CARROLL COTTON CO.

EST. 1995 AUSTRALIA

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN



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Purpose

The purpose of this plan is to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (such as local councils, NSW Health, SafeWork NSW, and Fire and Rescue NSW) and people outside the facility who may be affected by the impacts of the pollution incident.
- Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks.
- Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency, and suitability.
- If a pollution incident occurs during an activity so that material harm to the environment is caused or threatened, the plan will be implemented immediately.

Scope

This Management Plan applies to the Carroll Cotton operation, its employees, contractors, and visitors.

Requirements

The Pollution Incident Response Management Plan (PIRMP) has been developed in accordance with the requirements of the NSW Environment Protection Authority (EPA) and in the form required by regulations detailed in the POEO Act and Protection of the Environment Operations (General) Regulation 2022 (NSW).

What must be notified?

Notification is required if a pollution incident causes or threatens to cause 'material harm' to the environment.

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.

What is material harm?

Material harm includes on-site harm, as well as harm to the environment beyond the premises where the pollution incident occurred.

PROTECTION OF THE ENVIRONMENT OPERATIONS ACT 1997 (POEO) - SECT 147
Meaning of material harm to the environment
(1) For the purposes of this Part:

(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.

(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.

Responsibilities

Carroll Cotton Gin takes action to prepare for and prevent emergencies and critical incidents. This would include:

- identifying on-site and off-site situations that have the potential to become emergencies or critical incidents that would affect site operations.
- determining potential risks associated with particular situations.
- using risk management practices to assess the potential risks and develop mitigation strategies.
- developing an Emergency Management Plan that considers the management of foreseeable risks.
- communicating the plan to all staff.
- training key staff.
- testing and modifying the plan annually.

Incident response protocol

If a pollution incident occurs at the site the following steps should be followed by the General Manager, Production Supervisor or Maintenance Supervisor or Shift Supervisor.

Phase 1- Assess Risk Materiality (pollution incident occurs)

- 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. Evacuate if necessary.
- 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?
- Assess potential for off-site impacts to the community and the environment.
- If the emission has the potential to cause material harm to persons or property or the environment, execute the next phase of the PIRMP PHASE 2 - NOTIFY

Phase 2- Notify

Contact key individuals:

- Individuals responsible for activating the PIRMP (nominated site representatives),
- Individuals authorised to notify and co-ordinate relevant authorities (nominated representatives).
- Notify Relevant Authorities if it is determined that the pollution incident is a material harm incident in accordance with Section 9.
- If the incident does not require an initial combat agency, or once the 000 call has been made then the Production Manager will notify the relevant authorities in the following order.
  1. EPA
  2. NSW Health via the local Public Health Unit
  3. SafeWork NSW
  4. Police and Fire and Rescue NSW
  5. If required notify community members via the Community Notification Protocol.
  6. Please refer to contact details in Section 6.3.

Phase 3- Stop

- Read “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 emergency service (e.g. Fire and Rescue NSW) or instruction from the General Manager, Production Manager, Maintenance Supervisor or Acting Site Supervisor.
- Manage incident in accordance with the site PIRMP.

Phase 4- Contain Incident

- 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.

Phase 5- Clean Up

- Clean up and remedial actions to restore the environment.
- Disposal of pollutants in accordance with EPA regulations.

Phase 6- 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.

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.

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 Shift Supervisor must promptly notify (by telephone) the Production Supervisor, Maintenance Supervisor, or the General Manager. **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 Production Manager which in turn must notify the individuals via the process specified above. Contact details are as follows:

Contact Numbers

Carroll Cotton Co. Gin landline: 02 57 111 664

Scott Davies	General Manager	0427 445 282
Andrew Payne	Production Supervisor	0418 243 360

Communication with external government agencies / stakeholders

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:

EPA Armidale	02 6773 7000	
EPA Head Office	02 9995 5000	131 555 (emergency 24-hour service number)
NSW Health	02 6764 8000	
Local Council – Tamworth	02 6767 5555	1300 733625
Local Council – Gunnedah	02 6740 2100	02 6740 2100
SafeWork NSW	13 10 50	
Police/ Fire/ Ambulance	000	
ELGAS Emergency Number	1800 819 783	

Communication with local community (community notification protocol)

The Production Supervisor, and/or General Manager must 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 Carroll Cotton Co Pty Ltd 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.

