



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal



GrainCorp

Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

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Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

CONTENTS

1. PURPOSE AND BACKGROUND	4
2. SCOPE.....	4
3. LEGISLATIVE REQUIREMENTS	4
4. TERMS AND DEFINITIONS.....	4
4.1. DEFINITION OF A POLLUTION INCIDENT.....	4
A <i>POLLUTION INCIDENT</i> MEANS AN INCIDENT OR SET OF CIRCUMSTANCES DURING OR AS A CONSEQUENCE OF WHICH THERE IS LIKELY TO BE A LEAK, SPILL OR OTHER ESCAPE OR DEPOSIT OF A SUBSTANCE, AS A RESULT OF WHICH POLLUTION HAS OCCURRED, IS OCCURRING OR IS LIKELY TO OCCUR. IT INCLUDES AN INCIDENT OR SET OF CIRCUMSTANCES IN WHICH A SUBSTANCE HAS BEEN PLACED OR DISPOSED OF ON A PREMISES, BUT IT DOES NOT INCLUDE AN INCIDENT OR SET OF CIRCUMSTANCES INVOLVING ONLY THE EMISSION OF ANY NOISE.....	5
4.2. DEFINITION OF CLEAN-UP ACTION.....	5
4.3. ABBREVIATIONS	5
5. NOTIFICATION OF A POLLUTION INCIDENT.....	5
5.1. WHAT MUST BE NOTIFIED.....	5
5.2. RESPONSIBILITY TO NOTIFY	6
5.3. EMERGENCY RESPONSE	6
5.4. CONTAMINATED LAND	6
6. REFERENCE DOCUMENTATION.....	6
7. NEWCASTLE PIRMP	6
7.1. DESCRIPTION OF POTENTIAL HAZARDS AND THEIR LIKELIHOOD	7
7.2. PRE-EMPTIVE ACTIONS TO BE TAKEN.....	10
7.3. INVENTORY OF POTENTIAL POLLUTANTS	12
7.4. SAFETY EQUIPMENT.....	13
7.5. NOTIFICATION PROCEDURE	13
7.6. CONTACT DETAILS	14
8. MINIMISING HARM TO PERSONS ON PREMISES.....	16
8.1. EMERGENCY RESPONSE – ACTIVATION OF A WARNING ALARM	17
8.2. STANDARD SITE CONTROLS	17
9. ACTIONS TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT	18
10. STAFF TRAINING AND PIRMP TESTING	22
APPENDIX 1: MAPS.....	24
APPENDIX 2: GRAINCORP RISK ASSESSMENT MATRIX.....	30
APPENDIX 3: GRAINCORP INCIDENT MANAGEMENT CHART	32
APPENDIX 4: GRAINCORP STAFF TRAINING MATRIX	34



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

TABLE OF FIGURES

Figure 1 - Spill Kit in Chemical Store.....	10
Figure 2 - Monitoring Point 2 (fumigation ventilation)	10
Figure 3 - Methyl Bromide storage	11
Figure 4 - Facility signage.....	11
Figure 5 - Rail receival shed water spray	11
Figure 6 - Stormwater drain equipped with sediment mesh.....	11
Figure 7 - Ship being loaded at Carrington Grain Terminal	12
Figure 8 – Map of Newcastle Grain Terminal Site	24
Figure 9 – Map of Site Monitoring Points (potential sources for air emissions).....	25
Figure 10 – Map of Newcastle Grain Terminal Stormwater Drains.	26
Figure 11 – Newcastle Grain Terminal LEP Zoning	29

TABLE OF TABLES

Table 1 - Terms and definitions relevant to the PIRMP	5
Table 2 – GrainCorp internal plans and procedures underpinning the PIRMP	6
Table 3 – Likelihood and consequences assessment of hazards around Newcastle Grain Terminal	8
Table 4 - Pre-emptive actions arising from activities at Newcastle Grain Terminal.....	10
Table 5 - Potential grain pollutants.....	12
Table 6 - Chemicals stored on site at Newcastle Grain Terminal	12
Table 7 - Internal notification contact details	15
Table 8 - External relevant authority contact details.....	15
Table 9 - Other key stakeholders and neighbours contact details	16
Table 10 - Procedure for stakeholder’s communication including existing ERPs.....	16
Table 11 - Site Hazard, potential impact and expected site response	19
Table 13 - History of PRIMP testing	22



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

1. PURPOSE AND BACKGROUND

This Pollution Incident Response Management Plan (PIRMP) has been developed to satisfy obligations under the *Protection of the Environment Operations Act 1997 (POEO Act)* and associated *Protection of the Environment Legislation Amendment Act 2011 (POELA Act)* for licensed facilities.

Under GrainCorp's Emergency Management Plan, detailed emergency response procedure is already in place for the classification and management of incidents, across GrainCorp operational sites. Under the provisions of *Section 71 of the Protection of the Environment Operations (General) Regulation 2022*, to allow for the integration of requirements into existing plans in respect to pollution incident response, requirements under POEO legislation have been integrated into these existing plans where appropriate.

This document has been designed as a reference to existing emergency response plans and associated procedure. It also details additional supplementary site-specific information as required under the POEO legislation, in respect to the relevant Environment Protection Licence (EPL) holder.

2. SCOPE

This PIRMP covers GrainCorp's Newcastle (Carrington) Grain Terminal (the Terminal) located at Denison St, Carrington NSW 2294. This plan applies to all activities, products and services on the site over which GrainCorp has operational control.

3. LEGISLATIVE REQUIREMENTS

Specific legislative requirements for the development and implementation of this PIRMP are provided below.

- Part 5.7A of the Protection of the Environment Operations Act 1997 (POEO Act)
- Protection of the Environment Operations (General) Regulation 2022
- [Environment Protection License \(EPL\) 1296](#)

In summary:

- All holders of environment protection licences must prepare a pollution incident response management plan (section 153A, POEO Act).
- The plan must include the information detailed in the POEO Act (section 153C) and be in the form required by the POEO(G) Regulation 2022 (clause 71).
- Licensees must keep the plan at the premises to which the environment protection licence relates or, in the case of trackable waste transporters and mobile plant, where the relevant activity takes place (section 153D, POEO Act).
- Licensees must test the plan in accordance with the POEO(G) Regulation 2022 (clause 75).
- If a pollution incident occurs in the course of an activity so that material harm to the environment is caused or threatened, licensees must immediately implement the plan (section 153F, POEO Act).

4. TERMS AND DEFINITIONS

4.1. DEFINITION OF A POLLUTION INCIDENT



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

The dictionary of the POEO Act defines pollution as either 'water pollution, 'air pollution', 'noise pollution' or 'land pollution'.

A *pollution incident* means an incident or set of circumstances during or as a consequence of which there is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on a premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

4.2. DEFINITION OF CLEAN-UP ACTION

In relation to a pollution incident, *clean-up action* may include:

- a) action to prevent, minimise, remove, disperse, destroy or mitigate any pollution resulting or likely to result from the incident, and
- b) ascertaining the nature and extent of the pollution incident and of the actual or likely resulting pollution, and
- c) preparing and carrying out a remedial plan of action.

It also includes (without limitation) action to remove or store waste that has been disposed of on land unlawfully.

4.3. ABBREVIATIONS

Table 1 - Terms and definitions relevant to the PIRMP

Abbreviation	Explanation
EPA	Environment Protection Authority
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
CLM Act	Contaminated Land Management Act 1997
EPL	Environment Protection License
ERP	Emergency Response Plan
EMS	Environmental Management System

5. NOTIFICATION OF A POLLUTION INCIDENT

5.1. WHAT MUST BE NOTIFIED

A pollution incident is required to be immediately notified if there is a risk of 'material harm to the environment', defined under section 147 of the POEO Act as:

- a) harm to the environment is material if:
 - i. it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - ii. it results in actual or potential loss or property damage or an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

In order to determine if an incident causes or threatens material harm to the environment (i.e. Pollution Incident) the Incident Notification And Escalation Flow (see Appendix 3) must be implemented.

5.2. RESPONSIBILITY TO NOTIFY

Under Section 148 of the POEO Act, the following people have a duty to notify a pollution incident occurring in the course of an activity that causes or threatens material harm to the environment:

- The person carrying on the activity;
- An employee or agent carrying on the activity;
- An employer carrying on the activity;
- The occupier of the premises where the incident occurs.

Once determined that the incident causes or threatens material harm to the environment, notification must be given immediately, i.e. notification to be given to NSW EPA and Port of Newcastle promptly and without delay, after the person becomes aware of the incident.

All GrainCorp sites follow the GrainCorp Incident Management procedure to determine the responsibilities for notifying authorities through the Notification Table and the Incident Notification And Escalation Flow Chart (see Appendix 3).

