



ENVIRONMENTAL & POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Riverina (AUSTRALIA) Pty Ltd

1. PURPOSE

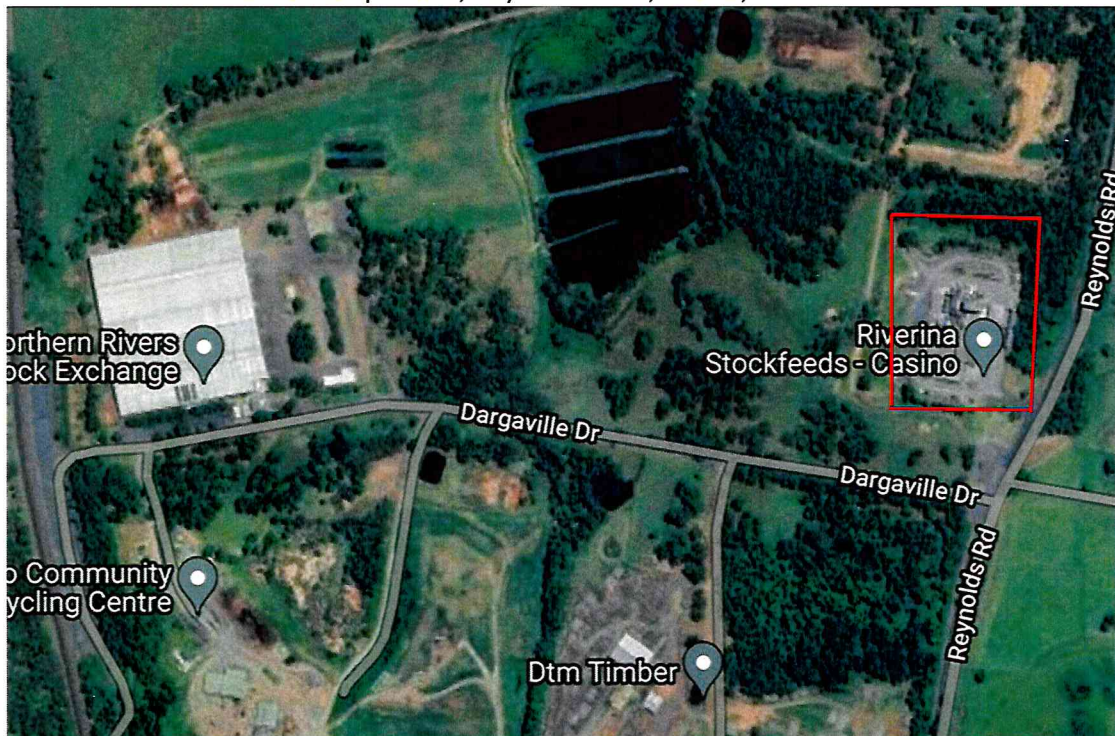
The purpose of this procedure is to ensure the Riverina (Australia) Pty Ltd comply with the requirements to prepare a Pollution Response Management Plan (PIRMP) under section 153A of the POEO Act 1997.

2. SCOPE

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

3. INTRODUCTION

Site location marked in red on the map below; Reynolds Road, Casino, New South Wales.



Map 1;

Neighbouring Land Uses;

To the immediate South sale yards land and beyond is DTM Timber,
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.

4. 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.

5. 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 but are not limited to:

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

Gas leak and/or fire. The sources may include but are not limited to:

- 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 but are not limited to:

- 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 to 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: Insectaguard is a pyrethrum and is used on site to treat flies and other insects. Insectaguard is 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.

Thinners: Thinners is used on site for cleaning some equipment in the workshop and when painting. The thinners come in 20 litre drums and are 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 1000 litre IBC's on portable bunded tanks.

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

6. Risk Identification

a. 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. Offsite 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.

Add the levels above to find risk level.

Level of Risk	Consequences				
	Insignificant	Minor	Moderate	Major	Catastrophic
Likelihood	1	2	3	4	5
5 (almost certain)	6	7	8	9	10
4 (likely)	5	6	7	8	9
3 (moderate)	4	5	6	7	8
2 (unlikely)	3	4	5	6	7
1 (rare)	2	3	4	5	6

Risk Prioritisation		
	RISK LEVEL	SUGGESTED ACTIONS
	Low Risk	Manage by Routine Procedures
	Moderate Risk	Responsibility and action dates must specified
	High Risk	Reduce as soon as possible
	Extreme Risk	Immediate action to Reduce the Risk

7. Management Procedure

The Branch Manager is responsible for notifying the authorities.

