Clean & Green Organics Pty Ltd

Pollution Incident Response Management Plan

Nov 2025 – Nov 2026

Document information

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Confidentiality notice

Acknowledgement of Country

Clean & Green Organics acknowledges the Traditional Owners of the land on which this site is located, the people of Dharug nation. We acknowledge their continuing connection to land and sea, and we pay our respects to their Elders past, present, and emerging.

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Abbreviations

EPA – Environment Protection Authority

EPL – Environment Protection Licence

PIRMP – Pollution Incident Response Management Plan

Glossary of Terms

Hazardous Substance – any substance in the workplace, which appears on the List of Designated Hazardous Substances (NOHSSC: 10005) or as may be classified under the Approved Criteria for Classifying Hazardous Substances (NOHSC: 10008).

Pollution Incident – As defined in the POEO Act Dictionary: 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.

Material Harm – as defined in section 147 of the POEO Act: harm to the environment is material if it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or if 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.

Reference Materials and Supporting Documentation

The CGO PIRMP works with and is complementary to:

- The *Protection of the Environment Operations* Act 1997 (POEO Act);
- The *Protection of the Environment Legislation Amendment Act 2011* (POELA Act);
- The *Protection of the Environment Operations (General) Regulation 2022* (General Regulation);
- The Clean & Green Organics Pollution Incident Response Procedure (the Procedure); and
- NSW EPA Environment Guideline: *Pollution Incident Response Management Plans 2022 (the Guidelines)*.

1. Introduction

Clean & Green Organics Pty Ltd (**CGO, the Licensee**) is the holder of Environment Protection Licence (**EPL**) No. 11539 which relates to the operation of an organic waste recycling facility, located at 769 The Northern Road, Bringelly NSW 2556 (**the Site**). As such, the Licensee is required to prepare and maintain a Pollution Incident Response Management Plan (**PIRMP**), in accordance with Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act). This requirement was added in 2011, via the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act). In addition to preparing the PIRMP, the licence holder must keep a copy of the plan at the premises (Section 153D) and 'test' the plan in accordance with the *Protection of the Environment Operations (General) Regulation 2022* (General Regulation).

The PIRMP consists of two parts:

1. The Pollution Incident Response Management Plan (**the Plan**); and
2. The Pollution Incident Response Procedure (**the Procedure**).

The Plan has been developed to meet the requirements of the POELA Act (2011) and the POEO Act (1997).

The Procedure provides detail on the process to be followed in the event of a pollution incident. The intended audience for this part is the people directly involved in the day-to-day operations of the Site, including the Site Manager, Site staff and (where relevant) contractors. All staff, at a minimum, must read and understand the Procedure in Appendix B .

These documents establish the framework that helps protect the environment, as well as the health, safety and well-being of all persons and stakeholders associated with the Site. In preparing and reviewing the PIRMP, it is important to reiterate the definition, objectives, and purpose of the report, as detailed in the NSW EPA Environment Guideline: *Pollution Incident Response Management Plans 2022* (the Guidelines). This serves to reinforce to all personnel, the importance and role of the PIRMP.

1.1 Definitions

As per the definition in the POEO Act dictionary, a 'pollution incident' is:

"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."

As per Section 148 of the POEO Act, notification of a pollution incident must occur if "material harm to the environment is caused or threatened". 'Material harm' is defined in Section 147 of the POEO Act as:

a) "harm to the environment is material if:

i. it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

ii. it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations), and

b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

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."

Therefore, not all pollution incidents are notifiable. This is made clear in the flow chart at the beginning of the Procedure in Appendix B .

1.2 Purpose of the PIRMP

The purpose of a PIRMP is to improve the management of pollution incidents and facilitate better coordination with the relevant response agencies. The PIRMP is to provide reference for the procedures and responsibilities for pollution incident response, and this extends to the ongoing management for the prevention and mitigation of any such incident.

The PIRMP (the Plan) works with and is complementary to:

- The Pollution Incident Response Procedure (the Procedure);
- The Site Based Management Plan (SBMP);

- Site inductions and training; and
- Other Site Environment and Workplace Health and Safety Management Plans.

Together, these documents establish the framework that helps protect the environment, as well as the health, safety and well-being of all persons and stakeholders associated with the site.

1.3 Availability of the PIRMP

A copy of the PIRMP will be maintained in its written form at the licensed premises so that it is readily available for implementation and can be provided to any authorised EPA officer on request. An extract of the PIRMP will be made available on the CGO website. If for any reason the plan is unavailable on the website and a person has made a written request, the PIRMP will be provided without charge.

1.4 Objectives

As set out in the Guidelines (2022), this PIRMP has been written to:

- Ensure the comprehensive and near immediate communication of a pollution incident to staff at the Site, the Environment Protection Authority (EPA), other relevant authorities specified in the Act (Goulburn Mulwaree Council, NSW Ministry of Health, SafeWork NSW, and Fire and Rescue NSW) and stakeholders within the community 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; and
- Ensure that the PIRMP 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.

1.5 Scope of the PIRMP

The PIRMP provides detail regarding the legislative framework, Site features, hazard identification, risk assessment, monitoring, testing, reporting and ongoing improvement.

The intended audience for this PIRMP includes the Company's Site Manager, Director, other employees, Site visitors and regulatory authorities. CGO is also obligated to provide a copy of the PIRMP on their website or to any person who makes a written request for a copy, however, this is not considered the intended audience.

2. Site Details

The Site is an organic waste recycling facility, located at 769 The Northern Road, Bringelly NSW 2556. Organic waste received at the site is recycled via composting and vermicasting processes. CGO have operated the Site for 10 years, receiving waste materials from over 120 supermarket stores, processing them, and selling the composted product (Australian Standard Soil Conditioner - AS4454). located throughout New South Wales.

The Site details are summarised in Table 1 below.

Table 1: Site details.

