

1. PURPOSE AND BACKGROUND

The Newcastle Grain Terminal (NGT) Pollution Incident Response Management Plan (PIRMP) has been developed to satisfy obligations under the *Protection of the Environment Operations Act 1997* (POEO Act) and associated *Protection of the Environment Legislation Amendment Act 2011* (POELA Act) for licensed facilities. GrainCorp currently holds Environment Protection Licence (EPL) 3693 at the GrainCorp Newcastle Grain Terminal (NGT) premises.

This website version of the PIRMP outlines the components of the Newcastle Grain Terminal Plan required to be published on GrainCorp's website (<http://www.graincorp.com.au/about-graincorp/sustainability-and-environment#more-64804>) in accordance with the POEO Act.

Content included in this PIRMP website version addresses the following legislative requirements:

Section 153C(a) of the POEO Act: The procedures to be followed by the holder of the relevant Environment Protection Licence, or the occupier of the relevant premises, in notifying a pollution incident to:

- (i) the owners or occupiers of premises in the vicinity of the premises to which the environment protection licence or the direction under section 153B relates, and
- (ii) the local authority for the area in which the premises to which the environment protection licence or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and
- (iii) any persons or authorities required to be notified by Part 5.7.

Section 98C(1)(h) of the POEO Act: the contact details of each relevant authority referred to in section 148 of the Act

Section 98C(1)(i) of the POEO Act: 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.

2. SCOPE

The PIRMP covers the operations at the Newcastle Grain Terminal (NGT). This plan applies to all activities, products and services on the site over which GrainCorp has operational control. Temporary activity outside of the scope, e.g. construction, would be managed using the PIRMP if it is found suitable or a supplementary response management plan specific to the temporary works.



3. NOTIFICATION PROCEDURE AND CONTACT DETAILS

The following section details GrainCorp’s compliance with section 153C(a) and 98C(1)(h) of the POEO Act.

Incident notification is detailed under the appropriate sections of the existing Newcastle Grain Terminal ERP and the Wharf Procedure consistent with requirements specified by the POEO Act. Refer to these procedures to determine what information is required to be immediately reported to authorities in the event of a pollution incident.

In response to requirements under changes to 5.7 of the POEO Act regarding pollution incident notifications, the following specific information and contact details are provided for the Newcastle Grain Terminal. If, under application of internal incident classification procedures, an environmental incident is determined to have caused or threatened material harm to the environment at the NGT, the following notification procedures must be undertaken immediately, and in alignment with internal notification and escalation procedures (escalation workflow provided in attachment A).

Firstly, call 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 require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order (refer to Table 1 for contact details).

- 1. the appropriate regulatory authority (ARA) – the NSW Port Authority**
- 2. the EPA, if it is not the ARA**
- 3. the Ministry of Health via the local Public Health Unit**
- 4. SafeWork NSW**
- 5. the local authority if this is not the ARA – Wollongong City Council**
- 6. Fire and Rescue NSW.**

Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by SafeWork NSW (previously WorkCover).

Table 1 External relevant authority contact details

Authority	Local Authority	Contact Details
Fire and Rescue NSW		000
NSW Environment Protection Authority (Pollution Hotline)		131 555
NSW Ministry of Health	Newcastle Office (diverts to John Hunter Hospital)	Phone: (02) 4924 6477 (Ask for Public Health Officer on call)
NSW WorkCover Authority		131 050
Local Council	Newcastle City Council	Phone: (02) 4974 2000



3.1. OTHER KEY STAKEHOLDERS / IMMEDIATE NEIGHBOUR NOTIFICATION CONTACT DETAILS (EXTERNAL NOTIFICATION)

Due to its industrial location in a secured and restricted port quarantine zone, there are no immediately surrounding residential properties. In response to the introduction of changes to 5.7 of the POEO Act, and as part of this PIRMP, in the event of a notifiable pollution incident, and dependent upon nature and scale, decisions to notify neighbours and the local community will be made in consultation with regulatory authorities.

After consultation with the regulatory authorities, if required the Operations Manager or Site Manager will undertake the early warning of the immediate neighbours in the first instance by phone. The initial notification will be brief and contain only a description of the environmental threat together with instructions what to do.

For example:

- Due to a fire on site, we are experiencing elevated dust emissions from the site. Please keep your doors and windows closed until further notice.
- An accidental discharge occurred from the site. Emergency vehicles may possibly be present on roads leading to the terminal.

Table 1 outlines the contact details of each relevant authority referred to in section 148 of the Act.

Table 2 lists nearby neighbours and key stakeholders that may need to be contacted following a pollution incident. Determining who to contact and when is up to the discretion of the terminal manager and upper management.

Table 2 Other key stakeholders and neighbours contact details

Agency	Phone Number
Port of Newcastle Environment Manager	Personal information has been removed for privacy purposes
Newcastle Stainless Pty Ltd	
Newcastle Cranes	
Citrosuco	
Residents	

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3.2. INTERNAL CONTACT DETAILS

Table 3 lists the names, positions and 24-hour contact details of those key individuals who:

- are responsible for activating the plan
- are authorised to notify relevant authorities under section 148 of the Act
- are responsible for managing the response to a pollution incident.

