



# **Pollution Incident Response Management Plan**

**JBS Prime City Feedlot  
NSW**

Document Owner:

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# 1. Introduction

## 1.1. Background

This Pollution Incident Response Management Plan (PIRMP) has been developed to document the processes required to prepare for and respond to pollution incidents at JBS's Prime City facility at Jones Road, Tabbita NSW 2652.

The purpose of this plan is to:

- 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

This plan has been prepared in accordance with the requirements introduced by the Protection of the Environment Legislation Amendment Act 2011 and the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plan) Regulation, 2012.

## 1.2. Scope & Purpose

This PIRMP applies to JBS's Prime City Feedlot at Jones Road, Tabbita NSW, the license details of which are provided in the table below:

Company	JBS
License Holder (ABN)	JBS Australia Pty Limited
Environmental Protection License (EPL) Number:	5725
Scheduled Activities	Agricultural Processing (> 100000 – 250000 T processed) Livestock Intensive Activities (>2500 T accommodated)
Site Name and address	Prime City Feedlot, Jones Road, Tabbita NSW 2652



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. Site Description**

The Prime City Feedlot is a 35,000 head capacity, 4000-hectare feedlot located 45 kilometres northwest of Griffith in the Riverina, NSW. Prime City has state-of-the-art infrastructure, including a modern grain processing facility with tempered grain, 24-hour steeping capacity, steam flaking ability and 3 mills. Uniform yard design and comprehensive cattle handling systems.. With a secure water supply and large on-site water storage, the Prime City farm is able to supply some of the roughage and feed required by the feedlot.

### **1.4. Pollution Incident Response Management Plans**

This PIRMP applies to all employees, visitors and contractors within the boundaries of the Prime City facility. This document is designed to satisfy the requirements of the *Protection of the Environment Operations Act 1997* and the Protection of the Environment Operations (General) Regulation 2009. This document will act as a standalone document but will also be incorporated in the site Emergency Plan that has been prepared in accordance with Australian Standard AS3745. This plan provides comprehensive details of emergency management procedures to be followed during an emergency event.



## 2. Hazard and Pollution Identification

A list of hazardous and dangerous goods listed in the permits held by Prime City Feedlot was developed with an appropriate spill response. Site inspections are regularly carried out by the Compliance Supervisor at Prime City in order to identify potential hazards and pollutants.

The following pollutants may be stored on site at any time:

- Diesel;
- Unleaded petrol;
- Lube oil;
- Pesticides and Herbicides; and
- Veterinary chemicals.
- Fertilisers

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

Site maps that detail the location of emergency response equipment are provided in Appendix A of this plan.

Environmental Site Inspections are completed on a regular basis as per the requirements set out in the EMP.

### 2.1. Hazard Identification and Assessment

JBS has developed a comprehensive Risk Register that details environmental and health risks that may occur due to a pollution incident. The figure 1 illustrates the risk assessment process that was developed to identify the appropriate management measures for environmental risks.

Table 1 provides an overview of the site specific environmental risks at the Prime City Feedlot.



