Document Title	Pollution Incident Response Management Plan
Department	Safety & Systems
Version Number	2.0
Scope	Clarrich Farms - Kilgra
Purpose	As per the Protection of the Environment Operations Act 1997 (the POEO Act), holders of an Environment Protection License must prepare, keep, test, and implement a pollution incident response management plan.

Table of Contents

1. Introduction 3
2. Abbreviations 3
3. Relevant definitions 3
4. Operating Procedure 4
   4.1 Site background 4
   4.2 Response procedures and responsibilities 6
   4.3 Description and risk assessment of pollution hazards 11
   4.4 Pre-emptive actions 11
   4.5 Inventory of pollutants 12
   4.6 Staff training 12
   4.7 Safety equipment 12
5. Plan Testing, Review and Update 13
6. Site Maps 15
7. Document History 18

1. Introduction

Clarrich Farms - Kilgra holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for *12 Masons Rd, Kilgra NSW 2474*. As per the Protection of the Environment Operations Act 1997 (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

If a pollution incident occurs during an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, the person carrying out the activity must immediately implement this plan in relation to the activity required by Part 5.7A of the POEO Act.

A copy of this plan must be kept at the licensed premises and be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan.

Parts of the plan must also be available either on a publicly accessible website, or by providing a copy of the plan to any person who makes a written request. The sections of the plan that are required to be publicly available are set out in section 74 of the Protection of the Environment Operations (General) Regulation 2022.

2. Abbreviations

- DC/DA: Development Consent OR Development Approval.
- EPL: Environmental Protection License.
- EMP: Environmental Management Plan.
- EPA: NSW Environment Protection Authority.
- POEO: Protection of the Environment and Operations Act 1997.
- PIRMP: Pollution Incident Response Management Plan.

3. Relevant definitions

- **Environmental Protection Licence**: An environmental protection licence is required for Schedule 2 activities under the Waste Management and Pollution Control Act 1998. Environment protection licences are generally associated with operational activity.

- **Environment:** Any component of the earth including land, air, water, any layer of the atmosphere, any organic or inorganic material, and any human-made or modified structures and areas.

- **Livestock Intensive Activities:** This term refers to production methods where the environment in total is provided for livestock to maximise productivity out of their rearing.

- **NSW Environment Protection Authority:** The EPA is the primary environmental regulator for New South Wales constituted by the Protection of the Environment Administration Act 1991.

- **Pollution:** The presence in or introduction into the environment of a substance which has harmful or poisonous effects. This term refers to water pollution, air pollution, noise pollution, or land pollution.

- **Pollution Incident:** Any incident or set of circumstances during or because of which there is or is likely to be a leak, spill or other escape or deposit of a substance, because of which pollution has occurred, is occurring or is likely to occur. This includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of noise.

- **Water:** As per the POEO, and for the purpose of this document, water is defined as the whole or any part of any river, stream, lake, lagoon, swamp, wetlands, unconfined surface water, natural or artificial watercourse, dam or tidal waters (including the sea), or any water stored in artificial works, any water in water mains, water pipes or water channels, or any underground or artesian water.

4. Operating Procedure

4.1 Site background

Clarrich Farms - Kilgra, part of Clarrich Farms Pty Ltd (A.C.N. 604 522) and part of the Riverbend Pork Group Pty Ltd (A.C.N. 604 522) is a registered pig breeding facility unit operating under EPA licence No 20048 and Kyogle council DA No 96/72 approved for the completion of animal accommodation as per details in Table 1.

Further details about the farm are already provided within Section 3 “Site Description” of the site EMP v1.1 dated 25/03/2025, pages 2 to 10.

Table 1. Site and EPL Details

4.1.1 Site Details:					
Site Name:	Clarrich Farms - Kilgra				
Site Address:	12 Masons Rd, Kilgra	**State:**	NSW	**Postcode:**	2474
Site Manager:	Arischa Vermaak	**Phone:**	0470 [redacted]		

4.1.2 Site Pictures:

4.1.3 Operator Details:					
Site Operator:	Clarrich Farms Pty Ltd				
Site Address:	487-489 Ruthven St, Toowoomba	**State:**	QLD	**Postcode:**	4350
Website:	https://www.riverbendgroup.com.au/our-responsibilities				
Company COO:	Andrew Morris	**Phone:**	0448 [redacted]		
Managing Director:	Jeremy Whitby	**Phone:**	0429 [redacted]		

