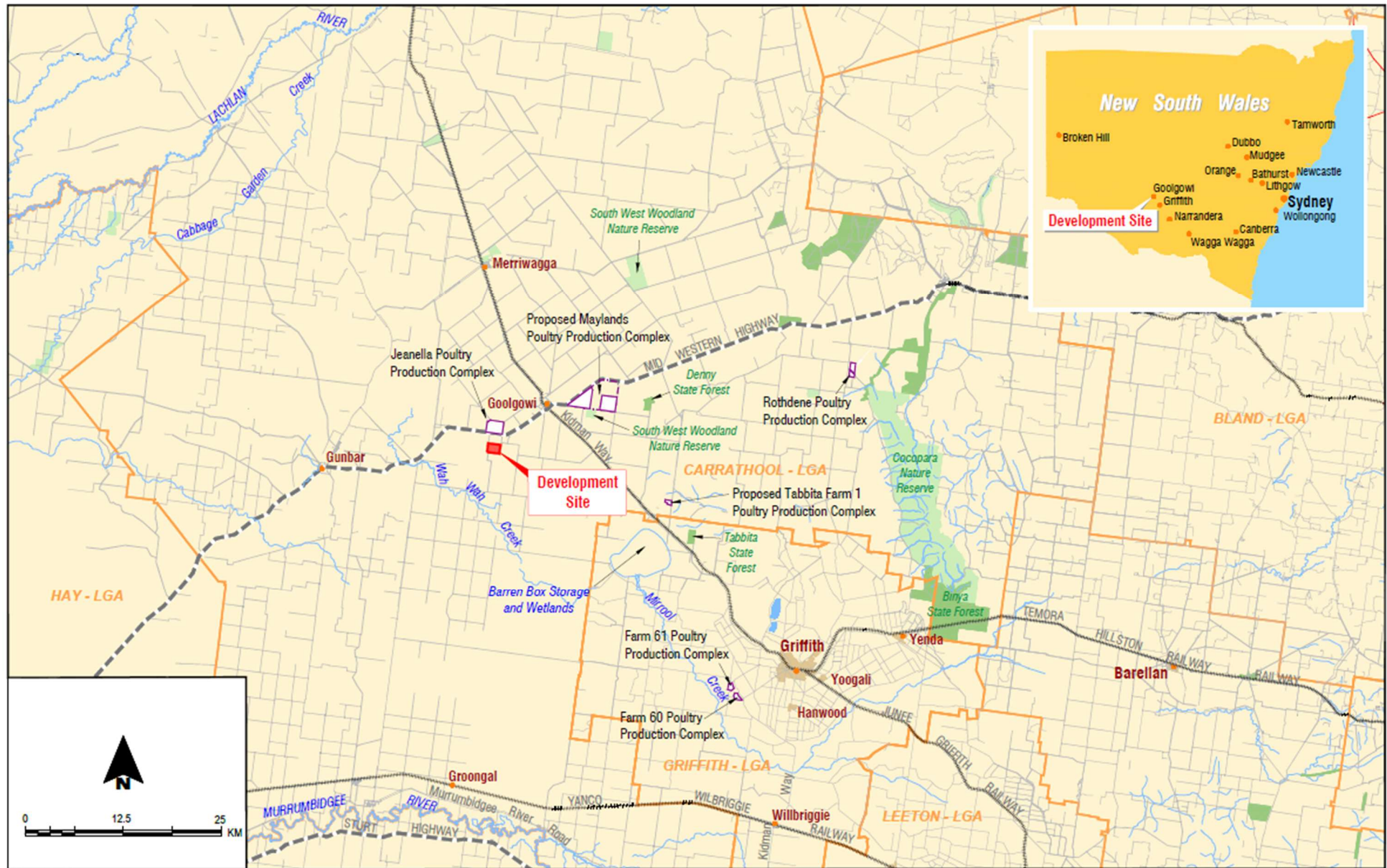
### 2.2 Description and Likelihood of Hazards

The likelihood of environmental hazards occurring at Jeanella South 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 the risks and the key pollution response measures.

The potential major hazards that have been identified at Jeanella South Farm are:

- Gas leaks;
- Chemical Spill;
- Petrol or Diesel Spill; and Fire in or around the poultry sheds.

**Figure 1 Location Plan**



## **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.



## 2.4 Inventory of Pollutants

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

## 2.5 Safety Equipment

**Table 2** lists the safety equipment kept onsite at Jeanella South Farm.

**Table 2** *Inventory of Safety Equipment*

| Product Name                        | Location(s)                | Caibration/Maintenance Requirement                                   |
|-------------------------------------|----------------------------|----------------------------------------------------------------------|
| Fire extinguishers                  | Poultry sheds              | Checked every six (6) months                                         |
| SDSs                                | Chemical stores            | When a new chemical is brought on site or the SDS is updated/revised |
| First AID Kits                      | Office/staffroom           | As required                                                          |
| Personal Protective Equipment (PPE) | Workshop/office/staffroom  | As required and needed                                               |
| Eye Wash Stations                   | Pump sheds & Chemical Shed | Checked monthly and maintenance as required                          |
| Spill Kits                          | Pump Sheds & Chemical Shed | Checked every six (6) months and restocked as required               |