<table>
<tr><th>Item</th><th colspan="2">Details</th></tr>
<tr><td>Street Address</td><td colspan="2">769 The Northern Road, Bringelly NSW 2556</td></tr>
<tr><td>Lot</td><td colspan="2">Lot 281 DP 1043744</td></tr>
<tr><td>Development Consent</td><td colspan="2">DA 1726(3)/2000</td></tr>
<tr><td>Land Zoning</td><td colspan="2">RU1: Primary Production (Camden Local Environmental Plan, 2010)</td></tr>
<tr><td>Local Government Area</td><td colspan="2">Camden Council</td></tr>
<tr><td>Environment Protection Licence (EPL)</td><td colspan="2">11539 (Licence version date 8 July 2019)</td></tr>
<tr><td>Scheduled activities</td><td colspan="2">Composting</td></tr>
<tr><td rowspan="7">Permitted waste types</td><td>Biosolids, categorised as unrestricted use, or as restricted use 2</td><td>A maximum of 50 tonnes is permitted to be stored at the Premises any time</td></tr>
<tr><td>Manure</td><td>A maximum of 180m3 is permitted to be stored at the Premises at any time</td></tr>
<tr><td>Natural organic fibrous materials</td><td>A maximum of 25 tonnes is permitted to be stored at the Premises any time</td></tr>
<tr><td>Paper pulp</td><td>A maximum of 50 tonnes is permitted to be stored at the Premises any time</td></tr>
<tr><td>Wood waste</td><td>A maximum of 50 tonnes is permitted to be stored at the Premises any time</td></tr>
<tr><td>Garden waste</td><td>A maximum of 2000m3 is permitted to be stored at the Premises any time</td></tr>
<tr><td>Food waste</td><td>A maximum of 50 tonnes is permitted to be stored at the Premises any time</td></tr>
<tr><td>Current infrastructure on Site</td><td colspan="2">Site Office, Incoming waste inspection station, Storage/Maintenance Dome, Shed, Sandstone pads, Leachate Dams (refer to Figure 1).</td></tr>
</table>

3. Roles and Responsibilities

The following section presents a brief outline of key positions and responsibilities associated with implementation of the PIRMP at CGO.

3.1 CGO roles and responsibilities.

The roles and responsibilities of CGO management are described in Table 2 below.

Table 2: CGO Roles and Responsibilities.

Responsibilities	Responsible Person(s)	
PIRMP Activation, implementation, review, testing and training	Name: Paul Moxey Role: Site Manager Phone: [redacted]	Name: Rhett Hahn Role: Director Phone: [redacted]
Notification of Relevant Authorities	Name: Paul Moxey Role: Site Manager Phone: [redacted]	
Managing Response to Pollution Incident	Name: Paul Moxey Role: Site Manager Phone: [redacted]	
First Aid Officer	Name: Paul Moxey Role: Site Manager Phone: [redacted]	

3.2 Site visitors

Employees, contractors, and visitors are to be inducted to the Site by the Site Manager, the individuals then accept a duty of care and the responsibility to ensure that any accidents, incidents, and near misses are reported through the correct channels. During an emergency or incident, they are obligated to follow procedures and authorised instruction, provided this does not place them at any additional risk. As such, they must commit to understanding the PIRMP and emergency plans.

3.3 Notification to relevant Authorities

The contact details of relevant authorities which may require contact in the event of a pollution incident are detailed in Table 3 below. Contact details for other relevant persons and organisations are summarised in Section 5.2, Table 9.

Table 3: Authority contacts that requiring notification during a pollution incident.

Authority	Description	Contact information
NSW Environment Protection Authority (EPA)	Main environmental regulator for Sites with an EPL	131 555
Camden Council	Local government environmental regulator	13 226 336
NSW Ministry of Health	Public Health Unit	1300 066 055
SafeWork NSW	WHS authority	13 10 50
Fire and Rescue NSW	Emergency services – fire, hazardous materials etc.	1300 729 579 (or 000)

3.3.1 Neighbours and community

The Site is located within a rural area, with the nearest sensitive receivers located over 500 m from the operation areas of the Site. Neighbouring properties are identified in Table 4. The location of the close neighbouring properties is shown in

Figure *2*. If a pollution incident should occur, all neighbours will be contacted by phone in the first instance if possible and will be followed up with a door knock if required. Neighbours will be notified within 12 hours of the pollution incident occurring, any sensitive neighbours will be prioritised and will be notified within four hours of the pollution incident occurring.

Table 4: Neighbours and community contact details.

Reference	Address	Lot/DP	Contact Method
A	765 The Northern Road Bringelly NSW 2556	282/1043744	Personal visit, phone call or prompt letter drop.
B	767 The Northern Road Bringelly NSW 2556	121/1289677	Personal visit, phone call or prompt letter drop.
C	70 Cheviot Drive Cobbitty NSW 2570	2/749043	Personal visit, phone call or prompt letter drop.
D	164B Coates Park Road Cobbitty NSW 2570	1034/851113	Personal visit, phone call or prompt letter drop.
E	40-40A Greendale Road Bringelly NSW 2556	98/1275504	Personal visit, phone call or prompt letter drop.
F	203 Greendale Road Bringelly NSW 2556	7/749043	Personal visit, phone call or prompt letter drop.
G	164 Coates Park Road Cobbitty NSW 2570	1030/851113	Personal visit, phone call or prompt letter drop.

4. Hazard assessment

4.1 Inventory of Pollutants

The chemicals and hazardous materials stored on Site are identified in the Inventory of Pollutants below in Table 5. The Inventory of Pollutants is dependent on variable Site conditions and may be subject to change. The identification, storage, handling and disposal of chemicals and hazardous substances at the facility is guided by Material Safety Data Sheets (MSDS). Should the types and maximum quantities of pollutants stored on Site vary, the Inventory of Pollutants will be updated promptly. Storage locations on Site are shown in Figure 1.

Table 5: Inventory of pollutants, storage locations and controls.

Pollutant	Maximum Quantity	Location (refer to Figure 1Appendix A)
Diesel	1000 L	Shed, on bunded pallet rack
Petrol	22 L	Shed, on bunded pallet rack
Hydraulic oil	40 L	Shed, on bunded pallet rack
Transmission oil	40 L	Shed, on bunded pallet rack
Engine oil	40 L	Shed, on bunded pallet rack
Brake fluid	20 L	Shed, on bunded pallet rack
Concentrated radiator coolant	40 L	Shed, on bunded pallet rack
Porta-Loo & associate effluent	2 x porta-loo	Shed, on bunded pallet rack
Humates and/or fulvates	100L	Shed, on bunded pallet rack
Effective Microorganisms	100 L	Shed, on bunded pallet rack
BioAktiv	50 kg	Shed, on bunded pallet rack

4.2 Safety Equipment

A summary of the safety equipment and devices used at the premises to minimise risks to human and environmental health, and to maintain and to control a pollution incident is presented in Table 6. Regular inspections, inventory checks, and servicing of equipment will be carried out in accordance with relevant standards and manufacturer's instructions. Training will be carried out with staff to ensure that all personnel are capable of operating safety equipment. Specific locations of safety equipment are shown in Figure 1.

