

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN (PIRMP)

Farm 61 Poultry Production Farm

Prepared for:

ProTen Holdings Pty Ltd
Bowditch Road
Griffith NSW

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BASIS OF REPORT

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

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DOCUMENT CONTROL

Issue	Date	Descriptions
1	September 2012	Draft PIRMP provided to ProTen for review
2	March 2014	PIRMP reviewed, discussed and documented
3	May 2015	Update of contact details; inclusion of PIRMP testing process and outcomes; and review of pollutant inventory
4	December 2015	Update of PIRMP testing history
5	October 2016	Update of PIRMP testing history
6	September 2017	Update of PIRMP testing history
7	September 2018	Update of PIRMP testing history and contact details

TESTING OF THE PIRMP HISTORY

Issue	Date	Description
1	April 2015	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 Farm 61. PIRMP quiz completed by all farm staff with signoff by the Farm Manager.
2	September 2015	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 Farm 61. PIRMP quiz completed by all farm staff with signoff by the Farm Manager.
3	September 2016	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 Farm 61. PIRMP quiz completed by all farm staff with signoff by the Farm Manager.
4	September 2017	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 Farm 61. PIRMP quiz completed by all farm staff with signoff by the Farm Manager.
5	September 2018	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 Farm 61. PIRMP quiz completed by all farm staff with signoff by the Farm Manager.

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ABBREVIATIONS

ARA	Appropriate Regulatory Authority
CLC	Community Liaison Committee
DP	Deposited Plan
EPA	Environment Protection Authority
EPL	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 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 POEO Act and the *Protection of the Environment Operations (General) Regulation 2009* (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 98C) and be in the form required by the POEO(G) Regulation (clause 98B);
- 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 98E); 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 10865, the Farm 61 Poultry Production Farm (Farm 61), 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 (see 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 98B(1) and 98D of the POEO(G) Regulation, a copy of this PIRMP shall be kept in written form at the EPL premises (i.e. Farm 61) and shall be made readily available to all personnel responsible for implementing the PIRMP and to any authorised officer (as defined in the POEO Act) on request.

The PIRMP will be made publically available within 14 days of finalisation (taken to be authorisation of the PIRMP by the Site Manager) via the ProTen website www.proten.com.au.

1.3 Definition of a Pollution Incident

The POEO Act defines a pollution incident as:

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

A licensee is required to notify the relevant regulatory authorities of a pollution incident if there is a risk of ‘material harm to the environment’, which is defined in section 147 of the POEO Act as:

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

Harm to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution.

In the case of an environmental incident, prior to any other action, the site must contact emergency services by telephoning 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

If the incident does not pose any threat to human health or property, concurrently with contacting emergency services (000), all possible actions should be taken to control the pollution incident and minimise health, safety and environmental consequences. These actions must be employed to the maximum extent possible to provide for the safety of people at and within the vicinity of the site, and contain the pollution incident.

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 in notifying a pollution incident to: (i) The owners or occupiers of premises in the vicinity of the premises to which the EPL relates; (ii) The local authority for the area in which the premises to which the EPL relates; and (iii) Any persons or authorities required to be notified by Part 5.7 (of the POEO Act).	Sections 3.1, 3.2 and 3.3
(b)	A detailed description of the action to be taken immediately after a pollution incident, by the holder of the relevant EPL 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 POEO(G) Regulation (as set out below): <i>98C(1)(a) A description of the hazards to human health or the environment associated with the activity to which the licence relates (the relevant activity),</i>	Sections 2.2 and 2.4, and Appendix A
	<i>98C(1)(b) The likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood,</i>	Section 2.2 and Appendix A
	<i>98C(1)(c) Details of the pre-emptive action to be taken to minimise or prevent any risk of harm to human health or the environment arising out of the relevant activity,</i>	Section 2.3 and Appendix A
	<i>98C(1)(d) An inventory of potential pollutants on the premises or used in carrying out the relevant activity,</i>	Section 2.4
	<i>98C(1)(e) The maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the licence relates,</i>	Section 2.4
	<i>98C(1)(f) A description of the safety equipment or other devices that are used to minimise the risks to human health or the environment and to contain or control a pollution incident,</i>	Section 2.5
	<i>98C(1)(g) The names, positions and 24-hour contact details of those key individuals who: (i) are responsible for activating the plan, and (ii) are authorised to notify relevant authorities under section 148 of the Act, and (iii) are responsible for managing the response to a pollution incident,</i>	Section 3.1
	<i>98C(1)(h) The contact details of each relevant authority referred to in section 148 of the Act,</i>	Section 3.2
	<i>98C(1)(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>98C(1)(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>98C(1)(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	