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

Figure 3 Potential Pollutants

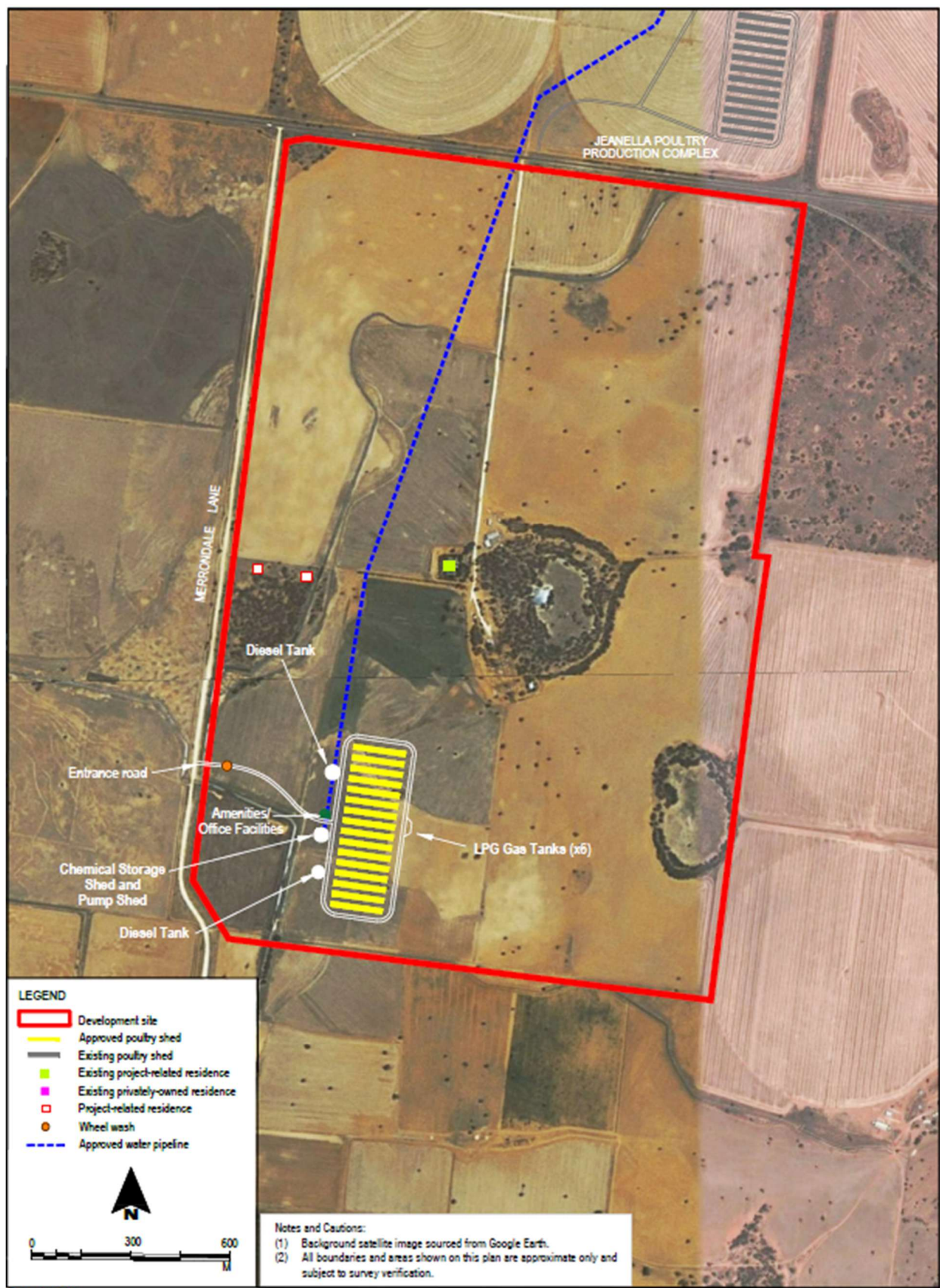
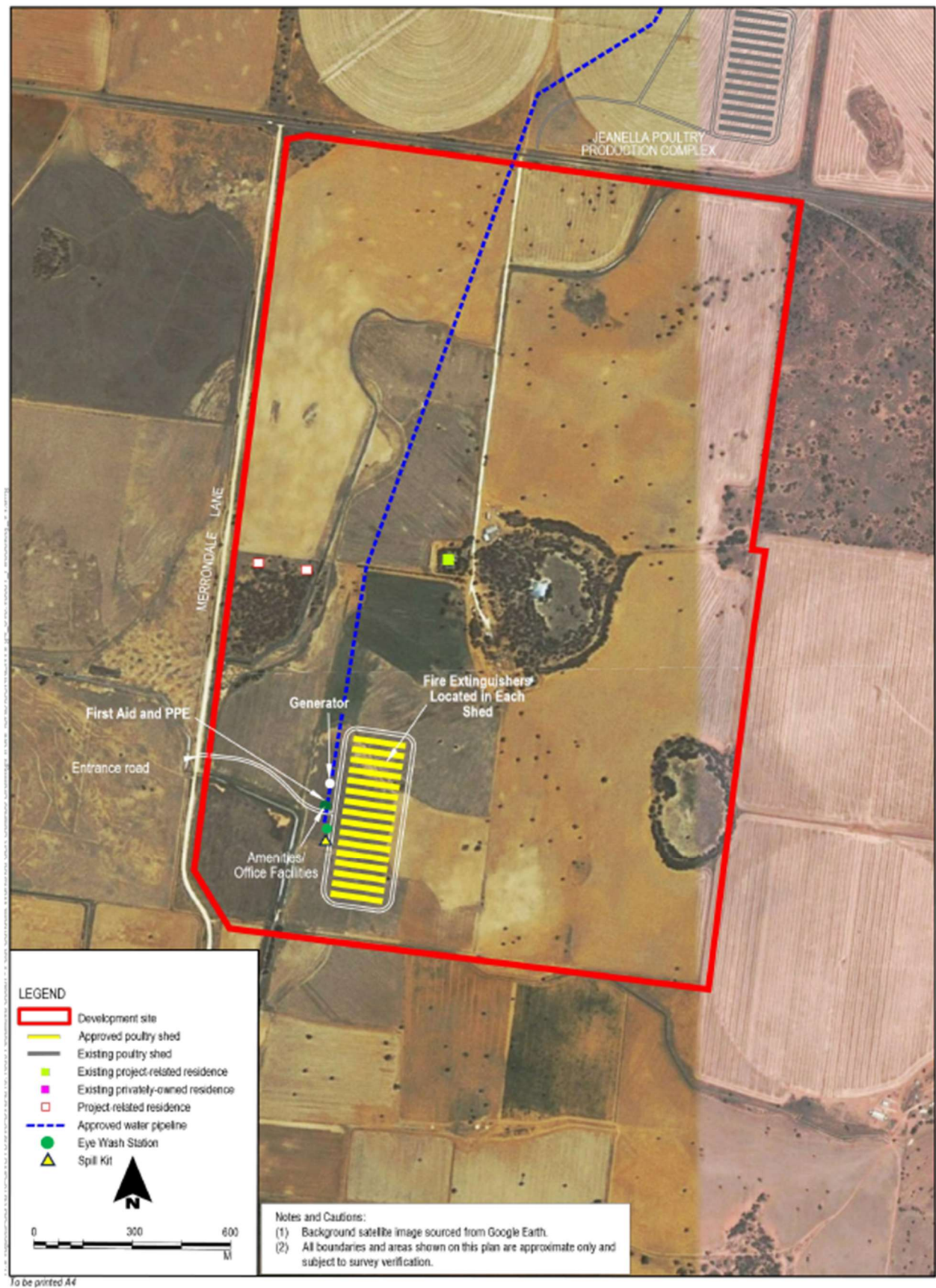