Table 6: Safety equipment locations and quantity.

Equipment	Location(s)	Quantity
Spill Kits	Maintenance Dome	2
General Personal Protective Equipment (PPE) Supplies	Storage/Maintenance Dome, Shed	Numerous
Dry Chemical Fire Extinguishers	Storage/Maintenance Dome, Site Office, Shed, & machines	Numerous
First Aid Kit	Site Office	1
Traffic control cones, barrier tape, signage	Storage/Maintenance Dome	Numerous
Radios	Site Office	Numerous
Material Safety Data Sheets (MSDS) & Chemical Inventory	With chemicals in Shed	Numerous

4.3 Mitigations and Pre-emptive Actions

4.3.1 General

Effective avoidance of the occurrence of pollution incidents is reliant on an effective system of maintenance and inspections. The Site Manager or their delegate (i.e., Environment/Community Advisor having a minimum qualification of AQF level 5) is to ensure that Site inspections are carried out regularly and that plant and equipment is inspected by operators prior to the commencement of work. General pre-emptive actions for the prevention of a pollution incident include:

- adequate training of all site staff in the prevention and management of spills and pollution incidents (see Section 5.4.1);
- refuelling, maintenance and servicing plant in designated and contained areas only;
- limiting the volume of potential pollutants stored on Site;
- appropriate storage and handling of all potential pollutants;
- appropriate management of surface water;
- maintaining safety equipment in appropriate locations on Site (Section 4.2); and
- management of Site processes according to the SBMP.

4.3.2 Spill or uncontrolled discharge

A pollution incident impacting ground or receiving waterways could occur in the event of a chemical spill or uncontrolled discharge of leachate. Pollution of ground or water in this way is prevented via the following controls:

- fuel and chemicals are stored within the Shed on bunded pallet racks;
- chemicals must be stored according to their respective MSDS;
- any chemical spills must be contained immediately with spill kits;
- leachate dams are an appropriate capacity for effective surface water management;
- leachate dams are bunded sufficiently and maintained regularly; and
- Site re-use of water is implemented to improve dam capacity.

4.3.3 Fire and combustion

Composting generates heat to thermally decompose wastes, however, if not managed correctly stockpiles may spontaneously combust. This will occur if stockpiles are allowed to become anaerobic, or are allowed to generate excessive heat (>67°C). Additionally, some chemicals are stored at the facility are flammable (such as fuels and oils). To prevent an incident involving fire or combustion, the following pre-emptive actions will be taken:

- fuel and flammable chemicals are stored within the Shed on bunded pallet racks;
- flammable chemicals must be stored according to their respective MSDS;
- any fuel or flammable chemical spills must be contained immediately with spill kits;
- compost stockpiles must be properly managed, including maintaining the appropriate moisture content, (i.e., <50% weight for weight);
- regular fire practise drills should be undertaken to ensure that if a fire incident occurs it can be managed and extinguished promptly;
- Safe Work practises include an onsite non-smoking policy where smoking is permitted only in designated smoking areas (outlined to new employees during their training);
- electrical components in onsite machinery and equipment or office accommodation must be regularly inspected and maintained; and
- a sufficient number of fire extinguishers are kept and maintained on Site (see *Figure 1*).

4.3.4 Air emissions

Potential air emissions that could be released from the Site include odour generated by the composting process, dust generated by the movement of mobile plant, and ash or smoke in the event of a fire. Pre-emptive actions to prevent air emissions include:

- management of compost stockpiles, stormwater and leachate dams to minimise odour;
- use of a water cart to wet down haul roads and pads to reduce dust generation;
- maintaining sufficient moisture content in stockpiles to prevent lift-off;
- ensuring truck loads are covered during transport; and
- prevention of fire or combustion as detailed in section 4.3.3.

4.4 Risk assessment

The following risk assessment matrix has been developed and applied to the known hazards at the Site. The risk matrix is detailed in Table 7.

Qualitative categories have been used to assign 'likelihood' of incidences. A qualitative evaluation has also been utilised to assign a category to the 'consequences' of a pollution incident. The risk rating assigned to each incident type is numerical, with 1 being the lowest and 25 being the highest. The rating is calculated by multiplying the 'likelihood' by the 'consequence'.

The hazards on the Site are documented in Table 8. The table also details the risk of the hazard to the environment by assessing the likelihood and the potential consequences of the hazard in accordance with the risk matrix in Table 7. The risk assessment is undertaken in consideration of the hazard's potential to impact the environment and the specific mitigation measures implemented by CGO to minimise the likelihood of the environmental incident occurring and to minimise any environmental consequences should a pollution incident occur.

Table 7: Risk matrix.

			Consequence				
			1 - Negligible	2 - Minor	3 - Moderate	4 - Major	5 - Catastrophic
			No effect	Local short-term effect	Short term effect to wider environment	Environmental damage requiring significant resources to rectify and potential enforcement action	Irreversible environmental damage requiring significant resources to manage, and enforcement action.
Likelihood	5 - Certain	Happens several times per year in company	5 Moderate	10 High	15 Extreme	20 Extreme	25 Extreme
	4 - Likely	Has happened before in company	4 Moderate	8 High	12 High	16 Extreme	20 Extreme
	3 - Possible	Has happened in local company	3 Low	6 Moderate	9 High	12 High	15 Extreme
	2- Unlikely	Rarely happens in the industry	2 Low	4 Moderate	6 Moderate	8 High	10 High
	1 - Rare	Never heard of in industry	1 Low	2 Low	3 Low	4 Moderate	5 Moderate

Table 8: Risk assessment of the types of incidents that may occur on the Site.