5.3. EMERGENCY RESPONSE

If an incident presents an immediate threat to human health or property, Fire and Rescue NSW, the NSW Police and NSW Ambulance Service should be contacted first for emergency assistance (phone 000).

Considering the actual or potential material harm to the environment or human health, the PIRMP must also be immediately implemented, and other response agencies must still be contacted in order to satisfy notification obligations.

5.4. CONTAMINATED LAND

Persons whose activities have contaminated land and owners of land who become aware, or ought reasonably to be aware, that the land has been contaminated must notify the EPA as soon as practicable after becoming aware of the contamination, if the contamination meets certain criteria. The duty to notify is a requirement under section 60 of the *Contaminated Land Management Act 1997* (CLM Act).

6. REFERENCE DOCUMENTATION

The following existing internal plans and procedure documentation underpin this PIRMP.

Table 2 – GrainCorp internal plans and procedures underpinning the PIRMP

Doc. No	Document	Format
GNC-SHEQ-3-01	Incident Reporting and Investigation Standard	Physical copy on site
	Newcastle Site Emergency Response Plan	Physical copy on site

7. NEWCASTLE PIRMP



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

7.1. DESCRIPTION OF POTENTIAL HAZARDS AND THEIR LIKELIHOOD

An environmental hazard is a term for any situation or state of events which poses a threat to the surrounding environment including human health as a result of an incident. Incident types that may occur at the Newcastle Grain Terminal are detailed below:

- Minor chemical spills and leaks
- Release of contaminants, including emissions, not in accordance with acceptable limits e.g. fumigant venting
- Uncontrolled release of emissions
- Dust from loading/unloading operations using ship, truck or train
- Spillage of material into stormwater drains
- Spillage of material into harbour from loading gantry and unloading activity

Potential hazards to human health and the environment that have been identified as a result of the above listed incidents include water pollution (including stormwater), air pollution and soil/ground pollution. Table 3 below identifies a list of foreseeable hazards that could occur on this site as a result of regular operating activities and the consequence and likelihood of each with current controls

A risk management matrix (Appendix 2) is used to score the residual risk associated with any particular hazard. The purpose of rating risk is to guide decision making on risk management and to eliminate or otherwise reduce the risk to an acceptable level.



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

Table 3 – Likelihood and consequences assessment of hazards around Newcastle Grain Terminal

Hazard	Type of pollution	Potential Impact	Consequence	Likelihood	Risk Score	Circumstances which may increase the potential of environment or health impact
Spillage of material into harbour from loading gantry and unloading activity	Water	Contamination of surface water from bulk material being spilled into the harbour from loading gantry	Moderate	Rare	5	<ul style="list-style-type: none"> Rainfall and/or wind would reduce capability to capture and contain any spill event. Non-operating periods where there are limited personnel on site.
Minor chemical spills and leaks	Soil & Water	Contamination of soil from Hydraulic hose failure	Moderate	Possible	12	<ul style="list-style-type: none"> Rainfall would reduce capability to capture and contain any spill event. Non-operating periods where there are limited personnel on site.
	Soil & Water	Contamination of soil and ground water from Application and handling of contact insecticides	Moderate	Unlikely	6	<ul style="list-style-type: none"> Rainfall would reduce capability to capture and contain any spill event. Non-operating periods where there are limited personnel on site.
	Soil & Water	Contamination of soil and ground water from Fuel and chemical storage areas	Moderate	Unlikely	6	<ul style="list-style-type: none"> Rainfall would reduce capability to capture and contain any spill event. Non-operating periods where there are limited personnel on site.
	Soil & Water	Contamination of soil and ground water from Fuel and chemical dispensing	Moderate	Unlikely	6	<ul style="list-style-type: none"> Rainfall would reduce capability to capture and contain any spill event. Non-operating periods where there are limited personnel on site.
Spillage of material into stormwater drains	Soil & Water	Contamination of surface water entering stormwater drains	Moderate	Possible	12	<ul style="list-style-type: none"> Rainfall would reduce capability to capture and contain any spill event. Non-operating periods where there are limited personnel on site.



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

Hazard	Type of pollution	Potential Impact	Consequence	Likelihood	Risk Score	Circumstances which may increase the potential of environment or health impact
Dust from loading/unloading operations using ship, truck or train	Air	Generating dust through truck, train wagon unloading, loading	Moderate	Possible	12	<ul style="list-style-type: none">• Wind may transport dust to neighbouring site and communities.
	Air	Generate dust through product transfer on conveyor	Minor	Unlikely	5	<ul style="list-style-type: none">• Wind may transport dust to neighbouring site and communities.
	Air	Generate dust through loading grain ships	Moderate	Unlikely	6	<ul style="list-style-type: none">• Wind may transport dust to neighbouring site and communities.
Uncontrolled release of emissions	Air	Degrade air quality through release of fumigants	Major	Unlikely	9	<ul style="list-style-type: none">• Wind may transport dust to neighbouring site and communities.• Non-operating periods where there are limited personnel on site.
Release of contaminants, including emissions, not in accordance with acceptable limits e.g. fumigant venting	Air	Contamination of air and human health exposure through unexpected or not acceptable release of Methyl Bromide or Phosphine	Major	Unlikely	9	<ul style="list-style-type: none">• Wind and rain may transport emissions to neighbouring site and communities.



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

7.2. PRE-EMPTIVE ACTIONS TO BE TAKEN

The following table details descriptions of the pre-emptive actions to be taken to minimise or prevent any risk of harm to human health or to the environment arising from activities occurring at the Newcastle Grain Terminal.

Table 4 - Pre-emptive actions arising from activities at Newcastle Grain Terminal

Activity / Pre-emptive Actions	Figure
<p><u>Minor Chemical Spill/Leak</u></p> <p>Only minor quantities of chemicals are stored onsite and any major maintenance activities are undertaken by third party contractors. Chemicals are stored with the appropriate bunding and spill kits are located in areas where there is a potential for a spill to occur including:</p> <ul style="list-style-type: none"> • Chemical Store; • Oil Store • Maintenance Workshop; • Locomotive Service Area; • Rail Unloading Shed • Western Storage Road Hopper • Main Road Hopper 	 <p>Figure 1 - Spill Kit in Chemical Store</p>
<p><u>Release of contaminants / emissions not in accordance with acceptable limits</u></p> <p>All fumigation activities are to be carried out in accordance with applicable requirements (from EPL). This includes real time monitoring of emission concentration in the silo prior ventilation. A warning red light is triggered if the operating status of the flowmeter is not adequate.</p>	 <p>Figure 2 - Monitoring Point 2 (fumigation ventilation)</p>



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

Activity / Pre-emptive Actions

Figure

Uncontrolled Release of Gas

There is some storage of fumigant gasses onsite, including methyl bromide and phosphine.

All gas cylinders are located and restrained in secured, fenced facilities with restricted access to licensed operators, and appropriate signage in place. All fumigations and subsequent venting activities are carried out by licensed fumigators.



Figure 3 - Methyl Bromide storage



Figure 4 - Facility signage

Dust Generation

Newcastle Grain Terminal has in place an Operational Dust Response Program to mitigate potential dust emissions resulting from various activities onsite. Initiatives and improvements introduced to date under the Operational Dust Response Program include:

- Improvements to ship loader spouts;
- Installation of dust systems at rail-receiver hoppers;
- Installation of rail receival shed water spray systems;
- Installation of exhaust stack broken bag detector systems (with automatic shutdown if high level of TSS is detected)
- Installation of Tapered Oscillating Microbalance (TEOM) Particle Monitoring stations and alarm system.



Figure 5 - Rail receival shed water spray

Storm Water Grates/Mesh

A site stormwater risk assessment has been completed and stormwater grates/mesh have been installed at drain locations which represent the highest risk of spilled grain entering the stormwater system.



Figure 6 - Stormwater drain equipped with sediment mesh



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

Activity / Pre-emptive Actions	Figure
<p><u>Spillage of grain into harbour from loading gantry</u></p> <p>The ship loaders have to be lowered horizontally for the loading belts to run. The loading belts have overload and alignment sensors.</p>	

Figure 7 - Ship being loaded at Carrington Grain Terminal

Other pre-emptive actions taken to minimise the likelihood of potential environmental hazards include:

- The implementation of a site-specific Environmental Management Plan (EMP);
- Onsite inductions for employees, contractors and suppliers;
- Monthly environmental inspections.

7.3. INVENTORY OF POTENTIAL POLLUTANTS

The main potential pollutants associated with the site activities are the various types of bulk grains (as listed in Table 5) which can generate excessive dust in the absence of dust minimisation controls. Total capacity of throughput for the terminal is approximately 1 million tonnes per annum. This throughput is impacted by the weather conditions season to season.