Section 153C	Detail Required	Section in PIRMP
	<i>98C(1)(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>98C(1)(m) The nature and objectives of any staff training program in relation to the plan,</i>	Section 5.1
	<i>98C(1)(n) The dates on which the plan has been tested and the name of the person who carried out the test,</i>	Section 5.2 and after TOC ¹
	<i>98C(1)(o) The dates on which the plan is updated,</i>	After TOC ¹
	<i>98C(1)(p) The manner in which the plan is to be tested and maintained.</i>	Section 5.2

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2 Premises Details

2.1 Site Details

The Farm 61 property is identified as Lot 4 in Deposited Plan 1053110 in the Local Government Area of Griffith. It comprises around 50 hectares and is located on Rathbone Road approximately seven kilometres south-west of Griffith in NSW.

This site encompasses ProTen's Farm 61 Poultry Production Farm, where birds are grown for human consumption. The Farm comprises 28 tunnel-ventilated fully-enclosed climate-controlled poultry sheds, with associated support infrastructure and staff amenities. The site houses up to 1,165,000 broiler birds at any one time.

The nearest residential dwelling is approximately 200 metres from the nearest poultry shed in an easterly direction. The city of Griffith, which is located over seven kilometres north-east of the respective poultry sheds, is identified as the closest urban area.

Farm 61 operates 24 hours a day with all activities besides bird transport undertaken between 7:00 am and 7:00 pm. As the birds reach their desired slaughter weight they are removed from the sheds and transported from the site. Removal of birds is conducted throughout the day but is generally undertaken when it is cooler and the birds are more settled.

2.2 Description and Likelihood of Hazards

This section has been prepared to meet the requirements of Clauses 98C(1)(a), (b) and (c) of the POEO(G) Regulation.

The likelihood of environmental hazards occurring at Farm 61 has been captured via a Broad Brush Risk Assessment (**Appendix A**). The purpose of the risk assessment was to identify the potential major hazards and/or risk(s) posed by the poultry production operation, the controls necessary to effectively mitigate and/or manage these risks and the key pollution response measures.

The potential major hazards that have been identified at Farm 61 are:

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



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2.3 Pre-Emptive Action to be Taken

2.3.1 General Site Maintenance

The PIRMP Risk Assessment (**Appendix A**) outlines potential pollution incident risks at Farm 61. For each potential risk, there are a number of controls outlined. Regular and effective site maintenance is essential to minimise odour, dust, noise and pests. Emphasis is placed on keeping the interior of the poultry sheds and surrounding environs as clean as possible, with maintenance activities including:

- Regular inspection and maintenance of ventilation systems, bird drinkers and bird feeders to avoid blockages, spillages, leaks and uneven distribution;
- Regular examination and management of stock densities and bird health within the poultry sheds;
- Appropriate waste management practices and/systems;
- Correct storage of chemicals and potential pollutants;
- Daily inspection and removal of dead birds from within sheds;
- Daily monitoring and maintenance of bedding materials to identify;
- Regular site slashing and mowing and maintenance of landscape plantings;
- Implementation of pest control measures, primarily a preventative baiting system;
- Training and awareness; and
- Testing of the PIRMP as per **Section 5.2**.

While ProTen makes all attempts to prevent pollution incidents, in a situation where a pollution incident is imminent and may potentially cause impacts to human health or the environment, Site Management will contact the necessary stakeholders (employees, contractors, neighbours and relevant authorities) to provide as much early warning as possible

2.3.2 Air Quality Management

Air quality issues are directly related to farm operation (in addition to meteorological conditions and surrounding land uses), with good management practices playing a significant role in reducing the potential for offensive emissions. Mitigation measures and management strategies employed include:

- The poultry sheds are fully-enclosed, have adequate roof overhang (wide eaves) and are surrounded by dwarf concrete bund walls to prevent rainwater entering the sheds and allow for the controlled discharge of wash down water from the sheds into the on-site surface water management system. These assist in reducing the level of moisture within the poultry sheds, which is identified as a significant potential odour source.
- The poultry sheds are tunnel-ventilated to allow control over internal temperature, air flow and moisture levels, which assists in providing optimum conditions for bird growth and health. The internal shed conditions are continuously monitored (automatic and alarmed) to ensure optimum conditions are maintained;
- The poultry sheds are fitted with nipple drinkers with drip cups (as opposed to cup drinkers), which reduces water spillage and shed moisture levels;
- The feed silos are fully enclosed to prevent rainfall entry (wet feed is identified as a source of odour) and minimise emissions of dust/particulate matter when filling;

