Pollution Incident Response Management Plan (PIRMP)

Port Kembla Terminal

21 April 2026

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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. GrainCorp currently holds Environment Protection Licence (EPL) 3693 at the GrainCorp Port Kembla Terminal (PKT) premises.

Under GrainCorp's Emergency Management System, detailed emergency response procedures are already in place for the classification and management of incidents, across GrainCorp operational sites. Under the provisions of Part 3A clause 98B(2) of the *Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012*, 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 procedures. It details additional supplementary site-specific information as required under the POEO legislation, in respect to the relevant EPL holder.

2. Scope

This PIRMP covers the PKT operations which includes the GrainCorp's Port Kembla Terminal, the Bulk Liquid storage facility, the Fertiliser Distribution Centre and the Cement Terminal (the Terminal). This plan applies to all activities, products and services on the site over which GrainCorp has operational control. Other environmental emergency plans that are in operation across the PKT are linked to this PIRMP and referenced in this document. Temporary activity outside of the scope, e.g. construction, would be managed using this PIRMP if it is found suitable or a supplementary response management plan specific to the temporary works.

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)

and Part 3A Protection of the Environment Operations (General) Regulation 2009 (POEO(G) Regulation) as amended by the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012

Environment Protection License (EPL) 3693 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 (clause 98B).

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 (clause 98E).

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

Table 1. Terms and Definitions relevant to the PIRMP

Term	Definition
Pollution Incident	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 premise, but it does not include an incident or set
EPA	of circumstances involving only the emission of any noise.
PIRMP	Environment Protection Authority
PKT	Pollution Incident Response Management Plan
POEO Act	Port Kembla Terminal
POELA Act	Protection of the Environment Operations Act 1997
POEO(G) Regulation	Protection of the Environment Legislation Amendment Act 2011
CLM Act	Protection of the Environment Operations (General) Regulation 2009
EPL	Contaminated Land Management Act 1997
ERP	Environment Protection Licence
EMP	Emergency Response Procedure
Wharf Procedure	Environmental Management Plan

5. Notification of a Pollution Incident

A pollution incident is required to be immediately notified if there is a risk of 'material harm to the environment', defined which has been 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.*

For the purposes of this Part, it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs.

In summary, material harm to the environment can involve actual or potential harm to humans and the ecosystem or results in actual or potential loss, damage or monetary impact exceeding $10,000. Loss can include the cost in preventing harm, mitigating or making good harm to the environment. It does not matter if the incident occurred within the site boundary, it is still considered material harm and requires notification to the relevant authority.

5.1. 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. 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 (see Appendix D).

5.2. Emergency Response

In an event of a pollution incident the Port Kembla Emergency Response Procedure (ERP) is required to be implemented. If a pollution incident occurs, all necessary action should be taken to minimise the size and any adverse effects of the release. If the incident presents an immediate threat to human health or property, Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service should be contacted first for emergency assistance (phone 000). The full list of agencies that GrainCorp MUST notify in accordance with the legislation for reportable incidents are found within the ERP. The other response agencies must still be contacted after that to satisfy notification obligations.

Where a pollution event occurs on the berth during bulk liquid unloading, for example during a loss of containment, the relevant sections in the Wharf Procedure should be followed.

5.3. 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 Documents

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

Table 2. GrainCorp internal plans and procedures underpinning this PIRMP

Document No.	Document	Format
	Port Kembla Emergency Response Procedure (flipchart)	Flipchart on site
GNC-SHEQ-3-01	Incident Management Chart-GrainCorp	Controlled document on SharePoint
GNC-SHEQ-3-01-F01	Injury/Incident Notification Form (If Sphera is not available)	Controlled document on SharePoint
13-208	Bulk Liquids Wharf Unloading Procedure	Soft copy and hard copy at Port Kembla

7. Port Kembla PIRMP

7.1. Description and Likelihood of Hazards

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 PKT are detailed below:

- Minor chemical spills and leaks
- Leak from underground piping network that carry bulk oil
- Chemical spill from Bulk liquid storage tanks into stormwater system
- Release of contaminants, including emissions, not in accordance with acceptable limits e.g. fumigant venting and boiler emissions
- 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 D) 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.