Table 5 - Potential grain pollutants

Name of Shipped Bulk Material
• Durum Wheat
• Bread Wheat
• Sorghum
• Barley
• Chickpeas
• Canola

In addition, an inventory of all chemicals is maintained in an online database, and monthly audits are undertaken to determine actual volumes stored onsite (Table 6). There are no underground storage facilities at the Newcastle Grain Terminal site. Chemical storage locations are detailed on Map 1, Appendix 1.

Table 6 - Chemicals stored on site at Newcastle Grain Terminal

Chemical	Quantity	Max Quantity
Dryacide	Approx. 25kg	Approx. 50kg
Chlorpyrifos-methyl (Reldan & Bichlor)	Approx. 40L	Approx. 40L
Methoprene (Rizacon & IGR)	Nil	Approx. 40L
Deltamethrin (K-Obiol Combi)	Nil	Approx. 40L
Phosphine (EcoFume)	Approx. 200kg	Approx. 500L
Methyl bromide	Approx. 800kg	Approx. 500kg
Insectigas	Approx. 80kg	Approx. 80kg
Spinosad (Conserve)	Approx. 70L	Approx. 70L



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

Chemical	Quantity	Max Quantity
Fenitrothion (Sumithion)	Approx. 190L	Approx. 190L
Glyphosate	Nil	Approx. 100L
Ethyl formate (Vapourmate)	Approx. 30kg	Approx. 60kg
LYNX WB	Nil	Approx. 500gr
CAVALIER	Approx. 10L	Approx. 10L
EXCALIBUR	Nil	Approx. 1kg
VICTORY	Nil	Approx. 2kg
PULSE PENETRANT	Approx. 5L	Approx. 5L
URAGAN	Approx. 5kg	Approx. 5kg
ROTARY MAX	Approx. 5L	Approx. 5L
FIREPOWER	Approx. 5L	Approx. 5L
HASTEN	Approx. 20L	Approx. 20L
CONTRAC BLOX	Nil	Approx. 10kg
RAMPAGE	Nil	Approx. 5L
GEN FIRSTSTRIKE	Nil	Approx. 5L
SELONTRA	Approx. 10kg	Approx. 10kg
Oils / Fuels / Grease	Quantity	Max Quantity
Gear Box Oil	Approx. 80L	Approx. 80L
Hydraulic Oil	Approx. 360L	Approx. 360L
Comp Oil	Approx. 80L	Approx. 80L
Torque Con Oil	Approx. 40L	Approx. 40L
EP Oil	Approx. 40L	Approx. 40L
Diesel Fuel	Approx. 20L	Approx. 20L
Transformer Oil	Approx. 20L	Approx. 2000L
Grease	Approx. 70kg	Approx. 70kg

7.4. SAFETY EQUIPMENT

Under GrainCorp’s Safety Management Program and ‘Zero Harm for Life’ campaign, minimum Personal Protection Equipment (PPE) requirements are in place for all Port Terminal Operations for all employees, contractors, visitors and transport operators. Minimum PPE includes high visibility clothing, enclosed footwear, hard hats and safety glasses. Other onsite safety-related equipment includes:

- Onsite safety sign-in and inductions for all employees, contractors and suppliers;
- Gas monitoring meters;
- Dust monitoring and alarm systems;
- Emergency stop/shut down and alarm points;
- Chemical wash stations/showers;
- Spill kits (refer section 7.3);
- Online SDS Register
- Appropriate process and chemical identification signage;
- First aid facility and kits;
- Restricted chemical access.

7.5. NOTIFICATION PROCEDURE

Incident notification is detailed under the GrainCorp Incident reporting and Investigation Standard (GNC-SHE-3-01 – for detailed information refer to the Incident Management Chart in GC intranet document management system and see also Appendix 3) Refer to this procedure to



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

determine what information is required to be immediately reported to authorities in the event of a pollution incident.

In response to requirements under changes to 5.7 of the POEO Act regarding pollution incident notifications, the following specific information and contact details are provided for Newcastle Grain Terminal, in the event of an environmental incident.

Excerpt from NSW EPA Website - Protocol for Industry Notification of Pollution Incidents:

<https://www.epa.nsw.gov.au/reporting-and-incidents/report-pollution/contacts-chemical-radiation-pollution/notification-protocol>

Recent changes to Part 5.7 of the Protection of the Environment Operations Act 1997 (POEO Act) specify new requirements relating to the notification of pollution incidents. The changes take effect from 6 February 2012 and require the occupier of premises, the employer or any person carrying on the activity which causes a pollution incident to immediately notify each relevant authority (identified below) when material harm to the environment is caused or threatened. The following information and procedures may assist those responsible for reporting a pollution incident.

If, under application of internal incident classification procedures, an environmental incident is determined to have caused or threatened material harm to the environment at the Newcastle Grain Terminal, the following internal and external stakeholders must be contacted immediately, in alignment with internal notification and escalation procedures.

Firstly, call 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

If the incident does not require an initial combat agency, or once the 000 call has been made, notify the relevant authorities in the following order. The 24-hour hotline for each authority is given when available:

- **the appropriate regulatory authority (ARA)**
- **the EPA, if it is not the ARA**
- **the Ministry of Health via the local Public Health Unit**
- **the SafeWork NSW**
- **the local authority if this is not the ARA**
- **Fire and Rescue NSW**

Complying with these notification requirements does not remove the need to comply with any other obligations for incident notification, for example, those that apply under other environment protection legislation or legislation administered by SafeWork NSW (previously WorkCover).

7.6. CONTACT DETAILS

7.6.1. Internal Notification Contact Details

The following Table 7 lists the names, positions and 24-hour contact details of those key individuals who:

- are responsible for activating the plan; and
- are authorised to notify relevant authorities under section 148 of the Act; and
- are responsible for managing the response to a pollution incident.



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

Table 7 - Internal notification contact details

Internal Notifications		
Contact Position	Contact Name	Contact Details
GrainCorp Carrington Site (business hours only)	Site phone number	(02) 4961 8100
Port Operations Manager	Jade Mann	
Site Manager	Mitchell James	
Operations Supervisors	Craig Casey	
	Simon Moore	
	Jack Forman	
Pest Control Supervisor	Paul Carpenter	
Maintenance Supervisor	Adam Lynch	

7.6.2. External Notification Contact Details

In response to the introduction of changes to 5.7 of the POEO Act, and as part of this PIRMP, in the event of a notifiable pollution incident, and dependent upon nature and scale, decisions to notify neighbours and the local community will be made in consultation with regulatory authorities (Table 6).

After consultation with the regulatory authorities, if required the Site Manager will undertake the early warning of the immediate neighbours in the first instance by phone. The initial notification will be brief and contain only a description of the environmental threat together with instructions what to do. For example:

- Due to a fire on site, we are experiencing elevated dust emissions from the site. Please keep your doors and windows closed until further notice.
- An accidental discharge occurred from the site. Emergency vehicles may possibly be present on roads leading to the terminal.
- Uncontrolled release of chemicals into waterway. Please avoid fishing or utilising the waterway for recreational purposes until the waterway is deemed safe.

Table 8 - External relevant authority contact details

Authority	Local Authority	Contact Details
Fire and Rescue NSW		000
NSW Environment Protection Authority (Pollution Hotline)		131 555
NSW Ministry of Health	Newcastle Office (diverts to John Hunter Hospital)	Phone: (02) 4924 6477 (Ask for Public Health Officer on call)
NSW Safe Work Authority		131 050
Local Council	Newcastle City Council	Phone: (02) 4974 2000



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

7.6.3. Other Key Stakeholders / Immediate Neighbour Notification Contact Details

Table 9 lists nearby neighbours and key stakeholders that may need to be contacted following a pollution incident.

In the event where the site is evacuated as a result of an emergency, generally the NSW Police and Fire and Rescue NSW will take over the site to respond to the incident. For this instance, instructions for coordinating the evacuation of neighbouring residents would be directed by the relevant authorities.

Table 9 - Other key stakeholders and neighbours contact details

Stakeholder	Contact Name	Contact Details
Port of Newcastle Environment Manager (requires immediate notification)	Jackie Spiteri	
Moda Marine Newcastle	Peter Sanderson	
Citrosuco	Macos Deoliveira	
Svitzer	Office	
Thales	Office	
AEP Anderson Environment and Planning	Office	
Residents	Not disclosed due to Privacy Act	Not disclosed due to Privacy Act

7.6.4. Newcastle Grain Terminal Contact Details

Contact details for Newcastle's Grain Terminal are publicly available via local directories, from <http://www.graincorp.com.au> and via signage on the outer security gate. GrainCorp operates a telephone complaint line during business hours. The contact details for Newcastle Grain Terminal are as follows:

Address: Denison Street, Carrington NSW 2294
Phone: (02) 4961 8100

Table 10 - Procedure for stakeholder's communication including existing ERPs

Document	Format
Newcastle Grain Terminal Emergency Response Procedure	Physical Copy on site
GrainCorp Incident Reporting and Investigation Standard (GNC-SHE-3-01)	Controlled document on SharePoint

8. MINIMISING HARM TO PERSONS ON PREMISES



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

The following section includes actions or arrangements that will be in place to minimise the risk of harm to any persons who will be on the premises or who are likely to be on the premise should an incident occur. Persons likely to be on site include employees of GrainCorp, contractors and sub-contractors.