- Dead birds are collected from the sheds regularly throughout the day and removed by a licensed contractor to Baiada's Protein Recovery Plant;
- Internal roads are well maintained to minimise dust emissions;
- Hundreds of trees and shrubs have been planted at the Farm. In addition to screening the sheds, the plantings act to slow and filter air movement which in turn enhances dust deposition and odour dispersion;
- Poultry litter (spent bedding material) is promptly removed from the sheds and transported off-site in covered trucks at the end of each production cycle during the clean-out phase;
- During sanitisation, the amount of air released from the poultry sheds while any sanitising scent is present is minimised and, when possible, a low scent sanitiser is utilised; and
- There is no long-term stockpiling or disposal of waste materials on-site.

2.3.3 Water Management

The potential for adverse impact to surface water and groundwater resources from the operation of intensive poultry production farms is very low, with the risk of impact considered far less than traditional agricultural activities. Given the controlled environment in which Farm 61 operates, along with the environmental licensing conditions it is required to comply with, it poses a low risk to local water resources and no detectable impact is expected.

The water requirements of Farm 61 are met via an annual water allocation from Murrumbidgee Irrigation Scheme.

The main operational water sources within the Farm are:

- Wash down water from within the sheds at the end of each nine week production cycle (approximately 5.7 times per year);
- Rainfall runoff from the shed roofs; and
- Rainfall runoff from the ground surfaces surrounding the poultry sheds and additional improvements.

The potential for impact to local water resources by runoff of nutrients, chemicals or pathogens is considered negligible. An engineered surface water management system has been established to provide long-term structural controls and management to mitigate the impact of surface water runoff throughout the life of the operation. Each poultry shed is surrounded by a dwarf concrete bund wall to prevent rainwater and runoff entering the sheds. Excess wash down water from the sheds runs into grassed swales between each of the sheds. Rainfall runoff from the shed roofs and from some of the surrounding surfaces is also directed into the grassed swales. The swales are designed to allow infiltration of the water into the topsoil for nutrient uptake by the grass, which is regularly slashed.

In terms of domestic waste water management, the wastewater generated by on-site dwellings and staff amenities is treated and disposed of via septic systems. The septic systems are made up of septic tanks and leaching trenches. A contractor is engaged to service and maintain the systems when required. The effluent is disposed of via evaporation. Based on the relatively low volumes and the low permeability of the underlying rock strata, the likely impact on surface water and/or groundwater is considered minimal.

Figure 2 shows the sites water bodies and drainage systems.



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2.3.4 Fire Management

The risk of a fire at Farm 61 is minimised via the following management practices:

- Smoke detection systems are installed within in office buildings and within the sheds;
- Fire extinguishing equipment is located in the office buildings and within each poultry shed;
- Regular site slashing and mowing;
- The grass within the shed environs is maintained short; and
- Fuel is stored in bunded tanks with an overflow container.

2.3.5 Waste Management

Stockpiling and/or disposal of waste materials, especially poultry litter, dead birds and chemical containers, can result in leaching of nutrients and pollution to surface waters and groundwater. However, appropriate systems are in place at Farm 61 to ensure that each waste stream generated by the poultry operation is effectively managed and disposed of off-site. On-site stockpiling or disposal of waste materials is not permitted.

General Daily Waste

Day to day general waste is placed into enclosed skips and removed from the Farm by a licensed contractor on a regular basis. This type of waste is transported to and disposed of at a local landfill site.

Poultry Litter

For sound farm management and quarantine control/biosecurity reasons, it is not in ProTen's interest to stockpile poultry litter (spent bedding material) near the sheds due to the vulnerability of the younger birds coming in to commence cycle. As such, at no time is litter stored within the bounds of the property. The sole reason a valuable commodity such as poultry litter is removed from the site is to ensure minimal opportunity for disease transfer to the flock. The product does not pose a health threat to the surrounding community.

Poultry litter is highly sought after as an organic fertiliser and/or rehabilitation agent for agricultural lands. The material is collected from the sheds at the end of each production cycle, loaded in covered trucks and removed from the site by an approved/licensed contractor(s) for use as a commercial raw product and/or to sell directly to regional farmers. The safe handling and application of the material once it has left Farm 61 is the responsibility of the end-user.