Figure 4 Fire Safety and First Aid Equipment



## 3.0 Management and Responsibilities

### 3.1 Jeanella South 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 responses 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 Jeanella South Farm*

| Key Contact | Contact Details | Position                                         |
|-------------|-----------------|--------------------------------------------------|
|             |                 | ProTen CEO                                       |
|             |                 | Griffith and Hanwood Regional Operations Manager |
|             |                 | National SHEQ Manager                            |
|             |                 | SHEQ Officer                                     |
|             |                 | Farm 74 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 Jeanella South 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<br><i>This will result in the incident being recorded and the appropriate person being contacted.</i> |

| Appropriate Authority                                   | Key Contact                                                    | Contact Details                                                                                                                                                                                                                           |
|---------------------------------------------------------|----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NSW Health                                              | Carrathool Shire Council - Planning and Environment Department | Ph: 02 6965 1900                                                                                                                                                                                                                          |
| SafeWork NSW                                            |                                                                | Incident Notification Hotline (Response Management Team) – Ph: 131 050<br><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)                               | Carrathool Shire Council - Planning and Environment Department | Ph: 02 6965 1900<br><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<br>Fire & Rescue – Ph: 1300 729 579                                                                                                                                                                                    |
| Department of Primary Industries                        | General enquiries                                              | Ph: 02 6391 3100                                                                                                                                                                                                                          |
|                                                         | Agriculture                                                    | Ph: 1800 808 095<br>Email: <a href="mailto:nsw.agriculture@dpi.nsw.gov.au">nsw.agriculture@dpi.nsw.gov.au</a>                                                                                                                             |

### 3.3 Communications with Neighbours and the Local Community

The location of the Development is outlined in Section 2.1 and shown on Figure 1. As advised, the nearest residential dwelling is over 2 kilometres from the nearest poultry sheds. Goolgowi township, located approximately 6.5 kilometres to the north-east of the Development, is identified as the closest populated area.

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 the 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 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 people at Jeanella South 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 they are instructed to leave;
- The Warden (or other staff nominated by the Warden in his/her absence) is to perform a role call;
- Once the Warden gives 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 (12) months as detailed in **Section 5.2**.

### 3.5 Legal Duty to Notify

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

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

- The duty of an employee or any person undertaking an activity:  
Any person engaged as an employee or undertaking an activity (at Jeanella South Farm) 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 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 authorization from ProTen CEO) as per **Section 3.0**.

## 4.0 Incident Management

### 4.1 Immediate Notification of a Pollution Incident

Licensees must notify all the relevant authorities of pollution events immediately (contact details can be found in **Table 4**), which, for Jeanella South 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 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.

If 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 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 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 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 (4) 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 and 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 per the Environmental Complaint Record Form. All complaints records will be kept on site in a legible format for a minimum of four (4) 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 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 four (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 neighboring 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 neighboring 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