At all times, minimising harm to persons on premises shall be a priority and is achieved through Engineering, Training, Administrative and PPE controls as the last line of defence. Regular health monitoring of fumigation staff is also undertaken.

Training is provided to GrainCorp employees and any other person entering the site so that they are aware of site hazards and processes in the event of a pollution incident. Training includes inductions (online), toolbox talks and simulated desktop scenarios and simulated exercises. A record of site inductions is recorded on the eLearning online database. A record of the most recent simulated desktop scenario and the attendees are located on the Newcastle Network Drive. A full training matrix for personnel at Newcastle Grain Terminal is maintained on site, including the requirement for attendance at the PIRMP toolbox and spill response fundamentals training. The training matrix is located in Appendix 3.

8.1. EMERGENCY RESPONSE – ACTIVATION OF A WARNING ALARM

As a standard on site, the alarm may be raised by anyone noting an emergency situation. It is also crucial that personnel notify the Operations Supervisor or Site Manager of what has occurred, what your actions have been and any identified issues. Response actions will be initiated based on this information.

A combination of communication methods are available. They include:

- Verbal communication between employees and others
- Radio communication
- Audible alarm
- Loud-speaker system
- Siren(s)
- Telephone - including mobiles

Electronic alarms are tested and maintained at regular intervals. Practice evacuations are conducted regularly to meet the requirements of the OHS Management System Program. The alarm system is covered during training and induction processes. Details of evacuation points are provided in Map 1, Appendix 1.

8.2. STANDARD SITE CONTROLS

8.2.1. Engineering controls

- Fire extinguishers located throughout plant
 - 173 x CO2 3.5kg
 - 53 x CO2 5kg
 - 8 x dry chemical 9kg
 - 4 x dry chemical 4.5kg
 - 1 x dry chemical 2.5kg
 - 3 x dry chemical 1.5kg
 - 3 x external air and water 9L
 - 1 x foam 9L
 - 44 hose reels
- Safety showers and eyewash stations located at the Pesticide and Oil Store, and at the FCOJ Plant



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

- Caged areas for gassed cylinders located at the Maintenance Workshop and the Fumigation Compound
- Early warning smoke detection system

8.2.2. Administrative controls

Administrative controls to minimise harm to persons on site include;

- Risk assessments for tasks undertaken on site
- Safe Work Method Statements
- Safety Signage across the site
- Online SDS register
- Site safety, health and environment inspection checklists
- Site Emergency Procedures booklet
- Toolbox talks, safety alerts

8.2.3. PPE

See Section 7.4.

9. ACTIONS TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

Internal incident management procedures, including the Notification and Escalation Flowcharts and ERPs provide detailed procedure as to immediate action to be undertaken during or immediately after an incident, dependent upon type and classification.

1. Assess and notify of incident if required: Follow the internal incident management procedures, including the Internal Emergency tab of the Newcastle Emergency Response Procedure (flipchart). This provides detail on immediate action to be undertaken during or after an incident, dependent upon type and classification.

2. Control the incident with available response equipment and procedures.

3. Classify incident and escalate: Follow internal notification requirements and classify incidents according to the Group Incident Notification & Escalation Procedure. The procedure provides details on classifying emergency incidents as either Level One, Two, Three or Four where Four is the most critical incident.

4. Report the Incident: Follow the GrainCorp Incident Reporting and Investigation Standard (GNC-SHE-3-01) and report to Sphera.

As outlined in section 7.1, the main hazards to human health and the environment that have been identified at the terminal are:

- Minor chemical spills/leaks
- Uncontrolled gas release e.g. Methyl bromide
- Release of contaminants/emissions not in accordance with acceptable limits
- Dust from loading/unloading operations ship/truck/rail
- Spillage of bulk grain into stormwater drains
- Spillage of bulk grain into the harbour from loading gantry

The following table details the actions to be taken in response to the events listed above. In the event of a pollution incident for the hazards above, the following actions are to be taken:



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

Table 11 - Site Hazard, potential impact and expected site response

Hazard	Potential Impact	Expected Response
Use and storage of bulk chemicals on site	Minor Chemical Spills/Leaks causing Soil and/or Water Pollution. - Generally, small quantities of hazardous materials are held on site and are managed following strict procedures and used by trained and experienced staff. Spill kits are provided as appropriate	<ul style="list-style-type: none">• Raise the alarm to alert the site supervisor• Contain spillage to minimise impact• Notify stakeholders (internal and external)• Clean up spillage• Work with authorities
Fumigation activities carried on site	Release of contaminants / emissions not in accordance with acceptable limits causing Air Pollution. This type of incident is most likely to be a release to air or water. The receiving environment including sensitive receptors may be impacted.	<ul style="list-style-type: none">• Cease release immediately• Determine what fumigant that has been released and refer to SDS for appropriate response• Qualify level of exceedance against relevant criteria• Determine if communities/ environment has been harmed<ul style="list-style-type: none">○ If granted, call 000 to assist with residents evacuation (refer to evacuation maps on Appendix 1)• Follow escalation/ notification and PIRMP procedures



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

Hazard	Potential Impact	Expected Response
Use and storage of gas vessels on site (mainly for fumigation activities)	Uncontrolled Gas Release causing Air Pollution. This type of emergency will, most likely, include escape of fumigant gases from faulty equipment in the event of a breached storage.	<ul style="list-style-type: none">• Alert the site supervisor• Identify the leak location if possible, isolate the system and contain in accordance with SDS, if it is safe to do so.• If unable to contain / stop, raise the alarm* Dial 000 and give name, location and details to the operator, secure the area and, if required, evacuate the site and residential area (refer to evacuation maps on Appendix 1)• Ensure access and guidance for emergency services• Follow GrainCorp OHS and PIRMP reporting requirements• Initiate “Internal Emergency” procedures as per the Emergency Procedures flipchart
Loading and Unloading operations (ship truck or rail)	Dust from loading/unloading operations Ship/Truck/Rail causing Air Pollution Dust generated as a result of grain movement	<ul style="list-style-type: none">• Cease operation• Assess dust extraction systems functionality• Assess dust suppression systems functionality• Analyse Weather Station data• Recommence as appropriate
Loading and Unloading operations using the conveyors systems on site (ship, truck, rail)	Spillage of bulk grain into stormwater drains causing Water Pollution Spills generally contained within storage and conveyor areas (internal). Minimal opportunity for grain to be in proximity to drains.	<ul style="list-style-type: none">• Raise the alarm to alert the site supervisor• Contain spillage to minimise impact• Notify stakeholders (internal and external)• Clean up spillage• Work with authorities



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

Hazard	Potential Impact	Expected Response
Loading and Unloading operations using the loading gantries	Spillage of grain into harbour from loading gantry causing Water Pollution The ship loaders have to be lowered horizontally for the loading belts to run. The loading belts have overload and alignment sensors.	<ul style="list-style-type: none">• Raise the alarm to alert the site supervisor• Contain spillage to minimise impact• Notify stakeholders (internal and external)• Clean up spillage• Work with authorities



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

10. STAFF TRAINING AND PIRMP TESTING

Site staff will be trained in the PIRMP every year via Toolbox lead by management. Training is provided to GrainCorp employees and any other person entering the site so that they are aware of site hazards and processes in the event of a pollution incident. Training includes inductions, toolbox talks and simulated desktop scenarios and when required simulated exercises. A record of site inductions is recorded on the online eLearn database. A record of the most recent simulated desktop scenario and the attendees are located on the Newcastle Network Drive. A full training matrix for personnel at Newcastle Grain Terminal is maintained at the terminal, including the requirement for attendance at the PIRMP toolbox and spill response fundamentals training.

This PIRMP will be tested annually through a desktop review and/or a practical exercise simulating where a spill or a release of chemical/gas has occurred. The practical exercise will determine the practical effectiveness of the ERP and the PIRMP and any areas for improvement.

The PIRMP will also be tested and reviewed within one month of any pollution incident occurring in the course of the site activities where it can be assessed whether the information included in the PIRMP is accurate and up to date, and the plan is still capable of being implemented in a workable and effective manner.

