



Pollution Incident Response Management Plan (PIRMP)

Riverstone Terminal - New South Wales

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1. PURPOSE AND BACKGROUND

This 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.

Under GrainCorp's Emergency Management System, detailed emergency response procedure is already in place for the classification and management of incidents, across GrainCorp operational sites. Under the provisions of *Section 71 of the Protection of the Environment Operations (General) Regulation 2022*, to allow for the integration of requirements into existing plans in respect to pollution incident response, requirements under POEO legislation have been integrated into these existing plans where appropriate.

This document has been designed as a reference to existing emergency response plans and associated procedure. It also details additional supplementary site-specific information as required under the POEO legislation, in respect to the relevant Environment Protection Licence (EPL) holder.

2. SCOPE

This PIRMP covers GrainCorp's Auscol (Riverstone) Terminal located at 148 RIVERSTONE PDE, RIVERSTONE, NSW, 2765. This plan applies to all activities, products, and services on the site over which Auscol's has operational control.

3. LEGISLATIVE REQUIREMENTS

Specific legislative requirements for the development and implementation of this PIRMP are provided below.

- Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act)
- Protection of the Environment Operations (General) Regulation 2022
- [Environment Protection License \(EPL\) 2550](#)

In summary:

- All holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO(G) Regulation 2022 (clause 71).
- Licensees must keep the plan at the premises to which the environment protection licence 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 plan in accordance with the POEO(G) Regulation 2022 (clause 75).
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act).

4. TERMS AND DEFINITIONS

4.1. DEFINITION OF A POLLUTION INCIDENT

The dictionary of the POEO Act defines pollution as either 'water pollution', 'air pollution', 'noise pollution' or 'land pollution'.

A *pollution incident* means an incident or set of circumstances during or as a consequence of which there 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 a premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

4.2. DEFINITION OF CLEAN-UP ACTION

In relation to a pollution incident, *clean-up action* may include:

- a) *action to prevent, minimise, remove, disperse, destroy or mitigate any pollution resulting or likely to result from the incident, and*
- b) *ascertaining the nature and extent of the pollution incident and of the actual or likely resulting pollution, and*
- c) *preparing and carrying out a remedial plan of action.*

It also includes (without limitation) action to remove or store waste that has been disposed of on land unlawfully.

4.3. ABBREVIATIONS

Table 1 - Terms and definitions relevant to the PIRMP

Abbreviation	Explanation
EPA	Environment Protection Authority
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
POELA Act	Protection of the Environment Legislation Amendment Act 2011
CLM Act	Contaminated Land Management Act 1997
EPL	Environment Protection License
ERP	Emergency Response Plan
EMS	Environmental Management System

5. NOTIFICATION OF A POLLUTION INCIDENT

5.1. WHAT MUST BE NOTIFIED

A pollution incident is required to be immediately notified if there is a risk of 'material harm to the environment', defined under 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 or 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.*

In order to determine if an incident causes or threatens material harm to the environment (i.e. Pollution Incident) the Incident Notification And Escalation Flow (see Annex E) must be implemented.

5.2. RESPONSIBILITY TO NOTIFY

Under Section 148 of the POEO Act, the following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- The person carrying on the activity;
- An employee or agent carrying on the activity;

- An employer carrying on the activity;
- The occupier of the premises where the incident occurs.

Once determined that the incident causes or threatens material harm to the environment, notification must be given immediately, i.e., promptly and without delay, after the person becomes aware of the incident.

All GrainCorp sites follow the GrainCorp Incident Management procedure to determine the responsibilities for notifying authorities through the Notification Table and the Incident Notification And Escalation Flow (see Annex E).

5.3. EMERGENCY RESPONSE

If a pollution incident occurs, all necessary action should be taken to minimise the size and any adverse effects of the release.

If the incident presents an immediate threat to human health or property, Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service should be contacted first for emergency assistance (phone 000).

Considering the actual or potential material harm to the environment or human health, the PIRMP must also be immediately implemented, and other response agencies must still be contacted in order to satisfy notification obligations.

5.4. CONTAMINATED LAND

Persons whose activities have contaminated land and owners of land who become aware, or ought reasonably to be aware, that the land has been contaminated must notify the EPA as soon as practicable after becoming aware of the contamination, if the contamination meets certain criteria. The duty to notify is a requirement under section 60 of the *Contaminated Land Management Act 1997* (CLM Act).

6. REFERENCE DOCUMENTATION

The following existing internal plans and procedure documentation underpin this PIRMP.

Table 2 - Auscol internal plans and procedures underpinning the PIRMP

Doc. No	Document	Format
	Terminal Emergency Plan	Flipchart on site
	Terminal Environmental Management Plan	Controlled document on SharePoint
	Incident Emergency Response Plans	Annex – C Flipchart on site
GNC-SHEQ-3-01-A01	Incident Notification and Escalation Flow Chart	Flipchart on Site
GNC-SHEQ-3-01	Incident and Injury Management Standard	Controlled document on SharePoint

7. RIVERSTONE PIRMP

7.1. DESCRIPTION OF POTENTIAL HAZARDS AND THEIR LIKELIHOOD

An *environmental hazard* is a term for any situation or state of events which poses a threat to the surrounding environment including human health as a result of an incident. Incident types that may occur at Riverstone are detailed below:

- Spill from Tank Farm;
- Truck Spill (offsite);
- Minor chemical/ UCO spill (onsite);
- Discharge of Liquid Food Waste to stormwater;
- Uncontrolled release of emissions.

Potential hazards to human health and the environment that have been identified as a result of the above listed incidents include water pollution (including stormwater), air pollution and soil/ground pollution. Table 3 below identifies a list of foreseeable hazards that could occur on this site as a result of regular operating activities and the consequence and likelihood of each with current controls.

A risk management matrix (see Annex D) is used to score the residual risk associated with any particular hazard. The purpose of rating risk is to guide decision making on risk management and to eliminate or otherwise reduce the risk to an acceptable level.