Hazard	Likely source & location	Potential Impact Type(s)	Risk Assessment		
			Likelihood (uncontrolled)	Consequence (uncontrolled)	Risk Rating
Fire	Stockpile combustion, flammable chemicals, bushfire	Human health, air	3	4	12 HIGH
Fuel spill - minor	Vehicle/mobile plant/machinery, and Fuel storage area (Shed)	Human health, surface water, ground water, soil, fire risk	4	2	8 HIGH
Fuel spill - major (i.e. permeating pads, escaping bunded area, proximity to ignition sources)	Vehicle/mobile plant/machinery, and Fuel storage area (Shed)	Human health, surface water, ground water, soil, fire risk	3	3	9 HIGH
Chemical spill - minor	Chemical storage area (Shed)	Human health, surface water, ground water, soil, fire risk	4	2	8 HIGH
Chemical spill - major (i.e. permeating pads, escaping bunded area, proximity to ignition sources)	Chemical storage area (Shed)	Human health, surface water, ground water, soil, fire risk	3	3	9 HIGH
Site Leachate	Site Leachate Dams	Human health, surface water, ground water, soil	4	3	12 HIGH
Odour generation	Compost processes, stockpiles	Human health, air	3	3	9 HIGH
Dust generation	Incoming soil material/stockpiles/vehicles and plant on haul roads	Human health, air	3	3	9 HIGH

5. Pollution Incident Response

5.1 Minimising Harm to Persons on the Premises

Minimising harm to people on the premise includes any action or arrangement that will be in place to minimise the risk of harm to any people who will be on the Site or who are likely to be on the Site should an incident occur. CGO employees and sub-contractors will be instructed to contact the Site Manager immediately if they are in doubt over any part of this PIRMP or their responsibilities.

5.1.1 Training

The best and most effective method for minimising harm to all persons on the premises, including employees, visitors, and subcontractors, is through education, training, and provision of appropriate resources to control hazards. All persons working on the Site, employees and subcontractors, and persons visiting the Site, are required to attend an induction program which reviews the contents and location of the PIRMP. All employees and regular subcontractors must attend the regular toolbox meetings, where they are openly encouraged to raise issues of concern. Employees, sub-contractors, and visitors will be provided with and instructed on the correct use of appropriate personal protective equipment.

Training often takes the form of on-the-job training of employees in the use of plant and equipment as well as reinforcement of the various management plans and systems in place.

Recommended training regime includes:

- Induction – upon new person entering the Site.
- Weekly toolbox talks with staff and regular contractors.
    - PIRMP location and procedure to be reviewed with staff at least monthly.
- 6 monthly training sessions for all staff to review location, procedure, and test drills of the PIRMP.
- 12 monthly routine testing of the PIRMP.

5.1.2 Signage

Signage on Site should include:

- Emergency evacuation point
- Traffic speed signs
- First aid equipment signs
- Personal Protection Equipment (PPE) signage

It is the responsibility of the Site Manager to ensure all signage is in good condition and visible in case of a pollution incident.

5.1.3 Activation of evacuation procedures

The PIRMP should outline the conditions under which employees and people on-site should evacuate the premises, when they should stay and assist in cleaning up a pollution incident, and what precautions people should take to minimise any harm to themselves (see Sections 5.2, 5.3 and Appendix B).

5.2 During an incident

Important note: The Pollution Incident Response Procedure contains a simple flow chart, for use when a pollution incident occurs. The Procedure also contains all relevant contact details for authorities and other stakeholders. The Site Manager must identify which incident response procedure is best aligned with the one at hand and respond accordingly. Variations to the recommended response detailed in the Procedure may be authorised and carried out at the discretion of the Site Manager or Director. The Procedure is provided as Appendix B . This section provides a high-level overview of the Procedure.

5.2.1 Incident identification

Any employee or contractor who suspects or confirms that a pollution incident has or is about to occur, shall immediately notify the Site Manager or the Director. If the employee is trained to respond to the incident, they may do so, provided that someone else is on hand to raise the alarm. The Site Manager should notify the Director or their delegate of the incident immediately.

The Procedure is to be implemented and followed at the discretion of the Site Manager.

5.2.2 Immediate actions for minimisation and control

- As soon as it is safe to do so, stop work and stop the process causing the environmental incident.
- Assess the risk, and if possible, contain the pollution source to limit any additional contaminant release. This includes the deployment of spill containment equipment, use of firefighting equipment.
- Isolate the area from workers, visitors, and other people including the public by erecting barricades to ensure there is no unauthorised access to the pollution incident.

5.2.3 Risk to environment or human health

- If the incident has any risk of material harm to the environment (on or off the Site), environmental amenity (off Site) or human health, the Site Manager will follow the Procedure to determine category and type of event and contact the relevant emergency services and management authorities (see Sections 3.1, 3.2 and 3.3 for contact information).
    - Section 148 of the POEO Act states relevant regulator(s) and management authorities must also be notified if there is a risk of material harm to the environment.
- For certain incidents, the Procedure may state that stakeholders need to be notified of the incident.

5.2.4 Notification to regulators or stakeholders

Stakeholders may also need to be notified of an incident; however, this is at the discretion of the Company's Site Manager (unless it is required by the regulator or relevant management authority). Neighbours will be contacted via phone call, personal visit or letter drop person depending on the urgency of the incident (see Table 4). Regulators should be contacted on the phone numbers provided in Table 9.

Information that should be provided to the EPA, or other regulators, includes:

- the time, date, location, nature and duration of the event;
- location of the place(s) where pollution is occurring or is likely to occur;
- nature, quantity and concentration of any pollutants involved;
- suspected cause of the incident;
- actions taken to control the situation;
- actions taken to mitigate any environmental harm and/or environmental nuisance caused by the event;
- proposed action(s) to prevent a recurrence of the event; and
- any other information that may be requested by regulatory authorities.

5.2.5 Pollution incident contact details

Table 9: Contact details for persons and organisations relevant to pollution incident and emergency response.

Contact	In case of...	Number
Rhett Hahn (Director)	Any pollution incident	[redacted]
Paul Moxey (Site Manager)	Any pollution incident	[redacted]
Emergency services (Ambulance, Fire, Police)	Time-critical life or property threatening emergencies	000 or 112 from mobile
State Emergency Service	Assistance required in recovering from storm events	132 500
NSW Environment Protection Authority (EPA)	Regulator notifiable pollution incident	131 555
Camden Council	Regulator notifiable pollution incident	13 226 336
Fire and Rescue NSW	Fire control assistance	1300 729 579 (or 000)
Telstra Call Connect (Telstra phones only)	For connection to key contacts and phone numbers	1234

5.3 Post-incident

5.3.1 Clean-up

The Quick Reference Guide in the Procedure outlines clean up procedures for incidents (Appendix B).

5.3.2 Internal reporting

A ‘post-incident report’ is to be completed by all staff involved in a pollution incident and forwarded to the Site Manager or their delegate prior to leaving the Site that day. Employees involved in a pollution incident are not permitted to leave the Site unless approved to do so by Management, or a representative of the Emergency Services (if in attendance).

The Site Manager or their delegate is responsible for ensuring that all required information has been collected, and that all concerned parties have completed a report. The Site Manager or their delegate must also complete a separate ‘post-incident report’. A hard and soft copy of each post-incident report is to be retained.