Table 12 - History of PRIMP testing

PIRMP Testing	
Date	Method
Mark Farnham/Peter Lino – 09/05/2014	Desktop Review and Simulation
Mark Farnham/Martin Sierszycki – 18/05/2015	Desktop Review and Simulation
Mark Farnham/Martin Sierszycki - TBA	Desktop Review and Practical exercise
Mark Farnham/Jade Mann/Craig Casey – 11/05/2017	Desktop Review and Simulation
Mark Farnham/Jade Mann/Craig Casey/Anne-Maree Hurst/Paul Thew/Mark Jelbart – 08/05/18	Desktop Review and Simulation
J. Mann, C. Casey, S. Moore, A. Donnelly, C. Nixon, M. Kennedy – June 2019	Desktop Review and Simulation
J. Mann, C. Casey, S. Moore, A. Donnelly, P. Bourke, M. Kennedy – June 2020	Desktop Review and Simulation
J. Mann, M. James, S. Moore, P. Bourke, A. Costa, M. Kennedy – April 2021	Desktop Review and Simulation
J. Mann, M. James, S. Moore, A. Donnelly, A. Costa – April 2022	Desktop Review and Simulation
J. Mann, M. James, S. Moore, R. Hodges, A. Costa – 20 September 2022	Desktop Review and Simulation
J. Mann, M. James, A. Donnelly, C. Casey, G. Palmer, A. Costa – 26 October 2022	Desktop Review and Simulation
J. Mann, M. James, A. Donnelly, G. Langlands, S. Moore, B. Dwyer, L. McDonald, A. Costa 27/9/2023	Desktop Review and Simulation
J. Mann, J Foreman, P. Carpenter M. Kennedy, M. Anderton 8 May 2024	Desktop Review and Simulation



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

J. Mann, M. James, M. Anderton, P. Carpenter,
M. Kennedy 10 April 2025

Desktop Review and Simulation



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

APPENDIX 1: MAPS

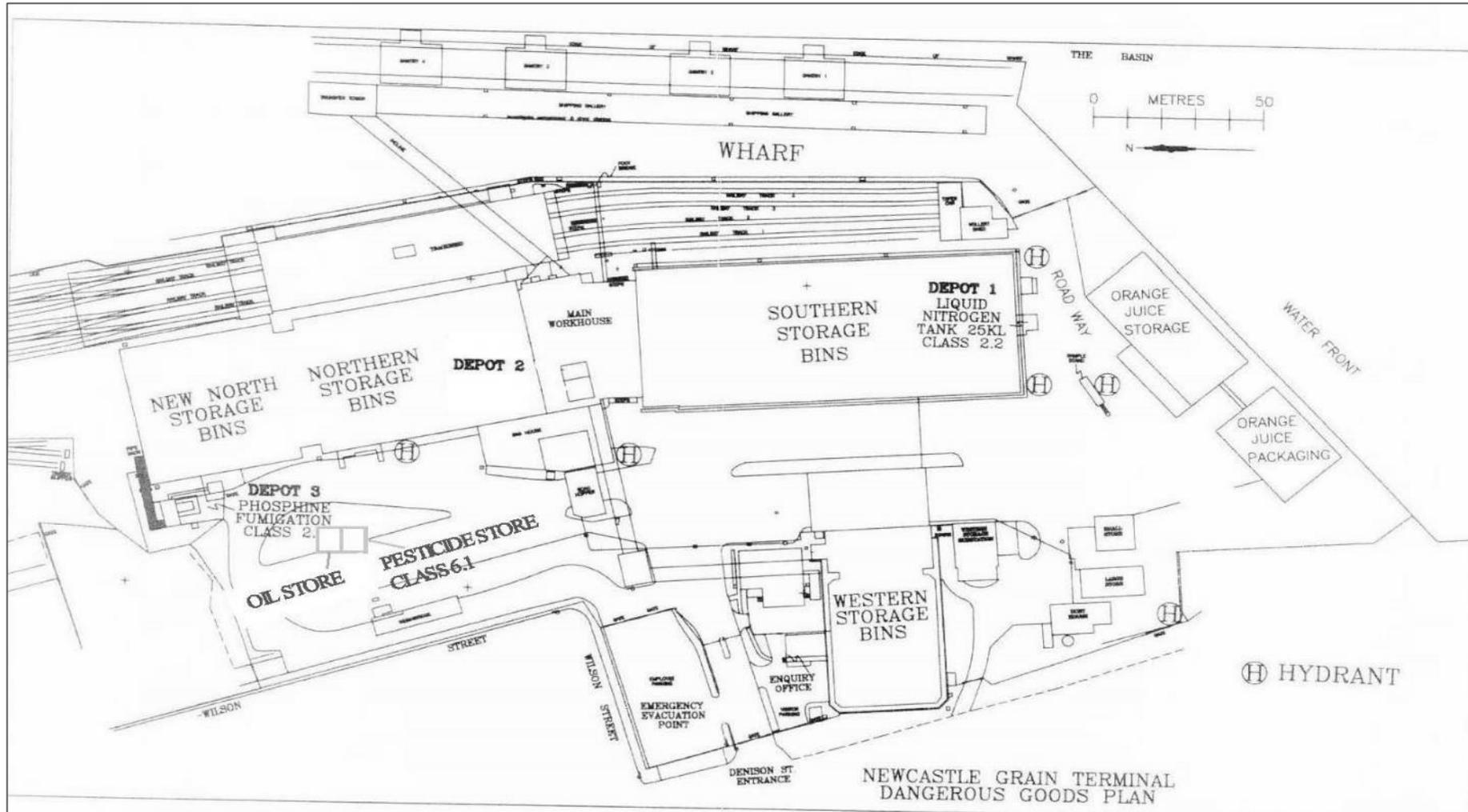


Figure 8 – Map of Newcastle Grain Terminal Site

 **Pollution Incident Response Management Plan (PIRMP)**
Newcastle Grain Terminal

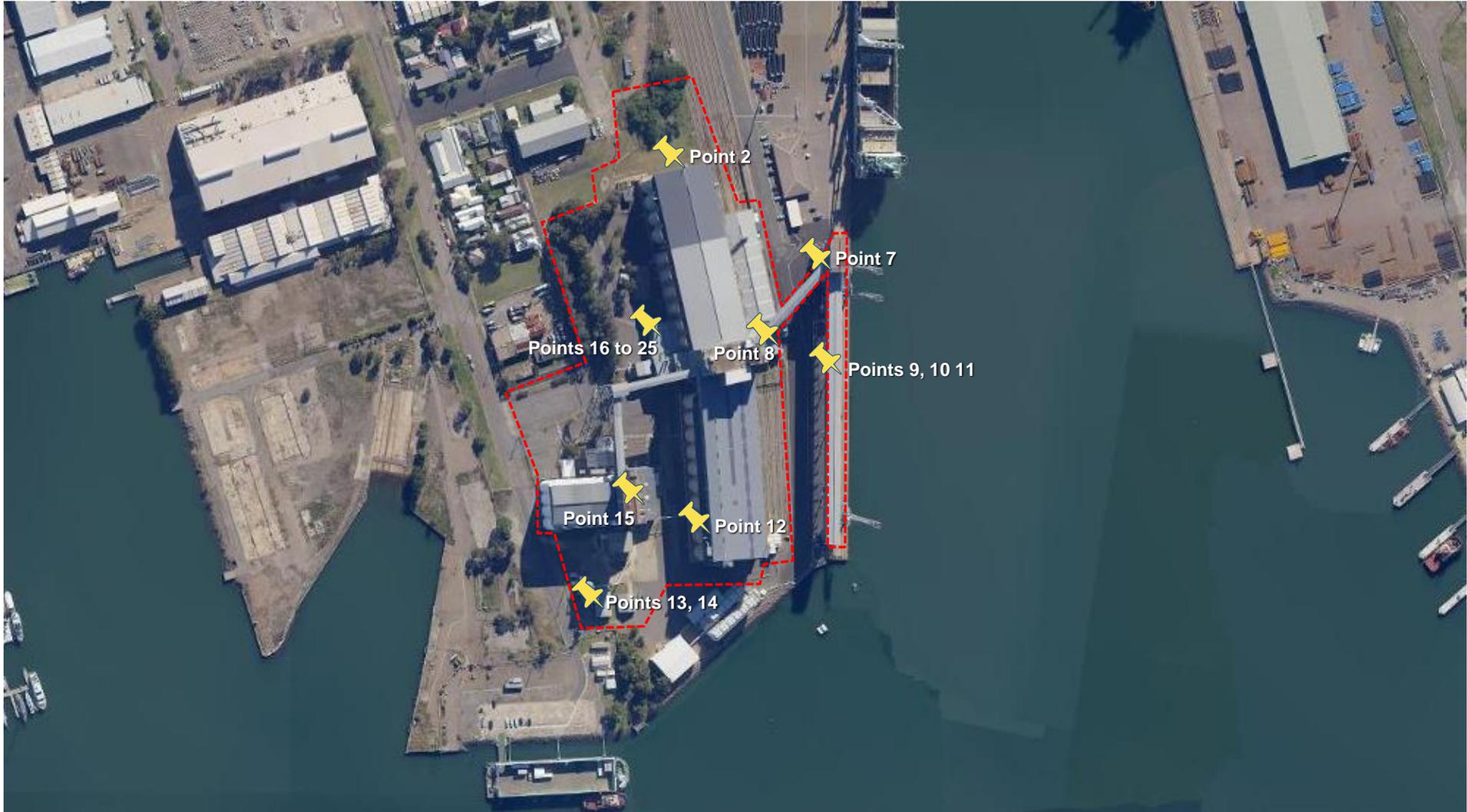


Figure 9 – Map of Site Monitoring Points (potential sources for air emissions)