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

# Appendix A      Risk Assessment

| APPENDIX A: PROTEN JEANELLA SOUTH COMPLEX POLLUTION RISK ASSESSMENT |                  |                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                |          |                        |           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------------------------------------------------------------|------------------|--------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|------------------------|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Version:-C<br>Date:- June 2024                                      |                  |                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                |          |                        |           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Risk Category                                                       | Risk Ref. Number | Potential Hazard / Risk (Impact)                                                                             | Relevance to Project                                                                                                                                                                                                                                                                                                                                                                   | Circumstances and or Events that could Increase Likelihood                                                                                                                                                                                                                                                                                     | Inherent |                        |           | Pre-Emptive Actions to be Taken                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Pollution Response Measures                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                                     |                  |                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                | C        | L (likelihood of Occur | Rating    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Spill                                                               | 1                | Spill of hazardous material causing impact to human health or environment                                    | Operation of Jeanelle South requires only limited chemical input, however the primary areas of chemical use are cleaning/sanitisation and pest/vermin control.                                                                                                                                                                                                                         | *Operator error.<br>Spill kits outdated                                                                                                                                                                                                                                                                                                        | 3        | C                      | 3C 13 (S) | Limited chemicals stored on site.<br>Chemical storage area container.<br>Contracted company for chemical delivery and pickup services.<br>SDSs available for chemicals stored and used onsite.<br>Relevant staff are instructed on proper use and handling of chemicals and spill/incident management procedures.<br>Training and awareness.                                                                                                                                                                                                                                                                                                                        | 1. Visually assess the situation, consult SDS for the chemical and activate PIRMP and/or emergency evacuation procedure if required.<br><br>2. Contact the Relevant Authorities in accordance with the PIRMP and take direction as required.<br><br>3. Seek immediate assistance from specialist environmental consultants.                                                                                                                                                             |
|                                                                     | 2                | Spill of fuel causing impact to the environment                                                              | Fuel is stored onsite however is located in bunded areas to contain potential spills                                                                                                                                                                                                                                                                                                   | *Bunds not maintained<br>Heavy rainfall event                                                                                                                                                                                                                                                                                                  | 5        | C                      | 5C 22 (L) | Fuel tanks in bunded areas with overflow containers.<br>SDS available for fuel and diesel.<br>Training and awareness.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 4. Complete incident investigation and send report to Relevant Authorities                                                                                                                                                                                                                                                                                                                                                                                                              |
| Surface Water                                                       | 3                | Flood and heavy rainfall events cause dam failures resulting in discharges.                                  | Surface water is stored onsite in dams.                                                                                                                                                                                                                                                                                                                                                | Lack of erosion and sediment inspections<br>Failure to manage sediment<br>Lack of dam integrity inspections<br>Poor leachate/effluent/wastewater storage management<br>Poor irrigation/saturated soils                                                                                                                                         | 4        | B                      | 4B 14 (S) | Sediment and erosion controls for unsealed areas are implemented and regularly inspected.<br><br>Integrity of dams is regularly reviewed<br><br>Bunds are kept empty to prevent them being filled with stormwater.<br><br>Chemicals are stored above areas that are prone to inundation. all loose items are secured to prevent them coming into contact with floodwater.<br><br>Storage of leachate / effluent / wastewater storage is reduced as far as practicable on site.<br><br>Irrigation activities review soil conditions during prolonged wet conditions.<br><br>Irrigation activities are regularly assessed for effectiveness<br><br>Contingency plans. | 1. Assess the situation for the type and extent of the incident.<br><br>2. Notify the Relevant Authorities in accordance with the PIRMP and take direction as required.<br><br>3. Seek immediate assistance from specialist environmental consultant/contractor.<br><br>4. Complete incident investigation and send report to Relevant Authorities                                                                                                                                      |
| Surface Water                                                       | 4                | Contamination of surface water by chemicals causing impact to human health.                                  | Operation of Jeanelle South requires limited chemical input.                                                                                                                                                                                                                                                                                                                           | Lack of dam integrity inspections<br>Operator error<br>Heavy rainfall event                                                                                                                                                                                                                                                                    | 4        | D                      | 4D 21 (L) | Limited chemicals stored on site.<br>Runoff from sheds and during shed cleaning is collected in the two sedimentation dams onsite (one at PPU1 and one at PPU2).<br>Relevant staff are instructed on proper use and handling of chemicals.<br>Training and awareness.<br>Maximise dry-cleaning practices in sheds when removing poultry litter.<br>Fuels stored in bunded areas with overflow containers in place                                                                                                                                                                                                                                                   | 1. Visually assess the situation, consult SDS for the chemical and undertake emergency response if required<br><br>2. Contact the Relevant Authorities in accordance with the PIRMP and take direction as required.<br><br>3. Seek immediate assistance from specialist environmental consultants.<br><br>4. Complete incident investigation and send report to Relevant Authorities                                                                                                    |
|                                                                     | 5                | Contamination of surface water causing impact to the environment.                                            | Operation of Jeanelle South requires limited chemical input, however there is a risk that a pollution incident caused by excessive poultry litter or cleaning chemicals could potentially occur.                                                                                                                                                                                       | Lack of dam integrity inspections<br>Operator error<br>Heavy rainfall event                                                                                                                                                                                                                                                                    | 5        | D                      | 5D 24 (L) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Air Quality                                                         | 6                | Smoke (due to onsite fire) causing impact to human health.                                                   | A fire could occur onsite and smoke could affect human health due to smoke inhalation.                                                                                                                                                                                                                                                                                                 | Warm temperature poses an increased risk to site.<br>Sparks created on site from maintenance works or other activities<br>Smoking areas on site and incorrect disposal of cigarettes.<br>Combustible materials present on site.<br>Outdated fire detection and fire fighting equipment.<br>Outdated Emergency Response/ evacuation procedures. | 4        | D                      | 4D 21 (L) | Emergency response/evacuation procedures.<br>Fire/Smoke detection systems in buildings and sheds.<br>Fire extinguishing equipment located in all sheds and other locations around the site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 1. Visually assess the situation, undertake emergency response/ evacuation procedures if required.<br><br>3. Contact and take direction from Relevant Authorities.<br><br>4. Complete incident investigation and send report to relevant authorities.                                                                                                                                                                                                                                   |
|                                                                     | 7                | Dust emissions from unsealed surfaces from site causing impact to human health.                              | Dust could affect human health due to dust inhalation at the site. Site access roads are unsealed surfaces that could cause dust in dry conditions. Excessive dust could impact the surrounding environment.                                                                                                                                                                           | Dust generated from different weather events particularly strong winds.<br>Exposed earth caused by dry conditions.<br>Trucks travelling above the site speed limits                                                                                                                                                                            | 4        | D                      | 4D 21 (L) | Site landscaping is maintained.<br>Maintenance of internal gravel roads.<br>Site speed limits.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 1. Visually assess the situation, undertake emergency response if required.<br><br>2. Stop/Shut down all dust producing activities.<br><br>3. Contact the Relevant Authorities and take direction as required.<br><br>4. Complete incident investigation and send report to relevant authorities.                                                                                                                                                                                       |
