



Pollution Incident Response Management Plan

Thomas Foods International Bourke Pty Ltd

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1. Purpose

The Bourke Small Stock Abattoir is operated by Thomas Foods International Bourke Pty Ltd.

The purpose of this Pollution Incident Response Management Plan is to:

- Provide direction to TFI and related staff at Bourke Small Stock Abattoir in responding to pollution incidents at the Bourke Small Stock Abattoir;
- Ensure timely communication about a pollution incident is provided to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Protection of the Environment Legislation Amendment Act (POELA Act) (including Bourke Shire Council, NSW Ministry of Health, Work Cover NSW, and Fire and Rescue NSW) and persons outside the operations who may be affected by the impacts of a pollution incident;
- Minimize and control the risk of a pollution incident at Bourke Small Stock Abattoir by identifying key risks and planned actions to minimize and manage those risks;
- Detail the training requirements for this plan, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

2. Legislative Requirements

The specific requirements for a Pollution Incident Response Management Plan (PIRMP) are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO (G) Regulation). In summary, this provision requires the following:

- All holders of environment protection licenses must prepare a pollution incident response management plan (section 153A, POEO Act).
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO (G) Regulation (clause 98B).
- Licensees must keep the plan at the premises to which the environment protection license relates (section 153D, POEO Act).
- Licensees must test the plan in accordance with the POEO (G) Regulation (clause 98E).
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act)

3. Definition of Pollution Incident

The definition of a pollution incident is:

“Pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.”

A pollution incident is required to be notified if there is a risk of 'material harm to the environment', which is defined in section 147 of the POEO Act as:

a) harm to the environment is material if:

- it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
- it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and

b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the Environment.

Thomas Foods International Bourke Pty Ltd is required to report pollution incidents immediately to the EPA and other relevant bodies specified in the Act (such as local councils, NSW Ministry of Health Work Cover NSW and Fire and Rescue NSW)

4. Scope

This Pollution Incident Response Management Plan must be followed by TFI employees, contractors and visitors to assist in the early response to and reporting of a pollution incident.

5. Pollution Incident Classification, Risk Assessment and Contributing factors

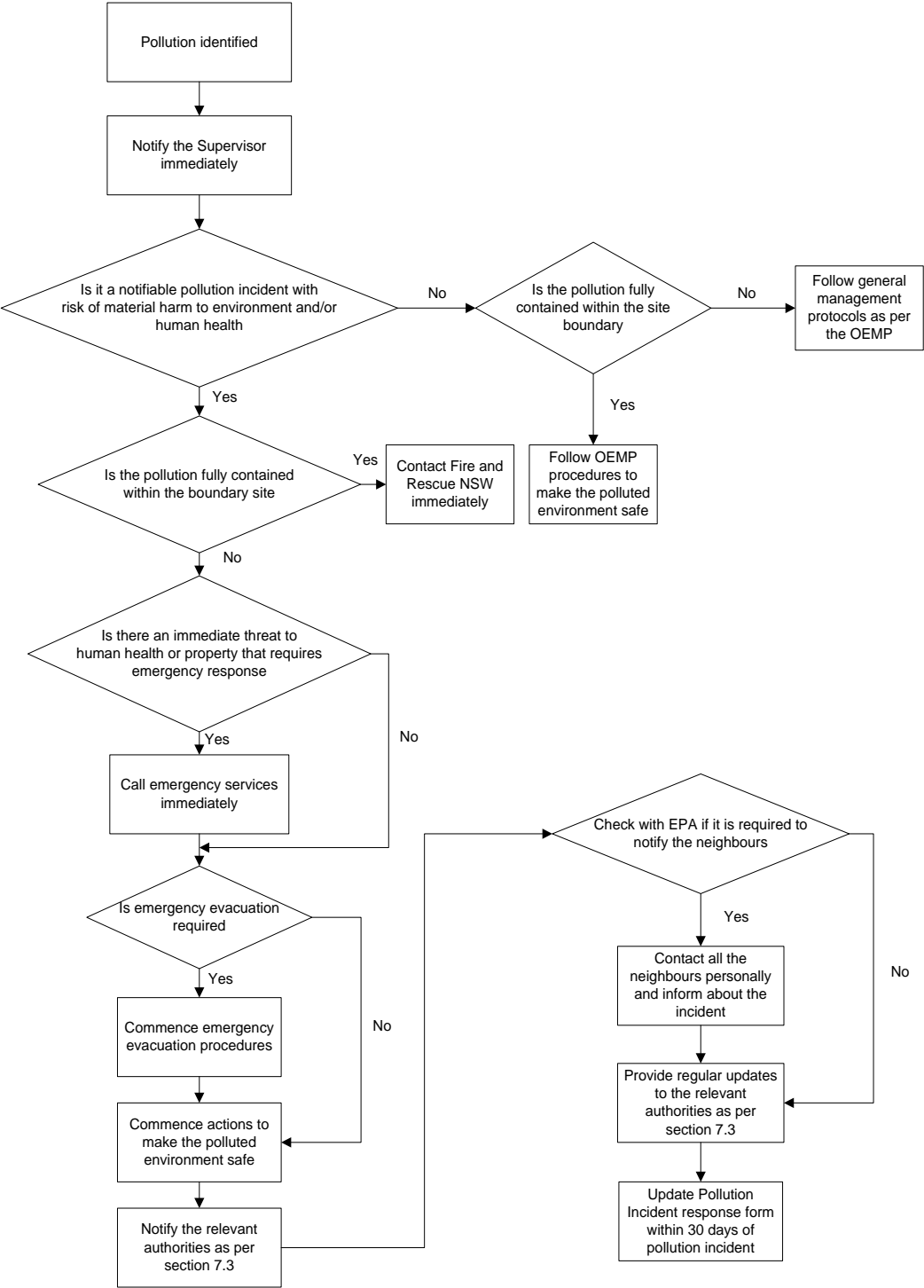
The main hazards to human health and the environment at Thomas Foods International Bourke Pty Ltd are included in the following table.

