	Pollution Incident Response Management Plan	RBPG-SOP-S&S-01
		v1.1 - 30/06/2025

Document Title	Pollution Incident Response Management Plan
Department	Safety & Systems
Version Number	1.1
Scope	Clarrich Farms - Tabulam
Purpose	As per the Protection of the Environment Operations Act 1997 holders of an Environment Protection Licence must prepare, keep, test, and implement a pollution incident response management plan.




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1. Introduction

Clarrich Farms - Tabulam holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for *160 Jackson Flat Rd, Tabulam*. 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: Development Consent
- 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.

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- **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 maximize 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 - Tabulam, 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 growing/finishing facility unit operating under EPA licence No 11427 and Kyogle council DC No 05/229 approved for the completion of livestock intensive activities as per details in Table 1.

Further details about the farm are already provided within Section 1 “Introduction” of the site EMP v1.0 dated 12/01/2024, pages 1 to 5.



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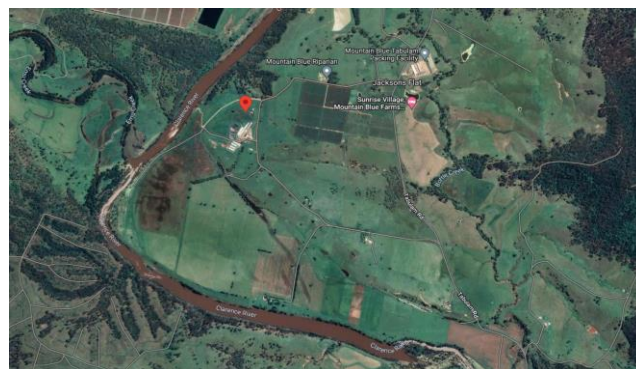
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Table 1. Site and EPL Details

4.1.1 Site Details:

Site Name:	Clarrich Farms - Tabulam (ABN 59 604 522 401)		
Site Address:	160 Jackson Flat Rd, Tabulam	State:	NSW Postcode: 2649
Site Manager:	Colin Tossel	Phone:	0470 [REDACTED]

4.1.2 Site Pictures:



4.1.3 Operator Details:


Site Operator:	Riverbend Pork Group Pty Ltd		
Site Address:	487-489 Ruthven St, Toowoomba	State:	QLD Postcode: 4350
Pyramid Manager:	-	Phone:	-
Production Manag:	Eraldo Neri	Phone:	0405 [REDACTED]
Company COO:	Andrew Morris	Phone:	0448 [REDACTED]

4.1.4 Land Details:

Landowner:	Clarrich Farms Pty Ltd	Phone:	0428 673 254
Piggery Area (ha):	Approx. 2.3	Pond Area (ha):	Approx. 0.8
Land Area (ha):	Approx. 67.5	Local Gov:	Kyogle Council
Property No:	Lot 117DP 751062	Shed Year Built:	Prior to 2007

4.1.5 Licence Details:

Activity:	Pig accommodation	Licence:	11427
Information:	> 500 T accommodation capacity		

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4.2 Response procedures and responsibilities

In the event of a pollution incident, 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.
2. Immediate action will be taken to contain and mitigate the pollution incident (refer to EMP and/or Contingency Plans if applicable). This may include spraying water on roads to minimise dust particles, starting the field irrigator to reduce pond-3 levels, postpone or stop irrigation events to reduce odours during strong wind events, etc.
3. The Site Manager OR 2IC must contact and advise all relevant internal stakeholders (via phone call preferably) as per details 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.

Table 2. Riverbend Pork Group - Internal Stakeholders

Role	Name	Phone	Email
Compliance Officer	Cesar Gomez	0492 [REDACTED]	[REDACTED]@riverbendgroup.com.au
Operations Manager	Eraldo Neri	0405 [REDACTED]	[REDACTED]@riverbendgroup.com.au
COO	Andrew Morris	0448 [REDACTED]	[REDACTED]v@riverbendgroup.com.au
Managing Director	Jeremy Whitby	0429 [REDACTED]	[REDACTED]@riverbendgroup.com.au

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

Both Tenterfield and Casino fire stations are located 1 hour 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.