In the event of an incident on site only the Managing Director or his delegate, shall be authorised to make any statements to the media or public.

8. 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 sit with the Production Manager.

9. Immediate Incident Response Procedure

Table 1; Notification Template for the Management Team

Site Management Team	Authorities to Notify of Pollution Incidents
Branch Manager	Environmental Protection Authority (EPA) Tel: (02) 6640 2500 Fax: (02) 6642 7743 Alternative Tel: 131 555 24 hrs
Workplace Systems Manager	SafeWork NSW Tel: 131 050
	Lismore Base Hospital Tel: (02) 6621 8000
Branch Manager	Richmond Valley Council Tel: (02) 6660 0300 24Hrs 7 Days/Week
Branch Manager (or in EMERGENCY, Production Manager or Shift Supervisor)	Fire and Rescue NSW Emergency Tel: 000 Alternative Tel: 1300 729 579

Table 1 Supplemental for specific Incident types affecting neighbours;
Notification Template for the Management Team

Site Management Team	Neighbours to be notified
Branch Manager	Northern Co-Operative Meat Company Ltd. (NCMC) Tel: (02) 6662 2444
	Casino Saleyards Tel: (02) 6662 6403
	Boral Timber Tel: (02) 6670 8700
	Richmond Valley Council Tel: (02) 6660 0300 24Hrs 7 Days/Week

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Riverina (AUSTRALIA) Pty Ltd – CASINO MILL

Table 2; Notification Template for the Site Employees

Safety First	<ul style="list-style-type: none">❖ 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	<ul style="list-style-type: none">❖ 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	<ul style="list-style-type: none">❖ 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 the Production Manager who will report to the Branch Manager, who will notify the Chief Operating Officer, Health Safety & Environment Manager, Workplace Systems Managers and Managing Director.❖ Contact Grelie Waste who is 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
	Workplace Systems Manager		Mob: 0409 099 218
	Chief Operating Officer		Mob: 0408 767 533
	Managing Director		Mob: 0455 087 342
Media Relations	In the event of an incident on site only the Managing Director or his delegate, shall be authorised to make any statements to the media or public.		

10. Emergency Response Equipment

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

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

11. 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.

12. Plan Testing, review and Maintenance

- a) The PIRMP will be reviewed following a significant pollution incident covering deficiencies identified in the investigation.

13. 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	Remove Alimet – no longer in use	24/05/19
	Potential pollution types	Remove poultry oil – no longer in use	24/05/19
	Potential pollution types	Remove Kappa 1 – no longer in use	24/05/19
	Notification template for site employees	Update phone number for Boral Timber	24/05/19
	Notification template for site employees	Update phone number for WHS Manager	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

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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

Reviewed by:

Director

Approved by:

Managing Director



Annual Return

RIVERINA (AUSTRALIA) PTY LIMITED

Licence 5848

A. Statement of Compliance - Licence Details

ALL Licence holders must check that the Licence details in Section A are correct.

If there are changes to any of these details, **you must advise Environment Protection Authority (EPA) and apply as soon as possible for a variation to your Licence or for a Licence transfer.**

Licence variation and transfer application forms are available on the EPA website at: <http://www.epa.nsw.gov.au/licensing-and-regulation/licensing> or from regional offices of the EPA, or by contacting by telephone 02 9995 5700.

If you are applying to vary or transfer your Licence, you must still complete and submit this Annual Return.

A1. Licence holder

Licence number : 5848
Licence holder : RIVERINA (AUSTRALIA) PTY LIMITED
Trading name (if applicable) : RIVERINA STOCK FEEDS
ABN : 76 010 755 254
ACN :
Reporting period : From: 12-5-2023 To: 11-5-2024

A2. Premises to which Licence Applies (if applicable)

Common name (if any) : RIVERINA STOCK FEEDS
Premises : LOT 101 REYNOLDS ROAD CASINO 2470 NSW

A3. Activities to which Licence Applies

Agricultural processing

A4. Other Activities (if applicable)

A5. Fee-Based Activity Classifications

Note that the fee based activity classification is used to calculate the administrative fee.

Fee-based activity	Activity scale	Unit of measure
General agricultural processing	> 30,000.00 - 100,000.00	T annual processing capacity

A6. Assessable Pollutants (if applicable)



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Note that the identification of assessable pollutants is used to calculate the **load-based fee**.
The following assessable pollutants are identified for the fee-based activity classifications in the licence:

B. Monitoring and Complaints Summary

B1. Number of Pollution Complaints

Pollution Complaint Category	Complaints
Air	0
Water	0
Noise	0
Waste	0
Other	0
Total complaints recorded by the licensee during the reporting period	0

B2. Concentration Monitoring Summary

For each concentration monitoring point identified in your licence, details are displayed below. If concentration monitoring is not required by your licence, **no data** will appear below.