Figure 1: Risk Assessment Matrix

**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 1: Overview of Environmental Risk at Prime City Feedlot**

Risk Category	Description of Risk/Hazard	Significance Score	Mitigation Strategies (Pre-emptive actions)	Risk Rating
<b>Water</b>	Incorrect disposal of sewage and/or residual water (contamination of local ground / water resources). Depletion of natural resources (water). Possible non-compliance with licence requirements.	Scale: 3 Severity: 3 Sensitivity: 3 <b>Score: SEI</b>	<ul style="list-style-type: none"> <li>Complete regular environmental risk assessments of the site.</li> <li>Ensure all equipment is regularly serviced to ensure there are no breakdowns in the process.</li> <li>Provide training to all staff on the risks associated with inappropriate disposal of effluent.</li> <li>Storage of chemical/waste should be away from surface water drains and gullies to avoid any environmental pollution in the event of leakage.</li> </ul>	Controls: 2 Probability: 3 <b>Risk: MR</b>
<b>Land/Soil</b>	Incorrect disposal of sewage and/or waste (contamination of soil e.g. oil spillage). Depletion of natural resources Possible non-compliance with licence requirements.	Scale: 2 Severity: 3 Sensitivity: 3 <b>Score: SEI</b>	<ul style="list-style-type: none"> <li>Complete regular environmental risk assessments of the site.</li> <li>All employees to complete waste management training as part of the environmental training programme.</li> <li>Ensure all equipment is regularly serviced to ensure there are no breakdowns in the process.</li> <li>Provide training to all staff on the risks associated with inappropriate disposal of effluent.</li> <li>Storage of chemical/waste should be away from surface water drains and gullies to avoid any environmental pollution in the event of leakage.</li> </ul>	Controls: 3 Probability: 3 <b>Risk: MR</b>

Risk Category	Description of Risk/Hazard	Significance Score	Mitigation Strategies (Pre-emptive actions)	Risk Rating
<b>Hazardous Substances</b>	<p>Environmental pollution due to spills or leaks of chemicals resulting in emissions to air, water soil or ground.</p> <p>Breaches of EPA licence and associated legislation.</p> <p>Production of hazardous waste</p>	<p>Scale: 3</p> <p>Severity: 3</p> <p>Sensitivity: 3</p> <p><b>Score: SEI</b></p>	<ul style="list-style-type: none"> <li>Develop, review and maintain a program for hazardous substances.</li> <li>Establish and maintain an SDS register Provide safe storage for hazardous substances.</li> <li>Ensure all hazardous substances are labelled.</li> <li>Conduct risk assessments on hazardous substances.</li> <li>Chemical Tracking and Risk Assessment Process for all new chemicals.</li> <li>Ensure that employees only handle hazardous substances after training and assessment.</li> <li>Storage should be away from surface water drains and gullies to avoid any environmental pollution in the event of leakage.</li> <li>Comply with Emergency Response plan &amp; Dangerous Goods Management.</li> </ul>	<p>Controls: 2</p> <p>Probability: 3</p> <p><b>Risk: MR</b></p>
<b>Fire &amp; Explosion</b>	<p>Flammable and explosive compounds are stored at the site.</p> <p>There is also a fire risk associated with a number of processes e.g. bulk gas storage, other fuel storage and ammonia storage and use.</p>	<p>Scale: 3</p> <p>Severity: 2</p> <p>Sensitivity: 2</p> <p><b>Score: SEI</b></p>	<ul style="list-style-type: none"> <li>Develop, review and maintain a program for hazardous substances.</li> <li>Establish and maintain an SDS register.</li> <li>Provide safe storage for hazardous substances.</li> <li>Ensure all hazardous substances are labelled.</li> <li>Conduct risk assessments on hazardous substances.</li> <li>Chemical Tracking and Risk Assessment Process for all new chemicals.</li> <li>Ensure that employees only handle hazardous substances after training and assessment.</li> </ul>	<p>Controls: 2</p> <p>Probability: 2</p> <p><b>Risk: LR</b></p>