When deciding the extent of community notification, the Production Supervisor and/or General Manager will consider:

- Type of pollutant
- Prevailing winds
- Height and magnitude of the emission
- Location of any onsite fallout or offsite impacts.

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

As part of the communication to the local community and neighbouring properties, people will be advised of the practical things they can do to minimize the risk of harm to their health and property, during and after the incident. For example, this could include instructions to close windows and doors and remain inside to avoid emissions of certain types of air pollutants.

Neighbouring sites

Middlebrook	Ben Middlebrook	0400 516 853
Longacre's	Steven Gibson	0427 276 105
Longacre's North	Greame Norman	0428 255 332
Aerial Spraying	Lauchie Jones	0428 755 181

Testing

Carroll Cotton Co. is committed to the testing of its PIRMP annually through scenario drills or desktop exercise. Where possible, we will contact the local fire station in advance of testing to provide an opportunity

for Fire and Rescue NSW and other emergency services to participate in or observe the testing of the PIRMP. Once testing has been completed, a debrief will personnel involved in the drill or exercise will be conducted and include:

- What worked?
- What would we do the same next time?
- What would we do differently next time?
- What needs did we identify? (e.g. staff training, safety procedure update, etc.)

In addition to the annual testing, the PIRMP must be tested within one month of a pollution incident which caused or threatened material harm to the environment.

The results of all testing of the PIRMP will be recorded on an Evacuation Drill Record. The record will include:

- the dates when the PIRMP was tested.
- the name of the person(s) who carried out the testing.
- outcomes or improvements to the PIRMP.

The testing of the PIRMP will be coordinated by the Production Supervisor at the beginning of the ginning season when the majority of the workforce is onsite and have been suitably trained in the PIRMP and emergency response.

Updates to PIRMP

This PIRMP may be updated in any of the following circumstances:

- following testing
- a change to the contact details for Carroll Cotton Co. personnel or neighbouring landholders
- a change to the POEO Act or Protection of the Environment Operations (General) Regulation 2022 (NSW).
- notification or information provided by the EPA.
- at the discretion of the General Manager.

FORM A – HAZARDOUS CHEMICAL REGISTER

Product Trade Name	UN No.	Proper Shipping Name	Class / Division	Sub-Risk	PG	Combustible Liquids *	Poison Schedule	Hazardous Chemical	Peak Quantity (L/Kg)
LPG	1075	Petroleum Gases Liquified	2.1		N/A	N/A	N/A		53’000L
Diesel	3082	ENVIRONMENTALLY HAZARDOUS SUBSTANCE	9		3	C1	5	Y	5’000L
Hydraulic Oil 32	3164		2			C2	N/A		10’000L
Petrol	1203	MOTOR SPIRIT or GASOLINE or PETROL	3		2	N/A	5	Y	4’000L
								Total Litres or Kg	**72’000**

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Potential Pollutants

Potential Pollutants	Hazard	Likelihood	Pre-Emptive Actions	Emergency Level
Cotton modules/ Cotton Trash	Fire, Smoke	Low	• Fire breaks/ roads segregate module pads.	Site / External
Gin Cotton	Fire, Smoke	Moderate	• Monitor module moister levels. • Fire reels and extinguishers	Local / Site
Cotton Bale	Fire, Smoke	Low	• As above	Site / External
Stored Diesel	Leaks, Spills, Fire	Low	• Bunding containment wall. • No smoking zone.	Local
Stored Petrol	Leaks, Spills, Fire	Low	• Bunding containment wall. • No smoking zone. • Extinguishers.	Local
Bulk LPG storage	Leaks / Explosion	Low	• Regular maintenance by Elias. • No smoking zone. • Fire Reel.	Site

