POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Riverina (AUSTRALIA) Pty Ltd

CASINO MILL

PIRMP-RIVERINA-AU-Casino-NSW-V13 June 2026

Contents

PURPOSE 3
SCOPE 3
INTRODUCTION 3
KEY ACTIVITIES & PROCESSES 3
POTENTIAL POLLUTION TYPES 4
POTENTIAL POLLUTION TYPES 7
Risk Identification 7
Risk Assessment Process 7
Management Procedure 9
Emergency Response Equipment 11
Incident Response Procedure 11
Training 11
Plan Testing, review and Maintenance 11
Approval & History 12

PURPOSE

The purpose of this procedure is to ensure the Riverina (Australia) Pty Ltd comply with the requirements to prepare a Pollution Response Management Plan (PIRMP) under section 153A of the POEO Act 1997.

SCOPE

This procedure relates to Riverina (Australia) Pty Ltd Casino Mill at Lot 101, DP 860152, Reynolds Road, Casino, New South Wales.

INTRODUCTION

Site location marked below; Reynolds Road, Casino, New South Wales. (Map 1)

Neighbouring Land Uses;

To the immediate South sale yards land and beyond is Boral,
To the West sale yards land,
To the North Council property, quarried and waste glass storage,
To the East (across Reynolds Road), Northern Co-Operative Meat Works farmland.
No residential properties in the immediate vicinity.

KEY ACTIVITIES & PROCESSES

Riverina (Australia) Pty Ltd (Riverina) supplies animal feed for the Australian agriculture industry and is also an exporter of grain and protein meals to South East Asia, the Pacific Rim and other export markets. Riverina's operations include procurement and trading of grain and agricultural commodities, milling of stockfeed, including beef and dairy cattle, birdseed mixes, pig feeds, poultry, sheep, goats, horse feeds and pasture supplements

POTENTIAL POLLUTION TYPES

The most likely environmental emergencies that may be encountered include:

Organic oil spill or molasses that reaches the stormwater system watercourse.
The sources may include:

- IBCs containing liquid vegetable oil.
- Bulk oil unloading from road tanker

Gas leak and/or fire. The sources may include:

- LPG bulk tank,
- LPG tank for filling fork lift tanks,
- LPG fork lift fuel tanks.

Air pollution from unusual particulate stack emission cause of which may include:

- Production trials.
- Dust produced when unloading grain trucks on the grain unloading pit.

Recycled Vegetable Oil: is delivered in bulk road and pumped into the RVO Tank, which is inside the liquid storage bund. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company.

Molasses Liquid: is delivered in bulk road and pumped into the Molasses Tank, which is inside the liquid storage bund. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company.

Waste Oil: All Waste Oil generated shall be stored in sealed black oil waste drums and stored adjacent to the large liquid bund. These drums are taken away by a contractor and the contents recycled off our premises.

Oil /Water Emulsions: These may develop inside the liquid bund if and when there is a leak of oil inside the confined space of the liquid bund. The Production manager arranges for the contents of the bund be pumped out by a liquid waste disposal contractor.

Boiler Water: Boiler water waste is contained in the Boiler Blowdown Water. The Production manager arranges for the contents of the bund be pumped out by a liquid waste disposal contractor.

Septic Waste: The septic systems discharge the treated water through a watering system which waters the grass at the western side of the site.

Bulk Grain: Bulk grain if spilled is swept up by personnel and can be added back into the process if not contaminated with foreign material. Alternatively, the waste is tipped into the bulk waste bins provided and serviced by a waste management company.

Raw Material: Bagged raw materials used on site if spilled are swept up by personnel and can be added back into the process if not contaminated with foreign material. Alternatively, the waste is tipped into the bulk waste bins provided and serviced by a waste management company.

Hydrochloric Acid: Hydrochloric acid is utilised to control the pH of the water in the boiler blow down sump. This product is stored in a separate container or in the portable bund area. Maximum quantity stored on site is 2 x 20 litre drums. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company.