5.3.3 External reporting

The Site Manager or their delegate will prepare a report that satisfies regulator reporting requirements in a timely manner following a regulator-notifiable incident or stakeholder-notifiable incident. Once this report has been reviewed and approved by the Site Manager, it is to be forwarded to the EPA, other relevant regulators, and management authorities on behalf of the company. This is to occur within the timeframes set out by the relevant regulators. Any follow up information requested by the regulator(s) is to be authorised by the Site Managers and provided in a timely manner.

5.3.4 Review and update the PIRMP

Following any incident (other than a non-notifiable incident), the PIRMP must be tested (and revised if necessary) within one month, as per section 153E of the POEO Act and section 75 of the General Regulation. Testing of a PIRMP following an incident must assess, in the light of that incident, whether the information included in the Plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner. If the answer to this is ‘no’, then the PIRMP must be revised to address any gaps or deficiencies identified.

5.4 Management

5.4.1 Training Requirements

The objectives of the training program that is to complement this Plan is to ensure that all Site staff are aware of the contents of the PIRMP, such that they understand environmental and safety issues in the workplace and are aware of their responsibilities in the event of a pollution incident. Information is to be disseminated through Site inductions, toolbox talks and ongoing training.

The Site Manager or their delegate is responsible for the administration of materials and maintenance of records for all inductions and ongoing training. At a minimum, records of training will contain details of who facilitated and received the training, when the training was undertaken, and what the training involved. Where applicable, test scores and simulation outcomes should also be carefully noted.

Contractors and visitors to the Site will also be subject to inductions and ongoing training as deemed appropriate by the Site Manger or their delegate. Details and copies of any relevant licenses, certificates and/or qualifications held by employees and contractors will also be recorded and maintained by the Site Manager or their delegate. It is the responsibility of all employees and contractors working on the Site to work in a safe manner and to look after the interests of their fellow workers.

Inductions and ongoing training requirements should be routinely reviewed and revised as deemed appropriate by the Site Manager or their delegate. Throughout this process, considerations should be made for but not limited to changes in procedures and regulations, as well as any errors or deficiencies in job performance and in reporting.

Desktop simulation and pollution incident drill testing procedures, as required under section 153E of the POEO Act, section 75 of the General Regulation, and outlined in Section 5, provide an interactive training experience for employees. Scenarios are designed to be reflective of an incident that may be encountered on Site, however, are implemented in a controlled and hazard free environment.

5.4.2 Testing the PIRMP

As per section 153E of the POEO Act and section 75 of the General Regulation, a <u>PIRMP must be tested routinely at least once every 12 months</u>. The testing must be carried out in a manner as to “ensure that the information included in the plan is accurate and up to date and that the plan is capable of being implemented in a workable and effective manner”. The PIRMP may be tested in a variety of ways, including basic review, desktop simulation and practical exercises or drills. Testing must cover all aspects of the plan, including the effectiveness of training. PIRMP's must also be tested within one month of any pollution incident occurring during an activity and to which a licence relates. This post-incident test must assess whether the information contained in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.

Plans must include all relevant details in regard to:

- the manner in which the PIRMP is to be tested and maintained;
- the dates on which they have been tested and the name of the staff members who carried out the testing;
- the dates on which they are updated or revised.

5.4.3 Testing procedures

Testing of the PIRMP may occur as a desktop simulation or a pollution incident drill. Once the test is complete, it will be followed by a PIRMP review. Any issues identified during the test will be rectified during the subsequent revision of the plan. The decision on which testing procedure to use is at the discretion of the Site Manager or their delegate. The decision will be taken into account prior performance, the occurrence of any incidents in the preceding period, substantial changes in regulatory frameworks and other relevant matters.

5.4.4 Desktop simulation

Responsibility for implementation: Site Manager or their delegate (i.e., Environmental and Community Advisor).

Procedure: The procedure for a desktop simulation is as follows:

1. The Site Manager or their delegate assembles all relevant personnel in the office;
2. The Site Manager or their delegate identifies a type of 'Regulator notifiable incident' or a 'stakeholder-notifiable incident' (i.e., risk of material harm to the environment exists) and notes whether there is also a risk to human health and safety (i.e., sediment-laden water overflow, leachate escape to soil/groundwater or illegal waste dumping incident with hazardous vapours). The employee is the person who has identified the hypothetical incident.
3. Using the procedures outlined in the PIRMP, the persons present move through the steps in the process, documenting what action is taken at each step;
4. At the end of the process, the persons present discuss the incident response and identify any weaknesses or deficiencies in the PIRMP process that were identified;

5.4.5 Pollution incident drill

Responsibility for implementation: Site Manager and their delegate (i.e., Environmental and Community Advisor).

Procedure: The procedure for a pollution incident drill is as follows:

1. The Site Manager identifies a type of 'Regulator notifiable incident' or a 'stakeholder-notifiable incident' (i.e., risk of material harm to the environment exists) and notes whether there is also a risk to human health and safety (i.e., leachate escape to soil or illegal waste dumping incident with hazardous vapours) (it should be different to the scenario that will be used in the desktop simulation);
2. The Site Manager then instructs an employee to commence the simulation at an unspecified time on a specified date (the Site Manager may suggest an approximate time, but the employee should determine when to commence the drill);
3. The employee commences the drill by notifying their Site Manager of the (pre-determined) incident;
4. The Site Manager must then commence the process outlined in the PIRMP that is relevant to the particular incident (including identifying the immediate response required);
5. The Site Manager is to be contacted for the purposes of the drill, but no actual notification of external parties is required (although, it should be documented which external parties would be notified in a real pollution incident scenario);
6. All parties involved in the drill will meet following the conclusion of the drill to debrief and discuss the process and any deficiencies identified in the process. This should also include a review of how prepared and well-equipped persons were to immediately respond to the incident, where relevant (i.e., was appropriate spill control equipment available for a spill incident?);
7. The Site Manager or their delegate is to document the drill, minute the debrief discussion and raise remedial actions for any deficiencies identified in the process.

5.5 PIRMP Review

Responsibility for implementation: Environment Advisor and Site Manager

Procedure: A basic review of the PIRMP will involve the Site Manager, or relevant delegate (i.e., Environment and Community Advisor) conducting a review of all information in the plan, paying particular attention to the following elements:

- Contact details;
- Regulatory/legislative context;
- Site capacity;
- Relevant hazards;
- Hazard inventory and location;
- Site safety equipment;
- Training provisions (training records should also be inspected to gauge compliance); and
- Site details (including maps and other diagrams);
- Local area e.g., new service stations, hospitals, roads, stormwater infrastructure, dangerous goods depots etc.