Site specific safety equipment

Fire Reels	Throughout Gin and Site. A map is available at the Site Manifest located at the main entrance.
Fire Extinguishers	Throughout Gin and Site. A map is available at the Site Manifest located at the main entrance.
1 Water truck with fire hoses and pump	All staff trained in Fire Truck use.
Front End Loader	
Water Storage for filling water trucks	
SDS	Chemical Storage Container & WHS Drive

Emergency services

Fire, Ambulance, Police	000
SES	02 6740 2380
Gunnedah Hospital	02 6741 8000
Tamworth Base Hospital	02 6767 7700

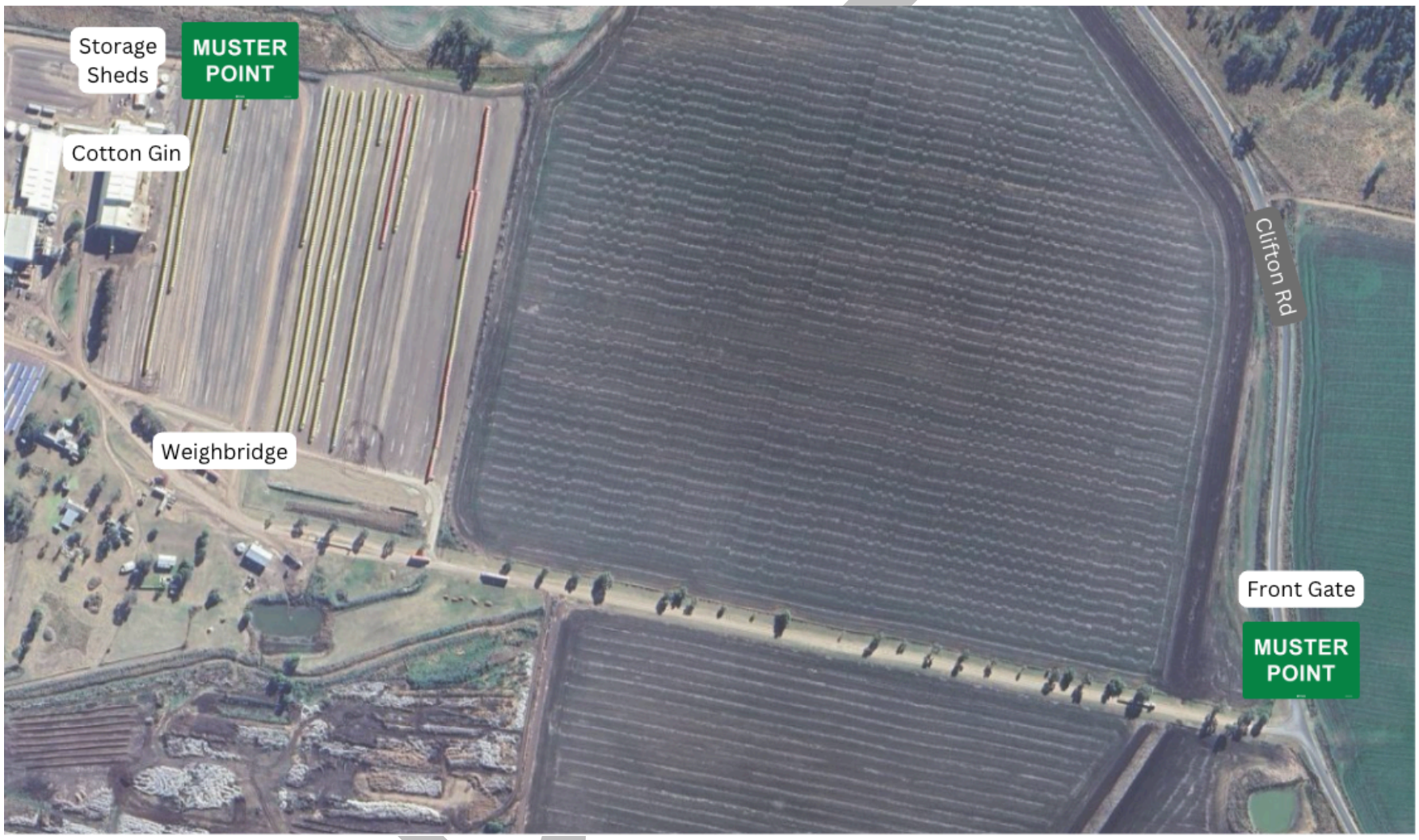
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Roles and Responsibilities