|                                                                     | 8                | Odour emissions from site causing impact to human health/comfort                                             | Due to the nature of operations, odour emissions and offensive odour are an issue, however, the definition of odour as a pollution incident is dependent on a number of complaints received rather than a single odour emission/incident. A collection of samples is required as part of an odour impact assessment and odour modelling subject to verified offensive odour incidents. | Incorrect implementation of the site inspection and maintenance program<br>Weather conditions                                                                                                                                                                                                                                                  | 4        | C                      | 4C 18 (M) | Mass Bird Disposal Plan.<br>Site inspection and maintenance program.<br>Daily inspections and removal of dead birds<br>Daily maintenance and removal of soiled bedding material.<br>Complaints Procedure<br>No long-term stockpiling or disposal of waste products on-site.                                                                                                                                                                                                                                                                                                                                                                                         | 1. Upon receipt of an odour complaint, handle and manage complaint in accordance with the complaints procedure including recording the complaint on a Complaints form<br><br>2. Review activities and farm data (age and litter quality) to determine if Jeanelle South is the source of the odour and if so if the odour can be reduced.                                                                                                                                               |
|                                                                     | 9                | Gas/fume emissions causing impact to human health                                                            | Leak from an onsite fuel or gas tank could cause impact to human health by inhalation                                                                                                                                                                                                                                                                                                  | Incorrect implementation of the site inspection and maintenance                                                                                                                                                                                                                                                                                | 3        | D                      | 3D 17 (M) | SDSs for fuels and chemicals stored and used onsite.<br>Site inspection and maintenance program.<br>Emergency evacuation/response procedures.<br>Training and awareness.<br>Fuel stored in a bunded area.                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 1. Assess the situation for the type and extent of the incident.<br><br>2. Apply appropriate safety precautions, consult SDS for the chemical and activate emergency evacuation procedure if required<br><br>3. Notify the Relevant Authorities in accordance with the PIRMP and take direction as required.<br><br>4. Seek immediate assistance from specialist environmental consultant/contractor.<br><br>5. Complete incident investigation and send report to Relevant Authorities |
| Fire                                                                | 10               | Gas Emissions or fuel causing fire or explosion                                                              | Leak from one of the onsite fuel or gas tanks could result in fire or explosion                                                                                                                                                                                                                                                                                                        | Warm temperature poses an increased risk to site.<br>Sparks created on site from maintenance works or other activities<br>Smoking areas on site and incorrect disposal of cigarettes.<br>Outdated fire fighting equipment.                                                                                                                     | 4        | C                      | 4C 18 (M) | Emergency response/evacuation procedures.<br>Fire/Smoke detection systems in buildings and sheds.<br>Fire extinguishing equipment located in all sheds and other locations around the site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 1. Assess the situation for the type and extent of the incident.<br><br>2. Apply appropriate safety precautions, consult SDS for the chemical and activate Activate PIRMP and/or emergency evacuation procedure if required<br><br>3. Notify the Relevant Authorities in accordance with the PIRMP and take direction as required.<br><br>4. Complete incident investigation and send report to Relevant Authorities.                                                                   |
|                                                                     | 11               | Fire in PPU or site premises                                                                                 | Fire on the premises due to weather conditions                                                                                                                                                                                                                                                                                                                                         | Sparks created on site from maintenance works or other activities<br>Smoking areas on site and incorrect disposal of cigarettes.<br>Outdated fire detection and fire fighting equipment.                                                                                                                                                       | 4        | C                      | 4C 18 (M) | Emergency response/evacuation procedures.<br>Fire/Smoke detection systems in buildings and sheds.<br>Fire extinguishing equipment located in all sheds and other locations around the site.<br>PPUs cleared of debris at the end of each production cycle<br>Fuel stored in bunded tanks with overflow containers.<br>Land surrounding the sheds is regularly slashed and well maintained.<br>Gas contained in permanent bulk tanks.                                                                                                                                                                                                                                | 1. Apply appropriate safety precautions, contact emergency services and conduct emergency evacuation procedure if required<br><br>2. Utilise fire safety equipment such as extinguishers located in each shed.<br><br>3. Notify the Relevant Authorities in accordance with the PIRMP and take direction as required.<br><br>4. Complete incident investigation and send report to Relevant Authorities.                                                                                |
| Waste                                                               | 12               | Incorrect handling, use, storage and/or disposal of hazardous/toxic waste causing impact to human health.    | Licensed waste contractor to remove waste from site.                                                                                                                                                                                                                                                                                                                                   | Operator error                                                                                                                                                                                                                                                                                                                                 | 4        | C                      | 4C 18 (M) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 1. Visually assess the situation<br><br>2. Apply appropriate safety precautions, consult SDS for the chemical if appropriate, and undertake emergency response if required.<br><br>3. Activate PIRMP and/or emergency evacuation procedure.<br><br>4. Notify Relevant Authorities                                                                                                                                                                                                       |
|                                                                     | 13               | Incorrect handling, use, storage and/or disposal of hazardous/toxic waste causing impact to the environment. | Licensed waste contractor to remove waste from site.                                                                                                                                                                                                                                                                                                                                   | Operator error                                                                                                                                                                                                                                                                                                                                 | 5        | C                      | 5C 22 (L) | No access of the site to the public.<br>Sign in book at site entry.<br>Contract with licensed waste contractor for transport.<br>Poultry litter removed for offsite rural/agricultural application.<br>Chemical supply company directly services the site dropping of and removing chemicals and containers.<br>Training & awareness.<br>Mass Bird Disposal Plan.                                                                                                                                                                                                                                                                                                   | 5. Undertake inspection to ensure that any waste has not leaked or split.<br><br>6. Take direction from specialist authorities.<br><br>7. Engage specialist waste handling consultants.                                                                                                                                                                                                                                                                                                 |
| Noise                                                               | 14               | Noise emissions from site causing impact to human health.                                                    | Operation of the site may cause disruption to surrounding receptors if noise limits are exceed (NB - Noise is not defined as a pollution incident by the EPA for the PIRMP).                                                                                                                                                                                                           | Weather conditions conducive to noise pollution.<br>Operator error<br>Noisy equipment                                                                                                                                                                                                                                                          | 5        | D                      | 5D 24 (L) | Complaints handling procedure.<br>Complaints Reporting phone number available during hours of operation.<br>Plant and Equipment regularly inspected and maintained to ensure optimal operating condition.<br>Plant and equipment operators instructed how to minimise noise generation.                                                                                                                                                                                                                                                                                                                                                                             | 1. Upon receipt of noise complaint, handle and manage complaint in accordance with the complaints procedure.<br><br>2. Review operation activities to determine if noise can be reduced.<br><br>3. Ensure all operation activities are only undertaken during approved operating hours.<br><br>4. Record complaint on Complaints form and keep on file.                                                                                                                                 |

