Pollution Incident Response Management Plan

JBS Yambinya Feedlot

NSW

Document Owner:

Troy White – Group Environment Manager

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1. Introduction

1.1. Purpose

This Pollution Incident Response Management Plan (PIRMP) has been developed to document the processes required to prepare for and respond to pollution incidents at the JBS Yambinya Station, Jimbaringle Road, Burraboi, NSW 2732.

The purpose of this plan is to:

- Comply with the legislative requirements outlined in the POEO Act.
- Outline the procedure for timely communication of an incident to staff, relevant authorities and appropriate stakeholders
- Ensure hazards to the environment, human health and safety are eliminated and where this is not possible minimized to an acceptable level.
- Detail the controls and policies in place to ensure that this plan is effectively implemented and regularly reviewed by management and staff
- Satisfy the requirements for publishing the PIRMP on the company website

1.2. Scope

This PIRMP applies to all JBS employees, contractors and visitors located at the JBS Yambinya Station, Jimbaringle Road, Burraboi, NSW 2732.

This document will act as a standalone document but will also be incorporated into JBS's Emergency Response Plan that has been developed in accordance with Australian Standard AS3745.

The Emergency Response Plan provides comprehensive details of emergency management procedures to be followed during an emergency event.

The license details which this PIRMP apply to are provided in the table below:

TABLE 1: YAMBINYA EPL

Environment Protection Licence Summary		
Licence (EPL) Number:	5245	
Licensee's Name:	JBS Australia Pty Limited	
Premises Address:	Yambinya Station, Jimbaringle Road, NSW 2732	
Scheduled Activities:	Extractive activities Livestock Intensive Activities	
Fee Based Activities:	Cattle, sheep or horse accommodation based extractive activity	Scale: > 2500 T accommodation Land > 50000-100000 T annual Capacity to extract, process or store

All environmental risks and environmental incidents will be managed through the implementation of this Plan. The PIRMP also details the pre-emptive actions that have been implemented at the site, these include:

- Specific measures implemented to minimise the risk of an incident occurring due to spillage, storage of hazardous materials or fire;
- inventory of potential pollutants on site;
- minimum safety equipment requirements;
- communication with the community;
- minimising harm to persons;
- training of personnel; and
- testing of the PRIMP

1.3. Aims and Objectives

The PIRMP has been prepared to provide a system and resources to deal with emergency situations to protect people, property and the environment.

The objectives of the plan are to:

- maintain a high level of preparedness;
- to respond quickly and efficiently to limit the impacts of an emergency;
- to manage an emergency until the emergency services arrive and take control;
- to support emergency services with information, knowledge, skills and equipment;
- to protect emergency responders, personnel and the community from harm;

- Ensure correct regulatory notifications are satisfactorily completed in the event of potential or actual environmental harm.
- This version of the plan is to satisfy the requirement for publishing the PIRMP on the company website.

1.4. Definitions

Dangerous Goods	Substances that may be corrosive, flammable, explosive, spontaneously combustible, toxic, oxidising or water reactive. If not controlled they can cause immediate injury, death and/or damage.
Emergency Controller (s)	The emergency controller is responsible for any incident from the time it occurs until the senior officer in charge of the emergency services arrives and assumes control of the situation. Control of the situation will be given back to the emergency controller only by the authority of the senior officer in charge of emergency services.
Emergency Response	Actions taken by personnel outside of the immediate work area to address an environmental incident.
Emergency	A non-routine incident or activity that could have serious effects on the environment, property or the health or safety of employees, contract employees, customers or the community. It may be caused on the site or by an external factor (e.g. weather) and may also occur as a knock on effect from an off-site occurrence which has impacts within the facility boundaries.
External Emergency	An emergency where the impacts are expected both within the facility and beyond the boundary of the facility. Emergency services will be required.
Hazardous Substance	Substances that may have the potential to harm human health. These substances may be solids, liquids or gases (they may be pure substances or mixtures). When used, opened, consumed or spilt, these substances can generate vapours, fumes, dusts and mists.
Material Safety Data Sheets (MSDS)	A document that is supplied by the manufacturer and/or supplier of substances that describes the chemical composition and provides vital information on how persons should use these substances safely and in accordance with their designated use. All chemicals held on site must have an MSDS.