Dead Birds

Dead birds are collected from the poultry sheds on a daily basis and removed by a licensed contractor to Baiada's protein recovery plant (rendering plant) near Hanwood on Kidman Way. Dead birds are not stockpiled within Farm 61 for reasons of strict quarantine control.

Chemical Containers

Limited chemicals are used at Farm 61, with the primary areas of use being for sanitisation and disinfection purposes, along with pest and vermin control. A chemical supply company is engaged to provide a chemical delivery and pickup service direct to Farm 61. At each delivery of new chemical supplies, all empty chemical containers are retrieved by the chemical company for reuse, recycling or appropriate disposal. Any non-returnable chemical containers can be collected and managed via the *drumMUSTER* program.

2.3.6 Poultry Disease and Biosecurity Management

Biosecurity refers to those measures taken to prevent or control the introduction and spread of infectious agents to a flock. It aims to prevent the introduction of infectious diseases, and prevent the spread of disease from an infected area to an uninfected area. Biosecurity plays a vital role in the incidence of disease and is an integral part of any successful poultry production system.

The key biosecurity measures implemented at Farm 61 include the following:

Farm Signage

Appropriate signage is erected at the site entrance to notify visitors of the biosecurity zone and direct them to contact the operator prior to proceeding.

Farm Isolation

The greater the separation distance between poultry farms, the less opportunity there is for disease spread. The layout of Farm 61 affords appropriate separation distance to ProTen's Farm 60 Farm.

Disease organisms (pathogens) can survive for some time on people and their clothes and as such isolation in time is also important in providing a break between visits of personnel and equipment. Time isolation allows equipment to be disinfected and allows personnel to shower and change clothing.

Additional measures to ensure isolation from disease include:

- Poultry sheds and equipment are cleaned and disinfected at the end of each production cycle;
- Dead birds are collected from sheds daily and removed by a licenced contractor to Baiada's Protein Recovery Plant;
- Poultry litter and dead birds are not permitted to be stockpiled within the site;
- Staff working in direct contact with livestock are not permitted to keep other bird species at their place of residence.
- Staff and visitors are not permitted to travel between poultry farms without showering and changing clothes and foot wear; and
- Attempts are made to limit wild birds and vermin from farm buildings and precincts.

Single Age Farm

Vaccinated stock can become infected and show no clinical signs of disease, yet can transfer the disease to younger and/or more susceptible birds. To reduce the risk for disease transfer and outbreak, whole flock units with minimum age difference are placed into each poultry shed. On this basis, the Farm operates on an 'all in – all out' placement and depopulation program.

Closed Flock

Birds on other sites may be exposed to different strains of organisms to which other flocks may not have developed immunity to. In addition, birds may have been exposed to a disease organism and not have developed clinical signs of the disease. Moving apparently healthy birds into a disease-free flock could mean introducing disease to a clean farm site. For these reasons, once a flock is placed, no new birds are introduced from any other source.

Pest Control

A variety of pest control measures are implemented to discourage pests and vermin from establishing residency within and around Farm 61.

2.3.7 Hazardous Material Management

Limited chemicals are used as part of the poultry production operation. The primary areas of use are:

- Sanitation of the poultry sheds during the cleaning phase at the end of each production cycle;
- Disinfection of the water supply; and
- Pest and vermin control, when and where necessary.

As previously advised, a chemical supply company is engaged to provide a chemical delivery and pick up service direct to Farm 61. It is the usual practice for chemicals to be delivered to the site only a few days prior to the commencement of the cleaning phase in order to minimise on-site chemical storage. Appropriately sealed chemical storage containers are provided at the Farm for the short-term storage of the limited volumes of chemicals delivered to the site. At each delivery of new chemical supplies, all empty chemical containers are retrieved by the chemical company for reuse, recycling or appropriate disposal.

On the basis of the best management practices and mitigation measures to be implemented, including appropriate staff training and incident management procedures, the potential for adverse environmental impact from chemical use is considered relatively low.

Given the limited applications and current management practices, the potential for adverse impact from chemical use within the site is considered low. The following mitigation measures and management practices are employed to ensure appropriate chemical handling and storage:

2.3.8 Chemical Use

- Staff members are instructed in the proper use and handling of all chemicals used on-site. If appropriate, this includes completion of training such as SMARTtrain or ChemCert (or similar).
- All chemical use is undertaken in full compliance with the relevant statutory requirements, including the *Pesticides Act 1999*.
- Where appropriate, chemicals used will be approved by the Australian Pesticide and Veterinary Medicine Authority as safe and fit for that particular use.