Pollution Incident Response Management Plan (PIRMP)

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Table 3 - Likelihood and consequences assessment of hazards around Riverstone Terminal

Hazard	Type of pollution	Potential Impact	Consequence	Likelihood	Residual Risk	Circumstances which may increase the potential of environment or health impact
Spill from tank farm	Soil & Water	Contamination of soil, ground and surface water leaking from plant (Normal storage volume is ~90t)	Extreme	Rare	15	<ul style="list-style-type: none"> Rain may transport emissions to neighboring site, communities, and environment (Eastern Creek) Non-operating periods where there are limited personnel on site.
Truck spill (offsite)	Soil & Water	Contamination of soil, ground and surface water leaking from plant (Normal storage volume is ~10t)	Major	Possible	18	<ul style="list-style-type: none"> Traffic accident (e.g., crash) Rain may transport emissions to neighboring site, communities, and environment (Eastern Creek)
Minor chemical/UCO spill on site	Soil & Water	Contamination of soil, ground and surface water leaking from handling and storing product on site (Normal storage volume is ~1t)	Minor	Likely	11	<ul style="list-style-type: none"> Rain may transport emissions to neighboring site, communities, and environment (Eastern Creek)
	Water	Contamination of ground and surface water leaking from stormwater drains	Minor	Likely	11	<ul style="list-style-type: none"> Rain may transport emissions to neighboring site, communities, and environment (Eastern Creek)
Discharge of Liquid Food Waste to Stormwater	Water	Loss of potentially contaminated stormwater runoff from site due to pump and equipment failure	Minor	Unlikely	5	<ul style="list-style-type: none"> Heavy rain event may release the contaminants offsite Spills occurring on site simultaneously as this Hazard Non-operating periods where there are limited personnel on site.
Uncontrolled release of emissions	Air	Degrade air quality through release of gas (boiler)	Minor	Rare	3	<ul style="list-style-type: none"> Wind may carry the emission to sensitive receptors (neighbors) Non-operating periods where there are limited personnel on site. Traffic accident impacting the infrastructure on site

7.2. PRE-EMPTIVE ACTIONS TO BE TAKEN

The following table details descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or to the environment arising from activities occurring at the Riverstone Terminal.

Table 4 - Pre-emptive actions arising from activities at Riverstone Terminal

Activity / Pre-emptive Actions	Figure
<p><u>Spill from tank farm</u></p> <ul style="list-style-type: none"> The tanks are located within a bunded area with a separate drainage system. The tanks have level alarms set at 90% (tanks are never used at full capacity). Bund inspections are carried out at a regular basis to validate condition of bunding. Tanks are also tested for integrity at a regular interval. 	 <p>Figure 1 - Bunded Tank Farm</p>
<p><u>Truck spill (offsite)</u></p> <ul style="list-style-type: none"> The tanks are built to Australian Standards and tests are performed to the tank's barrels thickness. Safety valves are installed in the tanks to prevent accidental opening of valves. Trucks have 'Seeing Machine' (built to monitor driver fatigue) which check for impact in the event of a traffic accident – this sends an immediate email notification to management on occurrence. 	 <p>Figure 2 - Auscol Riverstone truck</p>
<p><u>Minor UCO/ chemical spill on site</u></p> <ul style="list-style-type: none"> Only minor quantities of chemicals are stored onsite and any major maintenance activities are undertaken by third party contractors off site. Chemicals and UCO are stored with the appropriate bunding, and spill kits are located in areas where there is a potential for a spill to occur. 	<div style="display: flex; justify-content: space-around;"> <div>  <p>Figure 3 – Chemical bund</p> </div> <div>  <p>Figure 4 - Spill Kits near stormwater drain</p> </div> </div>
<p><u>Discharge of Liquid Food Waste to Stormwater</u></p> <ul style="list-style-type: none"> As backup, the pits in the sheds have pumps and IBCs ready to be engaged in the event of failure of this system. Regular inspections are performed to the equipment. Regular disposal offsite is performed to minimise the volume kept on site. 	 <p>Figure 5 - LFW backup storage equipment</p>


Activity / Pre-emptive Actions	Figure
<p><u>Uncontrolled release of emissions</u></p> <ul style="list-style-type: none"> The Boiler is connected to the main gas line (no storage of gas on site). There is a Gas Shut off point at the south side of site to be activated in the event of leaks, incidents, failures, etc. 	

Figure 6 - Gas Shut off point

Other pre-emptive actions taken to minimise the likelihood of potential environmental hazards include:

- The implementation of a site-specific Environmental Management System (EMS);
- Onsite inductions for employees, contractors and suppliers;
- Monthly environmental inspections.

7.3. INVENTORY OF POTENTIAL POLLUTANTS

The main potential pollutant associated with the site activities is the Used Cooking Oil (as listed in Table 5) which can generate impacts to stormwater and soil. Total throughput capacity for the site is approximately 7000tonnes per annum.

Table 5 - Potential UCO pollutant

Name	Properties	Environmental Hazards
Unclassified Liquids		<ul style="list-style-type: none"> Practically non-toxic to humans (probable lethal dose 15 g/kg) Will float in slick on surface of water. Tends to cause agglomeration in soils reducing permeability May destroy water birds and aquatic life including plankton, algae and fish
Waste Cooking Oils (including Vegetable Oil,)	Flashpoint > 200°C	

An inventory of all chemicals is maintained on ChemAlert, and inspections are undertaken onsite to determine actual volumes stored onsite (Table 6). There are no underground storage facilities at the Riverstone Terminal site. Chemical storage locations are detailed on Annex A.

Table 6 - Chemicals stored on site at Riverstone Terminal

Product	Quantity	Max Quantity
303 Enamel Reducer	1	20lts
Automotive Diesel Fuel	2	30lts
BL10B Truckwash	1	200lts
Cherry Hospital Grade Disinfectant	2	40lts
Dash	2	40lts
Dy-Mark Spray Ink All Colours	5	5lts
Ethyl Alcohol	4	20lts
Exit Grease	1	5lts
Glass Cleaner	2	40lts
Lpg	5	150kg
Phenolphthalein Solution	1	200mls
Recycled Used Cooking Oil	Refer to stock	600tonnes

Product	Quantity	Max Quantity
Smik	2	40lts
Sodium Hydroxide 1 Normal	2	5lts
Valcomp 68	4	80lts
Wd-40 Aerosol	1	200mls
White Knight Fiddly Bits Primer Undercoat Aerosol	5	1lt18

7.4. SAFETY EQUIPMENT

Under GrainCorp's Safety Management Program and 'Zero Harm for Life' campaign, Personal Protection Equipment (PPE) requirements are in place for all Terminal Operations for all employees, contractors, visitors and transport operators. Minimum PPE includes high visibility clothing, enclosed footwear, hard hats and safety glasses. Other onsite safety-related equipment includes:

- Onsite safety sign-in and inductions for all employees, contractors and suppliers
- Gas monitoring meters where required;
- Alarm systems;
- Emergency stop/shut down and alarm points;
- Chemical wash stations/showers;
- Spill kits (refer to Annex B);
- Online SDS Register (ChemAlert);
- Appropriate process and chemical identification signage;
- First aid facility and kits;
- Restricted chemical access.

7.5. NOTIFICATION PROCEDURE AND CONTACT DETAILS

Incident notification is detailed under the GrainCorp Incident and Injury Management Standard (GNC-SHEQ-3-01 – for detailed information refer to the Incident Management Chart in GC intranet document management system and also Annex E). 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 Newcastle Grain Terminal, in the event of an environmental incident.

Excerpt from NSW EPA Website - Protocol for Industry Notification of Pollution Incidents:

<https://www.epa.nsw.gov.au/reporting-and-incidents/report-pollution/contacts-chemical-radiation-pollution/notification-protocol>

*Recent changes to Part 5.7 of the Protection of the Environment Operations Act 1997 (POEO Act) specify new requirements relating to the notification of pollution incidents. The changes take effect from 6 February 2012 and require the occupier of premises, the employer or any person carrying on the activity which causes a pollution incident to **immediately notify** each relevant authority (identified below) when material harm to the environment is caused or threatened. The following information and procedures may assist those responsible for reporting a pollution incident.*

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 GrainCorp Riverstone site, the following internal and external stakeholders must be contacted immediately, in alignment with internal notification and escalation procedures.