4.1.4 Land Details:			
Landowner:	Glengowrie Farm Pty Ltd	**Phone:**	0429 354 604
Piggery Area (ha):	Approx. 1.75	**Pond Area (ha):**	Approx. 0.73
Property Area (ha):	Approx. 38.7	**Local Gov:**	Kyogle Council
Property No:	Lot 12 DP1132259	**Shed Year Built:**	Prior to 2007

4.1.5 Licence Details:			
Activity:	Pig accommodation	**Licence:**	20048
Information:	> 25,000 - 60,000 T accommodation capacity		

4.2 Response procedures and responsibilities

In the event of a pollution incident, suspected pollution incident, environmental nuisance event, or situation that has the potential to cause off-site environmental harm, the following procedure should be followed by all internal parties included within this document to the best of their knowledge as far as is reasonably practicable.

1. The staff member discovering the incident shall immediately notify the Site Manager or 2IC of the incident and its nature. Pollution incidents may include, but are not limited to:

   - ✓ Effluent spill, overflow, leak, pipe failure, or uncontrolled release.
   - ✓ Excessive pond level and freeboard concerns.
   - ✓ Irrigation runoff, spray drift, over-irrigation, or irrigation during rain events.
   - ✓ Odour event notified by neighbours or contractors on site.
   - ✓ Dust events from road usage, feed handlings, or earthworks.
   - ✓ Fire and/or smoke.
   - ✓ Chemical release or fuel spill.
   - ✓ Dead pit or sludge mismanagement causing off-site impact.
   - ✓ Contamination of stormwater, drains, creeks, waterways, or adjacent land.
   - ✓ Complaints from neighbours, businesses, regulators, or council.
   - ✓ Any other event that may cause environmental harm.

   The notification shall include, where known:

   - ✓ Location of the incident.
   - ✓ Type and nature of the incident.
   - ✓ Time the incident was discovered.
   - ✓ Whether the incident is ongoing or has stopped.
   - ✓ Estimated quantity or extent of any release.
   - ✓ Weather conditions, including wind direction, and rainfall.
   - ✓ Actions already taken.

2. Immediate action will be taken to stop, contain, or minimise the pollution incident as far as reasonably practicable. Relevant site specific or general procedures must be followed, including those outlined within the site EMP, BMP, Safe Work Procedures (SWP), Standard Operating Procedures (SOPs), Work Instructions (WIs), and any other relevant document.

   Depending on the nature of the incident, immediate actions may include:

   - ✓ Stopping the source of the release where safe to do so,
   - ✓ Shutting off pumps, valves, irrigators, or transfer systems,
   - ✓ Diverting flows away from stormwater drains, waterways, and roads.
   - ✓ Using bunds, earth banks, sandbags, absorbent material to contain spills.

- ✓ Recovering effluent, sludge, or contaminated material where possible.
- ✓ Increasing pond drawdown where appropriate and safe.
- ✓ Postponing or stopping irrigation during unsuitable wind and rainfall.
- ✓ Applying water to internal roads to reduce dust without generating runoff.
- ✓ Restricting vehicle movement on dusty roads.
- ✓ Covering, relocating, or securing material that may create dust or odour.
- ✓ Placing warning signs or barriers where required.

Important: *Before attempting containment, the Farm Manager and/or 2IC must ensure that staff, contractors, public, and animal safety are considered. Personnel must not place themselves at risk when responding to a pollution incident, appropriate personal protective equipment must be used, and unsafe areas must be isolated where required.*

Table 2. Riverbend Pork Group - Internal Stakeholders

Role	Name	Phone	Email
COO	Andrew Morris	0448[redacted]	[redacted].com.au
Managing Director	Jeremy Whitby	0429[redacted]	[redacted]com.au

3. The Site Manager OR 2IC must contact and advise all relevant internal stakeholders (via phone call preferably), as per details on Table 2, so a pre-assessment of the incident can be completed. It is also acceptable, in case of an emergency, for the Site Manager or 2IC to contact just one of the relevant internal stakeholders and request for that person to advise all other relevant roles while any containment or mitigation action is undertaken.

   The internal pre-assessment must consider the following items (aside from the initial notification):

   - ✓ Whether complaints have been received.
   - ✓ Whether the incident may cause environmental harm or nuisance.
   - ✓ Whether the event represents a breach of the EA conditions.
   - ✓ Whether external notification may be required.
   - ✓ Whether additional resources, contractors, or equipment are needed.

4. Upon discussion with all internal stakeholders and under management approval, responsible parties outlined in Table 3 section 4.2.2 must contact applicable emergency services and/or any regulatory authority as per Table 4.