Chemical Storage and Disposal

- A chemical inventory (Form 1002B) is maintained in the chemical storage containers. All chemicals and their quantities stored are itemised on the chemical inventory. Whenever a chemical is used, the amount taken is recorded on the chemical inventory sheet.
- Whenever a chemical is purchased and/or brought onto the farm it is recorded in the chemical inventory and a Safety Data Sheet (SDS) is collected.
- It is the usual practice for chemicals to be delivered to the site only a few days prior to the commencement of the cleaning phase in order to minimise on-site chemical storage requirements and time.
- An appropriately sealed chemical storage container is provided for the short-term storage of the limited volumes of chemicals delivered to the site.

- Empty chemical containers are retrieved by the chemical supply company for reuse, recycling or appropriate disposal.
- Appropriate signage is posted and a copy of the SDS for each chemical agent is stored with the chemicals.

Petrol and Diesel Use and Storage

There are three diesel-powered emergency standby generators installed on site to provide electricity to the sheds in the event of power loss from the electricity grid. There is a diesel tank located next to each generator, as well as a fourth free standing diesel tank opposite the site office. There is also one 1,000 litre petrol tank at the Farm. To minimise risk of a petrol or diesel spills, fuel is stored in bunded tanks with overflow containers. These overflow containers are inspected regularly and, when required, are removed by a licenced contractor to prevent overspill and are replaced with an appropriate empty container. Any excess water collected in bunded areas is also removed by a licenced contractor.

SDS are maintained on-site for diesel and petrol. Staff members are instructed in the proper use and handling of these products and are trained in incident management.

The gas requirements of Farm 61, used for heating of the poultry sheds, are serviced via the site's connection to reticulated natural gas infrastructure.

Incident Management

- In the event of a minor chemical spill, Site Management has been instructed to implement the actions indicated on the chemical's SDS.
- In the event of a major spill, which is considered highly unlikely given the proposed storage methods and the low volumes of chemicals to be stored on-site, Site Management has been instructed to follow this procedure:
 - Contact the EPA and/or other appropriate regulatory authorities immediately and advised of the nature of the chemical spill or incident, and adhere strictly to any instructions issued by the authority.
 - Where possible, contain the spilled material using vermiculite or similar absorbing material, and/or recover into suitable containers.
 - Any contaminated soil and/or absorption material is to be collected, managed and disposal of as advised by the regulatory authority.
 - Clean soil is to be brought in once all contaminated material has been removed.

2.4 Inventory of Pollutants

Table 2 provides a summary of the potential pollutants (hazardous materials) stored and/or used onsite at Farm 61. The location of these pollutants is shown on **Figure 3**.

Table 2 Potential Pollutants at Farm 61

Product Name	Storage Location(s)	Maximum Quantity	SDS Available
Agriphor	Chemical Storage Shed	20L to 25L	Y
Agriquat	Chemical Storage Shed	200L	Y
Amprolium 200	Chemical Storage Shed	30kg	N
Disinfectant	Chemical Storage Shed	25L	N
Goal	Chemical Storage Shed	5L	Y
Glyphosate CT	Chemical Storage Shed	22L	Y
Mouse Off	Chemical Storage Shed	15kg	Y
Polyphen	Chemical Storage Shed	190L	Y
Tomcat II Blocks	Chemical Storage Shed	10Kg	Y
Total Kleen	Chemical Storage Shed	25L	Y
Wipe Out	Chemical Storage Shed	20L	N
Petrol	Opposite Office	1,000L tank	Y
Diesel	At Office – 1 x 500L tank Between sheds 16 & 18 – 1 x 500L tank Opposite Office – 1 x 500L tank Opposite Office – 1 x 2,300L tank	Total – 3,800L	Y
Poultry Litter*	N/A (removed from the site)	N/A	N/A

* The product does not pose a health threat to the surrounding community.

2.5 Safety Equipment

Table 3 lists the safety equipment kept onsite at Farm 61.