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:

- **the appropriate regulatory authority (ARA)**
- **the EPA, if it is not the ARA**
- **the Ministry of Health via the Public Health Unit**
- **the SafeWork NSW**
- **the local authority if this is not the ARA**
- **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.

7.6. CONTACT DETAILS

7.6.1. Internal and External Notification Contact Details

The following Table 7 lists the names, positions and 24-hour contact details of those key individuals who:

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

Table 7 - Internal notification contact details

Contact Position	Contact Name	Contact Details
Auscol Riverstone Site (business hours only)	Site phone number	1800629476
National Operations Manager	Kylie Green	Phone: (02) 8302 7990 Mobile: 0437 926 125
Regional Operations Manager NSW QLD	Pete Williams	Phone: (02) 8302 7990 Mobile: 0439062724
Operations Supervisor	Ian George	Phone: 1800 629 476 Mobile: 0488456 400

7.6.2. External Notification Contact Details

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 (Table 8).

After consultation with the regulatory authorities, if required the Terminal 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.*
- *Uncontrolled release of chemicals into waterway. Please avoid fishing or utilising the waterway for recreational purposes until the waterway is deemed safe.*

Table 8 - 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	Parramatta Public Health Unit (Western Sydney LHD)	Phone: (02) 9840 3603 Afterhours: (02) 8890 5555 (Westmead Hospital) - ask for Public Health Officer on call
NSW Safe Work Authority		131 050
Local Council	Blacktown City Council	Phone: 02 5300 6000 After Hours: 1300 133 491

7.6.3. Communicating with the Local Community

Communication and updates regarding pollution incidents will be undertaken in accordance with existing procedure as detailed in existing ERPs. provide information for communicating with neighbours and the local community, dependent upon the nature and scale of an incident. In the event of a notifiable incident, the appropriate emergency response plan and associated external communication process will be deployed.

7.6.4. Immediate Neighbours

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, immediate neighbouring properties will be notified, under the direction of Emergency Services with immediate response information.

Stakeholder	Contact Details
Mac's Plant Hire	Phone: +61 (02) 9627 2555
J & S Metal Fabrication	Phone: +61 (02) 9186 3318
Spencer Systems	Phone: 1300 706 970
Riverstone Business Park	Phone: 1300 276 500
Hayes Metal	Phone: +61 (02) 9627 7150

7.6.5. Riverstone Terminal Contact Details

Contact details for Riverstone Terminal are publicly available via local directories, from <http://www.graincorp.com.au>, <https://auscol.com.au> and via signage on the site's gate. GrainCorp operates a telephone complaint line during business hours. The contact details for Riverstone Terminal are as follows:

- Address: 148 RIVERSTONE PDE, RIVERSTONE, NSW, 2765
- Phone: (02) 4961 8100

Document	Format
Riverstone Terminal Emergency Response Procedure	Flipchart on site

Document	Format
GrainCorp Incident and Injury Management Standard (GNC-SHEQ-3-01)	Controlled document on SharePoint

8. MINIMISING HARM TO PERSONS ON PREMISES

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 or who are likely to be on the premise should an incident occur. Persons likely to be on site include employees of Auscol, GrainCorp, contractors and sub-contractors.

At all times, minimising harm to persons on premises shall be a priority and is achieved through Engineering, Training, Administrative and PPE controls as the last line of defence. Regular health monitoring of fumigation staff is also undertaken.

Training is provided to Auscol employees and any other person entering the site so that they are aware of site hazards and processes in the event of a pollution incident. Training includes, but is not limited to:

- inductions (online),
- toolbox talks,
- simulated desktop scenarios and simulated exercises.

A record of site inductions is recorded on the eLearning online database. A record of the most recent simulated desktop scenario and the attendees are located on the Riverstone Network Drive. A full training matrix for personnel at Riverstone Terminal is maintained on site, including the requirement for attendance at the PIRMP toolbox and spill response fundamentals training. The training matrix is located in Annex F.

8.1. EMERGENCY RESPONSE – ACTIVATION OF A WANING ALARM

As a standard on site, the alarm may be raised by anyone noting an emergency situation. It is also crucial that personnel notify the Operations Supervisor or Terminal Manager 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
- Audible alarm
- Loud-speaker system
- 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 is covered during training and induction processes. Details of evacuation points are provided in Annex A.

8.2. STANDARD SITE CONTROLS

8.2.1. Engineering controls

- Fire extinguishers located throughout plant
 - 173 x CO2 3.5kg
 - 53 x CO2 5kg
 - 8 x dry chemical 9kg
 - 4 x dry chemical 4.5kg
 - 1 x dry chemical 2.5kg

- 3 x dry chemical 1.5kg
 - 3 x external air and water 9L
 - 1 x foam 9L
 - hose reels
- Safety showers and eyewash stations located at the Pesticide and Oil Store, and at the FCOJ Plant
- Vesda early warning smoke detection system

8.2.2. Administrative controls

Administrative controls to minimise harm to persons on site include;

- Risk assessments for tasks undertaken on site
- Safe Work Method Statements
- Safety Signage across the site
- Online SDS register (ChemAlert)
- Site safety, health and environment inspection checklists
- Site Emergency Procedures booklet
- Toolbox talks, safety alerts

8.2.3. PPE

See Section 7.4.

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

Internal incident management procedures, including the Notification and Escalation Flowcharts and ERPs provide detailed procedure as to immediate action to be undertaken during or immediately after an incident, dependent upon type and classification.

1. Assess and notify of incident if required: Follow the internal incident management procedures, including the Internal Emergency tab of the Newcastle 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 Group Incident Notification & Escalation Procedure. The procedure provides details on classifying emergency incidents as either Level One, Two, Three or Four where Four is the most critical incident.

4. Report the Incident: Follow the GrainCorp Incident and Injury Management Standard (GNC-SHEQ-3-01) and report to Sphera.

As outlined in section 7.1, the main hazards to human health and the environment that have been identified at the terminal. Refer to the list below which references the relevant Emergency Procedure (from Annex C) with the expected response:

- Spill from Tank Farm - **SPILL** Emergency Procedure;
- Truck Spill (offsite) - **TRANSPORT INCIDENT** Emergency Procedure;
- Minor chemical/ UCO spill (onsite) - **SPILL** Emergency Procedure;

- Discharge of Liquid Food Waste to stormwater – **WATER RELEASE** Emergency Procedure;
- Uncontrolled release of emissions – **AIR EMISSIONS** Emergency Procedure.

10. STAFF TRAINING AND PIRMP TESTING

This PIRMP will be tested annually through a desktop review and/or a practical exercise simulating where a spill or a release of chemical/gas has occurred. The practical exercise will determine the practical effectiveness of the ERP and the PIRMP and any areas for improvement.