Important: *Where the incident presents an immediate risk to people, animals, neighbouring properties, public roads, waterways, the environment, or farm infrastructure, emergency services must be contacted without delay. Management approval must not delay urgent emergency response. The Kyogle and Casino fire stations are staffed with "on-call" members ONLY and located 10 and 32 minutes away from the farm location. Subsequently any fire event will require the activation of the site Firefighting Plan until external assistance can be provided.*

5. Under management approval, contact neighbours outlined in Table 5 and as per Figure 1. If no contact number is available for neighbours, a company representative must travel to the property and advise of the emergency.

Table 3. Riverbend Pork Group PIRMP Responsible Parties

4.2.1 PIRMP Activation			
Criteria	**Responsible - 1**	**Responsible - 2**	**Responsible - 3**
Name:	Arischa Vermaak	2IC	Andrew Morris
Position:	Farm Manager	Piggery Attendant	Chief Operating Officer
Mobile:	0428 [redacted]	-	0448 [redacted]
Email:	c.kilgra@riverbend...	-	[redacted]
4.2.2 PIRMP Notification			
Criteria	**Responsible - 1**	**Responsible - 2**	**Responsible - 3**
Name:	Andrew Morris	Jeremy Whitby	Arischa Vermak
Position:	Chief Operating Officer	Managing Director	Interim Site Manager
Mobile:	0448 [redacted]	0429 [redacted]	0428 [redacted]
Email:	[redacted]	[redacted]	[redacted]
4.2.3 PIRMP Response			
Criteria	**Responsible - 1**	**Responsible - 2**	**Responsible - 3**
Name:	Arischa Vermak	2IC	Jeremy Whitby
Position:	Interim Site Manager	Piggery Attendant	Managing Director
Mobile:	0428 [redacted]	-	0429 [redacted]
Email:	c.kilgra@riverbend...	-	[redacted]

Table 4. Emergency Contacts - External

Relevant Contacts	Mobile	Website
Fire & Rescue NSW	000 (first notification)	https://www.fire.nsw.gov.au
Kyogle Fire Station	02 6690 6150	-
Casino Fire Station	02 6690 6153	-
EPA	131 555	https://www.epa.nsw.gov.au
NSW Health*	1300 066 055	https://www.health.nsw.gov.au
SafeWork NSW	13 10 50	https://www.safework.nsw.gov.au
Kyogle Council	(02) 6632 1611 - (02) 6626 6800	https://www.kyogle.nsw.gov.au

* *In NSW calling **1300 066 055** will direct you to the local Public Health Unit.*

Table 5. Neighbouring Properties - External

ID	Receptor	Distance (m)	Address	Phone
R1	[redacted]	Approx 161 W	983 Summerland Way	0428 [redacted]
R2	[redacted] (Empty shed)	Approx 457 SE	72 Masons Rd	0438 [redacted]
R3	[redacted] (Relative)	Approx 337 SE		
R4	[redacted]	Approx 406 SE		
R5	[redacted]	Approx 528 SW	923 Summerland Way	0427 [redacted]
R6	[redacted]	Approx 570 SW	924 Summerland Way	0427 [redacted]
R7		Approx 523 SW	922 Summerland Way	
R8	[redacted] (Empty shed)	Approx 428 N	1038 Summerland Way	0417 [redacted]
R9	[redacted]	Approx 441 NE		

Neighbour and receptor notification may be required for incidents involving:

- ✓ Offensive or abnormal odour.
- ✓ Dust leaving the site.
- ✓ Smoke or fire plume moving off site.
- ✓ Effluent and sludge moving towards adjacent land, roads, or waterways.
- ✓ Irrigation runoff, spray drift, or over-application.
- ✓ Traffic disruption or public safety concerns.

Nearby receptors have been identified using a risk-based approach that considers:

- ✓ Distance from the piggery complex.
- ✓ Receptor sensitivity.
- ✓ Wind direction,
- ✓ Likely incident pathways.
- ✓ Complaint history.

Important: *The NEGIP Level 1 and Level 1.5 odour separation methods have not been used to determine odour impact from this existing facility as they are not applicable to existing premises. However, the receptor categories and community amenity principles in NEGIP have been used to identify potentially affected neighbours for communication and incident response purposes*.

Where contact numbers are available, notification should be made by phone. Where no contact number is available and it is safe to do so, a company representative must travel to the property and advise the neighbour or receptor of the emergency or potential impact.