Description of Pollution Incident	Likelihood	Impact	Contributing Factors	Remedial actions to prevent, control or minimise	Incident Response Actions
Overflow of animal waste (effluent) to the environment	Low	Medium (land contamination, possible entry into waterway)	Prolonged period of heavy rain and lack of site maintenance	The abattoir has a protective effluent collection system, collection ponds and maintenance measures for animal waste.	<ol style="list-style-type: none"> 1. Visually assess the situation and apply appropriate safety precautions 2. Consult Safety Data Sheets (SDS) for the effluent if appropriate, and undertake emergency response if required
Solid wastes generated in the animal holding areas, slaughterhouse and processing areas and waste treatment plant.	Low	Low (land contamination)	Lack of site maintenance and non-compliance with licence requirements	Daily collection of manure from the holding yards will be scheduled at a time that does not interfere with livestock receipt and processing. Material removed from the holding yards will be placed in the manure compost area.	<ol style="list-style-type: none"> 3. Activate emergency evacuation procedure if required 4. Notify Relevant Authorities 5. Undertake inspection to ensure that any waste has not leaked or spilt 6. Take direction from specialist authorities 7. Engage specialist waste handling consultants.
Potentially large amount of wastewater generated from animal processing operations	Low	Low	Lack of site maintenance, Bad disposal of sewage and/or residual water	The abattoir has an effluent management system including physical processes for primary solids removal followed by a biological process incorporating anaerobic and aerobic treatment. The treated wastewater will be re-used to grow crops for harvesting and removal off-site	<ol style="list-style-type: none"> 1. Visually assess the situation, consult Safety Data Sheets and undertake emergency response if required 2. Contact the Relevant Authorities in accordance with the PIRMP and take direction as required
Storm water contamination when it comes into contact with animal holding pens, sludge stockpiles and treated wastewater irrigation areas	Low	Low (land contamination)	Prolonged period of heavy rain and lack of site maintenance	Storm water run-off is stored in a storm water retention pond, located east of the main processing building and reused through irrigation of lawns, gardens and vegetation across the facility.	<ol style="list-style-type: none"> 3. Seek immediate assistance from specialist environmental consultants 4. Complete incident investigation and send report to Relevant Authorities.
Airborne wastes such as odor, dust, fuel burning emissions, greenhouse gases etc.	Low	Low (affects the people on site and surrounding neighborhood, and also causes air pollution)	Chemical emissions, airborne contaminants, dust and fumes.	The abattoir has adopted odor and dust management measures to ensure that the operations are undertaken in a manner that minimizes the emission of potentially offensive odor and dust generation that would impact the air quality	<ol style="list-style-type: none"> 1. Employees/Contractors to notify the site representative of the issue immediately 2. Contact and take direction from the relevant authorities 3. Complete incident investigation and suppression activities and send the report to relevant authorities
Potential transmission of zoonotic diseases such as Q-fever and anthrax to humans	Low	Medium (health issues for people who are onsite)	Lack of knowledge to follow the safety procedures on site	The abattoir has adopted an Emergency Animal Disease Response Plan (EADRP) consistent with the AUSVETPLAN, providing guidance to all people	<ol style="list-style-type: none"> 1. Promptly report and diagnose the individual for the disease