Boiler water treatment chemical: Various boiler water treatment chemicals are used on site to control the level of total dissolved solids in the boiler water. These products are stored in 15 litre drums. These products are stored in the portable bund area. Maximum quantity stored on site is 10 x 15 litre drums. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company. (Alpha 1, Kappa Silver, Transpol 392 and Omega Tan).

Insectaguard: A pyrethrum chemical used on site to treat flies and other insects. Insectaguard is supplied in a 25 litre drum and is stored in the portable bund area. Maximum quantity stored on site is 1 x 25 litre drum. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company.

Gear oil: Gear oil is used on site to lubricate the numerous gearboxes. The gear oil is in 20 litre drums and is stored in the portable bund area. Maximum quantity stored on site is 3 x 20kg drums. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company. (Gulf Western Industrial gear oil 220)

Lubricant: Lubricant is used on site to lubricate various items of equipment. Lubricant is in 20 litre drums and is stored in the portable bund area. Maximum quantity stored on site is 2 x 20kg drums. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company.

Pyrafog: Pyrafog is a pyrethrum and is used on site to treat flies and other insects. Pyrafog is in a 60litre drum and is stored in the portable bund area. Maximum quantity stored on site is 1 x 60 litre drum. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company.

Thinners: Thinners is used on site for cleaning some equipment in the workshop and when painting. The thinners comes in 20 litre drums and is stored in the portable bund area.
Maximum quantity stored on site is 2x 20litre drums. Any spills outside the liquid bund are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company. (Recochem all-purpose thinner)

Diesel: Diesel is used on site to fuel the bulk delivery transport fleet and company vehicles. Maximum quantity stored is 29,050L in a self-bunded storage tank with a concrete pad with drainage for use when refuelling. Any spills outside the concrete pad are absorbed by bentonite (clay absorbent material), swept up and disposed of into the bulk waste bins provided and serviced by a waste management company.

AdBlue: AdBlue is a diesel exhaust fluid used in vehicles with Selective Catalytic Reduction (SCR) technology to reduce harmful gases being released into the atmosphere.
AdBlue is stored in a standalone tank that is self-bunded / double walled.

Fish Oil: Fish Oil is delivered in 1000 litre IBC's which are stored in the bunded area for use in the feed mill.

POTENTIAL POLLUTION TYPES

The Riverina Casino site has three main storm water easements located on the boundaries of the site on the West, North-West and North-East of the site.
Significant pollutant risks outside of the direct control of the building premises are the Diesel Pod, the Main Bund, holding Recycled Vegetable Oil and Molasses and the Air Compressor Services area. Two other identified areas of interest are the rear roadway, managed with the sedimentary fence and the truck cleaning location, currently decommissioned and not in use.

1 West - Storm Water Easement

2 North West – Storm Water Easement

3 North East – Storm Water Easement

1 Diesel Pod

2 Oil/Molasses Bund

3 Air Compressor Services

4 General Sediment Roadway

5 Decommissioned Truck Cleaning

Risk Identification

Risk Assessment Process

The environmental risk assessment identifies aspects that may cause a risk of harm to the environment and assesses the level of impact. Environmental risk assessments are used for determining the significance of impacts on the environment. The process of risk assessment is explained below.

How likely is an event to occur?

Level	Descriptor	Description
5	Almost Certain	The event is expected to occur in most circumstances
4	Likely	The event will probably occur in most circumstances
3	Moderate	The event should occur at some time
2	Unlikely	The event could occur at some time
1	Rare	The event may occur only in exceptional circumstances

If it does, what are the worst-case scenario consequences?