Pollution Incident Response Management Plan (PIRMP)
Newcastle Grain Terminal

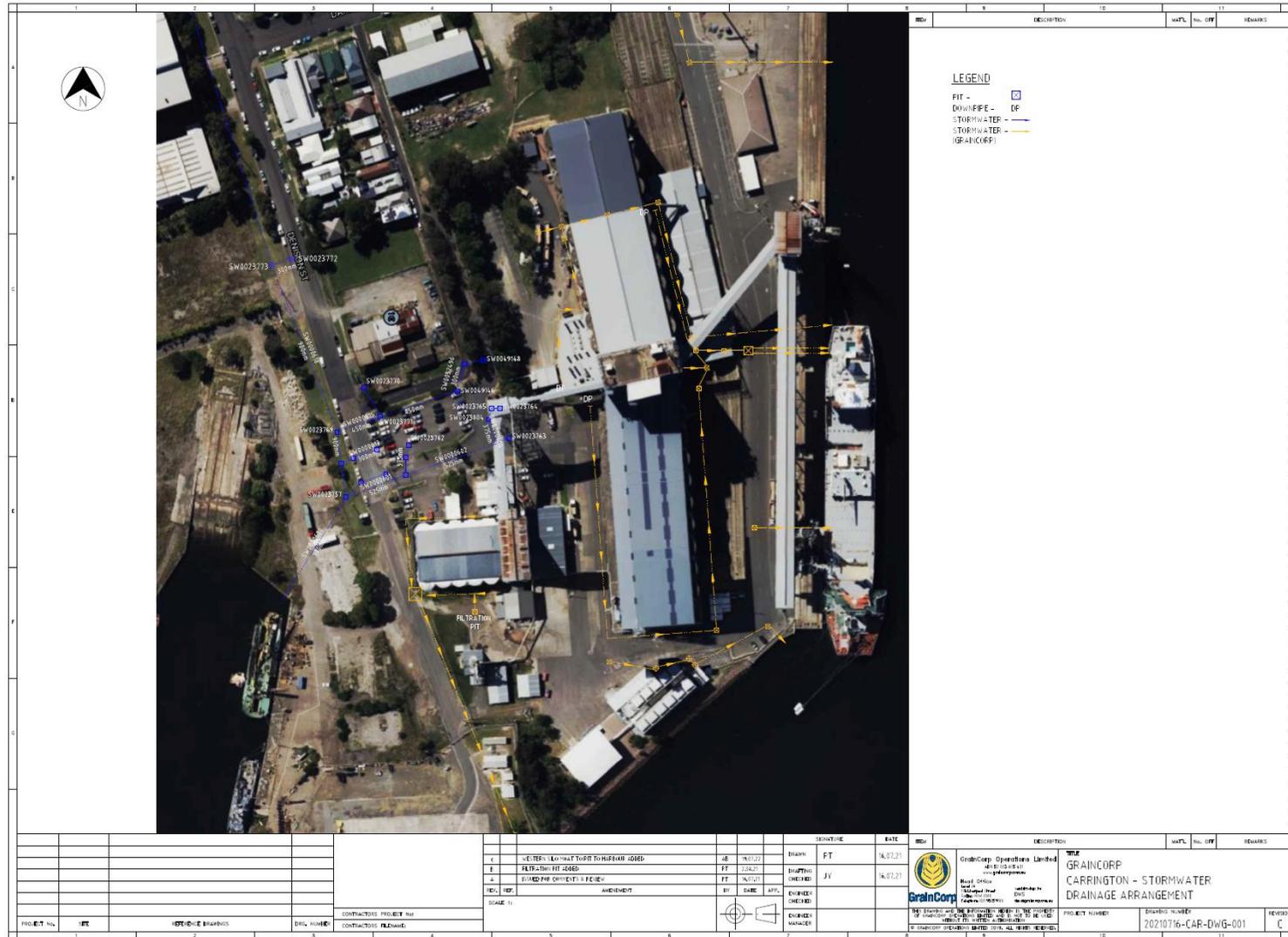


Figure 10 – Map of Newcastle Grain Terminal Stormwater Drains.