The PIRMP will also be tested and reviewed within one month of any pollution incident occurring in the course of the site activities where it can be assessed whether the information included in the PIRMP is accurate and up to date, and the plan is still capable of being implemented in a workable and effective manner.

Date of Test	Participants	Method
2 Nov 2022	K. Green, T. Horsburgh, J. DaCorte, G. Webb, A. Costa	Desktop Review and Simulation
27 October 2023	K.Green, Jessica DaCorte. Craig Macdonald, Brendon Hardaker	Desktop Review and Simulation
15 October 2024	K.Green, Matt Anderton. I George. P Williams	Desktop Review and Simulation

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1-Jan-16

Legend:

- Storm Water Valve
- Storm Water Pit
- Storm Water Lines
- Fire Extinguishers
- Hazardous Zones
- Hot Work Area
- Class 8 Corrosives

Building Layout:

- Assembly Area** (Top Left)
- WC**, **Board Room**, **Office**, **Lunchroom**, **Lab**, **Showers**, **Toilets**
- Emergency Cabinet** (Top Left)
- Waterhouse B Upper Level**
- Waterhouse C Level Level**
- Waterhouse D**
- Waterhouse A** (Right)
- Boiler** (Right)
- Compressor** (Right)
- Valve** (Right)
- Safety Shower** (Right)
- Gas Shut Off** (Bottom Right)
- Water Tank** (Bottom Center)

Other Features:

- Parking** (Top Left)
- Traffic** (Top, Bottom, Right)
- EXIT** (Top Left, Bottom Center)
- LPG gas storage** (Top Right)
- Class 8 Work Shop** (Top Right)
- Spill Kit** (Multiple locations)
- Class 8** (Multiple locations)
- Drain** (Right)
- MELT** (Right)

ANNEX B: SPILL KITS

While each terminal may have a different requirement for their specific site the fundamentals for spill control will be designated by the Terminal **Supervisor**. The Terminal **Supervisor** will be responsible for determining the following:-

- The type of material for the spill kit relative to the types of products stored e.g. flammable or Class 8,
- The quantity of spill kits to be used in a particular area of the site,
- The location of the spill kits in relation to site activities,
- The replenishment of used items within the spill kit,
- The amount of buffer stock on hand,
- Who is responsible for checking and reporting the status of the spill kits?



Spill Kit Contents

As a guide a general spill kit should contain the following items:-

Note: For dangerous goods refer to the class type for appropriate absorbent materials.

20 - 30	430x480mm Hazchem Absorbent Pad
4 Bags	Absorbent material
2	1.2m x 75mm Hazchem Absorbent Boom
2	3m x 75mm Hazchem Absorbent Boom
10	Contaminated Waste Bags
2 pair	Chemical Resistant Gloves
1 Roll	Barrier tape.
4	Splash Goggles
1	660L Mobile Bin
1 Roll	Packing Tape

Other practical tools to use with a spill kit.

- Squidgy for moving product and degreaser.
- Shovel for clean up.
- Broom for clean up.
- Buckets or pails for removal.

ANNEX C: EMERGENCY PROCEDURES

EMERGENCY PROCEDURES

General Instructions in the event of a: **SPILL**

IF THIS HAPPENS:	DO THIS:
Small Spill or Leak (Less Than 20 Liters)	<ol style="list-style-type: none"> 1. Shut down all operations in the vicinity of the spill/leak 2. Try to locate and correct the source of the spill/leak 3. Cover the spill with suitable absorbent material from spill kit. Ensure that you are wearing the correct PPE 4. Remove the saturated absorbent to a safe place 5. Record in incident log
Large Spill/Leak in the Terminal	<ol style="list-style-type: none"> 1. Shut down all operations in the vicinity of the spill/leak 2. Stop all road tanker and process operations as applicable 3. Stop flow of product from source if possible 4. Ensure bund valves are closed 5. Ensure inlets to storm water interceptor is closed 6. Immediately notify Terminal Supervisor of problem 7. Terminal Supervisor is to assume the role of Incident Controller 8. Incident Controller is to notify emergency services if assistance is required 9. Incident Controller or General Manager to notify SHE Team in order to determine if incident is notifiable to regulators (e.g. EPA) 10. If required, prepare emergency equipment only if you are certain it is safe to do so. 11. Assist in recovery of product as directed
Large Spill/Leak to the River	<ol style="list-style-type: none"> 1. Shut down all operations in the vicinity of the spill/leak 2. Stop all operations 3. Stop flow of product from source if possible 4. Immediately notify Terminal Supervisor of problem 5. Terminal Supervisor assumes role of Incident Controller 6. Incident Controller is to notify the General Manager and request assistance as required 7. Incident Controller or General Manager to notify SHE Team in order to determine if incident is notifiable to regulators (e.g. EPA) 8. Assist in recovery of product as directed
General Environmental Controls <ul style="list-style-type: none"> ▪ Monitoring of Bund area valves and contents. ▪ Spill kit location for easy quick access at loading areas. ▪ Report any usage of spill kits for refilling. ▪ Appropriate PPE used for the products handled. ▪ Storm water valves to remain closed unless authorised to open by Supervisor. ▪ Report any incidents, near misses to Management for corrective action. ▪ Permit system to describe any special assessment requirements. ▪ Keep all drains and pits clear of debris. 	

EMERGENCY PROCEDURES

General Instructions In The Event Of A: **TRANSPORT INCIDENT**

IF THIS HAPPENS:	DO THIS:
Transport Incident Product Release	<ul style="list-style-type: none"> ▪ Immediately stop operation. ▪ Advise others by radio for assistance. ▪ If safe to do so contain the incident. ▪ Implement External Emergency Response for dangerous goods over 200ltrs. ▪ Close down vehicle access to the area. ▪ Use barriers to redirect traffic to other areas. ▪ Implement appropriate emergency response procedure e.g. Spill, Emissions, Noise, Land etc.
Complaints	<p>Internal:</p> <ul style="list-style-type: none"> ▪ Terminal Supervisor to investigate the incident and implement corrective action. ▪ Implement recommendations from investigations. ▪ Follow up review with all staff as to the outcome. <p>External:</p> <ul style="list-style-type: none"> ▪ Stop the transport activity if it is safe to do so. ▪ Terminal Supervisor to investigate the Transport Incident and implement corrective action. ▪ Inform the external parties of actions taken. ▪ Record any communications with external parties. ▪ Inform customers if they are affected. ▪ Enter incident into SpheraCloud
<p>General Controls for Transport Incident.</p> <ul style="list-style-type: none"> ▪ Transport Driver inductions and where appropriate applicable training for the driver. ▪ Transport driver to wear appropriate PPE for the operation. ▪ Auscol vehicles to have a spill kit for emergency use. ▪ Road tanker inspections for product compatibility, signage, tanker safety compliance e.g. fall protection, no leaks, no visible damage, no breakdown during loading. ▪ Report any observations to the Manager / Supervisor for action on non compliance. ▪ Record findings in the incident log for any observations. ▪ Terminal Supervisor for issues that need addressing put into SpheraCloud. ▪ EPA Ph. 131 555 or (02) 9995 5555 	