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Table 3. Riverbend Pork Group PIRMP Responsible Parties

4.2.1 PIRMP Activation			
Criteria	Responsible - 1	Responsible - 2	Responsible - 3
Name:	Colin Tossel	Eraldo Neri	Andrew Morris
Position:	Site Manager	Operations Manager	Chief Operating Officer
Mobile:	██████████	██████████	██████████
Email:	c.tabulam@riverbend...	eraldo@riverbend...	andrew@riverbend...
4.2.2 PIRMP Notification			
Criteria	Responsible - 1	Responsible - 2	Responsible - 3
Name:	Andrew Morris	Jeremy Whitby	Colin Tossel
Position:	Chief Operating Officer	Managing Director	Site Manager
Mobile:	██████████	██████████	██████████
Email:	██████@riverbend...	██████@riverbend...	c.tabulam@riverbend...
4.2.3 PIRMP Response			
Criteria	Responsible - 1	Responsible - 2	Responsible - 3
Name:	Colin Tossel	2IC	Eraldo Neri
Position:	Site Manager	Piggery Attendant	Operations Manager
Mobile:	██████████	██████████	██████████
Email:	c.tabulam@riverbend...	-	██████@riverbend...

Table 4. Emergency Contacts - External

Relevant Contacts	Mobile	Website
Fire & Rescue NSW	000 (first notification)	https://www.fire.nsw.gov.au
Tenterfield Fire Station	02 6736 3835	-
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.

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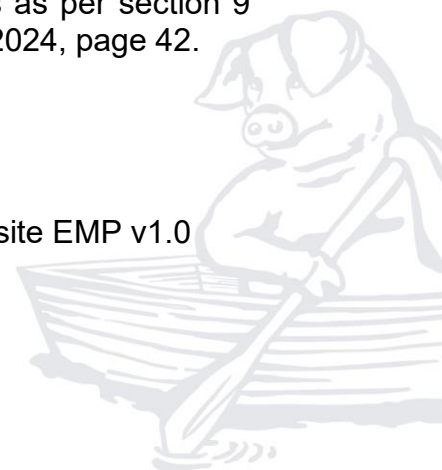
Table 5. Neighbouring Properties - External


Colour	Receptor	Distance (m)	Address	Phone
Yellow	Mountain Blue Farms	Approx 1,700 NNW	Hootons Road	
Pink		Approx 1,753 NNE	Tabulam Road	-
Yellow	Mountain Blue Crystal Park	Approx 887 NE	Jacksons Flat Road	
Yellow	Mountain Blue Packing Fac.	Approx 1,500 ENE	Tabulam Road	
Red		Approx 1,400 SE	Jacksons Flat Road	
Blue	Unknown - 1	Approx 2,200 SE	Jacksons Flat Road	-
Green	Vacant (to be demolished)	Approx 800 SE	Jacksons Flat Road	-
Orange	Vacant ()	Approx 1,400 SSE	Jacksons Flat Road	-

6. All internal parties must properly assess the nature, scale, and potential impact of the pollution incident once it has been controlled, or necessary steps have been taken to ensure no further damage or nuisance is caused.
7. Simultaneously, and if deemed as necessary by the company or by the regulator, an assessment of potential environmental impact shall be scheduled to determine the affected areas, and the extent of contamination if any. This may or may not include monitoring nearby water bodies, air quality, and soil conditions.
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 9 "Environmental Incidents" of the site EMP v1.0 dated 12/01/2024, page 42.

4.3 Description and risk assessment of pollution hazards

Please refer to section 4 "Environmental Impacts and Risks" of the site EMP v1.0 dated 12/01/2024, pages 10 to 19.



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4.4 Pre-emptive actions

Please refer to section 5 “Environmental Mitigation and Management Measures” of the site EMP v1.0 dated 12/01/2024, pages 20 to 31.

For reference on site contingency plans, consult section 6 “Contingency Plans” for the site EMP v1.0 dated 12/01/2024, pages 32 and 33.

Finally, any record associated to this document can be found within section 7 “Environmental Monitoring and Records” of the site EMP v1.0 dated 12/01/2024, pages 34 to 38.

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	2,000 litres	Liquid	Above ground tank.
Selko BE+	2,000 Litres	Liquid	IBC placed on bunded pallet.
Spent bedding	-	Solid	Composting area.
Sludge	-	Solid	Solid separator area and pond 3.
Effluent	-	Liquid	Pond 1 to 3 & Eco-pond.
Mortalities	-	Solid	Composting area.
Dust	-	Solid (Particles)	N/A

4.6 Staff training

Please refer to section 3 “Site Management” of the site EMP v1.0 dated 12/01/2024, page 8.


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

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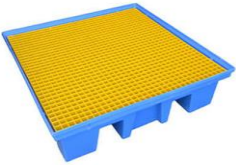

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address an issue relating to dangerous goods, should always refer to the Manufacturer Safety Data Sheets (SDS).

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	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.
- Cattle grids.