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal



Figure 11 - Fumigation Incident - Exclusion Zones

 **Pollution Incident Response Management Plan (PIRMP)**
Newcastle Grain Terminal



Figure 12 - Fumigation Incident - Major Leak Exclusion Zone



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal



Figure 13 – Newcastle Grain Terminal LEP Zoning



Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

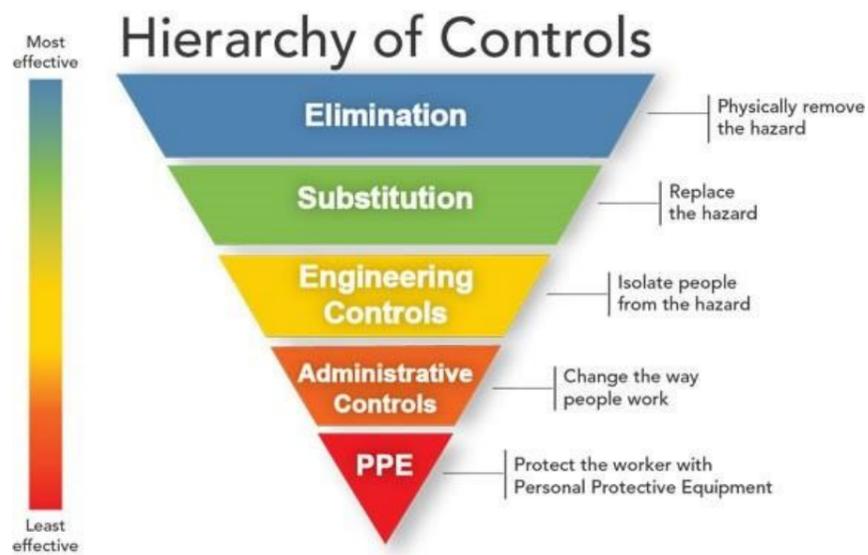
APPENDIX 2: GRAINCORP RISK ASSESSMENT MATRIX

TABLE 1: CONSEQUENCE TABLE - Qualitative Measurement of the Maximum Credible Outcome of an Event					
CONSEQUENCE	Extreme	Major	Moderate	Minor	Negligible
Safety	Fatality or significant permanent injury. Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 5 section.	Injury resulting in a loss of one or more full shifts – (i.e. a Lost Time Injury – LTI) Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 4 section.	Injuries requiring Medical Treatment (MTI) but where no time was lost. Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 3 section.	Injury requiring First Aid treatment only. Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 2 section.	Injury requiring no treatment – report only.
Health	Severe illness or chronic exposure resulting in fatality or significant life shortening effects.	Illness or significant adverse health effect needing a high level of medical treatment or management.	Mild illness or health effect and/or some functional impairment that needs some treatment but is usually easily managed, medically.	Minor illness or health effect with no functional impairment, treatment is optional, with no medical intervention.	Illness or effect with limited or no impact on ability to function – no treatment necessary.
Environment	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Destruction of important populations of habitat, species, or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised and measurable medium-term impact on habitat, species or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised and measurable short-term impact on habitat, species or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised but immeasurable impact on or impairment of habitat, species or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. No discernible impact on or impairment of habitat, species or natural environment.
Property Damage	Damage to or loss of GrainCorp or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively >\$500,000.	Damage to or loss of GrainCorp or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively between \$50,000 and \$500,000.	Damage to or loss of GrainCorp's or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively between \$10,000 and \$50,000.	Damage to or loss of GrainCorp's or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively <\$10,000.	Damage to or loss of GrainCorp's or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, deemed negligible.
Assets and Supply Chain	Extended loss of use of assets, significant supply chain / business interruption or widespread and sustained electronic systems outage with a time impact of >48 hours or total financial impact >\$1M.	Extended loss of use of assets, significant supply chain interruption / business interruption or widespread and sustained electronic systems outage with a time impact of >24 hours or total financial impact between \$1M and \$500,000.	Loss of use of assets, supply chain / business interruption or sustained electronic systems outage with a time impact of >12 hours or total financial impact of between \$500,000 and \$200,000.	Loss of use of assets, supply chain / business interruption or electronic outage with a time impact of >6 hours or total financial impact of between \$200,000 and \$50,000.	Loss of use of assets, supply chain / business interruption or electronic outage with negligible time impact or financial impact <\$50,000.
Regulatory & Legal[^]	Is 'notifiable' to an Authority / Regulator AND the Authority / Regulator attends the scene of the incident AND/OR commences an investigation. Involves a non-compliance of a licence, authority, permit, approval or law that has either the actual / potential for a civil penalty or fine the maximum of which is > \$50,000 or a criminal penalty. All incidents of suspected or actual fraud, bribery or corruption, events of significant illegal activity, or data breach / privacy breach events.	Is 'notifiable' to an Authority / Regulator or the Authority / Regulator issues a notice or intends to/or attends the scene / conducts an inspection. Involves a non-compliance of a licence, authority, permit, approval or law that has either the actual/potential for a civil penalty or fine the maximum of which is <\$ 50,000. Significantly exceeded legislated criteria or state policy limit.	Involves a non-compliance of a licence, authority, permit, approval or law that may result in a minor penalising action (quantum not determined), and any intervention by an Authority or Regulator is limited to a field report (or similar). A visit by a regulator following a complaint that results in no penalty but where a report is issued with follow up action. Exceeded legislated criteria or state policy limit.	Involves a non-compliance of a licence, authority, permit, approval or law with no penalising action, and no intervention by an Authority or Regulator. A visit by a regulator following a complaint that results in no penalty or follow up action. Legislated criteria or state policy limit at risk of not being met.	Minor breaches of company policy or procedure by individual staff members with no external actions or impact.
Community / Reputation	Extended national adverse media coverage. Brand devalued. Significant disruption to public activities or a third party's or our own business operations.	Sustained adverse, local to national media reference. Brand image has potential of being tarnished. Minor disruption to public activities or a third party's or our own business operations.	A clustering of complaints. Potential adverse local media reference. Potential for brand to be questioned.	Isolated complaint from an individual with the potential for adverse community discussion. Isolated adverse local media reference.	Isolated complaint from a local individual.
Product Safety, Quality or Contamination	A product recall or product withdrawal is planned or has been initiated following determination that the affected product could harm human health.	A product contamination, product specification or product quality failure event that has the potential to impact customers or the public with a financial impact >\$200,000.	A contamination, specification or quality incident that results in a potential or actual claim (or rework) of up to \$100,000 and can be resolved internally (i.e. without external expert support).	A customer complaint or incident resulting in a potential or actual claim (or rework) under \$5,000 (e.g. credit note or product reject), which has no harm to human health or the public.	Minor incident with no resulting impact on the customer.
External Disasters	A natural disaster event (flood, fire, earthquake), terrorism, pandemic or threat of extortion, and one other trigger under this level 5 section.	A natural disaster event (flood, fire, earthquake), terrorism, pandemic or threat of extortion, and one other trigger under this level 4 section.	A natural disaster event (flood, fire, earthquake), terrorism, pandemic or threat of extortion, and one other trigger under this level 3 section.	A natural disaster event (flood, fire, earthquake), terrorism, pandemic or threat of extortion, and one other trigger under this level 2 section.	A natural disaster event (flood, fire, earthquake), terrorism, pandemic or threat of extortion, and one other trigger under this level 1 section.

TABLE 2: RISK MATRIX - Qualitative Risk Matrix – Levels Of Risk					
Likelihood \ Consequence	Rare The consequence is not expected to occur or to occur less than once in 3 years.	Unlikely The consequence is expected to occur more than once in 3 years but less than once a year.	Possible The consequence is expected to occur more than once a year but less than once in 3 months	Likely The consequence is expected to occur more than once in 3 months but less than once a week.	Almost Certain The consequence is expected to occur on a weekly basis or more frequently.
Extreme	M (15)	M (19)	H (22)	H (24)	H (25)
Major	M (13)	M (14)	M (18)	H (21)	H (23)
Moderate	VL (6)	L (9)	L (12)	M (17)	H (20)
Minor	VL (3)	VL (5)	L (8)	L (11)	M (16)
Negligible	VL (1)	VL (2)	VL (4)	L (7)	L (10)

TABLE 3: PRIORITY ACTION MATRIX		
H	HIGH RISK	Review activity immediately. Advise local management. Immediate control action needed
M	MEDIUM RISK	Review existing controls. Apply hierarchy of controls to reduce risk to ALARP*
L	LOW RISK	Consider existing controls to determine adequacy
VL	VERY LOW RISK	Monitor existing controls

* ALARP = As Low As Reasonably Practicable – All hazards must have associated risk controlled to ALARP.





Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

APPENDIX 3: GRAINCORP INCIDENT MANAGEMENT CHART

Incident Classification Matrix and Notification Table

This matrix is designed to ensure that significant incidents are immediately notified and escalated within the organisation and that the appropriate investigation, shared learnings and actions are progressed to prevent incident recurrence. The matrix envisages that the notification allows our people at the front line to manage the incident while ensuring that senior management and, if appropriate, the CEO and members of the Board, are informed in a timely manner.

Use the **Incident Classification Matrix** below to classify the incident (default to the higher level if in doubt). Please note that some trigger events need another trigger in that section to apply. After you classify the incident refer to the **Incident Notification Table** below to determine who needs to be notified. Please note that if reporting an 'actual event' (not a 'potential event') by phone, leaving a voice message is insufficient – you must speak directly to the nominated person, or their delegated representative. If you cannot speak to the nominated person, a text message (SMS) is acceptable only provided that a reply text is received indicating that the nominated person received and understood your text. If you are unable to make DIRECT VERBAL OR TEXT contact with the person next in line, escalate to the next level again. Continue doing so until DIRECT VERBAL OR TEXT contact is made at the next level.

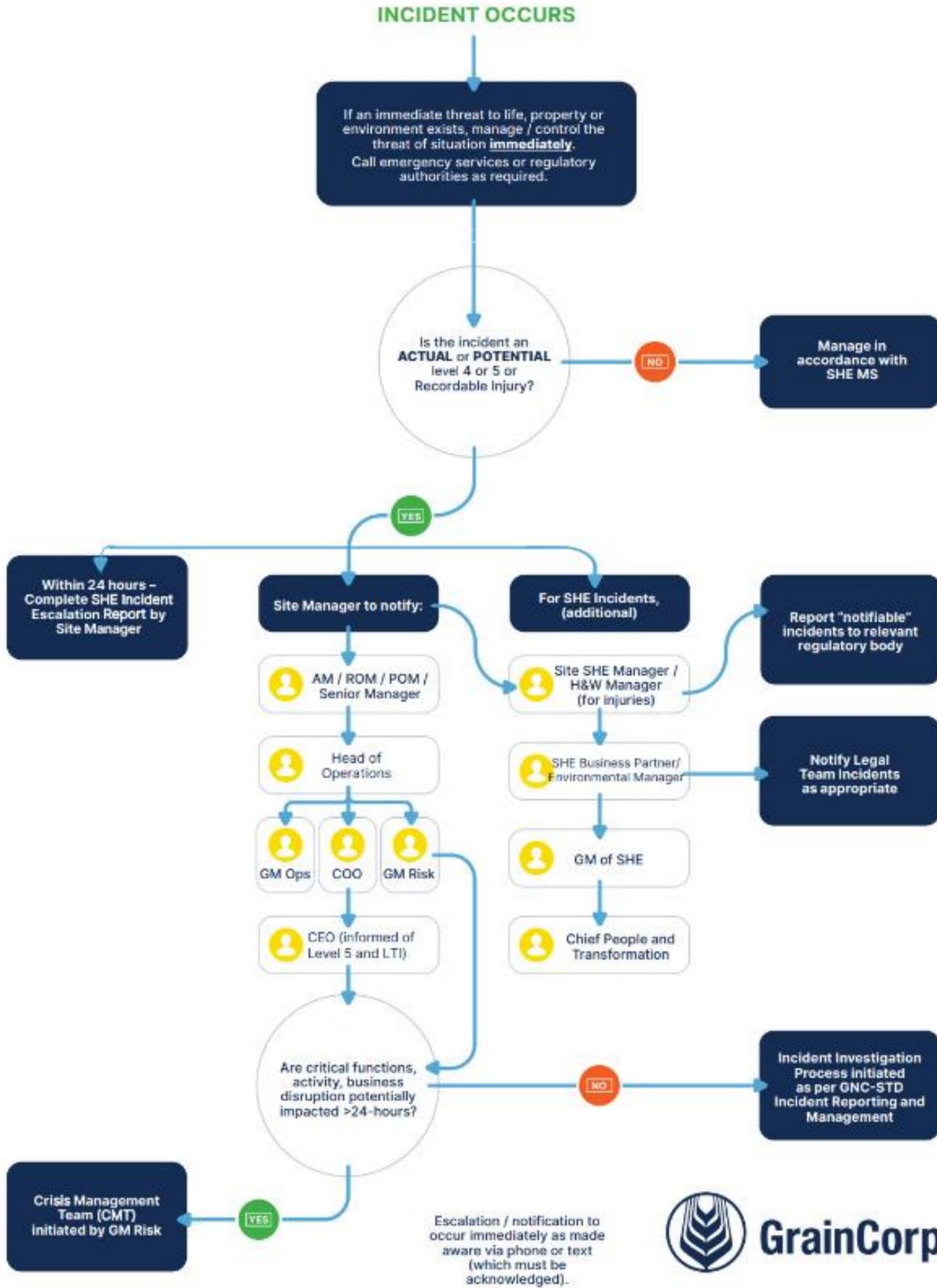
Note: a 'Critical Incident' is defined as a level 5 incident involving safety, health or environmental impacts only – events resulting in commercial losses where there are no SHE implications are not critical incidents.