Role	Responsibility
General Manager / Production Manager	• Provide technical advice and support to the management team in the event of an emergency. • Activate the Pollution Incident Response Management Plan if required and assume Team Leader Role • Arrange to routinely test the Pollution Incident Response Management Plan. • Notify external authorities, neighbours, and emergency services. • Ensure resources are made available for the inspection, testing, maintenance of equipment and the development and maintenance of Safe Work Procedures. • Ensure resources are made available for the training of Carroll Cotton Co. personnel.
Shift Supervisor	• Direct all employees and contractors to follow this Plan, • Ensure that all persons under their supervision have a sound working knowledge of this Plan, • In emergency situations, take on the role of Emergency Controller/ Fire Warden • Ensure that all incidents, or potential incidents are reported to the General Manager
WHS Officer	• Arrange for the training of Carroll Cotton Co personnel to effectively utilise the PIRMP. • Ensure that all incidents, or potential incidents are investigated, reviewed and recommendations are implemented and monitored. • Maintain an up-to-date register and Safety Data Sheets of chemicals and materials used and stored on site.
Maintenance Superintendent	• Ensure regular inspection of plant and equipment. • Maintain plant and equipment in a safe condition. • Correctly dispose of waste oils, chemicals, containers, and hazardous materials.
All Site Personnel	• Report all incidents or potential incidents to the Shift Supervisor and follow all instructions. • Follow all Safe Work Procedures • Correctly use all required PPE