|    |        |
|----|--------|
| 1a | 1 (E)  |
| 1b | 2 (E)  |
| 2a | 3 (E)  |
| 2b | 4 (E)  |
| 1c | 5 (H)  |
| 3a | 6 (H)  |
| 1d | 7 (H)  |
| 2c | 8 (H)  |
| 3b | 9 (H)  |
| 4a | 10 (S) |
| 1e | 11 (S) |
| 2d | 12 (S) |
| 3c | 13 (S) |
| 4b | 14 (S) |
| 5a | 15 (S) |
| 2e | 16 (M) |
| 3d | 17 (M) |
| 4c | 18 (M) |
| 5b | 19 (M) |
| 3e | 20 (L) |
| 4d | 21 (L) |
| 5c | 22 (L) |
| 4e | 23 (L) |
| 5d | 24 (L) |
| 5e | 25 (L) |

| RISK MATRIX                                                                                                                                                                                        |                                    |                           |                            |                                                                                                                                                |                                         |                                           | Likelihood |                |                |              |                          |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|---------------------------|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|-------------------------------------------|------------|----------------|----------------|--------------|--------------------------|
|                                                                                                                                                                                                    |                                    |                           |                            |                                                                                                                                                |                                         |                                           | A Certain  | B Probable     | C Possible     | D Remote     | E Improbable             |
| Consequence Note: Consequence may result from a single event or may represent a cumulative impact over a period of 12 months. Use the worst case reasonable consequence if there is more than one. |                                    |                           |                            |                                                                                                                                                |                                         |                                           | "Common"   | "Has Happened" | "Could Happen" | "Not Likely" | "Practically Impossible" |
| Rating                                                                                                                                                                                             | Impact to Annual Business Plan (F) | Personal Injury (PI)      | Business Interruption (BI) | Legal (L)                                                                                                                                      | Reputation (R)                          | Environment (E)                           |            |                |                |              |                          |
| 1. Catastrophic                                                                                                                                                                                    | >\$50m                             | Multiple Fatalities       | > 1month                   | Prolonged litigation, heavy fines, potential jail term                                                                                         | Prolonged International media attention | Long term impairment habitats ecosystem   | 1 (E)      | 2 (E)          | 5 (H)          | 7 (H)        | 11 (S)                   |
| 2. Major                                                                                                                                                                                           | \$10m - \$50m                      | Single Fatality           | 1 week to 1 month          | Major breach/ major litigation                                                                                                                 | International media attention           | Long term effects of ecosystem            | 3 (E)      | 4 (E)          | 8 (H)          | 12 (S)       | 16 (M)                   |
| 3. Moderate                                                                                                                                                                                        | \$1m - \$10m                       | Serious/ Disabling Injury | 1 day to 1 week            | Serious breach of regulation, prosecution/ fine                                                                                                | National media attention                | Serious medium term environmental effects | 6 (H)      | 9 (H)          | 13 (S)         | 17 (M)       | 20 (L)                   |
| 4. Minor                                                                                                                                                                                           | \$100k - \$1m                      | Lost Time Injury          | 12 hrs to 1 day            | Non-compliance, breaches in regulation                                                                                                         | Adverse local public attention          | Minor effects to physical environment     | 10 (S)     | 14 (S)         | 18 (M)         | 21 (L)       | 23 (L)                   |
| 5. Insignificant                                                                                                                                                                                   | <\$100k                            | First Aid Treatment Only  | < 12 hrs                   | Low level compliance issue                                                                                                                     | Local complaints                        | Limited physical damage                   | 15 (S)     | 19 (M)         | 22 (L)         | 24 (L)       | 25 (L)                   |
| Risk Rating                                                                                                                                                                                        | Risk Category                      |                           |                            | Generic Management Actions                                                                                                                     |                                         |                                           |            |                |                |              |                          |
| 1 to 4                                                                                                                                                                                             | E Extreme                          |                           |                            | Immediate intervention required from senior management to eliminate or reduce this risk                                                        |                                         |                                           |            |                |                |              |                          |
| 5 to 9                                                                                                                                                                                             | H High                             |                           |                            | Imperative to eliminate or reduce risk to a lower level by the introduction of control measures. Management planning required at senior levels |                                         |                                           |            |                |                |              |                          |
| 10 to 15                                                                                                                                                                                           | S Significant                      |                           |                            | Corrective action required, senior management attention needed to eliminate or reduce risk                                                     |                                         |                                           |            |                |                |              |                          |
| 16 to 19                                                                                                                                                                                           | M Moderate                         |                           |                            | Corrective action to be determined, management responsibility must be specified Monitor and manage by corrective action where practicable      |                                         |                                           |            |                |                |              |                          |
| 20 to 25                                                                                                                                                                                           | L Low                              |                           |                            |                                                                                                                                                |                                         |                                           |            |                |                |              |                          |

# **Appendix B      Environmental Incident Report Form**

|                                                                                  |                                           |  |
|----------------------------------------------------------------------------------|-------------------------------------------|--|
|  | <b>Environmental Incident Report Form</b> |  |
|                                                                                  | <b>PRT-F-SHEQ-070</b>                     |  |

**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<br>If yes, implement PIRMP (NSW) and contact EPA and Authorities as per section B<br>Comments: |
| Person responsible for investigating and Reporting                                      |                                                                                                         |
| Investigation method                                                                    |                                                                                                         |
| Findings of investigation                                                               |                                                                                                         |
| Action Taken and Close Out                                                              |                                                                                                         |
| Remedial Action taken                                                                   | Yes/No<br>If Yes, Describe:                                                                             |



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

|                                                                                                |                                           |  |
|------------------------------------------------------------------------------------------------|-------------------------------------------|--|
|  <b>ProTen</b> | <b>Environmental Incident Report Form</b> |  |
|                                                                                                | <b>PRT-F-SHEQ-070</b>                     |  |

**Section B – Notification of Authorities for PIRMP**

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

## Appendix C      Chemical Register

## Farm 74 - CHEMICAL REGISTER

| UPDATED: 16.06.2025 TR                                  |                                     |                           |                       |                          |                 |      |        |                                                                                                                                              |                        |                                                                                                                  |                                                   |
|---------------------------------------------------------|-------------------------------------|---------------------------|-----------------------|--------------------------|-----------------|------|--------|----------------------------------------------------------------------------------------------------------------------------------------------|------------------------|------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
| Product                                                 | Description                         | 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                                              | Herbicide                           | Y                         | 9 (III)               | S6                       | 1/05/2026       | 3082 | 53893  | 5L                                                                                                                                           | 10L                    | Chemical Shed                                                                                                    | Control of Weeds                                  |
| Apparent Axeman 600                                     | Herbicide                           | Y                         | 9 (III)               | S6                       | 31/05/2026      | 3082 | 67727  | 1L                                                                                                                                           | 2L                     | Chemical Shed                                                                                                    | Control of Woody weeds (Fleabane)                 |
| Grazon® Extra                                           | Herbicide                           | Y                         | 9 (III)               | S6                       | 6/01/2026       | 3082 | 60830  | 20L                                                                                                                                          | 20L                    | Chemical Shed                                                                                                    | Control of Woody weeds (Fleabane)                 |
| Apparent Axeman 600                                     | Group 1 Herbicide                   | Y                         | 9 (PG III)            | S6                       | 31/05/2026      | 3082 | 66727  | 20 L                                                                                                                                         | 40 L                   | Chemical Shed                                                                                                    | Control of Weeds                                  |
| Apparent Concussion 540K Herbicide<br><i>Glyphosate</i> | Herbicide                           | Y                         | 3 (PG III)            | N/A                      | 29/06/2025      | 1170 | 68506  | 25 L                                                                                                                                         | 50 L                   | Chemical Shed                                                                                                    | Control of Weeds                                  |
| Apparent Diuron 900WG Herbicide                         | Herbicide                           | Y                         | N/A                   | N/A                      | 11/11/2026      | N/A  | N/A    | 20kg                                                                                                                                         | 20kg                   | Chemical Shed                                                                                                    | Control of Weeds                                  |
| Apparent Oxyfluorfen 240<br><i>Oxyfluorfen</i>          | Broadleaf Herbicide                 | Y                         | N/A                   | S6                       | 28/02/2026      | N/A  | 56310  | 5 L                                                                                                                                          | 10 L                   | Chemical Shed                                                                                                    | Control of broadleaf weeds                        |
| Apparent Wetter 1000                                    | Wetting agent                       | Y                         | N/A                   | N/A                      | 4/11/2027       | N/A  | 67008  | 20 L                                                                                                                                         | 20 L                   | Chemical Shed                                                                                                    | Agricultural Wetting agent                        |
| Barmac Out of Bounds                                    | Insecticide and Termiticide         | 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 | Y                         | NA                    | S6                       | 20/07/2025      | NA   | 66448  | 1L                                                                                                                                           | NA                     | Chemical Shed<br><i>Temporary storage during cleanout</i>                                                        | Sprayed on empty sheds to Control litter beetle   |
| Surefire Zinc Phosphide Mouse Bait                      | Rodenticide                         | Y                         | NA                    | S7                       | 13/05/2026      | NA   | 59757  | 10kg Buckets                                                                                                                                 | 10kg                   | Chemical Shed (not to be stored onsite if not actively using bait)                                               | Control of rodents                                |
| Mouseoff Bromadiolone                                   | Rodenticide Blocks                  | N                         | NA                    | S6                       | 7/06/2026       | NA   | 64931  | 10kg Buckets                                                                                                                                 | 100kg                  | Chemical Shed                                                                                                    | Control of rodents                                |
| Deb Hand Sanitiser 70% Alcohol                          | Sanitiser                           | Y                         | N/A                   | -                        | 3/02/2026       | 1075 | NA     | 500ml                                                                                                                                        | 25L                    | Shed entrance/Office                                                                                             | Sanitising hands prior to entry to farm and sheds |
| Diesel                                                  | Automotive Diesel Fuel              | Y                         | 9                     | S5                       | 13/10/2025      | 3082 | N/A    | Generator 1 - 597L<br>Generator 1 (AGT)- 2000L<br>Generator 2 - 597L<br>Generator 2 (AGT)- 2000L<br>Generator 3 - 450L<br>Generator 4 - 450L | Total for site = 6094L | Depot 2 - Generator 1<br>Depot 3 - Generator 2<br>Rear sheds 12&13 - Generator 3<br>Rear Sheds 4&5 - Generator 4 | Fuel for tractor and generators                   |
| Ratshot Blue Blocks                                     | Rodenticide Blocks                  | N                         | N/A                   | N/A                      | 30/11/2026      | N/A  | 68762  | 10kg Buckets                                                                                                                                 | 100kg                  | Chemical Shed                                                                                                    | Control of rodents                                |
| Ratshot Red Blocks                                      | Rodenticide Blocks                  | N                         | N/A                   | NA                       | 30/11/2026      | N/A  | 69209  | 10kg Buckets                                                                                                                                 | 100kg                  | Chemical Shed                                                                                                    | Control of rodents                                |