INCIDENT CLASSIFICATION Actual or Potential (Worst Credible) Consequence	Extreme (Level 5)	Major (Level 4)	Moderate (Level 3)	Minor (Level 2)	Negligible (Level 1)
Safety	Fatality or significant permanent injury. Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 5 section.	Injury resulting in a loss of one or more full shifts – (ie a Lost Time Injury – LTI) Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 4 section.	Injuries requiring Medical Treatment (MTI) but where no time was lost. Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 3 section.	Injury requiring First Aid treatment only. Involves a fire, explosion or smoulder (smoke or fumes) and one other trigger in this level 2 section.	Injury requiring no treatment – report only.
Health	Severe illness or chronic exposure resulting in fatality or significant life shortening effects.	Illness or significant adverse health effect needing a high level of medical treatment or management.	Mild illness or health effect and/or some functional impairment that needs some treatment but is usually easily managed, medically.	Minor illness or health effect with no functional impairment, treatment is optional, with no medical intervention.	Illness or effect with limited or no impact on ability to function – no treatment necessary.
Environment	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Destruction of important populations of habitat, species, or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised and measurable medium-term impact on habitat, species or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised and measurable short-term impact on habitat, species or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised but immeasurable impact on or impairment of habitat, species or natural environment.	Loss of containment / spills meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. No discernible impact on or impairment of habitat, species or natural environment.
Property Damage	Damage to or loss of GrainCorp or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively >\$500,000.	Damage to or loss of GrainCorp or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively between \$50,000 and \$500,000.	Damage to or loss of GrainCorp's or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively between \$10,000 and \$50,000.	Damage to or loss of GrainCorp's or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, cumulatively <\$10,000.	Damage to or loss of GrainCorp's or third-party property, products, plant or equipment, including clean-up costs, remedial / corrective actions, deemed negligible.
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Regulatory & Legal[^]	Is 'notifiable' to an Authority / Regulator AND the Authority / Regulator attends the scene of the incident AND/OR commences an investigation. Involves a non-compliance of a licence, authority, permit, approval or law that has either the actual / potential for a civil penalty or fine the maximum of which is > \$50,000 or a criminal penalty. All incidents of suspected or actual fraud, bribery or corruption, events of significant illegal activity, or data breach / privacy breach events.	Is 'notifiable' to an Authority / Regulator or the Authority / Regulator issues a notice or intends to/or attends the scene / conducts an inspection. Involves a non-compliance of a licence, authority, permit, approval or law that has either the actual/potential for a civil penalty or fine the maximum of which is <\$ 50,000. Significantly exceeded legislated criteria or state policy limit.	Involves a non-compliance of a licence, authority, permit, approval or law that may result in a minor penalising action (quantum not determined), and any intervention by an Authority or Regulator is limited to a field report (or similar). A visit by a regulator following a complaint that results in no penalty but where a report is issued with follow up action. Exceeded legislated criteria or state policy limit.	Involves a non-compliance of a licence, authority, permit, approval or law with no penalising action, and no intervention by an Authority or Regulator. A visit by a regulator following a complaint that results in no penalty or follow up action. Legislated criteria or state policy limit at risk of not being met.	Minor breaches of company policy or procedure by individual staff members with no external actions or impact.
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INCIDENT NOTIFICATION TABLE ✓ Immediate phone call (email of Sphera Report within 24 hours)		Extreme (Level 5)	Major (Level 4)	Moderate (Level 3)
Responsibility:	Notify incident to:	Actual Occurrence	Potential to Occur	Actual Occurrence
Site / Plant / Terminal Manager	Line Manager (eg: National/Regional Operations Mgr)	✓	text / email only	✓
Site / Plant / Terminal Manager (immediately)	Incident Reporting Hotline	+61 2 9266 9436	-	-
Site / Plant / Terminal Manager (within 24 hours)	CEO (+61 419 133 433)	-	-	✓ LTI only
Line Manager (eg: National/Regional Operations Mgr)	SHE Manager	✓	text / email only	✓
Line Manager (eg: National/Regional Operations Mgr)	GM Operations	✓	text / email only	✓
SHE Manager	GM SHE	✓	text / email only	✓
GM, Operations	Chief Operations Officer	✓	text / email only	✓
GM, SHE (GM, Ops for non-SHE incidents)	Chief People & Transformation Officer	✓	text / email only	text / email only
GM, SHE (GM, Ops for non-SHE incidents)	General Counsel & Company Secretary	✓	text / email only	text / email only
GM, SHE (GM, Ops for non-SHE incidents)	Snr Mgr Corporate Affairs & Investor Relations	✓	text / email only	text / email only
GM, SHE (GM, Ops for non-SHE incidents)	Insurance Manager	✓	text / email only	text / email only
Chief Operations Officer	CEO	✓	text / email only	text / email only
Site Personnel	Emergency Services	As required (Police, Ambulance, Fire Services)		
SHE Manager	Regulatory Authorities	As required (<u>only after</u> consultation with General Counsel) (eg: WHS, EPA, etc)		
General Counsel & Company Secretary	Board of Directors	As deemed appropriate (all fraud and legal matters must be notified)		
[^] For Fraud, Bribery, Corruption or Illegal Activity Events please refer to the <i>Whistleblower Procedure</i> if you would prefer to make a confidential disclosure – available on Jumbunna and the GrainCorp website.				
Extreme (Level 5) and Major (Level 4) Incidents – Crisis Management Team Decision Point A decision to activate the GrainCorp Crisis Management Team (CMT) will be made by the Crisis Management Team Leader (Risk & Assurance)				

INCIDENT REPORTING	Extreme (Level 5)	Major (Level 4)	Moderate (Level 3)	Minor (Level 2)	Negligible (Level 1)
SHEQ Incidents (including Regulator activity / correspondence received)	All incidents recorded in Sphera within 24 hours				

Incident Management Chart





Pollution Incident Response Management Plan (PIRMP) Newcastle Grain Terminal

APPENDIX 4: GRAINCORP STAFF TRAINING MATRIX

SURNAME	Employee ID	Apply Chemicals Under Supervision			Fumigation (CPPUPM3011)				Pest Management				Ground Applicator		
		Certified Date	VoC Completed By		Certified Date	EPA Licence Expiry Date	VoC Completed By	QR Code Finalised	Certified Date	EPA Licence Expiry Date	VoC Completed By	QR Code Finalised	Certified Date	VoC Completed By	QR Code Finalised

SURNAME	GIVEN NAME	Employee ID	USI #	Certified Date	Retraining Date (3Yrly)	Certified Date	Retraining Date	Certified Date	Retraining Date (3Yrly)	Certified Date	Retraining Date (3YR)	Certified Date	Retraining Date (3Yrly)	Certified Date	Retraining Date (3Yrly)	Certified Date	Retraining Date (3Yrly)	Certified Date	Retraining Date (1Yrly)	Certified Date	Retraining Date (3Yrly)	Certified Date	Retraining Date (3Yrly)	Certified Date	Retraining Date (1YR)
				WORK SAFELY AT HEIGHTS	HEIGHTS RESCUE	CONFINED SPACES	CONFINED SPACE RESCUE	FIREFIGHTING EQUIPMENT	FIRE WARDEN / FIRE CHIEF	ISSUE WORK PERMIT	CPR	PROVIDE FIRST AID	PORT OF NEWCASTLE												