1.5. Site Description

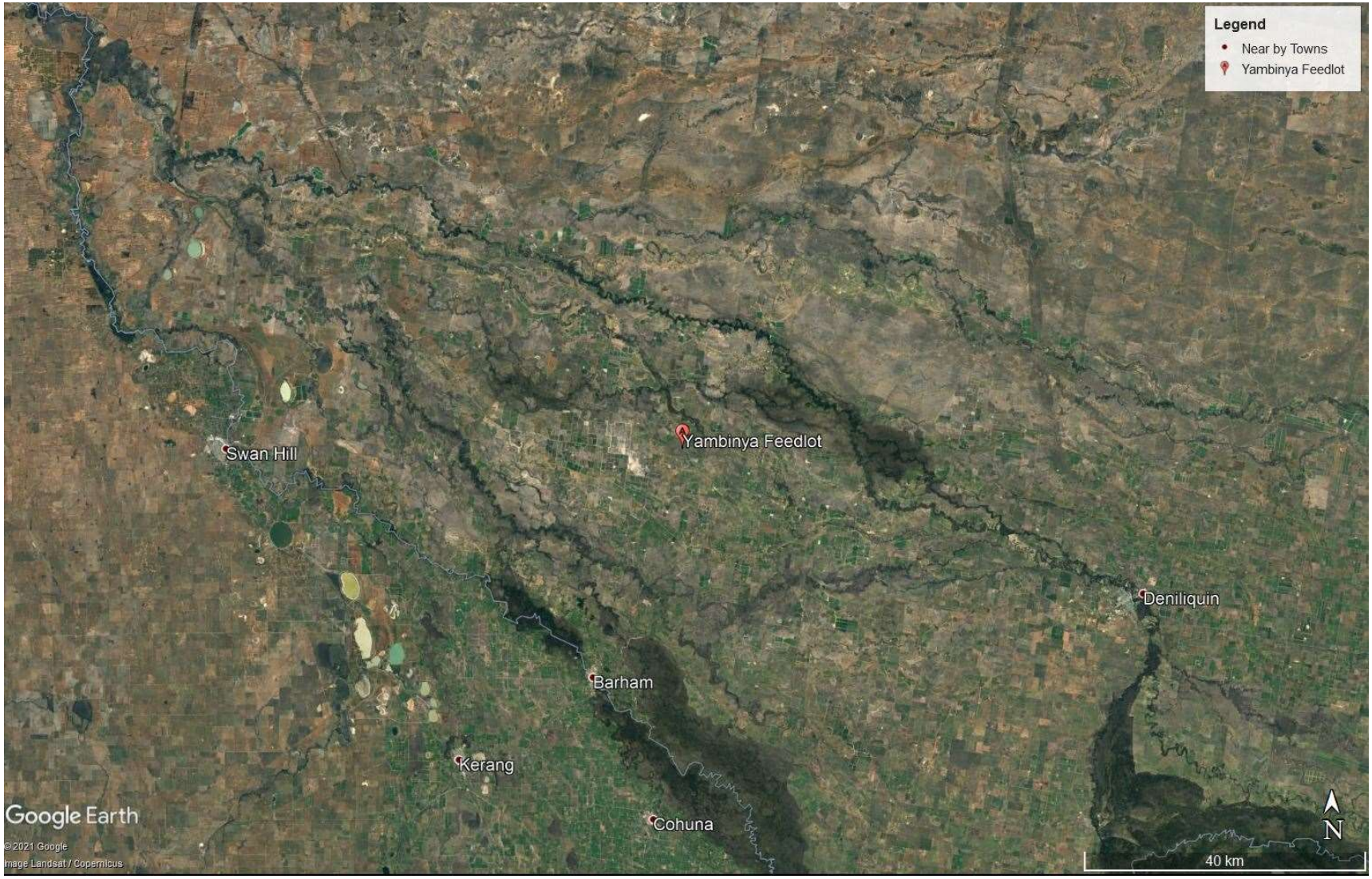
The Yambinya Station is a licensed feedlot for cattle and sheep with a maximum holding capacity of 25,000 head of cattle and 45,000 head of sheep at any one time. The feedlot is located on 205.52 hectares (lot 26 and lot 77 DP T56543) situated 65kms Northwest from the town of Deniliquin, NSW (Refer Hazard and **Pollution Identification**).

Activities at the JBS Yambinya site include:

Cattle and Sheep Feedlot Operations

- *Induction yards/holding pens for receiving & dispatching cattle and sheep via road transport*
- *Cattle Feedlotting*
- *Cattle feed mix preparations including feed batching, milling and delivery*
- *Cattle and sheep welfare activities including downer management*
- *Pen maintenance, manure removal and composting activities*
- *Sand quarry extraction*
- *Crop generation, harvesting and silage storage*
- *Manure composting*
- *Administration and amenities*

FIGURE 1: JBS YAMBINYA FEEDLOT LOCALITY



2. Hazard and Pollution Identification

2.1. Potential Pollutant Inventory

A master Safety Data Sheet (SDS) spreadsheet contains an inventory of potential pollutants that are stored on the premises at Yambinya. This inventory includes details of potential pollutants, the maximum quantity that is likely to be stored and whether the substances have the potential to be associated with a material pollution incident.