|                                             |                                     |     |             |     |            |      |       |                     |                                                |                                                           |                                                 |
|---------------------------------------------|-------------------------------------|-----|-------------|-----|------------|------|-------|---------------------|------------------------------------------------|-----------------------------------------------------------|-------------------------------------------------|
| <b>Wetter 1000</b>                          | Wetting agent                       | Y   | N/A         | NA  | 30/11/2026 | NA   | 67008 | 20L                 | 20L                                            | Chemical Shed                                             | Wetting agent for use with herbicides           |
| <b>eChem Paraquat 250 Herbicide</b>         | Herbicide                           | Y   | 6.1(PGIII)  | S7  | 30/11/2026 | 3016 | 66548 | 20L                 | Farm 74 Chemical Shed - Temporary storage only | Control of Glyphosate Resistant Weeds and grass           | Control of Weeds                                |
| <b>Elector PSP</b>                          | Pesticide                           | N/A | N/A         | N/A | 23/11/2028 | 3082 | 59422 | 1L                  | N/A                                            | Chemical Shed<br><i>Temporary storage during cleanout</i> | Sprayed on empty sheds to Control litter beetle |
| <b>Formaldehyde</b>                         | Disinfectant Germicide              | Y   | 8 (PG III)  | S6  | 28/02/2026 | 2209 | 61653 | 20L                 | N/A                                            | Chemical Shed<br><i>Temporary storage during cleanout</i> | Fogging Sheds                                   |
| <b>Glutachem</b>                            | Sanitiser – Sheds                   | Y   | 8 (PG II)   | NA  | 3/08/2026  | 1760 | 61656 | 20L                 | NA                                             | Chemical Shed<br><i>Temporary storage during cleanout</i> | Spraying inside sheds between batches           |
| <b>Glutaplus</b>                            | Additive to Glutachem               | Y   | NA          | NA  | 3/08/2026  | NA   | NA    | 5L                  | NA                                             | Chemical Shed<br><i>Temporary storage during cleanout</i> | Additive to Glutachem                           |
| <b>Larvabeta</b>                            | Insecticide spray for litter beetle | Y   | NA          | S6  | 20/07/2026 | NA   | 84858 | 1L                  | NA                                             | Chemical Shed<br><i>Temporary storage during cleanout</i> | Sprayed on empty sheds to Control litter beetle |
| <b>LPG</b>                                  | Liquefied Petroleum Gas             | Y   | N           | S6  | 1/09/2028  | 1075 | NA    | 8 x 7500litre Tanks | 60000 L                                        | Depot 1 Above Ground Tanks                                | Heating sheds                                   |
| <b>Pestmaster Brodifacoum RED</b>           | Wax blocks                          | Y   | N/A         | S6  | 1/01/2026  | N/A  | 91653 | 8kg Buckets         | 80kg                                           | Chemical Shed                                             | Control of rodents                              |
| <b>Pestmaster Difenacoum BLUE</b>           | Wax blocks                          | Y   | N/A         | S6  | 1/01/2027  | N/A  | 91657 | 8kg Buckets         | 80kg                                           | Chemical Shed                                             | Control of rodents                              |
| <b>Protosan</b>                             | Sanitiser – Sheds                   | N/A | N/A         | S6  | 1/02/2027  | N/A  | 39774 | 20L                 | N/A                                            | Chemical Shed<br><i>Temporary storage during cleanout</i> | Spraying inside sheds between batches           |
| <b>Proxitane</b>                            | Disinfectant                        | Y   | 5.1 (PG II) | S6  | 7/04/2026  | 3149 | 47399 | 20 L                | 40L                                            | Chemical Shed<br><i>Temporary storage during cleanout</i> | Sanitising Drinker lines                        |
| <b>Ratshot Blue Blocks</b>                  | Rodenticide Blocks                  | N   | N/A         | N/A | 30/11/2026 | N/A  | 68762 | 10kg Buckets        | 100kg                                          | Chemical Shed                                             | Control of rodents                              |
| <b>Ratshot Red Blocks</b>                   | Rodenticide Blocks                  | N   | N/A         | NA  | 30/11/2026 | N/A  | 69209 | 10kg Buckets        | N/A                                            | Chemical Shed                                             | Control of rodents                              |
| <b>Round Up Ultra Max</b>                   | Herbicide                           | Y   | 9 (PG III)  | S5  | 8/11/2026  | 1170 | N/A   | 25 L                | 50 L                                           | Chemical Shed                                             | Control of Weeds                                |
| <b>Sodium Hypochlorite 12.5%</b>            | Liquid Chlorine                     | Y   | 8 (PG III)  | N/A | 10/06/2030 | 1791 | 88600 | 200 L               | 800 L                                          | Chemical Cage                                             | Water Sanitation                                |
| <b>Striker Oxyfluorfen</b>                  | Broadleaf Herbicide                 |     | 9           | S5  | 1/04/2028  | N/A  | 56994 | 20 L                | 40 L                                           | Chemical Shed                                             | Control of broadleaf weeds                      |
| <b>Surefire Difenate All Weather Blocks</b> | Rodenticide Blocks                  | N   | N/A         | S6  | 12/10/2025 | N/A  | 69911 | 10kg Buckets        | 100kg                                          | Chemical Shed                                             | Control of rodents                              |
| <b>Total Kleen</b>                          | General Cleaner – Washing Sheds     | N/A | N/A         | S5  | 28/02/2026 | N/A  | N/A   | 25L                 | N/A                                            | Chemical Shed<br><i>Temporary storage during cleanout</i> | Detergent for washing sheds between batches     |
| <b>Twin Oxide Part A</b>                    | Water Sanitation                    | Y   | 5.1 (PGII)  | S6  | 23/01/2028 | 1476 | N/A   | 80 L                | 80L                                            | Pump Shed                                                 | Water Sanitation                                |
| <b>Twin Oxide Part B</b>                    | Water Sanitation                    | Y   | NA          | N/A | 23/01/2028 | NA   | N/A   | 80 L                | 80L                                            | Pump Shed                                                 | Water Sanitation                                |
| <b>Unleaded Fuel</b>                        | Unleaded Fuel                       | Y   | 3 (PG I)    | S5  | 13/10/2025 | 1203 | N/A   | 20L                 | 80L                                            | Workshop Flammable Cabinet                                | Fuel for farm equipment                         |