Level	Descriptor	Description
1	Insignificant	Low financial loss, negligible if any environmental impact
2	Minor	On site release immediately contained, minor and reversible impact. Generation of waste. Normal resource consumption. Medium financial loss.
3	Moderate	On site release contained with outside assistance. Potential release to stormwater. Incident reported to authorities. Minor but reversible impact. Generation of waste requiring disposal as controlled wastes. Significant consumption of resources, e.g. gas, water, electricity and raw materials. High financial loss.
4	Major	Loss of production capability. Off site release contained with outside assistance. Incident reported to authorities, major but reversible impact. Major financial loss.
5	Catastrophic	Toxic release off site with detrimental effect. Immediate involvement of authorities, major and irreversible impact. Huge financial loss.

	Multiply severity by likelihood				
	Likelihood				
Severity	1	2	3	4	5
1	1	2	3	4	5
2	2	4	6	8	10
3	3	6	9	12	15
4	4	8	12	16	20
5	5	10	15	20	25

Risk Prioritisation		
	RISK LEVEL	**SUGGESTED ACTIONS**
	Low Risk	Manage by Routine Procedures
	Moderate Risk	Prerequisite programs with specific environmental actions
	High Risk	Specific processes to manage risk

Management Procedure

The Branch Manager is responsible for notifying the authorities. The Branch Manager is authorised to call upon support from the business, should the circumstances require.
In the event of a major incident on site only the Managing Director or his delegate, shall be authorised to make any statements to the media or public.

For general environmental emergency preparedness and response, the site follows Emergency First Response Manual OPM 1300-2

Notification Procedure – Neighbours

The nature and direction of the incident will determine the most appropriate neighbours to be notified. In the event of a pollution incident the Branch Manager will be the person responsible for notifying any affected neighbours. In their absence the responsibility will site with the Production Manager.

Table 1; Notification List

Authorities to Notify of Pollution Incidents	
Environmental Protection Authority (EPA) Tel: (02) 6640 2500 Fax: (02) 6642 7743 Tel: 13 1555 24 hrs	Richmond Valley Council Tel: (02) 6660 0300
Work Cover NSW Tel: 131 050 Fire and Rescue NSW Tel: 000	Lismore Base Hospital Tel: (02) 6621 8000
Neighbour Notification	
Boral Timber Tel: (02) 6670 8700	Northern Co-Operative Meat Company Ltd. (NCMC) Tel: (02) 6662 2444
Casino Saleyards Tel: (02) 6662 6403	Richmond Valley Council Tel: (02) 6660 0300 24Hrs 7 Days/Week

Table 2; Notification Template for the Site Employees

Safety First	• Care of Workers – Evacuate the Area if there is any danger to personnel. • Care of Environment – contain spills, put out fires ONLY if safe to do so.		
Treatment	**Provide First Aid or Medical Treatment, if required**		
	Ambulance	000	
	Lismore Base Hospital	(02) 6621 8000	Uralba St, Lismore NSW 2480
Minor Spills or Emissions	• Stop the source of the spill if safe to do so. • Contain the spill (Spill Kits) and control its flow from the site. • If pollution has escaped the site or if the spill has potential to harm the environment, report the spill to Branch Manager, who will notify Managing Director, General Manager Feed Division and Workplace Systems Mangers. • Be safe rather than sorry; report any pollution no matter how small to the Branch manager.		
Majors Spills or Emissions	• For large scale hazardous spills call the NSW Fire and Rescue immediately on 000 (triple zero). • Control pollution flow from leaving the site where possible. • If pollution has escaped the site or if the spill has potential to harm the environment, report the spill to Branch Manager, who will notify Managing Director, General Manager Feed Division and Workplace Systems Mangers. • Contact Grelie Waste who are able to pump liquid wastes into the liquid waste removal truck for disposal, Tel: (02) 6662 2510. • Call key people listed below in order.		
Notify Key People	Production Manager		Mob: 0429 919 700
	Branch Manager		Mob: 0438 181 059
	Health Safety & Environment Manager		Mob: 0428 756 824
	Quality Manager		Mob: 0428 682 555
	Chief Operating Officer		Mob: 0408 767 533
Media Relations	In the event of a major incident on site only the Managing Director or his delegate, shall be authorised to make any statements to the media or public.		