Important: *Staff MUST not place themselves at risk or prioritise neighbour contact over containment. If direct contact is unsafe or not practicable based on the scale of the incident, emergency services, council, or another relevant authority may be requested to assist with notification.*

Neighbour notification should be factual and limited to relevant information. When appropriate and under management approval, the message should be:

- ✓ The nature of the incident.
- ✓ Whether there is any immediate safety concern.
- ✓ Actions being taken by the company,
- ✓ Expected duration of the issue, if applicable and known.
- ✓ Relevant advice, if applicable.
- ✓ Contact details for the nominated company representative.

6. Once the incident has been controlled, or once necessary steps have been taken to prevent further environmental harm/nuisance, all relevant parties must properly assess the nature, scale, and potential impact of the pollution incident.

   This assessment should consider:

   - ✓ The source and cause of the incident.
   - ✓ The pollutant and potential pollutant involved.
   - ✓ The estimated quantity, volume, area, or duration of the release.
   - ✓ Whether the release was contained on site or moved off site.
   - ✓ Current and recent weather conditions.
   - ✓ Whether complaints were received.
   - ✓ Whether regulators or neighbours were notified.
   - ✓ Whether further monitoring, clean-up, or remediation is required.

The assessment MUST be documented, including photographs, maps, observations, measurements, witness statements, and timelines.

7. Simultaneously, and if deemed as necessary by the company or by the regulatory authority, an environmental impact assessment shall be arranged to determine the affected areas, and the extent of contamination if any.

   This assessment may include, but is not limited to:

   - ✓ Inspection of nearby waterways, drains, gullies, and stormwater pathways.
   - ✓ Inspection of neighbouring land, fence lines, and roads.
   - ✓ Monitoring or sampling of water, soil, sediment, or other affected material.
   - ✓ Assessment of odour, dust, smoke, or air quality impacts.
   - ✓ Review of irrigation records, pond levels, and weather data.
   - ✓ Inspection of infrastructure, including ponds, pipes, pumps, valves, etc.
   - ✓ Engagement of suitably qualified external consultants.

8. After the incident has been addressed and operational compliance can be granted, efforts will be made to identify and address any potential further release of contaminants.

9. Any clean up as instructed by management and/or the relevant authority will be completed so far as is reasonably practicable.

10. Internal stakeholders to comply with reporting requirements as per section 11 “Environmental Incidents” of the site EMP v1.1 dated 25/03/2026, page 44.

4.3 Description and risk assessment of pollution hazards

Please refer to section 6 “Environmental Impacts and Risks” of the site EMP v1.1 dated 25/03/2026, pages 12 to 23.

4.4 Pre-emptive actions

Please refer to section 7 “Environmental Mitigation and Management Measures” of the site EMP v1.1 dated 25/03/2026, pages 24 to 33.

For reference on site contingency plans, consult section 8 “Contingency Plans” for the site EMP v1.1 dated 25/03/2026, pages 33 to 36.

Finally, any record or documented evidence associated to this document can be found within section 9 “Environmental Monitoring and Records” of the site EMP v1.1 dated 25/03/2026, pages 37 to 41.

4.5 Inventory of pollutants

All items stored on farm that can be considered a sort of potential pollution are listed below.

Table 6. Potential sources of pollution on site.

Item	Max Quantity	Type	Storage
Diesel & Petrol	<100 litres	Liquid	Jerry cans placed on bunded pallet.
Selko pH	<400 Litres	Liquid	20L drums placed on bunded pallet.
Intra Hydrocare	<1,000 Litres	Liquid	20L drums placed on a split IBC.
Sludge	-	Solid	Sludge drying area.
Effluent	-	Liquid	Pond 1 & 2.
	-	Liquid	Concrete tanks 1 & 2.
Mortalities	-	Solid	Composting area.
Dust	-	Solid (Particles)	N/A

4.6 Staff training

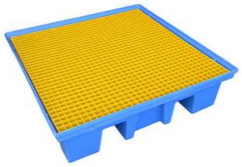
Please refer to section 5 “Site Management” of the site EMP v1.0 dated 25/03/2026, page 12.

4.7 Safety equipment

Table 7 applies only to chemicals and fuel stored and used on site as part of regular operations. Riverbend staff members, as well as first responders attending to site to address an issue relating to dangerous goods, should always refer to the Manufacturer Safety Data Sheets (SDS).

Table 7. Safety Equipment

Safety Equipment	Purpose	Product(s)	Safety Data Sheet
	P2 Mask is to be worn when handling chemicals and products where SDSs and Labels recommend doing so.	Please refer to your dangerous goods and chemicals folder	Please refer to your dangerous goods and chemicals record.