Table 3 GrainCorp 24-hour Internal Notification details Newcastle Grain Terminal

Internal Notification		
Contact Position	Contact Name	Contact Details
GrainCorp Newcastle Site	Site phone number	
Site Manager	Jade Mann	Personal information has been removed for privacy purposes
Operations Supervisors	Craig Casey Simon Moore	
Carrington Maintenance Supervisor	Phil Bourke	
Pest Control Supervisor	Aron Donnelly	



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3.3. COMMUNICATION

Contact details for the Newcastle Grain Terminal are publicly available via local directories and to surrounding industry via signage on the GrainCorp security gate. The contact details for Newcastle Grain Terminal are as follows:

Address: Denison Street, Carrington NSW 2294

Phone: 0407 084 130

Communication and updates to neighbours and staff regarding pollution incidents will be undertaken in accordance with existing procedures as detailed in the existing ERP, Incident & Escalation Procedure and contact details provided within this document.

Table 4 Procedures for stakeholder communication including existing ERPs

Document	Format
Newcastle Emergency Response Procedure	Flipchart on site
GrainCorp Incident and Injury Management Standard	Controlled document on SharePoint

4. MINIMISING THE RISK OF HARM

The following section details how GrainCorp satisfies section 98C(1)(i) of the POEO Act.

The following section includes actions or arrangements that will be in place to minimise the risk of harm to any persons who will be on the premises, who are likely to be on the premises or are located in the vicinity of the site and may be impacted should an incident occur.

At all times minimising harm to persons on premises shall be a priority and is achieved through the activation of the emergency evacuation procedure, engineering controls, administrative controls and standard site PPE enforced across site.

4.1. EMERGENCY EVACUATION PROCEDURE – ACTIVATION OF A WARNING ALARM

As is standard on site, the alarm may be raised by anyone noting an emergency situation. It is also crucial that personnel notify the Control Room on **02 4961 8100** of what has occurred, what your actions have been and any identified issues. Response actions will be initiated based on this information.

A combination of communication methods are available, they include:

- Verbal communication between employees and others
- Radio communication
- Audible alarm
- Siren(s)
- Telephone - including mobiles

Electronic alarms are tested and maintained at regular intervals.

Practice evacuations are conducted regularly to meet the requirements of the OHS Management System Program. The alarm system and emergency evacuation procedure is included during site training and site inductions.

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Newcastle Grain Terminal has in place comprehensive site-based emergency response and evacuation procedures.

4.2. ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

- 1. Assess and notify of incident if required:** Follow the internal incident management procedures, including the Environmental Emergency tab of the Newcastle Grain Terminal *Emergency Response Procedure* (flipchart). This provides detail on immediate action to be undertaken during or after an incident, dependent upon type and classification.
- 2. Control the incident** with available response equipment and procedures.
- 3. Classify incident and escalate:** Follow internal notification requirements and classify incidents according to the *SHE Incident and Injury Management Standard*. This standard provides details on classifying emergency incidents as either Level One, Two, Three, Four or Five where Five is the most extreme incident.
- 4. Report the Incident:** Follow the Newcastle *Emergency Response Procedure* (flipchart), report to Sphera and contact NGT neighbours.

In the event of a pollution incident for the hazards identified, as an example the following steps would be undertaken:

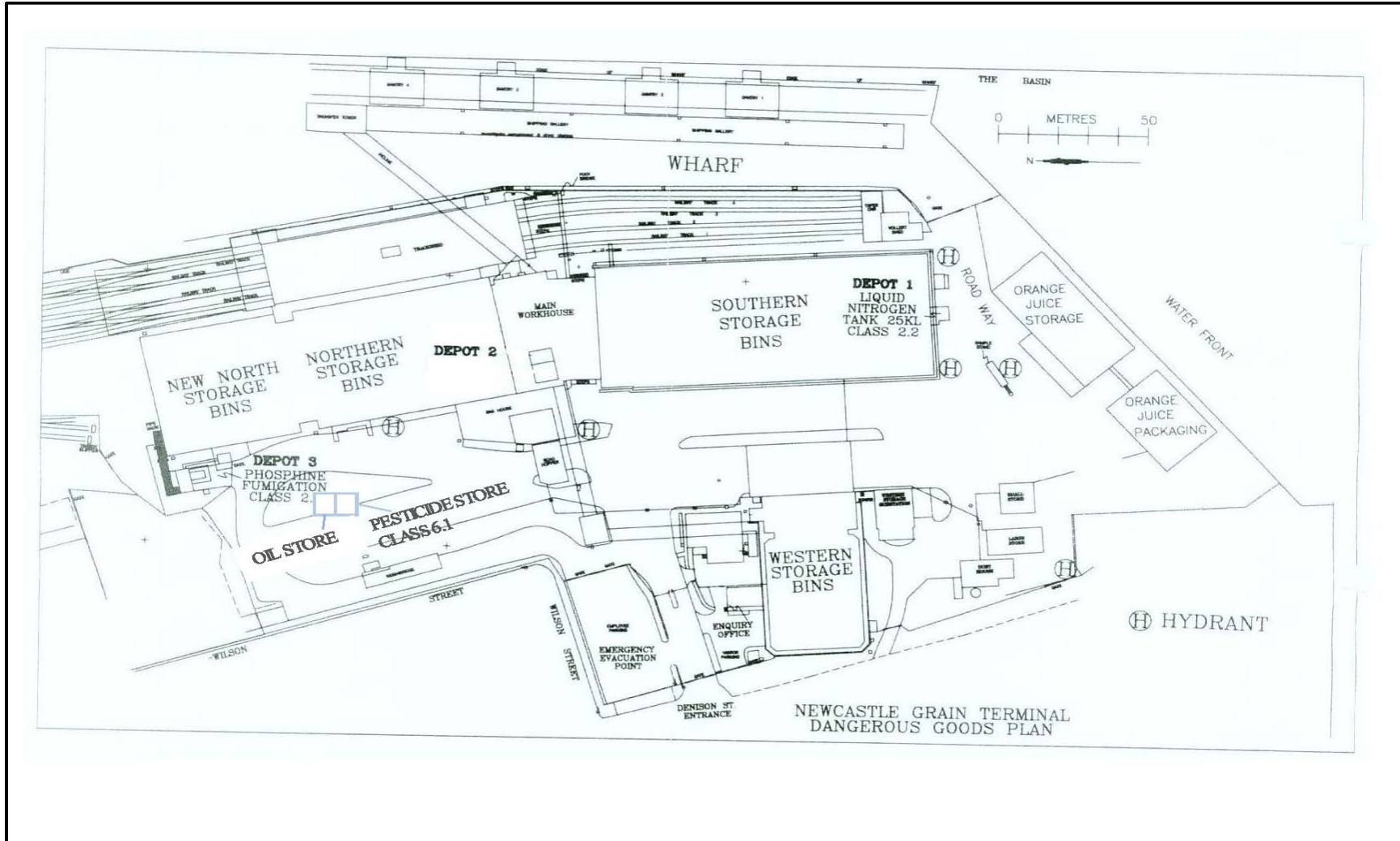
- Raise the alarm to alert the Site Manager as per the NGT Emergency Response Procedure (flipchart).
- Identify the material spilt/contaminant and contain in accordance with SDS (protect drainage using methods outlined in SDS), if it is safe to do so.
- If unable to contain, dial 000 and give name, location and details to the operator, secure the area and, if required, evacuate the site.
- Ensure access and guidance for emergency services.
- Account for all personnel (including visitors).
- Follow GrainCorp reporting requirements within the SHE Incident and Injury Management Standard.
- Notify stakeholders (internal and external).
- Work with authorities.
- **DO NOT ATTEMPT TO CLEANUP IF UNAWARE OF SUBSTANCE NATURE**

Pollution Incident Response Management Plan (PIRMP) -

Newcastle Grain Terminal (Website Version)



4.3. Facilities Map



ATTACHMENT A - ESCALATION PROTOCOL (GRAINCORP INTERNAL)

For Fraud, Bribery, Corruption or Illegal Activity events – please refer to the *Whistleblower Procedure* if you would prefer to make a confidential disclosure in relation to these events – the procedure is available on Jumbunna and the GrainCorp website

As appropriate:
GM Human Resources
Environment Mgr
Rail Compliance Mgr
Road Compliance Mgr

For all Level 5 (Extreme) & Level 4 (Major) incidents

**SHE ORGANISATION
(SHE Incidents)**

**LINE ORGANISATION
(All Incidents)**

Site / Plant / Terminal /
Corporate
Manager

Site / Plant / Terminal /
Corporate
Manager

SHE Manager

Line Manager

GM SHE

GM Operations

Level 4 Lost Time Injury
Site / Plant / Terminal / Corporate
Manager to call CEO within 24 hrs
CALL (24hrs): +61 477 040 009

All Level 5 Incidents
Site / Plant / Terminal / Corporate
Manager to immediately call *Incident Reporting Hotline*
CALL (24hrs): +612 9266 9436

From initial notification until last notification not more than 2 hours

Consult with Group Legal (General Counsel) about, and prior to, potential notification to regulatory authorities, unless a significant incident requires immediate notification to regulatory authorities in order to mitigate risk.

Ensure notification to:
Chief Operations Officer (+61 400 362 311)
Corporate Affairs (+61 413 946 708)
General Counsel & Company Secretary (+61 421 616 828)
GM Risk (+61 419 427 665)
Chief People & Transformation Officer (+61 413 177 758)
and email incidentreporting@graincorp.com.au

DECISION POINT: ACTIVATE CRISIS MGMT TEAM

If appropriate:
CEO
All ELT
Board of Directors (required for Fraud events)