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6. Plan Testing, Review and Update

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





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

Table 8. PIRMP Update Details

Date Tested	Tested by	Details of test	Findings	Review Date
27/03/2024	Cesar G. (Compliance Officer).	Desktop simulation: <ul style="list-style-type: none">• Act., Notification, & Response.• Selko BE+ & Diesel Spillage.• Contact details validation.• Safety Equipment.• Procedures, recording & Reporting.	Observations and CARs for the desktop simulation include: <ul style="list-style-type: none">• Plan did not include major site details.• Contact details were out of date.• Missing neighbouring properties.• References to wrong farm found.• No connection or relation to site EMP.• Inventory of pollutants to be updated.• No safety signs or spill kit available on site.• No procedures in place or within the plan.	26/03/2025
26/06/2025	Cesar G. (Compliance Officer).	Desktop simulation & Farm visit: <ul style="list-style-type: none">• RBPG staff contact details.• Neighbours contact details.• Farm devices for containment.	Observations and CARs for the desktop simulation include: <ul style="list-style-type: none">• RBPG staff and contact details out of date.• Missing neighbours' details.• No safety signs or spill kit available on site.• Complaints contact number disconnected.• Sampling signs missing.	25/06/2026

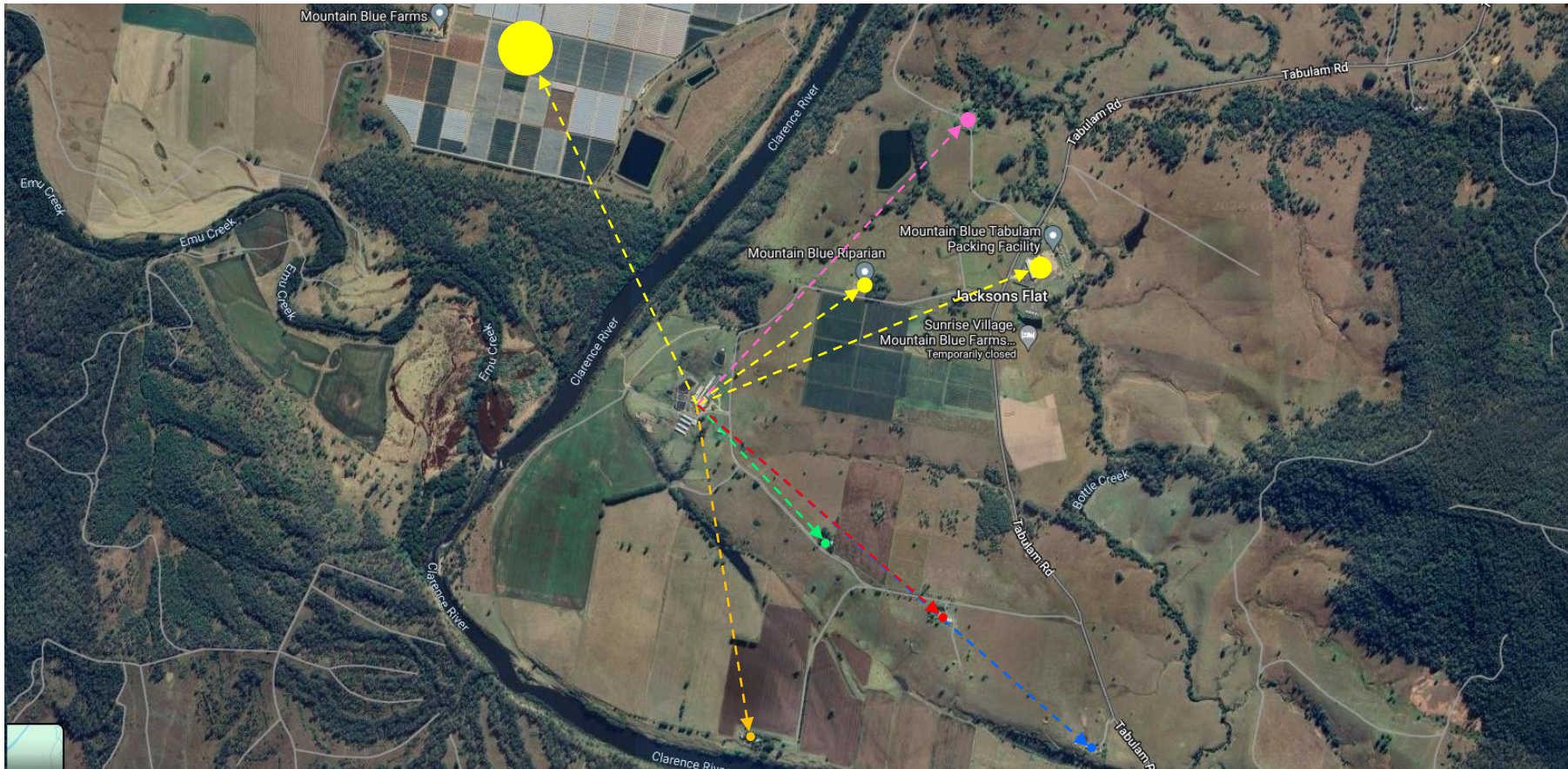
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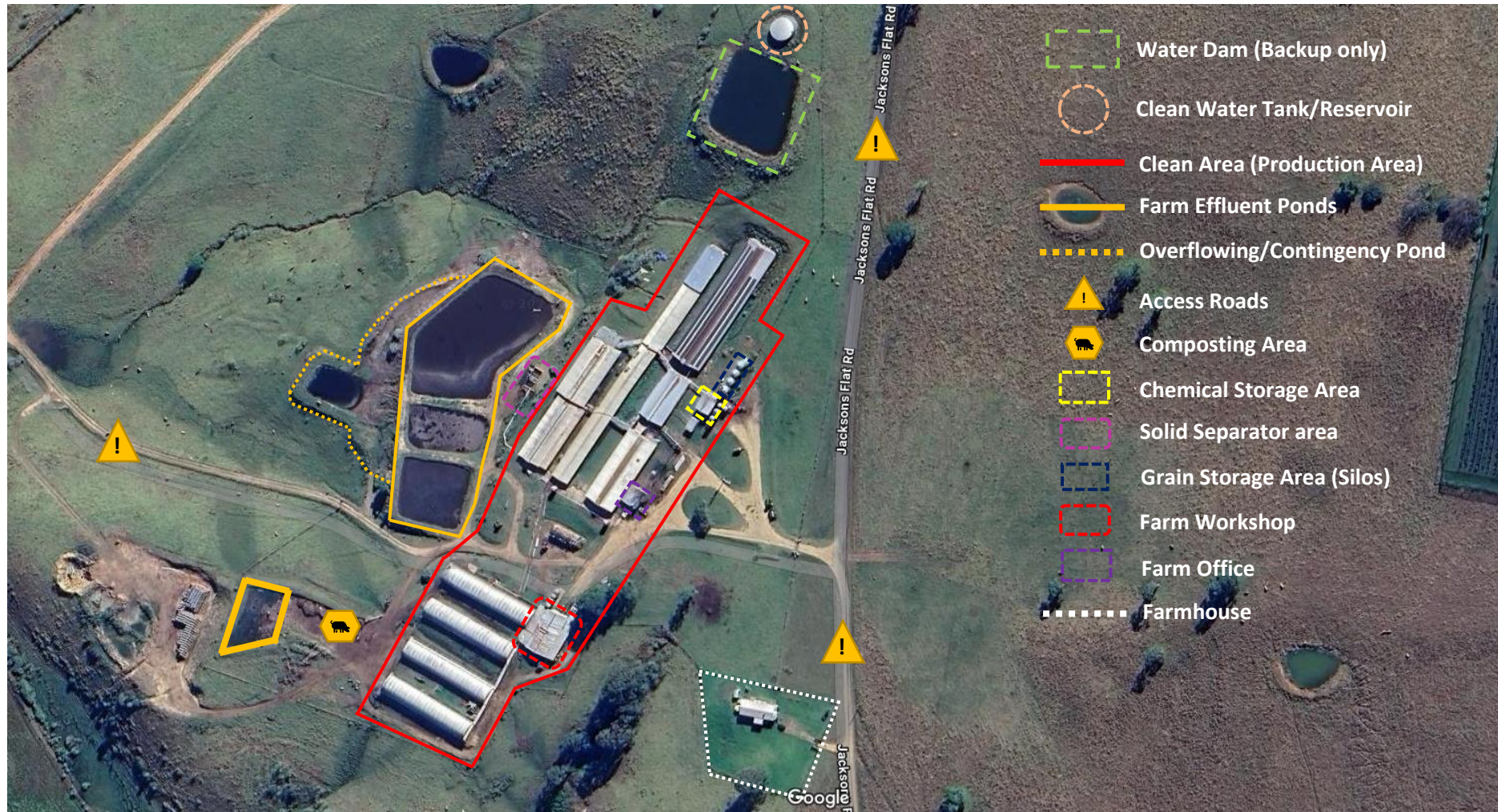
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7. Site Maps

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







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8.0. 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	30 June 2024	29 June 2025	Andrew Morris	Modification of sections 4, 5 & 6.
1.1	30 June 2025	29 June 2026	Andrew Morris	Updates as per Table 8.



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