Risk Category	Description of Risk/Hazard	Significance Score	Mitigation Strategies (Pre-emptive actions)	Risk Rating
<b>Biological Hazards</b>	<p>Production of hazardous biological waste.</p> <p>Environmental pollution due to spills or leaks of chemicals resulting in emissions to air, water soil or ground.</p> <p>Breaches of EPA licence and associated legislation. Production of hazardous waste</p>	<p>Scale: 2</p> <p>Severity: 3</p> <p>Sensitivity: 3</p> <p><b>Score: SEI</b></p>	<ul style="list-style-type: none"> <li>Adequate controls in place to ensure there is no release of these waste to the environment and community.</li> <li>Develop, review and maintain a program to control the risk of blood borne diseases.</li> <li>Compliance training and audits.</li> </ul>	<p>Controls: 2</p> <p>Probability: 3</p> <p><b>Risk: LR</b></p>
<b>Air</b>	<p>Emissions to air including chemical emissions, airborne contaminants, dust and smells and fumes.</p> <p>This can lead to compliance issues and complaints from the local community.</p> <p>Possible hazards to staff and local community if hazardous emissions to air arise.</p>	<p>Scale: 3</p> <p>Severity: 3</p> <p>Sensitivity: 3</p> <p><b>Score: SEI</b></p>	<ul style="list-style-type: none"> <li>Complete regular environmental risk assessments of the site.</li> <li>Ensure Hazardous waste is removed according to proper procedures.</li> <li>Ensure hazardous waste is stored in designated facilities as per the SDS spreadsheet.</li> <li>Emergency response equipment should be readily available.</li> <li>Environmental awareness training is provided to all staff.</li> <li>Notify the community if an incident occurs that may impact them</li> </ul>	<p>Controls: 2</p> <p>Probability: 3</p> <p><b>Risk: MR</b></p>
<b>Noise exposure</b>	<p>Noise pollution and annoyance of local community.</p> <p>Compliance issues /breach of licence.</p> <p>Impact on fauna and flora.</p>	<p>Scale: 3</p> <p>Severity: 3</p> <p>Sensitivity: 3</p> <p><b>Score: SEI</b></p>	<ul style="list-style-type: none"> <li>Noise dampening has been used to reduce noise.</li> <li>Noise survey conducted to identify areas of risk</li> <li>Noisy equipment has been removed from work area to reduce noise load</li> <li>Work approvals in place for noisy activities. Communicate with public if noisy activities will be taking place.</li> <li>Environmental awareness training for staff and contractors e.g. truck drivers accessing the site.</li> </ul>	<p>Controls: 2</p> <p>Probability: 3</p> <p><b>Risk: MR</b></p>

Risk Category	Description of Risk/Hazard	Significance Score	Mitigation Strategies (Pre-emptive actions)	Risk Rating
<b>Security Risks</b>	Unauthorised persons accessing the facility and causing damage to equipment or processes, leading to environmental damage.	Scale: 2 Severity: 2 Sensitivity: 2 <b>Score: EI</b>	<ul style="list-style-type: none"> <li>Provide appropriate security to prevent unauthorised persons interfering with the tank or opening valves, etc. That may lead to a spillage of liquids and/or gases and a subsequent fire risk and/or environmental pollution risk.</li> </ul>	Controls: 2 Probability: 3 <b>Risk: MR</b>
<b>Transport</b>	<p>Pollution of environment may arise from vehicle movement in yard associated with the following:</p> <ul style="list-style-type: none"> <li>Vehicle deliveries</li> <li>Reversing</li> <li>Delivery bays</li> <li>Vehicle loading</li> </ul> <p>There may also be noise and dust issues associated with the transportation of these items.</p> <p>Possible ground/soil erosion.</p> <p>Disturbance to neighbours and impacts to the local community.</p>	Scale: 2 Severity: 2 Sensitivity: 2 <b>Score: EI</b>	<ul style="list-style-type: none"> <li>Complete regular environmental risk assessments of the site.</li> <li>Provide training to all staff and subcontractors on the risks associated with transport.</li> <li>Apply specific mitigations e.g. dust, water noise, etc.</li> </ul>	Controls: 2 Probability: 3 <b>Risk: LR</b>
<b>General</b>	Carbon emissions. Resource depletion. Previously unidentified and uncontrolled hazards.	NA	<ul style="list-style-type: none"> <li>Complete regular environmental risk assessments of the site</li> <li>Compliance with EPA licence.</li> <li>Environmental awareness training for staff.</li> </ul>	NA



## **2.2. Safety Equipment & Maps**

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.

An equipped first aid facility is located at the entrance to the site and it is maintained by a Senior First Aider.

The Maps located in Appendix A details the locations of Emergency & Evacuation Response Equipment throughout the site.