The document is to be revised and re-issued following the review. The Site Manager must ensure that all relevant persons are re-trained in the PIRMP following the review, with a particular focus given to sections that have been changed.

6. Appendices

Appendix A Site Plans

Appendix B Pollution Incident Response Procedure

Appendix A Site Plans

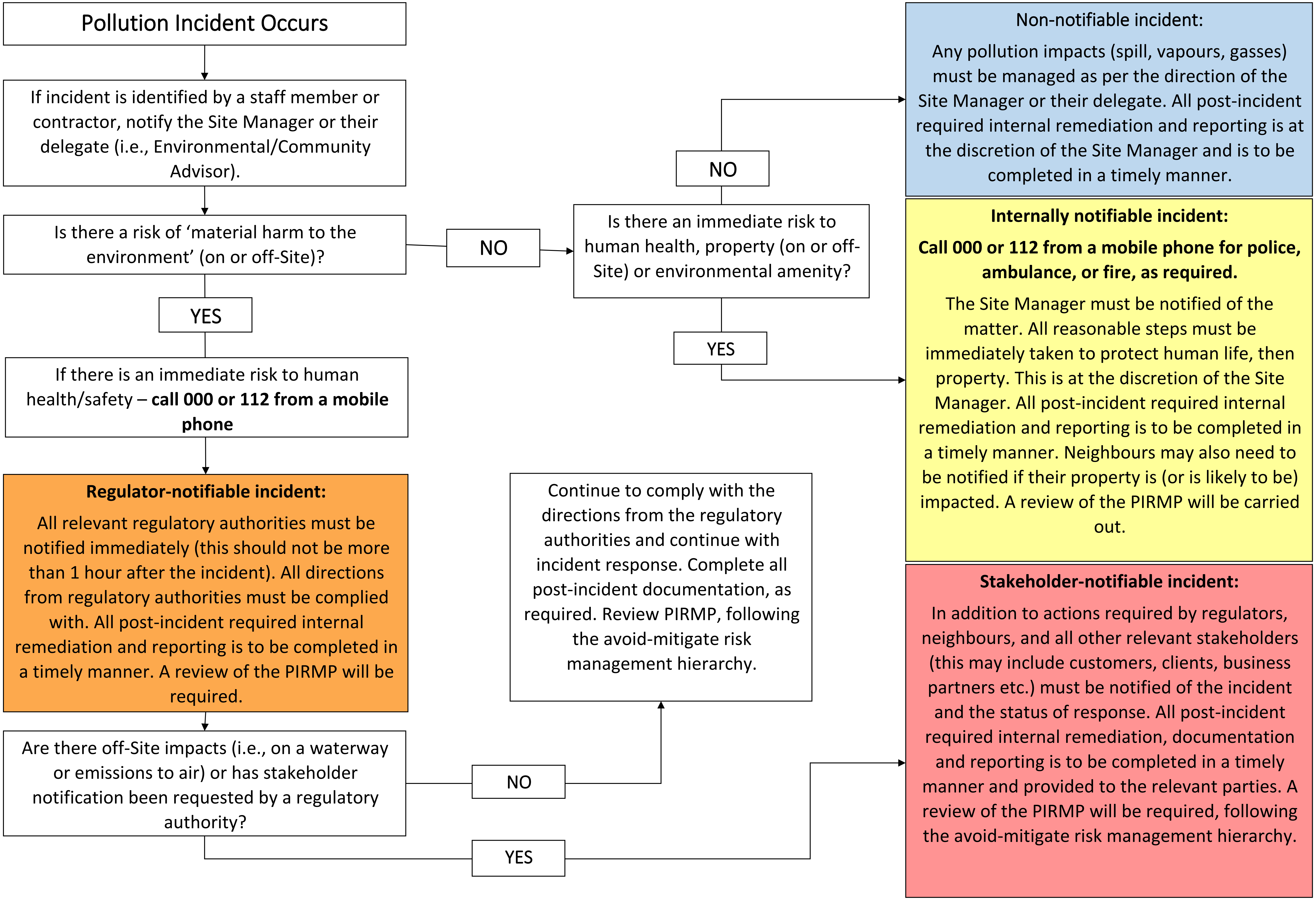
Appendix B Pollution Incident Response Procedure

Clean & Green Organics Pty Ltd

Pollution Incident Response Procedure

Nov 2025 – Nov 2026

Version: 5


Pollution Incident Occurs
If incident is identified by a staff member or contractor, notify the Site Manager or their delegate (i.e., Environmental/Community Advisor).
Is there a risk of 'material harm to the environment' (on or off-Site)?
NO
Is there an immediate risk to human health, property (on or off-Site) or environmental amenity?
NO
Non-notifiable incident:
Any pollution impacts (spill, vapours, gasses) must be managed as per the direction of the Site Manager or their delegate. All post-incident required internal remediation and reporting is at the discretion of the Site Manager and is to be completed in a timely manner.
YES
Internally notifiable incident:
Call 000 or 112 from a mobile phone for police, ambulance, or fire, as required.
The Site Manager must be notified of the matter. All reasonable steps must be immediately taken to protect human life, then property. This is at the discretion of the Site Manager. All post-incident required internal remediation and reporting is to be completed in a timely manner. Neighbours may also need to be notified if their property is (or is likely to be) impacted. A review of the PIRMP will be carried out.
YES
If there is an immediate risk to human health/safety – call 000 or 112 from a mobile phone
Regulator-notifiable incident:
All relevant regulatory authorities must be notified immediately (this should not be more than 1 hour after the incident). All directions from regulatory authorities must be complied with. All post-incident required internal remediation and reporting is to be completed in a timely manner. A review of the PIRMP will be required.
Are there off-Site impacts (i.e., on a waterway or emissions to air) or has stakeholder notification been requested by a regulatory authority?
NO
Continue to comply with the directions from the regulatory authorities and continue with incident response. Complete all post-incident documentation, as required. Review PIRMP, following the avoid-mitigate risk management hierarchy.
YES
Stakeholder-notifiable incident:
In addition to actions required by regulators, neighbours, and all other relevant stakeholders (this may include customers, clients, business partners etc.) must be notified of the incident and the status of response. All post-incident required internal remediation, documentation and reporting is to be completed in a timely manner and provided to the relevant parties. A review of the PIRMP will be required, following the avoid-mitigate risk management hierarchy.