The following table identifies the primary potential pollutants and maximum quantity which may be stored on site at any time. The storage locations are detailed within - Appendix A.

TABLE 2: POTENTIAL POLLUTANT INVENTORY

Potential Pollutant	Maximum Storage Quantity
Molasses	120 Tonnes
Diesel	25,000 LT
Lube oil	2,000 LT
Waste oil	2,000 LT
Veterinary chemicals	Average approx. 500 L

Environmental site inspections are completed on a regular basis as per the requirements set out in the sites EMP and CEMS. These inspections include an assessment of environmental controls (i.e. bunding, spill kits, etc) associated with chemical and other potential pollutant storage locations. If corrective actions are required, they are entered into a maintenance program for tracking and completion.

2.2. Hazard Identification and Assessment

The JBS corporate EMS includes a standardised risk assessment process. This risk assessment process is illustrated in **Error! Reference source not found.** below and uses the Environmental Significance and Risk Assessment Tool to assign a significance score for each potential impact and then determine the level of risk.

A risk assessment of the potential environmental and health impacts associated with the JBS Yambinya facility has been undertaken using the JBS risk assessment process. The outcomes of this risk assessment are detailed within **Error! Reference source not found.** below.

FIGURE 2: JBS RISK ASSESSMENT PROCESS

Environmental Significance Rating

Scale x Severity x Sensitivity = Significance Score

Risk Rating:

Significance Score x Control Rating x Probability = Risk Rating

ENVIRONMENTAL SIGNIFICANCE & RISK ASSESSMENT TOOL					
Applicable to the evaluation of Significant Environmental Impacts				Applicable only to Risk Level evaluation	
RATING:	SCALE: (Volume of discharge or usage/ Cost)	SEVERITY:	SENSITIVITY:	CONTROL RATING:	PROBABILITY: (With existing Controls in place)
1	Insignificant	No detectable change to the environment, internally contained	No complaints, no perceived legal / community threat	Fully Controlled	Rare/Remote – theoretically possible, has not occurred
2	Low	Reversible, internally contained requiring clean-up, short term change to the environment	Employees / neighbour / community concern / potential legal exposure	<75% Effective Controls	Unlikely – not expected, has not occurred in the past 10 years
3	Medium	Reversible change to the environment, off-site release (accidental or uncontrolled)	Community / local media attention / legal exposure (e.g. breach of license) / Non-Compliance with Kraft Policy	<50% Effective Controls	Possible - Likely – potential to occur multiple times per year
4	High	Irreversible change to the environment, uncontrolled off-site release	National media attention / legal exposure / Non-Compliance with Kraft Policy	<25% Effective Controls	Almost Certain – known to occur

Significant Score Rating:
1 to 11 Environmental Impact (EI)
12 to 64 Significant Environmental Impact (SEI)

Risk Rating:
1 to 128 Low Risk (LR)
129 to 431 Medium Risk (MR)
432 to 1024 High Risk (HR)

TABLE 3 POTENTIAL ENVIRONMENTAL AND HEALTH IMPACTS

Risk Category	Description of Risk/Hazard	Significance Score	Mitigation Strategies (Pre-emptive actions)	Risk Rating
Water	Inadequate disposal / use of sewage, wastewater and/or residual water (contamination of local groundwater and surface water resources). Depletion of natural resources (water). Possible non-compliance with licence requirements.	Scale: 2 Severity: 3 Sensitivity: 3 Score: 18 SEI	• Complete regular environmental inspections and reviews of risk assessments / registers. • Regular inspections and maintenance of the stormwater drainage network. • Complete groundwater and other environmental monitoring in accordance with licence requirements. • Ensure all equipment is regularly serviced to ensure there are no breakdowns in the process. • Provide training to all staff on the risks associated with inappropriate disposal of effluent. • Storage of chemical/waste should be away from surface water drains and gullies to avoid any environmental pollution in the event of leakage. • Undertake regular sustainability reporting (i.e. water use) to track water usage and reduce where possible.	Controls: 2 Probability: 2 **Risk: 72 LR**
Land/Soil	Inadequate disposal / use of sewage, wastewater and/or waste (contamination of soil e.g. oil spillage). Possible non-compliance with licence requirements.	Scale: 2 Severity: 3 Sensitivity: 3 Score: 18 SEI	• Complete regular environmental inspections and reviews of risk assessments / registers. . • Complete soil monitoring in accordance with licence requirements. • All relevant employees to complete waste management training. • Ensure all equipment is regularly serviced to ensure there are no breakdowns in the process.	Controls: 2 Probability: 2 **Risk: 72 LR**