Emergency Response Equipment

The site maintains the following emergency equipment and has the ability to engage spill control assistance of Grelie Waste.

i. Liquid Spills can be absorbed by Bentonite (clay)
ii. Fire extinguishers
iii. Fire Hose Reels

Incident Response Procedure

A person has a duty to notify the Branch Manager and in their absence the Production Manager when – while carrying out any activity – the person becomes aware that an event has happened that causes or threatens to cause material environmental harm.

Emergency incidents such as those involving

a. The release of contaminants into the stormwater system.
b. Hazardous materials from fires.
c. Spillage of chemicals that require involvement of emergency response personnel.

Material Environmental Harm includes actual or potential harm to the health or safety of humans or the ecosystem.

Training

Training of site personnel will include the following elements.

Training	**Objective**
PIRMP overview	Understand the elements of the PIRMP and how it supports the environmental obligations of the business
Environmental Obligations	Understand the expectations of staff in managing and controlling environmental.
Spill Management	Instructional information for the successful deployment of spill kit equipment in the event of an incident
Storm Water Management	Instructional information for management of storm water easement and actions required to maintain health of waterways.

Plan Testing, review and Maintenance

The PIRMP will be reviewed following a significant pollution incident covering deficiencies identified in the investigation. The performance of the plan and the sites infrastructure and team member skill base will be assessed as a part of investigation and continuous improvement.

Internal audits and reviews are used to confirm that the processes and outputs meet the requirements of the management system. Internal audits of the EMS are outlined in the Audit Schedule. Outcomes from internal audits are classed as opportunities for improvement and are reviewed by the Chief Operating Officer.

Audit process includes challenge testing the requirements and expectations of the Pollution Incident Response Management Plan.

Approval & History

Issue	Amended paragraphs/pages	Amendment Details	Date issued
1	New PIRMP	New PIRMP	04/07/2014
2	Approved by	Change to CEO	26/04/2016
3	Potential Pollution Types	Additions to chemicals on site	27/05/2016
	Immediate incident response Procedure	Added neighbours contact numbers	27/05/2016
4	Contact details	Internal executive and senior management changes inclusive of phone contact details have changed	06/04/2018
5	Potential pollution types Potential pollution types Potential pollution types Notification template for site employees Notification template for site employees	Remove Alimet — no longer in use Remove poultry oil — no longer in use Remove Kappa 1— no longer in use Update phone number for Boral Timber Update phone number for WHS Manager	24/05/19 24/05/19 24/05/19 24/05/19 24/05/19
6.	Sanitiser	Remove Quat — No longer used	19/06/2021
7.	Regional Manager	Change to Branch Manager	26/06/2021
8.	Potential pollution types	Change to Insectaguard. Pyrafog no longer used.	26/06/2021
9.	Potential pollution types	Change to Alpha 1. Change to Kappa Silver Change to Transpol 392 Change to Omega Tan	26/06/2021
10.	HSE Manager Managing Director	Added HSE Manager Change mobile number	07/07/2023 17/07/2023
11.	HSE Manager Branch Manager General Manager Manufacturing Division Reviewed by General Manager Manufacturing Division Reviewed by Managing Director Potential Pollution Types Potential Pollution Types Potential Pollution Types	Change mobile number. Change mobile number. Change to Chief Operating Officer Change to Chief Operating Officer Changed to Director Addition of diesel Addition of Fish Oil Addition of AdBlue	16/05/2024 16/05/2024 16/05/2024 16/05/2024 16/05/2024 21/05/2024 21/05/2024 21/05/2024
12.	Storm water / Pollutant potentials	Inclusion of map Internal Audit of PIRMP Challenge testing of PIRMP Training elements	24/01/2025
13.	HSE Manager update. Risks Reviewed. Approval process. AD Blue	Change of mobile number. Nil additions. Inclusion of signatures. Change in storage contatiner.	03.06.2026

Approved by:

Akira Matsui, Managing Director.

Michael Greenwood, Chief Financial Officer.