Table 3. Likelihood and consequence assessment of hazards around the PKT

Hazard	Type of pollution	Potential Impact	Consequence	Likelihood	Risk Score	Circumstances which may increase the potential of environmental or health impact
Minor chemical spills and leaks	Soil & Groundwater	Contamination of soil and groundwater from hydraulic hose failure at bulk liquid storage tanks	Minor	Possible	8 Low	• Rainfall would reduce capability to capture and contain any spill event. • Non-operating periods where there are limited personnel on site.
		Contamination of soil and groundwater from application and handling of contact insecticides	Moderate	Rare	6 Very Low	• Rainfall would reduce capability to capture and contain any spill event. • Non-operating periods where there are limited personnel on site.
		Contamination of soil and groundwater from fuel and chemical dispensing	Moderate	Rare	6 Very Low	• Rainfall would reduce capability to capture and contain any spill event. • Non-operating periods where there are limited personnel on site.
		Contamination of soil and groundwater from hazardous chemical storage areas	Moderate	Rare	6 Very Low	• Rainfall would reduce capability to capture and contain any spill event. • Non-operating periods where there are limited personnel on site.
Leak from underground piping network that carry bulk oil	Soil & Groundwater	Contamination of land with oil through underground piping network	Moderate	Rare	6 Very Low	• Rainfall would reduce capability to capture and contain any spill event. • Non-operating periods where there are limited personnel on site.
Chemical spill from Bulk liquid storage tanks into stormwater system	Water	Contamination of storm water through untreated release of contaminated water by interceptor at the bulk liquid tank farm	Major	Unlikely to occur	14 Medium	• Rainfall would reduce capability to capture and contain any spill event. • Non-operating periods where there are limited personnel on site.
		Contamination of surface water as a result of chemicals in bulk liquid storage tanks entering stormwater drains during unloading/supply of liquid chemicals to trucks	Major	Rare	13 Medium	• Rainfall would reduce capability to capture and contain any spill event. • Non-operating periods where there are limited personnel on site.

Hazard	Type of pollution	Potential Impact	Consequence	Likelihood	Risk Score	Circumstances which may increase the potential of environmental or health impact
		Contamination of surface water from bulk liquid chemicals being spilled into the harbour from the berth during unloading activity	Moderate	Rare	6 Very Low	• Rainfall would reduce capability to capture and contain any spill event. • Non-operating periods where there are limited personnel on site.
		Release of contaminated water into stormwater drains from fertiliser distribution centre as a result of accidental spillages of fertiliser, failure of bunding and/or unmaintained drains	Moderate	Likely	17 Medium	• 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, Including cement and other bulk materials	Water	Contamination of surface water with grain husks and seeds from loading/unloading activity and cleaning using water and high-pressure air	Moderate	Possible	12 Medium	• Rainfall would reduce capability to capture and contain any spill event. • Non-operating periods where there are limited personnel on site.
		Spillage of grain and grain dust to ground during road and rail loading and unloading	Minor	Almost certainly would occur	16 Medium	• 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 harbour from loading gantry and unloading activity	Water	Contamination of surface water from bulk material being spilled into the harbour from loading gantry (grain, fertiliser, oil or cement)	Moderate	Unlikely	9 Low	• Rainfall would reduce capability to capture and contain any spill event. • Non-operating periods where there are limited personnel on site. • Wind and/or tide may transport dust to neighbouring site and communities.
Dust from loading/unloading operations using ship, truck or train, including cement and other bulk materials	Air	Generating grain dust through truck, train wagon unloading and loading	Moderate	Rare	6 Very Low	• Wind may transport dust to neighbouring site and communities.
		Generate dust through product transfer (grain fertiliser and cement) on conveyor	Moderate	Rare	6 Very Low	• Wind may transport dust to neighbouring site and communities.
		Generate dust through loading grain ships	Moderate	Unlikely	9 Low	• Wind may transport dust to neighbouring site and communities.

Hazard	Type of pollution	Potential Impact	Consequence	Likelihood	Risk Score	Circumstances which may increase the potential of environmental or health impact
		Dust release to air from fertiliser loading and unloading at fertiliser distribution centre	Moderate	Likely	17 Medium	• Wind may transport dust to neighbouring site and communities.
		Generate dust through loading and unloading cement trucks and ships	Moderate	Unlikely	9 Low	• Wind may transport dust to neighbouring site and communities
Release of contaminants, including emissions, not in accordance with acceptable limits e.g. fumigant venting and boiler emissions	Air	Degrade air quality through VOC releases above EPL limits e.g. emissions from the boiler (Carbon monoxide, Nitrogen Oxides, Solid Particles and Sulphur dioxide) above EPL limits	Minor	Unlikely	5 Very Low	• Wind may transport dust to neighbouring site and communities.
		Contamination of air and human health exposure through unexpected or not acceptable release of Methyl Bromide or Phosphine	Major	Unlikely	14 Medium	• Wind may transport dust to neighbouring site and communities.
Uncontrolled release of emissions	**Air**	**Degrade air quality through release of fumigants**	**Negligible**	**Unlikely to occur**	**5 Very Low**	• **Wind may transport emissions to neighbouring site and communities.** • **Non-operating periods where there are limited personnel on site.**

7.2. Pre-Emptive Actions to be Taken

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

Table 4. Pre-emptive Actions to be taken at PKT

Activity / Pre-emptive Actions	Figure
Minor chemical spill/leak **Action: Spill Kits** 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: • Chemical Store • Oil Store • Maintenance Workshop • Sampling Stand • Road Receival Hopper • Truck Loading Gantries Tank farm • Wharf • Distribution Centre Weighbridge • Distribution Centre Bag Storage Shed • Fertiliser Distribution Centre	 **Figure 1.** Spill Kits are various colours around site. See label on bin.
Leak from underground piping network that carry bulk oil **Action: Integrity Testing, Leak detection testing, concrete bund in conduit** Oil is transferred from the ship through underground piping into the bulk liquid storage tank farm. The pipe network is fully bunded therefore in the instance a leak occurs it is captured. Before every ship transfer into site the pipe work is pressure tested.	 **Figure 2.** Bulk Liquid Terminal facilities