EMERGENCY PROCEDURES

General Instructions in the event of: Water Release

IF THIS HAPPENS:	DO THIS:
Emergency Release of Storm Water	<p>From rain buildup there may be a requirement for release of storm water to the environment.</p> <ul style="list-style-type: none"> ▪ Management authority for release. ▪ Visual inspection of pit and drains prior to release. ▪ If clear and no residues on water then release to the environment. ▪ If not clear then remove any residues until clear then release. ▪ Check the outlet if available to confirm no contamination. ▪ Record open & close times and visual inspection times in the incident log book. ▪ Release and monitor at all time while the valve is open. ▪ Take a sample of the water released. ▪ Twice a year the sample must be tested externally for analysis.
Complaints	<p>Internal:</p> <ul style="list-style-type: none"> ▪ Terminal Supervisor to investigate the source and implement corrective action. ▪ Follow up review with all staff as to the outcome. <p>External:</p> <ul style="list-style-type: none"> ▪ Terminal Supervisor to investigate the source and implement corrective action. ▪ Stop activity if due to breakdown and it is safe to do so. ▪ Inform the external parties of actions taken. ▪ Record any communications with external parties. ▪ Enter incident into the SpheraCloud.
<p>General Controls for Water Release:</p> <ul style="list-style-type: none"> ▪ Rain water to be controlled for release by bunding for storage tank areas, loading areas and process areas. ▪ Contractor activities to identify soil erosion and run off to the environment. ▪ Storm water drains to signposted and locked with signage for Management Authorisation. ▪ Releases to the environment to be under full monitoring of the activity. ▪ Drains and gutters to be kept cleaned. ▪ Bund area reports to be actioned for any observations requiring improvements. ▪ Reuse rain water where practicable. ▪ EPA Ph. 131 555 or (02) 9995 5555 	

EMERGENCY PROCEDURES

General Instructions in the event of **AIR EMISSIONS**

IF THIS HAPPENS:	DO THIS:
Extreme Excessive Air, Dust, Smoke, Odours, Vapours	<ul style="list-style-type: none"> ▪ Immediate investigation of air emission. ▪ If Safe to do so shut down offending operation / equipment ▪ Use PPE – Appropriate respirator to enter areas that have excessive exposure levels. ▪ After shut down implement repairs, replacement or admin controls. ▪ Enter incident into the SpheraCloud.
Complaints	<p>Internal:</p> <ul style="list-style-type: none"> ▪ Terminal Supervisor to investigate the source and implement corrective action. ▪ Follow up review with all staff as to the outcome. ▪ External: Supervisor / Supervisor to investigate the source and implement corrective action. ▪ Stop activity if due to breakdown and it is safe to do so. ▪ Inform the external parties of actions taken. ▪ Record any communications with external parties. ▪ Enter incident into the SpheraCloud.
<p>General Controls for Air Emissions:</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <p>Elimination:</p> <p>Substitution:</p> <p>Engineering:</p> <p>Administration:</p> <p>PPE:</p> </div> <div style="width: 65%;"> <ul style="list-style-type: none"> ▪ Does the activity need to be done? ▪ Can other equipment be used that has less noise emissions. ▪ Modify or repair the equipment to an acceptable exposure level. ▪ Control the timing of the operation to a time that has less impact on the community placement of any warning signs for operations. ▪ Operators to have appropriate product training for potential leaks to atmosphere. ▪ Monitoring of site operations with air emission level tests for the appropriate release. ▪ Issue appropriate respirator protection for areas of operation. </div> </div> <p>Record findings in the incident log for any low level air emissions.</p> <p>For any excessive emissions levels that need addressing put into SpheraCloud.</p> <p>EPA Ph. 131 555 or (02) 9995 5555</p>	

EMERGENCY PROCEDURES

General Instructions in the event of Excessive Noise

IF THIS HAPPENS:	DO THIS:				
Extreme Excessive Noise	<ul style="list-style-type: none"> ▪ Immediate investigation of noise emission. ▪ If Safe to do so shut down offending operation / equipment ▪ Use hearing Protection to enter areas that have excessive noise levels. ▪ After shut down implement repairs, replacement or admin controls. ▪ Enter incident into SpheraCloud. 				
Complaints	<p>Internal:</p> <ul style="list-style-type: none"> ▪ Terminal Supervisor to investigate the source and implement corrective action. ▪ Follow up review with all staff as to the outcome. <p>External:</p> <ul style="list-style-type: none"> ▪ Terminal Supervisor to investigate the source and implement corrective action. ▪ Stop activity if due to breakdown and it is safe to do so. ▪ Inform the external parties of actions taken. ▪ Record any communications with external parties. ▪ Enter incident into the SpheraCloud. 				
<p>General Controls for Noise.</p> <table border="0" style="width: 100%;"> <tr> <td style="vertical-align: top; width: 30%;"> Elimination: Substitution: Engineering: Administration: </td> <td style="vertical-align: top;"> <ul style="list-style-type: none"> ▪ Does the activity need to be done? ▪ Can other equipment be used that has less noise emissions. ▪ Modify or repair the equipment to an acceptable noise level. ▪ Control the timing of the operation to a time that has less impact on the community placement of any warning signs for operations. ▪ Monitoring of site operations with noise level tests. </td> </tr> <tr> <td style="vertical-align: top;"> PPE: </td> <td style="vertical-align: top;"> <ul style="list-style-type: none"> ▪ Issue appropriate respirator protection for areas of operation. </td> </tr> </table> <p>Record findings in the incident log for any low level nuisance noise. For any excessive noise levels that need addressing put into SpheraCloud EPA Ph. 131 555 or (02) 9995 5555</p>		Elimination: Substitution: Engineering: Administration:	<ul style="list-style-type: none"> ▪ Does the activity need to be done? ▪ Can other equipment be used that has less noise emissions. ▪ Modify or repair the equipment to an acceptable noise level. ▪ Control the timing of the operation to a time that has less impact on the community placement of any warning signs for operations. ▪ Monitoring of site operations with noise level tests. 	PPE:	<ul style="list-style-type: none"> ▪ Issue appropriate respirator protection for areas of operation.
Elimination: Substitution: Engineering: Administration:	<ul style="list-style-type: none"> ▪ Does the activity need to be done? ▪ Can other equipment be used that has less noise emissions. ▪ Modify or repair the equipment to an acceptable noise level. ▪ Control the timing of the operation to a time that has less impact on the community placement of any warning signs for operations. ▪ Monitoring of site operations with noise level tests. 				
PPE:	<ul style="list-style-type: none"> ▪ Issue appropriate respirator protection for areas of operation. 				