Table 3 Inventory of Safety Equipment

Product Name	Location(s)	Calibration/Maintenance Requirement
Fire extinguishers	Poultry sheds	Checked every 6 months
SDSs	Chemical stores	When a new chemical is brought on site or the SDS is update/revised
First AID Kits	Office/staffroom	As required
Personal Protective Equipment (PPE)	Workshop/office/staffroom	As required and needed

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



LEGEND

- Development Site
- Poultry Shed
- Major Roads
- Rothdene Complex Access Roads
- Dwelling
- Office

Aerial Base Plan Data Source: Google Earth

Scale: 1 : 12 000

The scale bar shows 0, 250, and 500 meters. The north arrow indicates cardinal directions: N (North), S (South), E (East), and W (West).

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

G:\Drafting\610.12234_Pro-Ten - PIRMP - all sites\Figures\CAD\Current\2015 Update\TE\CAD\FARM 61\Fig 4_Farm 61 PIRMP_FireSafety-First Aid_V2.dwg



To be printed A4



Farm 61 Poultry Production Complex
Fire Safety and First Aid Equipment

FIGURE 4

3 Management and Responsibilities

3.1 Farm 61 Contact Details

The management and implementation of this PIRMP is to be undertaken by the key individuals listed in **Table 4**. These individuals are responsible for activating the PIRMP, managing the response to the incident and are authorised to notify relevant authorities

Table 4 Primary Contacts for Farm 61

Key Contact	Contact Details	Position
		National Operations Manager
		Griffith Regional Manager
		Farm 61 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 Regulatory Authorities

Table 5 lists the contact details for the regulatory authorities that should be notified in the event of a pollution incident at Farm 61.

Table 5 Relevant Regulatory Authorities Contact Details

Appropriate Regulatory Authority	Key Contact	Contact Details
Environment Protection Authority		Environmental Line – Ph: 131 555 <i>This will result in the incident being recorded and the appropriate person being contacted.</i>
NSW Health	Murrumbidgee Local Health Population Health Unit – Wagga Wagga	Ph: 02 6933 9100
SafeWork NSW		Incident Notification Hotline (Response Management Team) - Ph: 131 050 <i>Select Option 3 to report a 'Serious Incident or Fatality' - this will result in the incident being recorded and the appropriate person being contacted.</i>
Local Authority (Council)	Griffith City Council – Environment Manager	Ph: 02 6962 8100 <i>After office hours, emergency calls are diverted to Council's after-hours service (on the same phone number).</i>
Emergency Services (Fire and Rescue NSW and NSW Police)		Emergency - Ph: 000 Fire & Rescue - Ph: 1300 729 579

3.3 Communication with Neighbours and the Local Community

The location of Farm 61 is outlined in **Section 2.1** and shown on **Figure 1**. As advised, the nearest residential dwelling is approximately 200 metres from the nearest poultry sheds in an easterly direction. The city of Griffith, which is located over seven kilometres north-east of Farm 61, is identified as the closest urban area.

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

- When an incident occurs, Site Management will immediately contact the five regulatory authorities listed in **Table 5**.
- Site Management will consult with these regulatory authorities to determine if the community is to be notified of the pollution incident. Site Management will discuss the most appropriate communication strategy with the regulatory authorities (for example, media release, local radio, 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 (for example, type and extent of pollution). Notification strategies may include door knocking, letter drop, phone calls, SMS or email (where contact details are available), notifications on the ProTen website and/or other forms of social and mass media as appropriate to the circumstances.

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

3.4 Minimising Harm to Persons on the Premises

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

Minimising the impact to persons at Farm 61 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 title 'Emergency Procedures'. In the event of an evacuation:

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

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

3.5 Legal Duty to Notify

All employees, contractors and sub-contractors at Farm 61 are responsible for alerting Site Management to hazards and potential hazards that may result in an environmental incident, regardless of the nature or scale.

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

- **The duty of an employee or any person undertaking an activity:**

Any person engaged as an employee or undertaking an activity (at Farm 61) 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**; and

- **The duty of the employer or occupier of a premises to notify:**

An employer or occupier of the premises on which the incident occurs, who is notified (or otherwise becomes aware of) a potential pollution incident, must undertake notification to the appropriate regulatory authorities of any “material harm incidents”, as defined in **Section 1.3**, including relevant information. Notification shall be undertaken by Site Management as per **Section 3**.

4 Incident Management

4.1 Immediate Notification of a Pollution Incident

Holders of an EPL are now required to report pollution incidents *“immediately”* instead of *“as soon as practicable”* (section 148 POEO Act). This means that licensees need to report pollution incidents without delay.