Risk Category	Description of Risk/Hazard	Significance Score	Mitigation Strategies (Pre-emptive actions)	Risk Rating
Hazardous Substances	Spills or leaks of chemicals resulting in emissions to air, water or soil. Breaches of EPA licence and associated legislation. Production of Hazardous waste.	Scale: 3 Severity: 3 Sensitivity: 3 Score: 27 SEI	• Establish and maintain a SDS register • Complete regular environmental inspections and reviews of risk assessments / registers. • All relevant staff to complete spill response training and ensure adequate clean-up of any spills. • Ensure effective implementation of this PIRMP and the Emergency Response Plan • Ensure spill containment devices are available and appropriately serviced at regular intervals. • Ensure all hazardous substances are appropriately stored, bunded and labelled. • Undertake a chemical tracking and risk assessment process for all new chemicals brought onto site. • Ensure that employees only handle hazardous substances after appropriate training and assessment.	Controls: 2 Probability: 2 **Risk: 108 LR**
Fire and Explosion	Fire and / or explosion caused by the ignition of flammable and explosive products stored on site.	Scale: 3 Severity: 3 Sensitivity: 3 Score: 27 SEI	• Establish and maintain a SDS register. • Complete regular environmental inspections and reviews of risk assessments / registers. • Ensure all hazardous substances are appropriately stored and labelled. • Undertake a chemical tracking and risk assessment process for all new chemicals brought onto site. • Ensure adequate firefighting equipment and training is available and provided to appropriate staff • Ensure effective implementation of this PIRMP and the Emergency Response Plan	Controls: 1 Probability: 2 **Risk: 54 LR**

Risk Category	Description of Risk/Hazard	Significance Score	Mitigation Strategies (Pre-emptive actions)	Risk Rating
Biological Hazards	Production of hazardous biological waste. Environmental pollution due to spills or leaks of chemicals resulting in emissions to air, water or soil. Breaches of EPA licence and associated legislation.	Scale: 2 Severity: 2 Sensitivity: 3 Score: 12 SEI	• Develop, review and maintain a program to control the risk of blood borne diseases. • Appropriate storage and disposal of biological waste products. • Ensure effective implementation of this PIRMP and the Emergency Response Plan	Controls: 2 Probability: 2 **Risk: 48 LR**
Air	Emissions to air including chemical emissions, airborne contaminants, dust, vehicle emissions and odour causing potential compliance issues and community complaints. Possible hazards to staff and local community if hazardous emissions to air arise.	Scale: 2 Severity: 3 Sensitivity: 3 Score: 18 SEI	• Complete regular environmental inspections and reviews of risk assessments / registers. • Regular maintenance and inspection of point source emission sources (i.e. boilers) in accordance with manufacturer specifications. • Undertake dust suppression activities where appropriate • Maintain a community compliant register and investigate dust or odour complaints (if received). • Ensure hazardous waste is stored in designated facilities as per the SDS spreadsheet. • Provide environmental awareness training to all appropriate staff.	Controls: 2 Probability: 2 **Risk: 72 LR**
Noise exposure	Noise pollution causing nuisance to nearby sensitive receptors. Compliance issues /breach of licence.	Scale: 2 Severity: 3 Sensitivity: 3 Score: 18 SEI	• Noise dampening on appropriate equipment and machinery has been undertaken to reduce noise emissions. • Complete occupational health and safety noise monitoring as required. • Maintain a community compliant register and investigate noise complaints (if received). • Provide environmental awareness training to all appropriate staff.	Controls: 2 Probability: 2 **Risk: 48 LR**

Risk Category	Description of Risk/Hazard	Significance Score	Mitigation Strategies (Pre-emptive actions)	Risk Rating
Security Risks	Unauthorised persons accessing the facility and causing damage to equipment or processes, leading to environmental damage.	Scale: 2 Severity: 2 Sensitivity: 3 Score: 12 SEI	• Provide appropriate security to prevent unauthorised persons entering site and ensure appropriate control devices (i.e. valves) are locked or secured where possible.	Controls: 1 Probability: 1 **Risk: 12 LR**

2.3. Safety and Emergency Response Equipment

Safety equipment is located at a number of locations throughout the site. This equipment is checked regularly in accordance with the Occupational Health and Safety Plan (OH&S) plan.