EMERGENCY PROCEDURES GENERAL INSTRUCTIONS IN THE EVENT OF WASTE

IF THIS HAPPENS:	DO THIS:
<p><i>The waste generated at a Auscol site is in relation to the customer supplied products therefore as a result there is little produced by the terminal.</i></p> <p><i>It is a very low likelihood that an emergency will be initiated from a waste related incident.</i></p>	
<p>Waste release to the Environment</p>	<ul style="list-style-type: none"> ▪ Immediate investigation of waste release. ▪ For general solid waste clean site for disposal. ▪ If Safe to do so use appropriate supplied container. ▪ Use PPE – to clean up then implement repairs, replacement or admin controls. ▪ Enter incident into SpheraCloud. <p>All prescribed waste to be kept separate for licensed pick up and disposal.</p>
<p>Waste Controls</p>	<p>For General Waste:</p> <ul style="list-style-type: none"> ▪ All waste to be place in containers that are appropriate for the type of waste. ▪ All containers to be kept closed to avoid pests, odours, and waste being blown out of the container. ▪ Waste tracking to confirm EPA Licensed approval. <p>For Prescribed Waste:</p> <ul style="list-style-type: none"> ▪ To be handled as per operating instructions. ▪ Oils, Fuels and Rags to be disposed of by EPA Licensed contractor. ▪ Customer supplied product waste under control of customer but also must be disposed of by licensed contractor. ▪ Waste tracking to confirm EPA Licensed approval. ▪ All documentation to be checked and records kept.
<p>Recycling</p> <ul style="list-style-type: none"> • Avoid • Reduce • Reuse • Recycle • Recover • Treatment and Disposal (Least Preferred) 	<ul style="list-style-type: none"> ▪ Avoid printing of unnecessary documents/emails. ▪ Re-use the reverse side of paper. ▪ Separate paper/cardboard waste for recycling. ▪ Metal recycling by a metal recycler. ▪ Report any wastage to management for action. ▪ Keep records of waste amounts for disposal. ▪ Minimize the amount of energy usage by good supervision. ▪ EPA Ph. 131 555 or (02) 9995 5555

ANNEX D: GRAINCORP RISK ASSESSMENT MATRIX

TABLE 1: CONSEQUENCE TABLE - Qualitative Measurement of the Maximum Credible Outcome of an Event

CONSEQUENCE	Extreme	Major	Moderate	Minor	Negligible
Safety	Fatality or significant permanent injury. Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 5 section.	Injury resulting in a loss of one or more full shifts – (i.e. a Lost Time Injury – LTI) Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 4 section.	Injuries requiring Medical Treatment (MTI) but where no time was lost. Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 3 section.	Injury requiring First Aid treatment only. Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 2 section.	Injury requiring no treatment – report only.
Health	Severe illness or chronic exposure resulting in fatality or significant life shortening effects.	Illness or significant adverse health effect needing a high level of medical treatment or management.	Mild illness or health effect and/or some functional impairment that needs some treatment but is usually easily managed, medically.	Minor illness or health effect with no functional impairment, treatment is optional, with no medical intervention.	Illness or effect with limited or no impact on ability to function – no treatment necessary.
Environment	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Destruction of important populations of habitat, species, or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised and measurable medium term impact on habitat, species or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised and measurable short-term impact on habitat, species or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised but immeasurable impact on or impairment of habitat, species or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. No discernible impact on or impairment of habitat, species or natural environment.
Property Damage	Damage to or loss of GrainCorp or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively >\$500,000.	Damage to or loss of GrainCorp or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively between \$50,000 and \$500,000.	Damage to or loss of GrainCorp's or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively between \$10,000 and \$50,000.	Damage to or loss of GrainCorp's or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively <\$10,000.	Damage to or loss of GrainCorp's or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, deemed negligible.
Assets and Supply Chain	Extended loss of use of assets, significant supply chain / business interruption or widespread and sustained electronic systems outage with a time impact of >48 hours or total financial impact >\$1M.	Extended loss of use of assets, significant supply chain interruption / business interruption or widespread and sustained electronic systems outage with a time impact of >24 hours or total financial impact between \$1M and \$500,000.	Loss of use of assets, supply chain / business interruption or sustained electronic systems outage with a time impact of >12 hours or total financial impact of between \$500,000 and \$200,000.	Loss of use of assets, supply chain / business interruption or electronic outage with a time impact of >6 hours or total financial impact of between \$200,000 and \$50,000.	Loss of use of assets, supply chain / business interruption or electronic outage with negligible time impact or financial impact <\$50,000.
Regulatory & Legal^A	Is 'notifiable' to an Authority / Regulator AND the Authority / Regulator attends the scene of the incident AND/OR commences an investigation. Involves a non-compliance of a licence, authority, permit, approval or law that has either the actual / potential for a civil penalty or fine the maximum of which is > \$50,000 or a criminal penalty. All incidents of suspected or actual fraud, bribery or corruption, events of significant illegal activity, or data breach / privacy breach events.	Is 'notifiable' to an Authority / Regulator or the Authority / Regulator issues a notice or intends to attend the scene / conducts an inspection. Involves a non-compliance of a licence, authority, permit, approval or law that has either the actual/potential for a civil penalty or fine the maximum of which is <\$ 50,000. Significantly exceeded legislated criteria or state policy limit.	Involves a non-compliance of a licence, authority, permit, approval or law that may result in a minor penalising action (quantum not determined), and any intervention by an Authority or Regulator is limited to a field report (or similar). A visit by a regulator following a complaint that results in no penalty or follow up action. Exceeded legislated criteria or state policy limit.	Involves a non-compliance of a licence, authority, permit, approval or law with no penalising action, and no intervention by an Authority or Regulator. A visit by a regulator following a complaint that results in no penalty or follow up action. Legislated criteria or state policy limit at risk of not being met.	Minor breaches of company policy or procedure by individual staff members with no external actions or impact.
Community / Reputation	Extended national adverse media coverage. Brand devalued. Significant disruption to public activities or a third party's or our own business operations.	Sustained adverse, local to national media reference. Brand image has potential of being tarnished. Minor disruption to public activities or a third party's or our own business operations.	A clustering of complaints. Potential adverse local media reference. Potential for brand to be questioned.	Isolated complaint from an individual with the potential for adverse community discussion. Isolated adverse local media reference.	Isolated complaint from a local individual.
Product Safety, Quality or Contamination	A product recall or product withdrawal is planned or has been initiated following determination that the affected product could harm human health.	A product contamination, product specification or product quality failure event that has the potential to impact customers or the public with a financial impact >\$200,000.	A contamination, specification or quality incident that results in a potential or actual claim (or rework) of up to \$100,000 and can be resolved internally (i.e. without external expert support).	A customer complaint or incident resulting in a potential or actual claim (or rework) under \$5,000 (e.g. credit note or product reject), which has no harm to human health or the public.	Minor incident with no resulting impact on the customer.
External Disasters	A natural disaster event (flood, fire, earthquake), terrorism, pandemic or threat of extortion, and one other trigger under this level 5 section.	A natural disaster event (flood, fire, earthquake), terrorism, pandemic or threat of extortion, and one other trigger under this level 4 section.	A natural disaster event (flood, fire, earthquake), terrorism, pandemic or threat of extortion, and one other trigger under this level 3 section.	A natural disaster event (flood, fire, earthquake), terrorism, pandemic or threat of extortion, and one other trigger under this level 2 section.	A natural disaster event (flood, fire, earthquake), terrorism, pandemic or threat of extortion, and one other trigger under this level 1 section.