Licensees must notify all of the relevant authorities (contact details can be found in **Table 5**), which, for Farm 61, are identified as:

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

4.2 Actions During a Pollution Incident

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

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

(1) Preventative Action

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

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

(2) Assistance

Where assistance is required in handling the situation, ProTen’s National Operations Manager should be contacted (**Table 4**).

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

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

- Location of the pollution incident/emergency;
- Nature of the pollution incident/emergency;

- Their name and contact details; and
- Details of any assistance required.

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

(3) Notify

Under the provisions of the POEO Act, there is a duty to notify any incident that has caused or threatens to cause material harm to the environment and all relevant information about the incident. The specific duties to notify are outlined in **Sections 3.5 and 4.1**. The relevant authorities required to be immediately notified are listed in **Table 5**.

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

(4) Investigate

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

(5) Remedial Action

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

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

Additional controls for managing chemical spills include:

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

4.3 Actions Following a Pollution Incident

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

Depending on the nature and/or extent of the pollution incident, ProTen will consult with the relevant authorities when determining whether the community will be notified of the pollution incident. If the community is to be notified, and as outlined in **Section 3.3**, ProTen will decide the most appropriate consultation and/or notification strategy with the relevant authorities.

Within a month following a pollution incident, the PIRMP will be reviewed and tested. 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 Training, Testing and Communication

5.1 Staff Training

The requirements of the PIRMP will be outlined in the site induction for all new employees and contractors. A Toolbox Talk outlining the key components on the PIRMP will be presented to all staff and contractors at Farm 61 following implementation in 2012. The objective of this training will be 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 will be tested every 12 months as per the requirement of the POEO(G) Regulation. The testing of the PIRMP is to be carried out in such a manner as 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.

Farm 61 PIRMP was last tested in September 2018. Testing involved all staff reviewing a factsheet containing an overview of the PIRMP and reporting requirements relating to pollution incidents, followed by all staff completing a two-page quiz on various scenarios which might require reporting under the PIRMP. A sign-off sheet was also completed by all staff members after completing the quiz and signed off by the Farm Manager.

The PIRMP must also be tested within one month of any pollution incident occurring in the course of an activity to which a licence relates. This is to assess, in the light of that incident, whether the information included in the PIRMP is accurate and up to date, and the PIRMP is still capable of being implemented in a workable and effective manner.

Since being implemented in September 2012, the PIRMP has not been activated and there have been no pollution incidents at Farm 61.

6 References

Environment Protection Authority (2012) *Guideline for the Preparation of Pollution Incident Response Management Plans*.