Spill response kits are stored in the maintenance workshop (Appendix A). The site does have confined spaces and confined space emergency rescue equipment is located in the weighbridge office. The kits are inspected and replenished as required.

The site has a trained emergency response team and an emergency alarm system.

For the Feedlot, communication during an emergency is via internal/mobile phones and CB radio (dedicated internal channel for the site).

First aid kits are located in various buildings across the facility and maintained by an occupational First Aider.

The Maps located in Appendix A detail the locations of emergency & evacuation response equipment throughout the site.

2.4. Incident Response

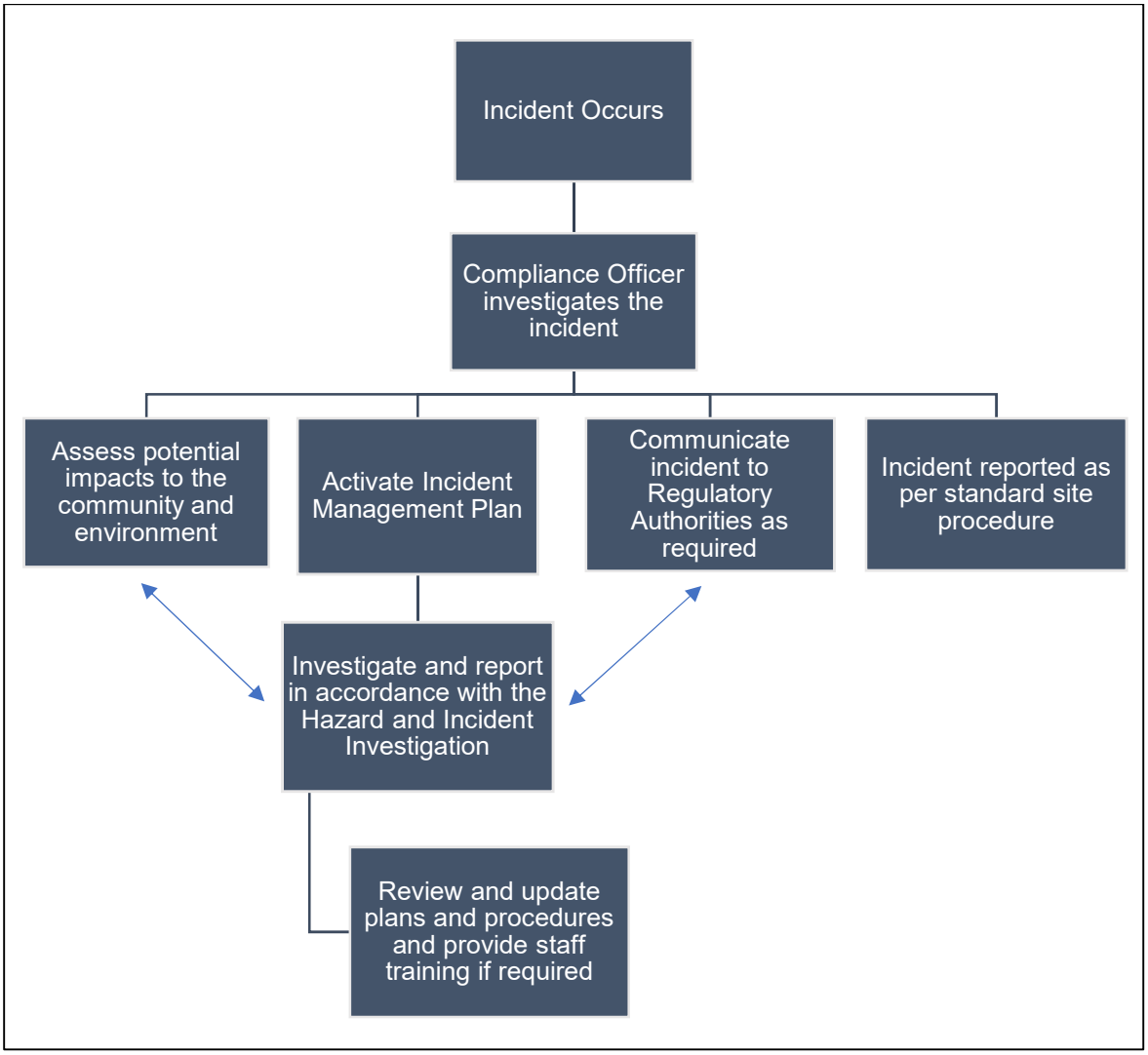
The incident response process is outlined in **Error! Reference source not found.** and includes initial containment, clean-up, notification and investigation. In addition, incident response procedures are further detailed within the following documents:

Emergency Response Plan: Provides procedures to be followed in the event of an emergency (including environmental incidents)

Spill Response Procedure: Details requirements for notification, containment and clean-up of spills (Appendix C).