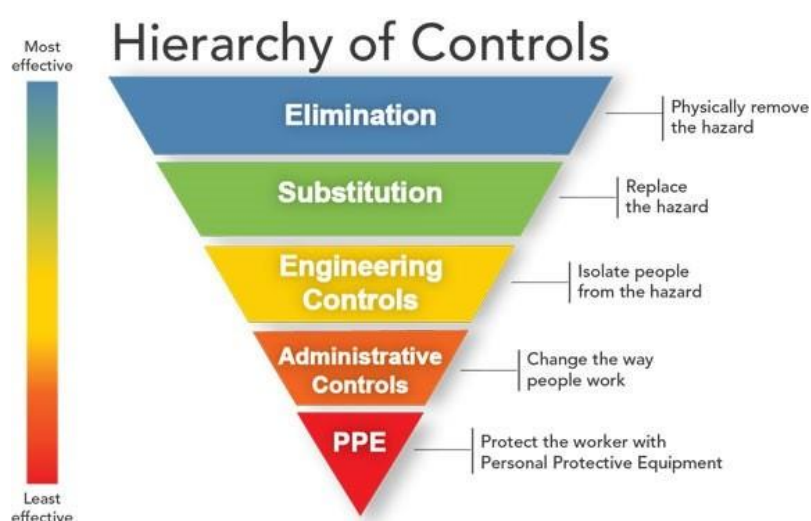
TABLE 2: RISK MATRIX - Qualitative Risk Matrix – Levels Of Risk

Likelihood Consequence	Rare The consequence is not expected to occur or to occur less than once in 3 years.	Unlikely The consequence is expected to occur more than once in 3 years but less than once a year.	Possible The consequence is expected to occur more than once a year but less than once in 3 months	Likely The consequence is expected to occur more than once in 3 months but less than once a week.	Almost Certain The consequence is expected to occur on a weekly basis or more frequently.
Extreme	M (15)	M (19)	H (22)	H (24)	H (25)
Major	M (13)	M (14)	M (18)	H (21)	H (23)
Moderate	VL (6)	L (9)	L (12)	M (17)	H (20)
Minor	VL (3)	VL (5)	L (8)	L (11)	M (16)
Negligible	VL (1)	VL (2)	VL (4)	L (7)	L (10)

TABLE 3: PRIORITY ACTION MATRIX

H	HIGH RISK	Review activity immediately. Advise local management. Immediate control action needed
M	MEDIUM RISK	Review existing controls. Apply hierarchy of controls to reduce risk to ALARP*
L	LOW RISK	Consider existing controls to determine adequacy
VL	VERY LOW RISK	Monitor existing controls

* ALARP = As Low As Reasonably Practicable – All hazards must have associated risk controlled to ALARP.



ANNEX E: GRAINCORP INCIDENT MANAGEMENT CHART

Incident Classification Matrix and Notification Table

This matrix is designed to ensure that significant incidents are immediately notified and escalated within the organisation and that the appropriate investigation, shared learnings and actions are progressed to prevent incident recurrence. The matrix envisages that the notification allows our people at the front line to manage the incident while ensuring that senior management and, if appropriate, the CEO and members of the Board, are informed in a timely manner.

Use the **Incident Classification Matrix** below to classify the incident (default to the higher level if in doubt). Please note that some trigger events need another trigger in that section to apply. After you classify the incident refer to the **Incident Notification Table** below to determine who needs to be notified. Please note that if reporting an 'actual event' (not a 'potential event') by phone, leaving a voice message is insufficient – you must speak directly to the nominated person, or their delegated representative. If you cannot speak to the nominated person, a text message (SMS) is acceptable only provided that a reply text is received indicating that the nominated person received and understood your text. If you are unable to make DIRECT VERBAL OR TEXT contact with the person next in line, escalate to the next level again. Continue doing so until DIRECT VERBAL OR TEXT contact is made at the next level.

Note: a 'Critical Incident' is defined as a level 5 incident involving safety, health or environmental impacts only – events resulting in commercial losses where there are no SHE implications are not critical incidents.