	Long Sleeve work shirts are to be worn when handling chemicals and products where SDS and Labels recommend doing so.	Please refer to your dangerous goods and chemicals folder	Please refer to your dangerous goods and chemicals record.
	Suitable gloves are to be worn when handling chemicals and products where SDS and Labels recommend doing so.	Please refer to your dangerous goods and chemicals folder	Please refer to your dangerous goods and chemicals record.
	Dangerous chemicals stored in various containers or IBCs that may spill are to be stored on top of bunded pallets or split IBCs.	Please refer to your dangerous goods and chemicals folder	Please refer to your dangerous goods and chemicals folder.
	Spill equipment is an environmental and WHS requirement on sites or areas where dangerous liquids and chemicals are stored.	Please refer to your dangerous goods and chemicals folder	Please refer to your dangerous goods and chemicals folder.

Other devices available on farm used to minimise the risk to human health or the environment and to contain or control a pollution incident include:

- Damm walls.
- Overflowing pond.
- Biosecurity fence.
- Solids separator.

5. Plan Testing, Review and Update

Responsibility	Responsible(s)
Plan development	Cesar Gomez & Andrew Morris
Plan socialisation	Andrew Morris & Arischa Vermaak
Plan review and update	Cesar Gomez, Arischa Vermaak & Andrew Morris

The PIRMP will be reviewed annually or within 30 calendar days after a significant pollution incident covering any deficiency identified in the investigation.

Table 8. C-Kilgra - PIRMP Testing Details

Date Tested	Tested by	Details of test	Findings	Next Test Date
01/01/2024	Cesar G. (Compliance Officer).	Desktop simulation: • Act., Notification, & Response. • Risk assessment validation. • Contact details validation. • Safety Equipment. • Procedures, recording & reporting.	Observations and CARs for the desktop simulation include: • Plan did not include major site details. • Contact details were out of date. • Missing neighbouring properties. • Inventory of pollutants to be updated. • No safety signs or spill kit available on site.	01/01/2025
18/07/2025	Cesar G. (Compliance Officer).	Desktop simulation & Farm Visit: • Act., Notification, & Response. • Risk assessment validation. • Contact details validation. • Safety Equipment. • Procedures, recording & reporting. • Farm devices for containment.	Observations and CARs for the desktop simulation include: • RBPG staff and contact details out of date. • Incomplete neighbours' list and location. • Incomplete farm map. • No safety signs or spill kit available on site. • Outdated EMP in place. • Risk assessment could be improved. • No copy of the PIRMP on site.	18/07/2026

Table 8. *(Continue)*

Date Tested	Tested by	Details of test	Findings	Next Test Date
31/08/2026	Cesar G. (Compliance Officer).	Desktop simulation: • RBPG staff contact details. • Emergency contact details. • Neighbours contact details. • Farm devices for containment.	Observations and CARs for the desktop simulation include: • Missing neighbouring properties.	30/08/2027

6. Site Maps

Figure 1. Site Map (a) Neighbours, and (b) Infrastructure.

Clean Area (Production Area)
1 Water Dam (Reservoir)
2 Clean Water Tanks x 5
3 Farm Effluent Ponds
4 Overflowing/Contingency Pond
5 Access Roads
6 Composting Area
7 Chemical & Storage Areas
8 Solid Separator Area
9 Farm Workshop
10 Farm Office
11 Farmhouse and dongas
12 Water treatment shed
13 Concrete effluent tank
Masons Rd
Summerland Way
B91
983 Summerland Way
Recently viewed
12 Masons Rd
Recently viewed

7. Document History

Version	Date of Issue	Date of Review	Responsible	Changes made
1.0	01 January 2023	01 January 2024	Brenden Giuffrida	Original document.
1.1	01 January 2024	01 January 2025	Andrew Morris	Modification of sections 4, 5 & 6.
1.2	18 July 2025	18 July 2026	Andrew Morris	Changes as per Table 8.
1.3	25 March 2026	18 July 2026	Andrew Morris	Addition of EPA visit requirements
2.0	31 August 2026	30 August 2027	Andrew Morris	Testing details and changes to section 4.2

8. Document Approval Sign-off

Name	Position/Title	Responsibility	Signature	Date
Cesar Gomez	Compliance Officer	Author	Cesar Gomez	31/08/2026
Andrew Morris	Chief Operations Officer	Reviewer	Andrew Morris	07/09/2026
Andrew Morris	Chief Operations Officer	Approver	Andrew Morris	07/09/2026