Environmental Hazard / Incident Report: Is used for the reporting and investigation of environmental incidents. Includes a description of the incident, risk assessment and identification of corrective actions (Appendix B).

FIGURE 3: JBS INCIDENT RESPONSE PROTOCOL



3. Communication

3.1. Communication with Regulatory Authorities

In the unlikely event that a significant environmental incident occurs (i.e breach of EPA license) a phone call will be made to the appropriate authority by the Environmental Compliance Manager or delegate or another member of the Emergency Planning Committee as nominated by the Management Team. Contact details are provided in **Error! Reference source not found.**.

TABLE 4: INCIDENT OR EMERGENCY CONTACTS

JBS Contacts	Name	Phone
Yambinya Feedlot Manager Chief Warden	Ben Wade	(03) 5887 3296 (M) 0427 795 613
Yambinya Operations Manager Deputy Chief Warden	Adrian Fisher	(M) 0458 010 005
Yambinya Feedlot Commercial and Compliance Officer, Environmental Delegate Warden	Haylee Elliot	(03) 5887 3296
JBS Group Environment Manager	Troy White	(03) 9316 4732 (M) 0409 189 308
JBS Environmental Compliance Manager	Neville Fiegert	(03) 9316 4733 (M) 0499 494 966
Government Contacts		**Phone**
EPA		131 555
Albury Council		(02) 6022 0600
SafeWork		131 050
Fire & Rescue NSW		1300 729 579
Emergency Services		000
NSW Ministry of Health		(02) 9391 9000

3.2. Communicating with Local Residents

Community stakeholders that are potentially affected by an environmental incident at the JBS Yambinya feedlot will be notified immediately by one of the following methods:

- Phone call by the Environmental Delegate or Feedlot Manager; or
- Door knocking by an appropriate site representative.

Any additional communication will be determined by the nature of the event or as directed by the relevant agency. Regular updates will be provided to the affected community stakeholders throughout the course of the event.

In the event of a major pollution incident, residents or businesses may be further contacted by an emergency service representative, such as in a case where evacuation or critical safety actions are necessary.

An 'all-clear' telephone call will also be made to residents when the incident is no longer of concern or normality has been restored.

Note: In the event of an emergency, the Chief Executive (or their delegate) may only make Press Statements on behalf of JBS Australia.

4. Training

Relevant staff and contractors complete an induction that includes environmental components relating to the following:

- General environmental duties under relevant legislation;
- Providing details on the sensitivity of the site and importance of adhering to environmental procedures;
- Raising awareness of environmental signage that is displayed on the site;
- Emergency numbers are to be clearly displayed; and
- Environmental procedures to be followed.

5. Document Availability

In accordance with Section 153D of the POEO Act, this PIRMP will be made available to all site personnel via the site document control system. A hard copy of the plan will also be available at the Yambinya Feedlot site office.

In addition, this plan will be made available to the public via the following methods:

- Uploading a public version of the plan to the JBS Australia website at http://www.jbssa.com.au/
- Providing copies of the public version of the Plan, without charge, to any member of the public who may request a copy.

6. Testing of Plan

This Plan will be tested and reviewed at least once every twelve (12) months to ensure that the information contained within the plan is accurate and up to date, and that the Plan is capable of being implemented in a workable and effective manner.