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Maps

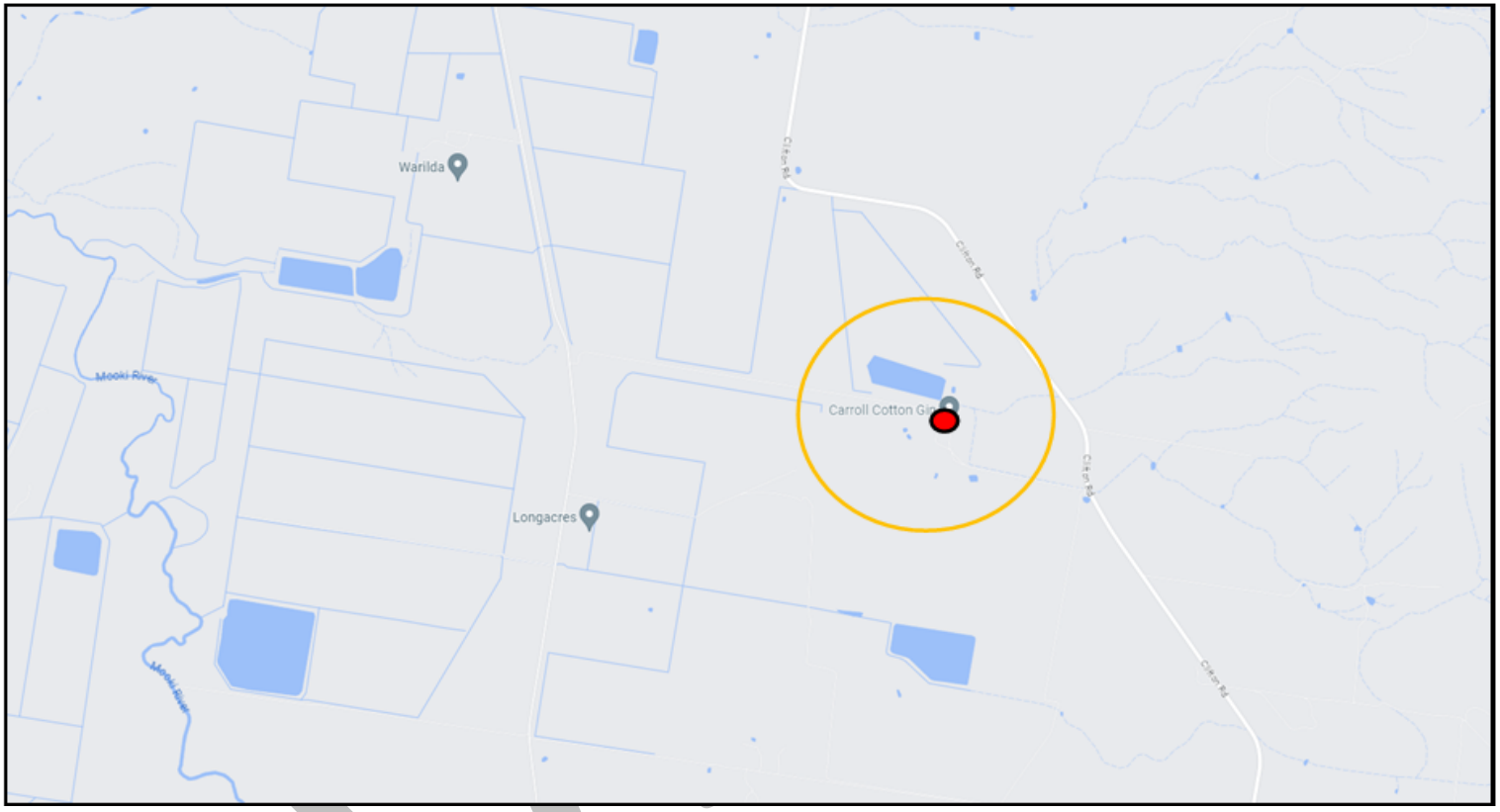

Storage Sheds
MUSTER POINT
Cotton Gin
Clifton Rd
Weighbridge
Front Gate
MUSTER POINT