Description of Pollution Incident	Likelihood	Impact	Contributing Factors	Remedial actions to prevent, control or minimise	Incident Response Actions
				associated with the operation of the abattoir and will be enforced when an emergency disease is detected.	<ol style="list-style-type: none"> 2. Take effective measures to minimise the spread of infection 3. Notify the Animal health authorities and ensure appropriate procedures are established 4. Impose Quarantine on all premises on which information is suspected.
Noise generated by several sources such as animals especially when in concentrated groups, processing activities within the slaughterhouse, plant machinery, plant and service vehicles etc.	Low	Low (affects the people on site and surrounding neighborhood, air pollution)	Lack of planning for animal activities on site.	The induction program for transport operators will include awareness of sensitive surrounding uses and potential noise impacts. This includes providing control over impact generating activities in necessary areas, minimizing the use of engine beaks and horns etc.	<ol style="list-style-type: none"> 1. Upon receipt of noise complaint, handle and manage complaint in accordance with the complaints procedure 2. Review operation activities to determine if noise can be reduced 3. Ensure all operation activities are only undertaken during approved operating hours 4. Record complaint on Complaints form and keep on file.
Any other incident or observation that is likely to cause an immediate environmental hazard outside the normal operating conditions	Low	Affects the people and/or environment	Carbon emissions, resource depletion etc.	The abattoir has measures in place to ensure safe handling of dangerous goods and chemicals, traffic management etc.	<ol style="list-style-type: none"> 1. Assess the situation for the type and extent of the incident 2. Apply appropriate safety precautions, consult Safety Data Sheets (SDS) for the chemical and activate r emergency evacuation procedure if required 3. Notify the Relevant Authorities in accordance with the PIRMP and take direction as required 4. Complete incident investigation and send report to Relevant Authorities.

6. Incident Response

This section provides details on the incident response, including the communication and on-site emergency response actions for responding to an incident that has resulted in a material impact to human health or the environment.



7. Notification of Pollution Incidents

7.1. Notification Speed of Response

The requirement for notification of a pollution incident has changed from ‘as soon as practicable’ to ‘immediately’ (section 148 of the POEO Act 1997). In short, ‘immediately’ means ‘promptly without delay’, but it does not mean undertaking notification ahead of doing what is necessary to make safe.

7.2. Responsible Key Person(s) for notification

	Name	Position	Contact Details
Person who is responsible for and authorized to activate the plan	Rhubin Reti	Plant Manager	0473 167 384
Person who is authorized to liaise with the relevant authority	Abdul Shah	Environment Advisor	0475 891 696
Person who is responsible for managing the response to a pollution incident	Rhubin Reti/Abdul Shah	Site Management (Environmental)	0475 891 696

7.3. Notification to Relevant Authorities

When the pollution incident causes or threatens material harm to the environment or human health, all the following authorities must be notified by the Plant Manager.

