



POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Wathagar Gin

Environment Protection Licence – 10832

Namoi Cotton Limited

(PUBLIC INFORMATION)



1. FACILITY DETAILS

The Facility details are as follows:

Licensee:	Namoi Cotton Limited and Sundown Pastoral Co Pty Ltd
Scheduled Activity:	Agricultural Processing
Facility Address:	Collarenebri Road (Gwydir Highway), Moree known as the Wathagar Cotton Gin
Facility Name:	“Wathagar Cotton Gin”
EPL Number:	EPL 10832

2. PLAN PURPOSE

The Pollution Incident Response Management Plan (“PIRMP”) has been developed in accordance with requirements of the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012 (“POEO requirements”). This PIRMP is a modified version available to the public on our website for the POEO requirements.

The PIRMP covers Namoi Cotton Limited’s Facility known as the Wathagar Cotton Gin.

The purpose of the PIRMP is to:

- minimize and control risk of pollution incident at the Facility by identifying pollution incident risks, action plans to minimize pollution risks and manage pollution risks if they arise;
- ensure the timely communication about any pollution incident to staff at the Facility, Ginning Operations Manager, Chief Operations Officer, Namoi EPA Compliance Liaison Officer, the Chief Executive Officer for Namoi Cotton, the Directors for Sundown Pastoral Co Pty Ltd, the EPA, other relevant Authorities and community members which may be impacted by the pollution incident;
- ensure the PIRMP is properly implemented by appropriately qualified trained staff; and
- ensure the PIRMP is reviewed annually and regularly tested for currency.

3. POLLUTION INCIDENT

The definition of 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 reported to the EPA if there is a risk of “material harm” to the environment, which is defined in section 147 of the POEO Act as:

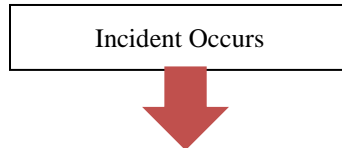
- (a) harm to the environment is material if:
 - (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
 - (ii) it results in actual or potential loss of property damage of an amount or amounts in aggregate exceeding \$10,000 (or such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

- (b) 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.

4. INCIDENT RESPONSE PROTOCOLS

If a pollution incident occurs at the site the following steps should be followed by the Site Manager or Acting Site Manager, Environment, Health and Safety Manager (Northern), Ginning Operations Manager, Chief Operations Officer and EPA Compliance Liaison Officer.

Below is the Incident Response Protocol:



A. Assess Risk Materiality (pollution incident occurs) – Phase 1

- Firstly, call 000 if the incident presents an immediate threat to human health or property or there are injured persons.
- Ensure the safety of all persons on the site.
- Identify the severity, risks, and extent of the incident:
 - What is the substance emitted?
 - What are its properties?
 - Is there a risk to health and safety?
 - Do you have the necessary PPE to manage the emission?
 - What is the volume of the emission?
- If the emission has the potential to cause material harm to persons or property or the environment, execute the next phase of the PIRMP NOTIFY PHASE 2.
- Assess potential for off-site impacts to the community and the environment.

B. Notify – Phase 2

Contact key individuals:

- Individuals responsible for activating the PIRMP (nominated site representatives), please refer to contact details in Section 13 and **Appendix 2**.
- Individuals authorised to notify and co-ordinate relevant authorities (nominated representatives), please refer to contact details in Section 14.
- Notify Relevant Authorities If it is determined that the pollution incident is a material harm incident in accordance with Section 9, then:
- If the incident does not require an initial combat agency, or once the 000 call has been made then the Environment, Health and Safety Manager (Northern) or EPA Compliance Liaison Officer, notify the relevant authorities in the following order.
 - (i) EPA
 - (ii) Ministry of Health via the local Public Health Unit
 - (iii) WorkCover Authority
 - (iv) Police, Fire and Rescue NSW
 - (v) If required notify community members via the Community Notification Protocol.

Please refer to contact details in Section 14.

C. Stop – Phase 3

- Read “Material Safety Data Sheet” and label for response (if applicable).

- If safe to do so stop the source of the emission.
- If pollutant or contaminant cannot be identified wait for relevant public service (e.g. Fire and Rescue) or instruction from the Environment, Health and Safety Manager (Northern).
- Manage incident in accordance with the site PIRMP.