1. Quick Reference Guide - Incident

Table 1: Quick reference guide for different types of incidents that may occur at the Site.

Incident Type	Incident	Likely Incident Category	Immediate response actions	Notification	Post-incident Response Actions
Combustion	Fire	Regulator & Stakeholder notifiable incident	1. Immediately utilise the fire extinguishers, water or sand to control the fire; 2. If a stockpile is the source of the fire, it must be safely deconstructed during water cart suppression to fully extinguish, if safe to do so (wind conditions should be carefully considered); 3. Allow deconstructed stockpiles to cool; 4. Take all steps to remove any sources of ignition; 5. Evacuate the Site at the discretion of the Site Manager; and 6. Contact fire brigade by calling 000.	A stockpile fire is a 'Regulator-Notifiable Incident' as per the flow chart above, regardless of the size of the stockpile fire or the source of its ignition. 1. The Site Manager & Director must be notified for all fires; 2. Uncontrolled fire is likely to result in material environmental harm to air, soil, groundwater, or surface water depending on the volume of fire; 3. The Site Manager or their delegate must notify the NSW EPA, emergency services and other regulator(s) for all fires in stockpiles; and 4. The Site Manager or their delegate must also notify neighbours and other relevant stakeholders.	1. If required, immediately engage a suitable contractor to repair any damage the fire caused; 2. If fire retardants were used, engage a suitably qualified consultant to obtain soil samples from effected areas and leachate dams to determine whether contamination has occurred; 3. Review any relevant management plans or operational procedures regarding waste management, fire management and procurement and review this PIRMP; and 4. Submit any required reports to the appropriate regulatory authorities.

Incident Type	Incident	Likely Incident Category	Immediate response actions	Notification	Post-incident Response Actions
Fuels	**Minor Spill** (i.e. non-permeating, contained)	Internally notifiable incident	**1.** If possible, shut off or contain the source of the spill; **2.** Take all steps to remove sources of ignition; **3.** Lay down spill kit control products to contain the spill; and **4.** Treat any persons that may have come into contact with the fuel.	**1.** The Site Manager & Director must be notified; **2.** Material environmental harm may occur to soil, groundwater, or surface water, depending on the volume and location of the spill; and **3.** Regulator/stakeholder notification is at the discretion of the Site Manager or their delegate.	**1.** Collect spill kit materials and dispose at a facility that is licensed to accept the waste; **2.** If regulatory authorities were notified, immediately carry out any remediation actions for ground or waterways (off-Site or on Site) as directed by the regulator(s); **3.** Engage a suitably qualified consultant to conduct soil monitoring, if required, and continue with surface water monitoring. Investigate any subsequent increases in pollutant levels, in consultation with the qualified consultant; and **4.** If regulatory authorities were notified, submit follow up written report(s) as required.

Incident Type	Incident	Likely Incident Category	Immediate response actions	Notification	Post-incident Response Actions
Fuels	**Major Spill** (i.e. permeating sandstone pad, escaping bunded area, proximity to ignition sources)	Regulator & Stakeholder notifiable incident	1. If possible, shut off or contain the source of the spill; 2. Take all steps to remove sources of ignition; 3. Lay down spill kit control products to contain the spill; 4. If it is operationally possible, utilise mobile plant to construct a bund in the path of the fuel flow to capture and contain the flow (priority must be given to preventing the entry of hydrocarbons into waterways, particularly stormwater drains or the waterways); and 5. Treat any persons that may have come into contact with the fuel.	1. The Site Manager & Director must be notified; 2. A hydrocarbon spill that threatens surface water is likely to result in material environmental harm, particularly if the chemical enters an off-Site waterway. The Site Manager or their delegate must notify the regulator(s); and 3. If the fuel enters the stormwater system or any other off-Site waterway, the Site Manager must also notify neighbours and other relevant stakeholders.	1. Immediately carry out any remediation actions for waterways (off-Site or on Site) as directed by the regulator(s); 2. Collect spill kit materials and dispose at a facility that is licensed to accept the waste; 3. Immediately engage an excavator and truck(s) and isolate any soil that came into contact with the fuel (and ensure it is disposed of at a licensed facility, along with spill containment materials); 4. Immediately engage a suitable contractor to repair any damage to fuel storage or plant if required (with a product that addresses the cause of the incident); 5. Engage a suitably qualified consultant to obtain soil samples from beneath porous sandstone pad areas to determine whether contamination of the earth below has occurred. Continue surface water monitoring. Investigate any subsequent increases in pollutant levels, in consultation with the qualified consultant; 6. Review any relevant management plans or operational procedures regarding hydrocarbon handling, management and procurement and review this PIRMP; and 7. Submit any required reports internally and to the appropriate regulatory authorities.

Incident Type	Incident	Likely Incident Category	Immediate response actions	Notification	Post-incident Response Actions
Chemicals	**Minor Spill** (i.e. non-permeating, contained)	Internally notifiable incident	**1.** If possible, shut off or contain the source of the spill; **2.** If flammable, take all steps to remove sources of ignition; **3.** Consult the MSDS for information on human and environmental toxicity and take appropriate actions, as directed by the Site Manager or their delegate; **4.** Clear the area and ventilate if it is an enclosed space and the chemical is likely to produce a hazardous vapour; **5.** Lay down spill kit control products to contain the spill; and **6.** Treat any persons that may have come into contact with the chemical.	**1.** The Site Manager & Director must be notified; **2.** Material environmental harm may occur to soil, groundwater, or surface water, depending on the chemical type and location of the spill; and **3.** Regulator notification is at the discretion of the Site Manager or their delegate.	**1.** If regulatory authorities were notified, carry out all required remediation actions for ground or waterways (off-Site or on Site) as directed by the regulator(s); **2.** Collect spill kit materials in a manner that takes into account to precautions outlined in the chemical MSDS. Dispose of the spill kit materials at a facility that is licensed to accept the waste; **3.** Engage a suitably qualified consultant to conduct soil monitoring, if required and continue surface water monitoring. Investigate any subsequent increases in pollutant levels, in consultation with the qualified consultant; and **4.** If regulatory authorities were notified, submit follow up written report(s) as required.