INCIDENT CLASSIFICATION Actual or Potential (Worst Credible) Consequence	Extreme (Level 5)	Major (Level 4)	Moderate (Level 3)	Minor (Level 2)	Negligible (Level 1)
Safety	Fatality or significant permanent injury. Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 5 section.	Injury resulting in a loss of one or more full shifts – (ie a Lost Time Injury – LTI) Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 4 section.	Injuries requiring Medical Treatment (MTI) but where no time was lost. Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 3 section.	Injury requiring First Aid treatment only. Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 2 section.	Injury requiring no treatment – report only.
Health	Severe illness or chronic exposure resulting in fatality or significant life shortening effects.	Illness or significant adverse health effect needing a high level of medical treatment or management.	Mild illness or health effect and/or some functional impairment that needs some treatment but is usually easily managed medically.	Minor illness or health effect with no functional impairment, treatment is optional, with no medical intervention.	Illness or effect with limited or no impact on ability to function – no treatment necessary.
Environment	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Destruction of important populations of habitat, species, or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised and measurable medium-term impact on habitat, species or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised and measurable short-term impact on habitat, species or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised but immeasurable impact on or impairment of habitat, species or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. No discernible impact on or impairment of habitat, species or natural environment.
Property Damage	Damage to or loss of GrainCorp or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively >\$500,000.	Damage to or loss of GrainCorp or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively between \$50,000 and \$500,000.	Damage to or loss of GrainCorp's or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively between \$10,000 and \$50,000.	Damage to or loss of GrainCorp's or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively <\$10,000.	Damage to or loss of GrainCorp's or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, deemed negligible.
Assets and Supply Chain	Extended loss of use of assets, significant supply chain / business interruption or widespread and sustained electronic systems outage with a time impact of >48 hours or total financial impact >\$1M.	Extended loss of use of assets, significant supply chain interruption / business interruption or widespread and sustained electronic systems outage with a time impact of >24 hours or total financial impact between \$1M and \$500,000.	Loss of use of assets, supply chain / business interruption or sustained electronic systems outage with a time impact of >12 hours or total financial impact of between \$500,000 and \$200,000.	Loss of use of assets, supply chain / business interruption or electronic outage with a time impact of >8 hours or total financial impact of between \$200,000 and \$50,000.	Loss of use of assets, supply chain / business interruption or electronic outage with negligible time impact or financial impact <\$50,000.
Regulatory & Legal^A	Is 'notifiable' to an Authority / Regulator AND the Authority / Regulator attends the scene of the incident AND/OR commences an investigation. Involves a non-compliance of a licence, authority, permit, approval or law that has either the actual / potential for a civil penalty or fine the maximum of which is > \$50,000 or a criminal penalty. All incidents of suspected or actual fraud, bribery or corruption, events of significant illegal activity, or data breach / privacy breach events.	Is 'notifiable' to an Authority / Regulator or the Authority / Regulator issues a notice or intends to attend the scene / conducts an inspection. Involves a non-compliance of a licence, authority, permit, approval or law that has either the actual/potential for a civil penalty or fine the maximum of which is < \$50,000. Significantly exceeded legislated criteria or state policy limit.	Involves a non-compliance of a licence, authority, permit, approval or law that may result in a minor penalising action (quantum not determined), and any intervention by an Authority or Regulator is limited to a field report (or similar). A visit by a regulator following a complaint that results in no penalty but where a report is issued with follow up action. Exceeded legislated criteria or state policy limit.	Involves a non-compliance of a licence, authority, permit, approval or law with no penalising action, and no intervention by an Authority or Regulator. A visit by a regulator following a complaint that results in no penalty or follow up action. Legislated criteria or state policy limit at risk of not being met.	Minor breaches of company policy or procedure by individual staff members with no external actions or impact.
Community / Reputation	Extended national adverse media coverage. Brand devalued. Significant disruption to public activities or a third party's or our own business operations.	Sustained adverse, local to national media reference. Brand image has potential of being tarnished. Minor disruption to public activities or a third party's or our own business operations.	A clustering of complaints. Potential adverse local media reference. Potential for brand to be questioned.	Isolated complaint from an individual with the potential for adverse community discussion. Isolated adverse local media reference.	Isolated complaint from a local individual.
Product Safety, Quality or Contamination	A product recall or product withdrawal is planned or has been initiated following determination that the affected product could harm human health.	A product contamination, product specification or product quality failure event that has the potential to impact customers or the public with a financial impact >\$200,000.	A contamination, specification or quality incident that results in a potential or actual claim (or rework) of up to \$100,000 and can be resolved internally (i.e. without external expert support).	A customer complaint or incident resulting in a potential or actual claim (or rework) under \$5,000 (e.g. credit note or product reject), which has no harm to human health or the public.	Minor incident with no resulting impact on the customer.
External Disasters	A natural disaster event (flood, fire, earthquake), terrorism, pandemic or threat of extortion, and one other trigger under this level 5 section.	A natural disaster event (flood, fire, earthquake), terrorism, pandemic or threat of extortion, and one other trigger under this level 4 section.	A natural disaster event (flood, fire, earthquake), terrorism, pandemic or threat of extortion, and one other trigger under this level 3 section.	A natural disaster event (flood, fire, earthquake), terrorism, pandemic or threat of extortion, and one other trigger under this level 2 section.	A natural disaster event (flood, fire, earthquake), terrorism, pandemic or threat of extortion, and one other trigger under this level 1 section.

INCIDENT NOTIFICATION TABLE ✓ Immediate phone call (email of Sphera Report within 24 hours)		Extreme (Level 5)		Major (Level 4)		Moderate (Level 3)	
Responsibility:	Notify incident to:	Actual Occurrence	Potential to Occur	Actual Occurrence	Potential to Occur	Actual Occurrence	Potential to Occur
Site / Plant / Terminal Manager	Line Manager (eg. National/Regional Operations Mgr)	✓	text / email only	✓	text / email only	text / email only	-
Site / Plant / Terminal Manager (immediately)	Incident Reporting Hotline	+61 2 9266 9436	-	-	-	-	-
Site / Plant / Terminal Manager (within 24 hours)	CEO (+61 419 133 433)	-	-	✓ LTI only	-	-	-
Line Manager (eg. National/Regional Operations Mgr)	SHE Manager	✓	text / email only	✓	text / email only	text / email only	-
Line Manager (eg. National/Regional Operations Mgr)	GM Operations	✓	text / email only	✓	text / email only	text / email only	-
SHE Manager	GM SHE	✓	text / email only	✓	text / email only	text / email only	-
GM, Operations	Chief Operations Officer	✓	text / email only	✓	text / email only	-	-
GM, SHE (GM, Ops for non-SHE incidents)	Chief People & Transformation Officer	✓	text / email only	text / email only	text / email only	-	-
GM, SHE (GM, Ops for non-SHE incidents)	General Counsel & Company Secretary	✓	text / email only	text / email only	text / email only	-	-
GM, SHE (GM, Ops for non-SHE incidents)	Snr Mgr Corporate Affairs & Investor Relations	✓	text / email only	text / email only	text / email only	-	-
GM, SHE (GM, Ops for non-SHE incidents)	Insurance Manager	✓	text / email only	text / email only	text / email only	-	-
Chief Operations Officer	CEO	✓	text / email only	text / email only	text / email only	-	-
Site Personnel	Emergency Services	As required (Police, Ambulance, Fire Services)					
SHE Manager	Regulatory Authorities	As required (<u>only after</u> consultation with General Counsel) (eg: WHS, EPA, etc)					
General Counsel & Company Secretary	Board of Directors	As deemed appropriate (all fraud and legal matters must be notified)					
^For Fraud, Bribery, Corruption or Illegal Activity Events please refer to the <i>Whistleblower Procedure</i> if you would prefer to make a confidential disclosure – available on Jumbunna and the GrainCorp website.							
Extreme (Level 5) and Major (Level 4) Incidents – Crisis Management Team Decision Point							
A decision to activate the GrainCorp Crisis Management Team (CMT) will be made by the Crisis Management Team Leader (Risk & Assurance)							

INCIDENT REPORTING	Extreme (Level 5)	Major (Level 4)	Moderate (Level 3)	Minor (Level 2)	Negligible (Level 1)
SHEQ Incidents (including Regulator activity / correspondence received)	All incidents recorded in Sphera within 24 hours				

ANNEX F: TRAINING MODULE

Training Element	Relevant Section in this Plan	Competency Required
Responsibilities for Environmental controls:- Manager Supervisors Operators	Sect 2 Responsibilities	Competency Assessment
Environmental concerns for:- Water, General waste, Noise, Air Emissions, Soil Contamination.	Sect 4 Environmental Concerns	Competency Assessment
Location of Terminal:- Drains, Storm water, Separator pits, Spill kits.	Site drawings Terminal inspection Terminal site maps where listed.	Competency Assessment. Practical description of location.
Authority and control of locked drains and valves.	State Manager guidelines. Routine Activities	Competency Assessment
Management Strategy for:- Air, Water, Soil.	Sect. 6.0 Emissions	Competency Assessment
Action on spill response:- PPE correctly identified, Control of spill, Record of incident SpheraCloud	Product Safety Assessments Product Safety Cards MSDS SpheraCloud	Competency Assessment
Administration: Location of Environmental Plans Location of Emergency Plans	Terminal Emergency Plan Terminal Environmental Plan	Competency Assessment. Practical description of location.