	Relevant Authority	Contact Number
1	Emergency Call Services <ul style="list-style-type: none"> Emergency Hotline Number (24 hours) (*The site supervisor should call 000 if the incident presents an immediate threat to human health and/or property and a combat agency is required (i.e. NSW Fire and Rescue, NSW Ambulance Service, NSW Police Force) and then notify all other parties below including NSW Fire Rescue via a local telephone number)	000* ('112' if using a mobile)
2	Bourke Council <ul style="list-style-type: none"> Council emergency contact number 	02 6830 8000 0419 722 055 (After Hours)
3	Environmental Authority (EPA) <ul style="list-style-type: none"> Dubbo Office Emergency Hotline Number (24 Hours) 	02 6883 5333 131 555

	Relevant Authority	Contact Number
4	NSW Ministry of Health (via Public Health units) <ul style="list-style-type: none"> • Dubbo Regional Office • Public Health Office on Call (24 Hours) 	02 6809 8979 02 6809 6809 (After Hours)
5	Safe Work NSW <ul style="list-style-type: none"> • Hotline Number 	13 10 50
6	Fire and Rescue NSW <ul style="list-style-type: none"> • Bourke Fire Station 	02 6872 2568 (000) “122
(**If there is no immediate threat to human health and/or property i.e. a combat agency is not required, then the Plant Manager is still required to follow the outlined above except for dialing 000)		

7.4. Information to be notified

Under the section 150 of the POEO act 1997, the information about a pollution incident that must be notified is:

- The time, date, nature, duration and location of the incident;
- The location of the place where pollution is occurring or is likely to occur;
- The nature, the estimated quantity or volume and the concentration of any pollutants involved (if known);
- The circumstances in which the incident occurred (including the cause of the incident, if known);
- The action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution (if known); and
- Other information prescribed by the regulations.

Immediately after a pollution incident becomes known, the Environment Advisor is required to notify the above information. Any information required that is not known at the time the incident is notified, must be provided when it becomes known.

A pollution Incident Reporting Form is attached in Appendix A.

8. Staff Training

All the staff members at the facility should be inducted and the induction must cover the purpose, requirements and responsibilities details in the PIRMP

All staff should receive sufficient training to enable them to carry out their assigned duties in a complete and safe manner.

- Staff must be capable of identifying potential pollution incidents; and
- Staff must be familiar with the requirements and procedures contained within this PIRMP.

At least one staff every year should undertake a simulated pollution incident response exercise, including with emergency services, to familiarize site personal with the requirements of this

management plan. A register of staff training is included in Appendix B and must be kept on site and updated regularly.