## **2.3. Incident Response**

JBS's Emergency Response Plan provides comprehensive details of the procedures to be followed in the event of an emergency incident occurring (including environmental emergencies).

In addition to this JBS has developed a Hazard, Incident Investigation and Regulatory Contact Reporting Procedure (CEMS\_10.2\_CA\_1). The purpose of this procedure is to outline the processes for investigating and report all potential hazards, incidents and Regulatory Contact. The results of these investigation are then used to improve overall Environmental performance.

This plan details the procedure Environmental Incident Protocol in line with their EMP which also details corrective actions if an environmental incident should occur. A sample Non Compliance, Incident and Corrective Action form is included in Appendix B.

JBS' Environmental Spill Response Procedure is provided in Appendix C.

The illustration in Figure 1 below details the JBS process for responding to Environmental Incidents at the Prime City Feedlot.

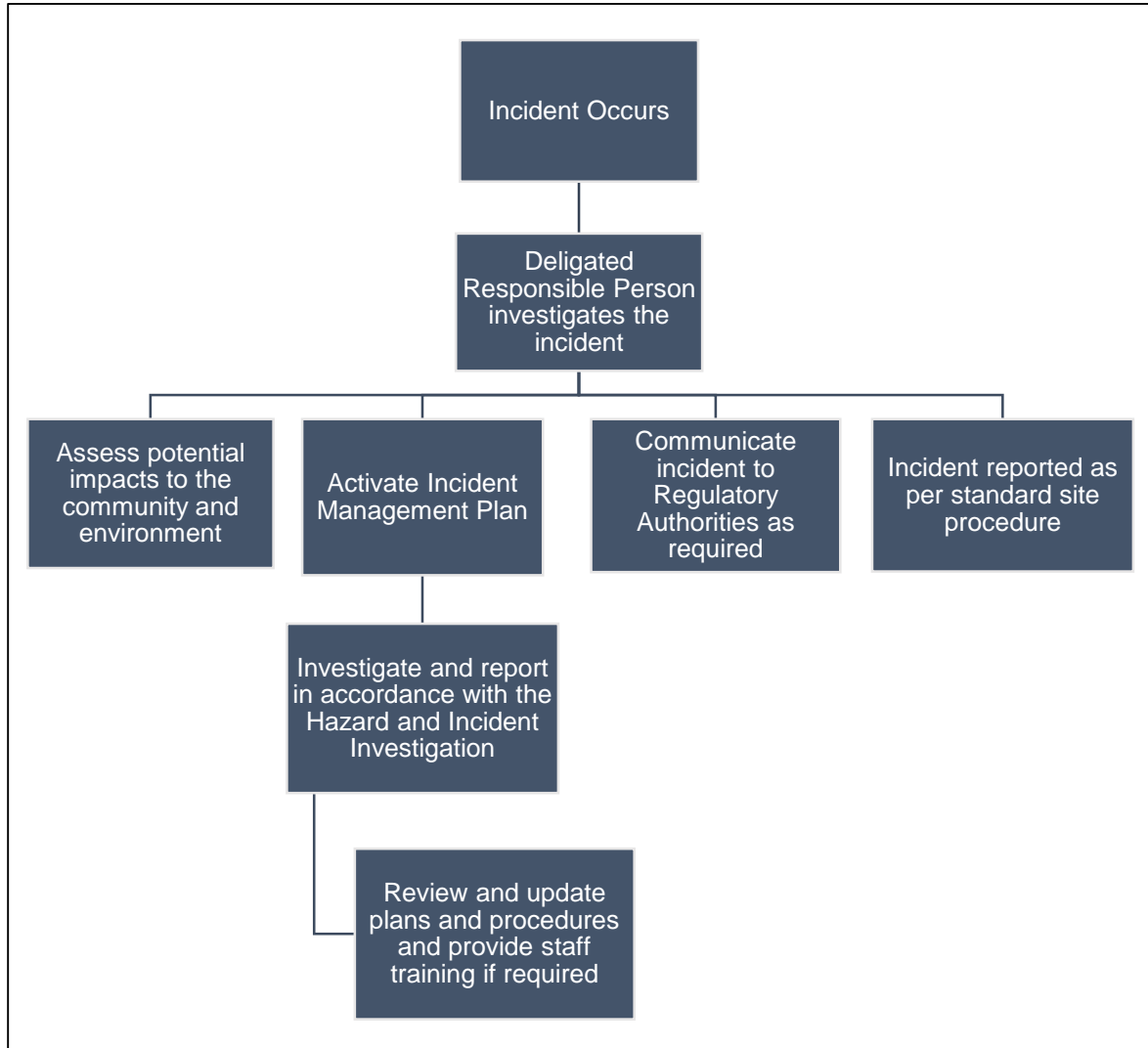


FIGURE 1: JBS INCIDENT RESPONSE PROTOCOL



### 3. Communication

#### 3.1. Internal Notification Details

Contact Position	Contact Details
Prime City Operations Manager	Office: (02) 6968 8514
Regional HR Advisor	Office: (02) 69511132
First Aid/HR Officer	Office: (02) 69511132
Environmental Compliance Manager - Northern	Office: (07) 3810 5482
Group Environmental Manager	Office: (03) 9314 1011

#### 3.2. External Authorities Notification Details

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 Operations Manager, Environmental Compliance Manager or delegate.

Authority	Local Authority	Contact Details
Emergency Services		000
EPA	Far West	131 555
Ministry of Health		(02) 9391 9000
Fire & Rescue NSW		000
Carrathool Shire Council		(02) 6965 1900
WorkCover NSW		131 500



### **3.3. Community Stakeholder Notification Details**

Community stakeholders that are potentially affected by an environmental incident at the JBS Prime City Feedlot event will be notified immediately by one of the following methods:

- Phone call by Operations Manager or delegate; 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 may only make Press Statements on behalf of JBS Australia.



## 4. Training & Document Control

### 4.1. Staff Awareness and Training

All staff and contractors are required to complete the one day “Introduction to Environment” induction training, all site staff are provided with sufficient environmental awareness training. The contents of this training include:

- Informing employees of their impacts on the environment and how they can prevent or minimise these impacts will lead to sound environmental practices;
- 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.

In addition, Feedlot employees will also participate in environmental awareness training as part of the Feedlot Cert III Programme and Task Technical Training Programme.

All persons who complete this training will be made aware of the contents of this plan. All persons will also be provided refresher training through the implementation of the Toolbox Talk Project.

### 4.2. Document Availability

In accordance with Section 153D of the POEO Act, the plan 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 Prime City 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.