|          |           |   |    |    |           |    |       |      |     |                              |                                                     |
|----------|-----------|---|----|----|-----------|----|-------|------|-----|------------------------------|-----------------------------------------------------|
| Virukill | Sanitiser | Y | NA | NA | 6/05/2029 | 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**

| <b>Revision/<br/>Version</b> | <b>Date</b>    | <b>Prepared<br/>By</b> | <b>Details of Test/Update</b>                                                                                                                                                                                                                                | <b>Change<br/>Description</b>                        | <b>Next<br/>Review</b> |
|------------------------------|----------------|------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|------------------------|
| 1                            | September 2016 | ProTen                 | PIRMP handout to all farm staff detailing what classifies as a pollution incident and the correct procedure to follow in the event pf a pollution incident at Jeanella South Farm. PIRMP quiz completed by all farm staff with sign off by the Farm Manager. | Update of PIRMP testing history and contact details. | September 2017         |
| 2                            | September 2017 | ProTen                 | PIRMP handout to all farm staff detailing what classifies as a pollution incident and the correct procedure to follow in the event pf a pollution incident at Jeanella South Farm. PIRMP quiz completed by all farm staff with sign off by the Farm Manager. | Update of PIRMP testing history and contact details. | September 2018         |
| 3                            | September 2018 | ProTen                 | PIRMP handout to all farm staff detailing what classifies as a pollution incident and the correct procedure to follow in the event pf a pollution incident at Jeanella South Farm. PIRMP quiz completed by all farm staff with sign off by the Farm Manager. | Update of PIRMP testing history and contact details. | September 2019         |
| 4                            | September 2019 | ProTen                 | PIRMP handout to all farm staff detailing what classifies as a pollution incident and the correct procedure to follow in the event pf a pollution incident at Jeanella South Farm. PIRMP quiz completed by all farm staff with sign off by the Farm Manager. | Update of PIRMP testing history and contact details. | September 2020         |
| 5                            | September 2020 | ProTen                 | PIRMP handout to all farm staff detailing what classifies as a pollution incident and                                                                                                                                                                        | Update of PIRMP testing history                      | September 2021         |

| Revision/<br>Version | Date           | Prepared<br>By | Details of Test/Update                                                                                                                                                                                                                                       | Change<br>Description                                | Next<br>Review |
|----------------------|----------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|----------------|
|                      |                |                | the correct procedure to follow in the event pf a pollution incident at Jeanella South Farm. PIRMP quiz completed by all farm staff with sign off by the Farm Manager.                                                                                       | and contact details.                                 |                |
| 6                    | September 2021 | ProTen         | PIRMP handout to all farm staff detailing what classifies as a pollution incident and the correct procedure to follow in the event pf a pollution incident at Jeanella South Farm. PIRMP quiz completed by all farm staff with sign off by the Farm Manager. | Update of PIRMP testing history and contact details. | September 2022 |
| 7                    | September 2022 | ProTen         | PIRMP handout to all farm staff detailing what classifies as a pollution incident and the correct procedure to follow in the event pf a pollution incident at Jeanella South Farm. PIRMP quiz completed by all farm staff with sign off by the Farm Manager. | Update of PIRMP testing history and contact details. | September 2023 |
| 8                    | September 2023 | ProTen         | PIRMP handout to all farm staff detailing what classifies as a pollution incident and the correct procedure to follow in the event pf a pollution incident at Jeanella South Farm. PIRMP quiz completed by all farm staff with sign off by the Farm Manager. | Update of PIRMP testing history and contact details. | September 2024 |
| 9                    | September 2024 | ProTen         | PIRMP handout to all farm staff detailing what classifies as a pollution incident and the correct procedure to follow in the event pf a pollution incident at Jeanella                                                                                       | Update of PIRMP testing history and contact details. | September 2025 |

| Revision/<br>Version | Date           | Prepared<br>By | Details of Test/Update                                                                                                                                                                                                                                       | Change<br>Description                                | Next<br>Review |
|----------------------|----------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|----------------|
|                      |                |                | South Farm. PIRMP quiz completed by all farm staff with sign off by the Farm Manager.                                                                                                                                                                        |                                                      |                |
| 10                   | September 2025 | ProTen         | PIRMP handout 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 Jeanella South Farm. PIRMP quiz completed by all farm staff with sign off by the Farm Manager. | Update of PIRMP testing history and contact details. | September 2026 |
|                      |                |                |                                                                                                                                                                                                                                                              |                                                      |                |
|                      |                |                |                                                                                                                                                                                                                                                              |                                                      |                |
|                      |                |                |                                                                                                                                                                                                                                                              |                                                      |                |