Incident Type	Incident	Likely Incident Category	Immediate response actions	Notification	Post-incident Response Actions
Chemicals	**Major Spill** (i.e. permeating sandstone pad, escaping bunded area, proximity to ignition sources)	Regulator & Stakeholder notifiable incident	1. If possible, shut off or contain the source of the spill; 2. If flammable, take all steps to remove sources of ignition; 3. Consult the MSDS for information on human and environmental toxicity and take appropriate actions, as directed by the Site Manager or their delegate; 4. Clear the area and ventilate if it is an enclosed space and the chemical is likely to produce a hazardous odour; 5. Lay down spill control products or use mobile plant to create an earth bund to contain the spill (with priority given to preventing off-Site escape of the spill); 6. If flammable, spray a mist of water over the spill; and 7. Treat any persons that may have come into contact with the chemical.	1. The Site Manager & Director must be notified; 2. A chemical spill that threatens surface water is likely to result in material environmental harm, particularly if the chemical enters an off-Site waterway. The Site Manager or their delegate must notify the regulator(s); and 3. If the chemical enters waterways or any other off-Site waterway, the Site Manager or their delegate must also notify neighbours and other relevant stakeholders.	1. Immediately carry out any remediation actions for waterways (off-Site or on Site) as directed by the regulator(s); 2. Collect spill kit materials in a manner that takes into account to precautions outlined in the chemical MSDS. Dispose of the spill kit materials at a facility that is licensed to accept the waste; 3. Immediately engage an excavator and truck(s) and isolate any soil that came into contact with the chemical (and ensure it is disposed of at a licensed facility, along with spill containment materials); 4. Immediately engage a suitable contractor to repair any damage to chemical storage if required (with a product that addresses the cause of the incident); 5. Engage a suitably qualified consultant to obtain soil samples from beneath affected sandstone pad areas to determine whether contamination of the earth below has occurred. Continue surface water monitoring. Investigate any subsequent increases in pollutant levels, in consultation with the qualified consultant; and 6. Submit any required reports internally and to the appropriate regulatory authorities.

Air Emissions	Odour	Internally notifiable incident	1. Take any action required to reduce the generation of odours (e.g., appropriate management of compost stockpiles, stormwater and leachate dams); and 2. If off-site detection of odour continues, the Site Manager & Director must be notified.	1. The Site Manager & Director must be notified if persistent off-site detection of odour occurs; and 2. Excessive off-site odours pose a risk to air quality and may impact nearby receivers. Regulator and neighbour/stakeholder notification is at the discretion of the Site Manager or their delegate.	1. If the controls were initially effective, continue to monitor the situation and apply controls as needed to prevent generation and off-Site migration of odour; 2. If the controls were not effective, increase controls (e.g., increase leachate dam treatment); and 3. If complaints were received, these should be processed and documented as per the community and complaints procedure.

Incident Type	Incident	Likely Incident Category	Immediate response actions	Notification	Post-incident Response Actions
Air Emissions	Dust	Internally notifiable incident	1. Take any control actions required to stop the generation of dust (e.g., water truck); and 2. If visible off-site movement of dust continues, the Site Manager & Director must be notified.	1. The Site Manager & Director must be notified if persistent off-site movement of dust occurs; and 2. Excessive dust that travels off-site poses a risk to air quality and may impact nearby receivers. Regulator and neighbour/stakeholder notification is at the discretion of the Site Manager or their delegate.	1. If the controls were initially effective, continue to monitor the situation and apply controls as needed to prevent generation and off-Site migration of dust; 2. If the controls were not effective, increase controls (e.g., increase application of water to stockpiles); and 3. If complaints were received, these should be processed and documented as per the community and complaints procedure.

2. Notification Details

2.1. Communication with Regulators and Management Authorities

There are several regulators and management authorities who may need to be notified in the event of a regulator-notifiable incident. These stakeholders are shown in the Table 2 below.

Table 2: Authority contacts that requiring notification during a pollution incident.

Authority	Description	Contact information
Department of Planning and Environment (DPE)	State planning regulator	1300 305 695
NSW Environment Protection Authority (EPA)	Main environmental regulator for Sites with an EPL	131 555
Camden Council	Local government environmental regulator	13 226 336
NSW Ministry of Health	Penrith public health unit	(02) 4734 2022
SafeWork NSW	WHS authority	13 10 50
Fire and Rescue NSW	Emergency services – fire, hazardous materials etc.	1300 729 579 (or 000)

2.2. With Emergency Services and Senior Management

The Table 3 lists emergency services and senior management staff that may need to be contacted in the event of an incident.

Table 3: Contact details for persons and organisations relevant to pollution incident and emergency response.

Contact	In case of...	Number
Rhett Hahn (Director)	Any pollution incident	[redacted]
Paul Moxey (Site Manager)	Any pollution incident	[redacted]
Emergency services (Ambulance, Fire, Police)	Time-critical life or property threatening emergencies	000 or 112 from mobile
State Emergency Service	Assistance required in recovering from storm events	132 500
Bringelly Family Medical Practice	Local medical clinic for treatment of minor injuries	02 4774 8888
Nepean Hospital Emergency Department	Local hospital for serious (non-life-threatening) injuries	02 4734 2000

Contact	In case of…	Number
Camden Fire Station	Assistance with fire or pollution incident response	02 4634 6048
Narellan Police Station	To report non time-critical crime, such as vandalism or illegal dumping	02 4632 4499
Telstra Call Connect (Telstra phones only)	For connection to key contacts and phone numbers	1234

2.3. Stakeholder Notifiable Incident

When it is necessary, neighbours and external stakeholders will be promptly notified of a pollution incident. The extent of notification will be at the discretion of the Company Site Manager and the company lawyers, unless otherwise directed by a relevant regulator or management authority. Table 4 below details relevant stakeholders and information pertinent to making a decision on whether notification is required.

Table 4: Notification requirements for stakeholders and neighbours.

Stakeholder	Likely to be affected by	Contact information/method
Nearest receivers	Harmful or nuisance emissions to surface water (off-Site), groundwater or air.	Personal visit, phone call or prompt letter drop.
Immediate neighbours	Harmful or nuisance emissions to surface water (off-Site), groundwater or air.	Personal visit, phone call or prompt letter drop.
Wider community/distant neighbours	Harmful emissions to surface water (off-Site), groundwater or air (that is likely to expand into the wider community).	Prompt letters drop.
Contractors or other internal stakeholders not on Site	Pollution events that result in the closure of the Site.	Various – phone call.
Business partners/investors	Pollution events that are likely to result in negative publicity for the business, regulatory action, or closure (permanent or temporary).	Various – phone call.