D. Contain Incident – Phase 4

- Utilise barriers (absorbent booms, banks of soil or any other safe objects) or spill absorbent to prevent the emission or leak from spreading.
- The main priority is to prevent the emitted or leaked material from discharging off site.
- If necessary minimise the impact of potential off-site spreading.

E. Clean Up – Phase 5

- Clean up and remedial actions to restore the environment.
- Disposal of pollutants in accordance with POEOGs.
- Refer to PIRMP for clean-up information.

F. Review

- Conduct an investigation into the incident and assist the EPA and investigators with external enquiries (if applicable).
- Complete internal reporting.
- Test the effectiveness of the PIRMP within one month after the incident to ensure controls are replenished.

5. POLLUTION INCIDENT NOTIFICATION PROCEDURES AND CONTACTS

This section sets out details on the communication protocols for a pollution incident which has occurred in the course of activities for the Site which has resulted in or has the potential to result in a material impact to human health or the environment.

A. COMMUNICATION INTERNALLY

For internal notification, contact details are as follows:

If a material pollution incident occurs at the site or outside the site as a consequence of the site activities then the Site Manager or Acting Site Manager or senior employee for the site must promptly notify (by telephone) the Environment, Health and Safety Manager (Northern) and Ginning Operations Manager on the details below (if they are unavailable then the Chief Operations Officer or EPA Compliance Liaison Officer or Chief Executive Officer should be contacted promptly). Do not hesitate to call these representatives regardless of the time.

If an employee or contractor for the site discovers a pollution incident they must report the pollution incident to the Site Manager or Acting Site Manger which in turn must notify the individuals via the process specified above. Contact details are as follows:

Contacts	Title	Contact Numbers
Mike Murray	Site Manager - Wathagar	Wk: 02 6752 5390 Mob: 0417 707 042
Shane McGregor	Environment, Health and Safety Manager (Northern)	Wk: 07 4631 6109 Mob: 0438 903 084
Andrew Vanderstok	Ginning Operations Manager	Wk: 02 6752 4378 Mob: 0429 232 303
Shane McGregor	Chief Operations Officer	Wk: 07 4631 6109 Mob: 0438 903 084
Bailey Garcha	EPA Compliance Liaison Officer	Wk: 07 4631 6103 Mob: 0428 265 594
Jeremy Callachor	Chief Executive Officer	Wk: 07 4631 6104 Mob: 0428 116 290

The Environment, Health and Safety Manager (Northern) and the Ginning Operations Manager must promptly (within two hours of discovering a pollution incident is present) advise the Chief Operations Officer and the EPA Compliance Liaison Officer of any notification they decide is a pollution incident.

B. COMMUNICATION WITH EXTERNAL GOVERNMENT AGENCIES STAKEHOLDERS

The Environment, Health and Safety Manager (Northern) or Ginning Operations Manager are responsible for the implementation and management of the PIRMP and have authorisation to contact the following external agencies. The relevant external agencies will be notified of a material pollution incident without delay. The following parties should be notified promptly on the following contact details:

Environment, Climate & Water, Department of (formally EPA)	131 555 (emergency 24 hour service number)
Public Health Unit – Tamworth	02 6764 8000
Local Council - Moree Plains	02 6757 3222
WorkCover Authority	13 10 50
Police/ Fire/ Rescue	000

C. COMMUNICATION WITH LOCAL COMMUNITY (COMMUNITY NOTIFICATION PROTOCOL)

The Site Manager or Acting Site Manager, Environment, Health and Safety Manager (Northern) and Ginning Operations Manager are to assess if community members or their property may potentially be affected by a **material pollution** incident, if this is the case then community members must be notified immediately without delay by one of the following methods:

- door knocking if an emergency event;

- phone call by a Namoi Cotton Limited representative; and
- in writing if appropriate for continuing material pollution incident.

The appropriate method of communication will be determined by the nature of the pollution incident or as directed by the relevant agency.

Community members are to be notified within these areas at the earliest convenience.

D. UPDATES

Regular updates to relevant government agencies and community members will be provided using the relevant protocols.

6. REVIEW

Control and Review History

Version	Date Reviewed	Reviewed By	Amendment
1	15 November 2013	Bailey Garcha	15 November 2013
2	27 June 2018	Bailey Garcha	27 June 2018