Water course, dam, irrigation channel Map

1875 Clifton Road, Carroll, NSW 2340

-31.066608, 150.472408

For latest map information refer to SIX Maps or Google Maps



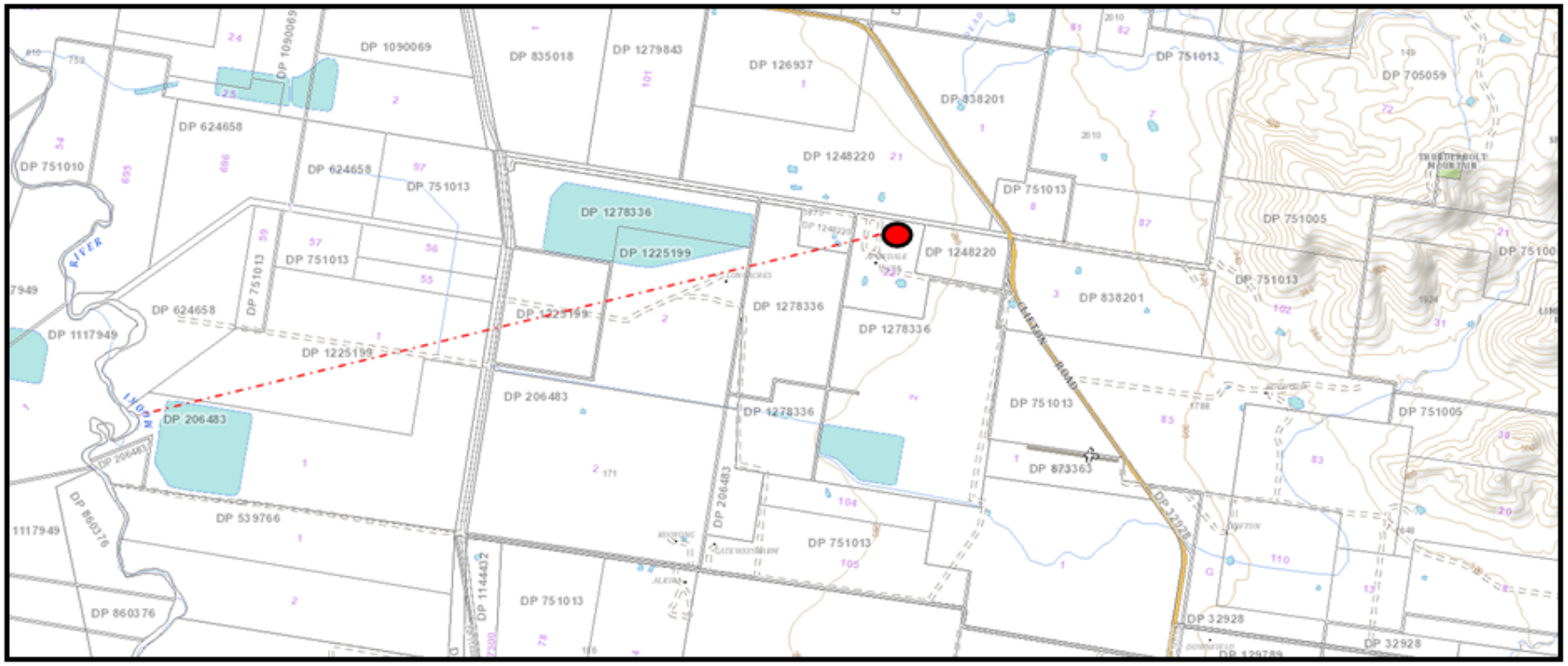
Legend

- Carroll Cotton Co. Gin
- Mooki River 6.94km to WSW

DP Lot identifier, Mooki River and Contour Map

1875 Clifton Road, Carroll, NSW 2340

-31.066608, 150.472408



For latest map information refer to SIX Maps


Carroll Cotton Gin
Clifton Rd
Clifton Rd
Clifton Rd
Clifton Rd
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Revisions

Revisions	Revision Description	Who Consulted	Date
0	Original		Pre 2016
1.0	Standard template, new logo, revised content	Scott Davies, Trudy Davies, Allan Botfield, Lucy Staughton,	04/05/2016
2	Review, update contacts	Allan Botfield, Lucy Staughton,	02/05/2017
3	Review and update from Truck Fire incident Align with EPA Guideline: Pollution Incident Response Management Plans (issued September 2022) Additions/Updates: - POEO Act and Protection of the Environment Operations (General) Regulation 2022 (NSW) - What must be notified - 6.3 deciding the extent of community notification, - 6.3 instructions to neighbouring landholders - Section 7 Testing - Section 8 Updates to PIRMP - Change WorkCover to SafeWork NSW - Change Managing Director to General Manager - Change to Carroll Cotton Co. Personnel emergency contacts - Change MSDS to SDS - Inclusion of Maps into PIRMP	Scott Davies, Andrew Payne, Henry Lavender	09/05/2023
4	Updated template Reviewed and updated contacts	Scott Davies, Andrew Payne, Henry Lavender	08/05/2024
5	Reviewed and updated contacts, neighbouring properties and chemical manifest	Scott Davies, Andrew Payne	18/03/2025

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