If data was provided from an uploaded file, the file name will be displayed below instead of any data.

Note that this does not exclude the need to conduct appropriate concentration monitoring of assessable pollutants as required by load-based licensing (if applicable).

B3. Volume or Mass Monitoring Summary

For each volume or mass monitoring point identified in your licence, details are displayed below. If volume or mass monitoring is not required by your licence, **no data** will appear below.

If data was provided from an uploaded file, the file name will be displayed below instead of any data.

Note that this does not exclude the need to conduct appropriate volume or mass monitoring of assessable pollutants as required by load-based licensing (if applicable).

C. Statement of Compliance - Licence Conditions

C1. Compliance with Licence Conditions

Were all conditions of the licence complied with (including monitoring and reporting requirements)?	Yes
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D. Statement of Compliance - Load Based Fee Calculation



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RIVERINA (AUSTRALIA) PTY LIMITED

Licence 5848

If you are not required to monitor assessable pollutants by your licence, **no data** will appear below.

If assessable pollutants have been identified on your licence, the following worksheets for each assessable pollutant will determine your load based fee for the licence fee period to which this Annual Return relates.

Loads of assessable pollutants must be calculated using any of the methods provided in EPA's Load Calculation Protocol for the relevant activity. A Load Calculation Protocol would have been already sent to you with your licence. If you require additional copies, you can download the Protocol from the EPA's website or you can contact us on telephone 02 9995 5700.

You are required to keep all records used to calculate licence fees for four years after the licence fee was paid or became payable, whichever is the later date.

E. Statement of Compliance - Requirement to Prepare PIRMP

Have you prepared a Pollution Incident Response Management Plan (PIRMP) as required under section 153A of the Protection of the Environment Operations (POEO) Act 1997?	Yes
Is the PIRMP available at the premises?	Yes
Is the PIRMP available in a prominent position on a publicly accessible website?	Yes
Address of the web page where the PIRMP can be accessed ▼	
www.riverina.com.au	
Has the PIRMP been tested?	No
Has the PIRMP been updated?	Yes
The PIRMP was last updated on	21-5-2024
Number of times the PIRMP was activated in this reporting period?	0
The PIRMP was activated on	

F. Statement of Compliance - Requirement to Publish Pollution Monitoring Data

Are there any conditions attached to your licence that require pollution monitoring to be undertaken as required under section 66(6) of the Protection of the Environment Operations (POEO) Act 1997?	No
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G. Statement of Compliance - Environment Management System and Practices



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RIVERINA (AUSTRALIA) PTY LIMITED

Licence 5848

Do you have an ISO 14001 certified Environmental Management System (EMS) OR any other system that EPA considers is equivalent to the accountability, procedures, documentation and record keeping requirements of an ISO 14001 certified EMS?	No
Have you conducted an assessment of your activities and operations to identify the aspects that have a potential to cause environmental impacts and implemented operational controls to address these aspects?	Yes
Have you established and implemented an operational maintenance program, including preventative maintenance?	Yes
Do you keep records of regular inspections and maintenance of plant and equipment?	Yes
Do you conduct regular (at least yearly) environmental audits at the premises that are conducted by a competent and independent person?	Yes
Have you undertaken an independent environmental audit covering documented environmental practices, procedures and systems in place during the annual return period?	No
Have you established and implemented an environmental improvement or management plan?	Yes
Do you train staff in environmental issues that may arise from your activities and operations at the premises and keep records of this?	Yes

H. Signature and Certification

This Annual Return may only be signed by person(s) with legal authority to sign it as set out in following categories: an Individual, a Company, a Public authority or a Local council.

It is an offence under section 66 of the Protection of the Environment Operations Act 1997 to supply any information in this form that is false or misleading in a material respect, or to certify a statement that is false or misleading in a material respect. There is a maximum penalty of \$250,000 for a corporation and \$120,000 for an individual.

I/We

- declare that the information in the Monitoring and Complaints Summary in Section B of this Annual Return application is correct and not false or misleading in a material respect, and
- certify that the information in the Statement and Compliance in sections A, C, D, E, F, G and H and any other pages attached to Section C is correct and not false or misleading in a material respect.