APPENDIX A

Risk Assessment

APPENDIX A: PROTEN FARM 61 COMPLEX POLLUTION RISK ASSESSMENT

							Version:- B Date:- May 2015		
Risk Category	Risk Ref. Number	Potential Hazard / Risk (Impact)	Relevance to Project	Inherent			Existing Controls / Management Response	Pollution Response Measures	
				C	L	Rating			
Spill	1	Spill of hazardous material causing impact to human health or environment	Operation of Farm 61 requires only limited chemical input, however the primary areas of chemical use are cleaning/sanitisation and pest/vermin control.	3	C	3C	13 (S)	Limited chemicals stored on site. Chemical storage area container. Contracted company for chemical delivery and pickup services. SDSs available for chemicals stored and used onsite. Relevant staff are instructed on proper use and handling of chemicals and spill/incident management procedures. Training and awareness.	1. Visually assess the situation, consult SDS for the chemical and activate PIRMP and/or emergency evacuation procedure if required. 2. Contact the Relevant Authorities in accordance with the PIRMP and take direction as required. 3. Seek immediate assistance from specialist environmental consultants. 4. Complete incident investigation and send report to Relevant Authorities
	2	Spill of fuel causing impact to the environment	Fuel is stored onsite however is located in bunded areas to contain potential spills	5	C	5C	22 (L)	Fuel tanks in bunded areas with overflow containers. SDS available for fuel and diesel. Training and awareness.	
Surface Water	3	Contamination of surface water by chemicals causing impact to human health.	Operation of Farm 61 requires limited chemical input.	4	D	4D	21 (L)	Limited chemicals stored on site. Runoff from sheds and during shed cleaning is collected in the dam onsite. Environmental Incident Register. Relevant staff are instructed on proper use and handling of chemicals. Training and awareness.	1. Visually assess the situation, consult SDS for the chemical and undertake emergency response if required 2. Contact the Relevant Authorities in accordance with the PIRMP and take direction as required. 3. Seek immediate assistance from specialist environmental consultants. 4. Complete incident investigation and send report to Relevant Authorities
	4	Contamination of surface water causing impact to the environment.	Operation of Farm 61 requires limited chemical input, however there is a risk that a pollution incident caused by excessive poultry litter or cleaning chemicals could potentially occur.	5	D	5D	24 (L)	Maximise dry-cleaning practices in sheds when removing poultry litter. Fuels stored in bunded areas with overflow containers in place	
Air Quality	5	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.	4	D	4D	21 (L)	Emergency response/evacuation procedures. Fire/Smoke detection systems in buildings and sheds. 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. 3. Contact and take direction from Relevant Authorities. 4. Complete incident investigation and send report to relevant authorities.
	6	Dust emissions from unsealed surfaces from site causing impact to human health.	Dust could affect human health due to dust inhalation as the site. Site access roads are unsealed surfaces that could cause dust in dry conditions. Excessive dust could impact the surrounding environment.	4	D	4D	21 (L)	Site landscaping, including perimeter plantings, are maintained. Maintenance of internal gravel roads. Single entry access to site. Site speed limits.	1. Visually assess the situation, undertake emergency response if required. 2. Stop/Shut down all dust producing activities. 3. Contact the Relevant Authorities and take direction as required. 4. Complete incident investigation and send report to relevant authorities.
	7	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.	4	C	4C	18 (M)	Mass Bird Disposal Plan. Site inspection and maintenance program. Daily inspections and removal of dead birds Reduced shed ventilation rates Complaints Procedure No long-term stockpiling or disposal of waste products on-site. A Telephone Complaints Line is available for the public to contact the site to make a complaint during hours of operation.	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 2. Review activities and farm data (age and litter quality) to determine if Farm 61 is the source of the odour and if so if the odour can be reduced.
Fire	8	Fuel leak causing fire or explosion	Leak from one of the onsite fuel tanks could result in fire or explosion	4	C	4C	18 (M)	Emergency response/evacuation procedures. Fire/Smoke detection systems in buildings and sheds. 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. 2. Apply appropriate safety precautions, consult SDS for the chemical and activate Activate PIRMP and/or 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.
	9	Fire in PPU or site premises	Fire on the premises due to weather conditions	4	C	4C	18 (M)	Emergency response/evacuation procedures. Fire/Smoke detection systems in buildings and sheds. Fire extinguishing equipment located in all sheds and other locations around the site. Sheds cleared of debris at the end of each production cycle Fuel stored in bunded tanks with overflow containers. Land surrounding the sheds is regularly slashed and well maintained.	1. Apply appropriate safety precautions, contact emergency services and conduct emergency evacuation procedure if required 2. Utilise fire safety equipment such as extinguishers located in each shed. 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.
Waste	10	Incorrect handling, use, storage and/or disposal of hazardous/toxic waste causing impact to human health.	Licensed waste contractor to remove waste from site.	4	C	4C	18 (M)	No access of the site to the public. Sign in book at site entry. Contract with licensed waste contractor for transport. Poultry litter removed for offsite rural/agricultural application. Chemical supply company directly services the site dropping of and removing chemicals and containers. Training & awareness. Mass Bird Disposal Strategy.	1. Visually assess the situation 2. Apply appropriate safety precautions, consult SDS for the chemical if appropriate, and undertake emergency response if required. 3. Activate PIRMP and/or emergency evacuation procedure. 4. Notify Relevant Authorities
	11	Incorrect handling, use, storage and/or disposal of hazardous/toxic waste causing impact to the environment.	Licensed waste contractor to remove waste from site.	5	C	5C	22 (L)		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.
Noise	12	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).	5	D	5D	24 (L)	Operating hours as approved by consent conditions. Complaints handling procedure. Complaints reporting phone number available during hours of operation. Plant and Equipment regularly inspected and maintained to ensure optimal operating condition. 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. 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.

APPENDIX B

Environmental Incident Report Form

PROTEN LIMITED

Farm 61 Poultry Broiler Production Complex

ENVIRONMENTAL INCIDENT REPORT FORM

INCIDENT DETAILS

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

Location:-

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

NOTIFICATION TO REGULATORY AUTHORITY

Has the incident caused or does it threaten to cause material harm to the environment:- Yes / No

If yes, the Environmental Protection Agency (EPA) must be notified.

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

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

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

REMEDIAL ACTION

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

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

Any Further Corrective Action Required:- Yes / No

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

SIGN OFF

Name:- **Title:-**

Signature:- **Date:-**

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