9. PIRMP Testing and Update

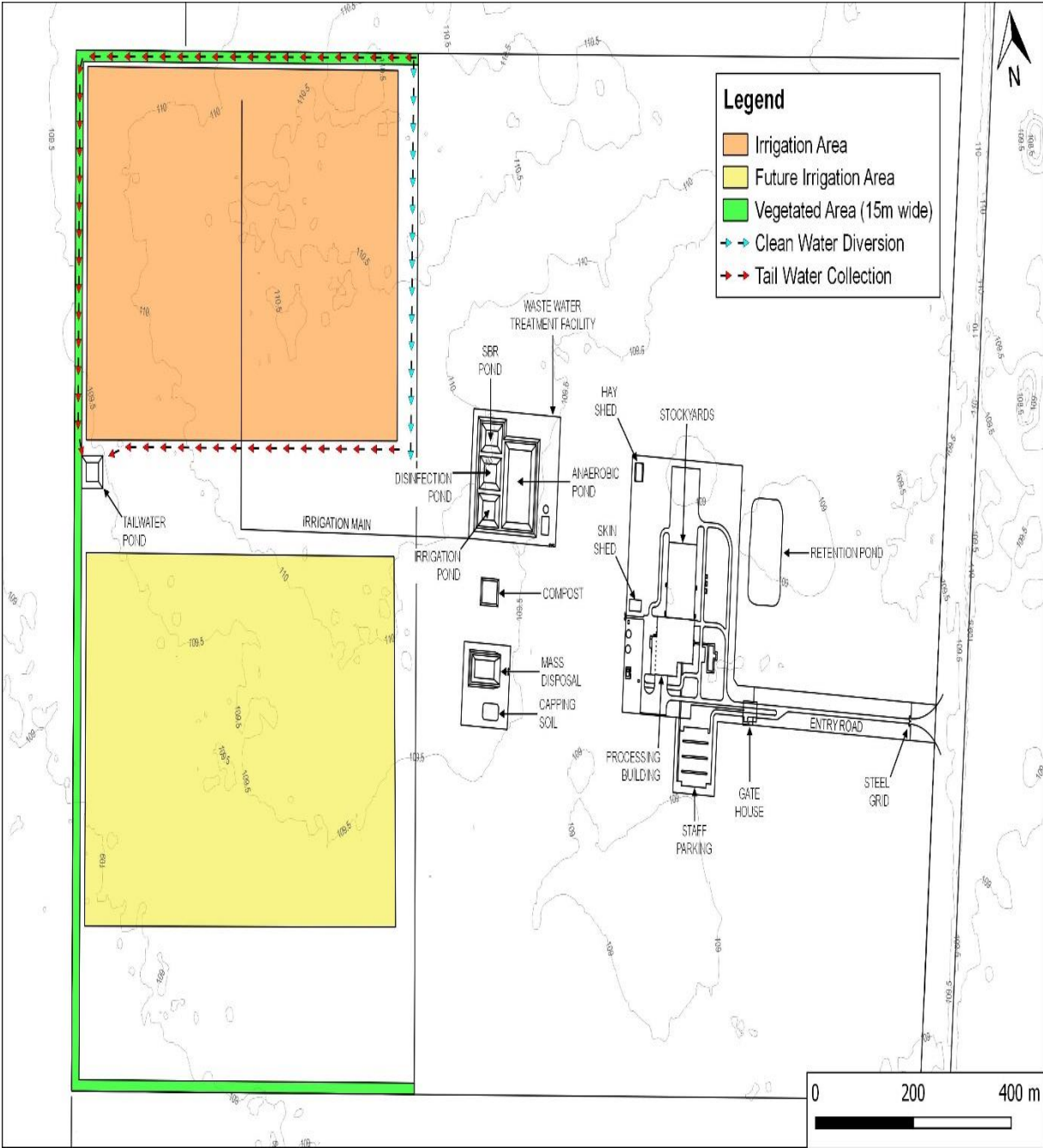
The PIRMP is a living document required to be reviewed and updated once every 12 months to ensure accuracy and effectiveness. A review must also be undertaken within one month of any pollution incident occurring.

For these reasons, document control is an important part of the environmental management system. It is critical that PIRMP storage locations are made known to all relevant staff members and that only the latest version is in use. Revised and updated versions of PIRMP will always be issued with a summary of changes.

A register for updating and testing the PIRMP is included in Appendix C and must be kept on site and updated regularly.

Copies of the revised PIRMP will be distributed to all relevant staff and kept in an easily accessible location in the company website.

10. Site Locality and Layout



Appendix A: Pollution Incident Reporting Form

Incident No:	Time:
Date:	Duration of Incident:
Nature of Incident:	
Temperature (Degree Celsius):	Wind Direction and Speed (km/hr.):
Relative Humidity (%):	Rainfall (mm):
The location of the place where pollution is occurring or is likely to occur:	
The nature, the estimated quantity or volume and the concentration of any pollutants involved (if known):	
The circumstances in which the incident occurred, including the cause of the incident (if known):	

The Corrective action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution (if known):	
Has a Combat Agency (Via Emergency Call Services - 000) been notified?	
Has the Council been notified	
Has Environment Protection Authority (EPA) been notified?	
Has NSW Ministry of Health (via Public Health Unit) been notified?	
Has Work Cover NSW been notified?	
Has EPA directed Council to notify neighbors?	
If not, has the Council voluntarily notified neighbors?	
Signature:	Date:
(Environment Advisor)	
Signature:	Date:
(Plant Manager)	

Appendix B: Staff Training Register

Date	Staff Member	Position	Brief Description of Training Task

Appendix C: PIRMP Testing and Update Register

Date	Routine Testing	Routine Update	Post Incident Updates	New Copies Distributed?	Approved by the supervisor