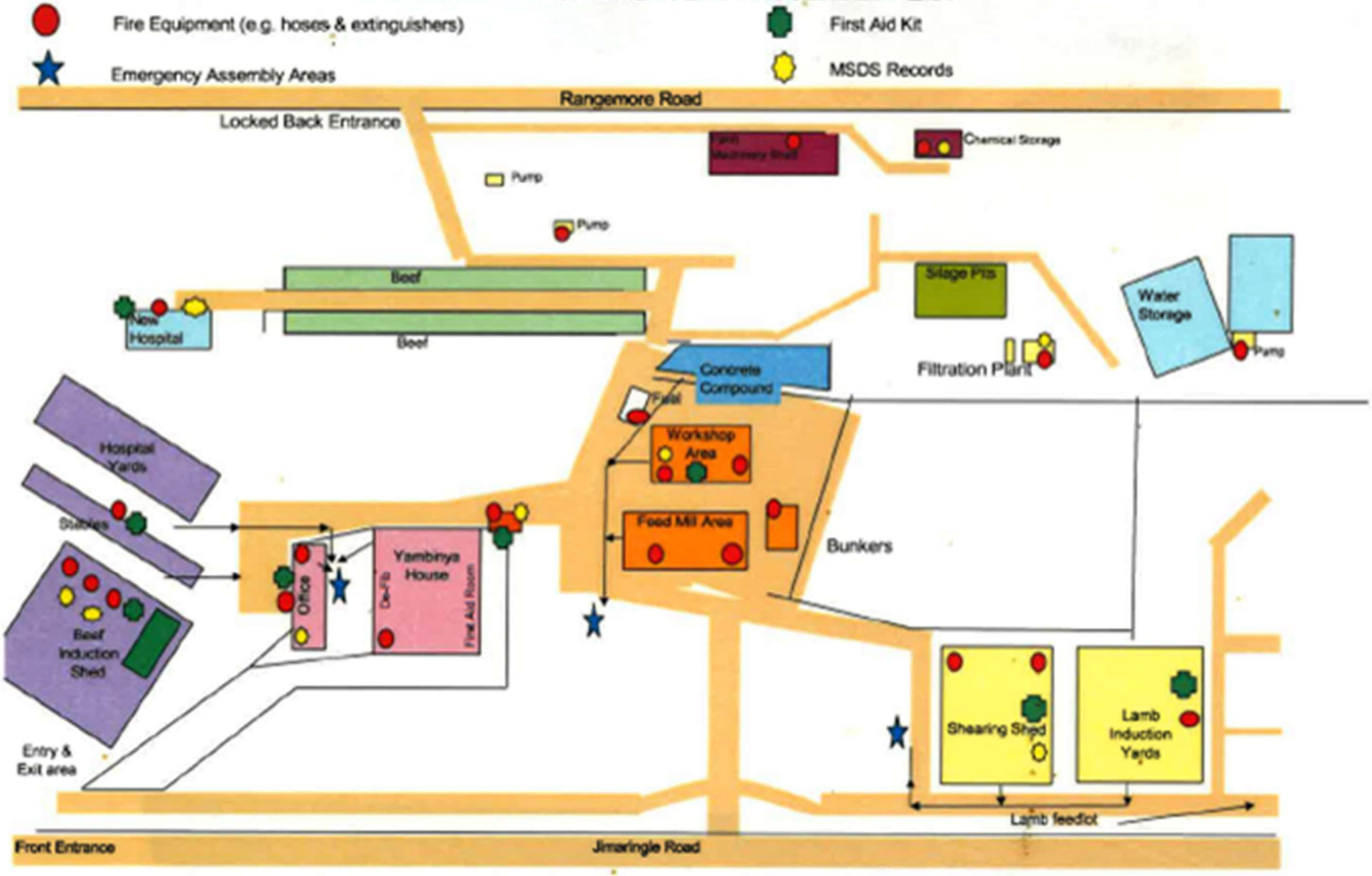
The review will consist of a desktop review of the content within this PIRMP to ensure accuracy. A review of the testing of the plan (i.e. emergency exercise) will be undertaken following each exercise to determine any required modifications to this PIRMP.

TABLE 5: PIRMP TEST RECORD

Method	Staff Members	Incident Type	Date
Desktop Revision	Ben Wade, Haylee Elliot, Neville Fiegert, Troy White	Desktop review to ensure PIRMP content is valid and can be followed in the event of an incident.	26.02.2021
Scenario	Ben Wade, Adrian Fisher, Haylee Pottage	Fire emergency – Hay Stack fire	26.12.2020
Desktop Revision	Ben Wade, Adrian Fisher, Haylee Pottage	Fire evacuation	01.06.2020

Appendix A:- Chemical Storage & Isolation Locations

YAMBINYA FEEDLOT EMERGENCY ASSEMBLY PLAN



EVACUATION PROCEDURES

STAGE 1:- Removal of people from the immediate Danger Area
Occupants and staff in the immediate danger area are to assemble a safe distance away from the fire and smoke. When the area has been evacuated all doors and windows should be closed to contain fire.

STAGE 2:- Removal to a Safe Area
If the severity of the smoke or fire warrants further **evacuation**, occupants should be moved through fire / smoke to a safe area.

STAGE 3:- Complete Evacuation of Entire Complex
Should the emergency necessitate **evacuation** of the whole building, the Manager or the Fire Service will direct occupants from the safe place to the **ASSEMBLY AREA**.