### 4.3. 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.

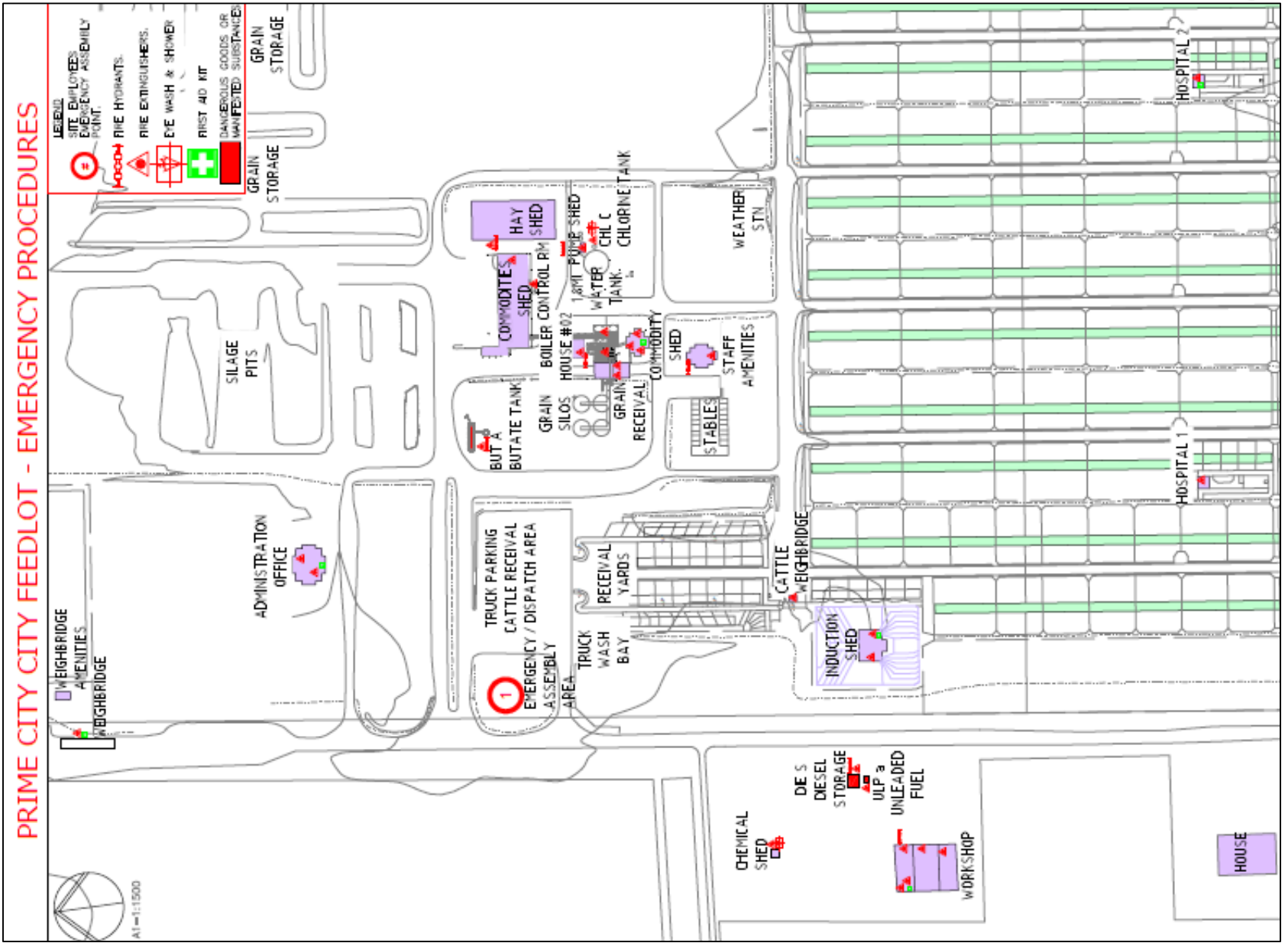
#### PIRMP Test Record

Method	Staff Members	Incident Type	Date
Desktop Revision	Emily Perkins Jessica Dunstan,	Desktop review to ensure PIRMP content is valid and can be followed in the event of an incident.	17.01.2020
Desktop Revision	Lauren Costin James Palfreeman Christina McInally	Desktop review to ensure PIRMP content is valid and can be followed in the event of an incident.	04.02.2021





## **Appendix A:- Chemical Storage & Safety Equipment Locations**





## **Appendix B:- Environmental Hazard or Incident Investigation Report**



Document Subject: Corporate Environmental Management System (CEMS)

# Environmental Hazard or Incident Investigation / Regulatory Contact Report

DOCUMENT NUMBER: CEMS\_10.2\_CALF1

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 2-4)	Scale	Severity	Sensitivity	Significance Rating	Control	Probability	Risk Rating
	X	X	=	1-41 (G) 43-51 (G) 1-41 (G) 43-51 (G)	X	=	4-130 (L) 138-171 (H) 432-4081 (R)
Immediate corrective action/s taken							
Corrective actions to be taken							
Status of investigation:							
Further information contact:	Name:	Position:					
	Phone:	Mobile:					
Site Manager Approval	Name:	Date:					
	Signature:						



## **Appendix C:- Spill Response Procedure**



## 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.