STAGE 4:- Roll Call.
To be conducted as soon as possible and to ensure all Persons are accounted for. Report all missing persons to **FIRE OFFICERS**.

STAGE 5:- ASSEMBLY AREA

SAFETY MEASURES

- Always turn off all electrical appliances and shut all doors.
- Your first role is life safety, only attempt to extinguish fire **IF SAFE TO DO SO.**

Mobility impaired persons should evacuate immediately on hearing the fire alarm assisted by a nominated person.

FIRE EXTINGUISHER OPERATION

- Stand well back from fire (3 M)
- Always face the fire with your back to a clear doorway
- Always be in pairs
- Use the PASS method
  - P - pull the pin
  - A - aim at edge of fire
  - S - squeeze the handle
  - S - sweep the fire

As the fire diminishes, slowly move closer towards the FIRE staying 1 m

FIRE FIGHTING EQUIPMENT

Installed in this building are:

Dry Powder Extinguishers (red with white band)

Check the Extinguisher label for instructions.

Under no circumstances should you use water on or near live electrical equipment.

HOSEREEL

MANUAL CALL POINT

EXTINGUISHER

FIRST AID

SWITCH BOARD

EXIT SIGN

PATH OF EXIT

ASSEMBLY AREA

IN CASE OF FIRE

FIRE / EVACUATION PROCEDURES

R EMOVE PEOPLE
IF IN DANGER TO THE ASSEMBLY POINT

A LERT THE FIRE SERVICE
NEARBY RESIDENCE AND MEMBERS OF THE PUBLIC

C ONFINE FIRE & SMOKE
CLOSE ALL WINDOWS & DOORS (IF SAFE TO DO SO)

E XTINGUISH
AND CONTROL THE FIRE (IF SAFE TO DO SO)

Appendix B:- Environmental Hazard or Incident Investigation Report

JBS AUSTRALIA Pty Limited ABN: 14 011 062 258	Document Subject: Corporate Environmental Management System (CEMS) **Environmental Hazard or Incident Investigation / Regulatory Contact Report** DOCUMENT NUMBER: CEMS_10.2_CA_F1

Report Date:		Report Number:	

Site/Location		Area of Incident:	
Aspect & Impact Register Reference #			
Incident date		Incident time:	
Type of notification			
Regulatory Body Notified Contact person details?			
Name of person/s reporting			
Nature of Incident			
What happened?			

Evaluation of Environmental Risk (refer EV 2-1)	Scale	Severity	Sensitivity	Significance Rating 1-11 (LR) / 12 – 64 (SR)	Control	Probability	Risk Rating 1-120 (LR) / 128-424 (MR) 432-1024 (HR)
	X	X	=	X	X	=	

Immediate corrective action/s taken	
Corrective actions to be taken	
Status of investigation:	

Further information contact:	Name:		Position:	
	Phone:		Mobile:	
Site Manager Approval	Name:			
	Signature:		Date:	

Appendix C:- JBS Spill Response Procedure

JBS Spill Response Procedure

Notification

All spills need to be considered serious until verified otherwise. The factors which will determine the seriousness of the spill are the nature of the material, the location of the spill and the volume of material released. As a spill can result in WHS, Environmental or Production risk, any spill which is not consistent with NORMAL discharge is to be reported to the area supervisor.

1. Notify the area Supervisor immediately.
2. The area Supervisor must determine whether or not the Weighbridge is notified and thus the Emergency Response Team. At this point the spill will be treated as an incident.
3. If the spill is determined to be normal, the clean up as per normal operations or consult the MSDS or environmental / compliance officer.

For the purpose of the environment, the weighbridge should be notified if:

- Spills escape the Bunded Areas and cannot be controlled;
- When spills are discharged into effluent;
- The material cannot be disposed of to effluent;
- The material must not directly enter the effluent ponds; and
- The material may result directly or indirectly in odour.

Areas outside effluent Catchment:

- The material could contaminate soils or kill plants/trees;
- Could contaminate water courses including storm water; and
- Could contaminate ground water.

Spills should be cleaned up as instructed. However in Principle:

- Contain the spill;
- Control the discharge;
- Determine the disposition of spill and adsorbent material; and
- Clean the area thoroughly to prevent further contamination.

The incident and clean-up is performed in consultation with the Compliance Officer, Feedlot Manager and/or Corporate Environmental Team.

Environmental Spills should be recorded in CEMS_10.2_CA_F1 Environmental Hazard or Incident Investigation and Regulatory Contact Reporting and may require reporting to the EPA.