Activity / Pre-emptive Actions	Figure

Chemical spill from bulk liquid storage tanks into stormwater system

Action: Bunding and Interceptor

All tanks are bunded in accordance with the relevant Australian Standard (AS1940:2017 The Storage and Handling of Flammable and Combustible Liquids). All liquid transfer areas (gantries) are bunded in accordance with Australian Standard (AS1940:2017) and drain to the oil/water separator on site. All water falling on roads and hardstand areas not used for the storage of chemicals flow off site through the existing site stormwater management system.

All bund valves will be maintained in a 'normally closed' position and will only be opened to release stormwater from the bunded areas with management approval following monitoring in accordance with the sites EPL.

The design specification of the system is to provide for treatment and discharge of up to 90m3/hour reducing any oils and greases (petroleum hydrocarbons) to levels of 2ppm. The maximum flow expected from a 1 in 10-year storm event in the area would result in flows of ~30m3/hour indicating the design and sizing of the system is sufficient to meet weather extremes.

Rain and stormwater collected from the product gantry areas will flow directly to the on-site treatment system. The first settlement chamber of the on-site treatment system is 12,000 litres in capacity allowing for the complete loss of one compartment of a standard road tanker (typically 8,000 – 9,000) litres to be contained.

Action: Interceptor

The physical parameters of the water in the interceptor is tested before the valve is opened to the stormwater to prevent a release of water from the interceptor outside EPL limits (other than total suspended solids). Staff are trained in the operation of the interceptor pit and sampling method required in the EPL and the specific limits of water quality that must be met.

Figure 3. Bulk Liquid Storage Facility

Figure 4. Interceptor

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Activity / Pre-emptive Actions	Figure

Release of contaminants, including emissions, not in accordance with acceptable limits and/or uncontrolled release of emissions

Action: Secure hazardous material storage area, ChemAlert, SWMS, qualified fumigators, equipment testing, calibration and maintenance, SCADA system

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

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 with training in the treatment of grain. Chemical composition, risk and exposure controls are outlined on Port Kembla's ChemAlert site.

Fumigation equipment is up to current standards and is compliant with EPL requirements. A Supervisory Control and Data Acquisition (SCADA) system is in use on site for fumigation and venting.

A detailed Safe Work Method Statement (SWMS) is used and referred to during the fumigating grain at the PKT and includes consideration of safety, health and the environment. Fumigant ventilation does not occur when cruise ships are in the inner harbour as per the SWMS. All fumigators are trained and aware of the sites EPL 3693 conditions.

A diesel boiler is also located on site at the bulk liquids storage facility and has emission testing annually as per the EPL and is maintained regularly by an external provider.

Figure 5. Fumigant Gas Storage Compound

Figure 6. Facility Signage

Figure 7. Purge Stacks

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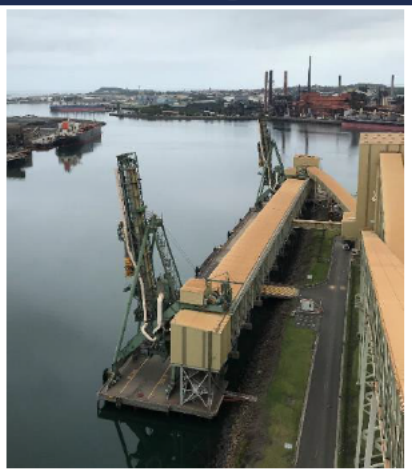
Activity / Pre-emptive Actions	Figure
Dust from loading/unloading operations using ship, truck or train **Action: Mecal Chutes** Most of the loading and unloading areas around site are located under covered areas or within sheds. Dust is therefore contained within the immediate area. Any dust evident on the ground is swept and cleaned up as soon as possible. Dust is also contained using Mecal chutes and dust houses across site. The Cement Terminal outloading area is located under cover and within a bund. Therefore, dust is contained and spills do not track outside of this area.	 **Figure 8.** Dust House
Spillage of material into stormwater drains **Action: Sediment traps, adequate cleaning routine** Sediment traps and covers are located near areas where spillages are likely to occur, e.g. near grain loading and unloading areas, in stormwater drainage channels at the fertiliser distribution centre. Sediment traps are cleaned when they are visibly almost blocked with sediment. Where spillage occurs near drains, the spillage is cleaned as soon as possible and before weather events. As required, (usually one to two times a year) the stormwater network is high pressure cleaned at the fertiliser distribution centre by a contractor. The wastewater is collected and disposed of by a licence waste transporter. Drain Mats are to be deployed and installed on all stormwater drains that are (potentially) exposure to contaminants arising from a pollution incident. The mats must be installed in a manner that blocks any rainfall from entering the drain. Sediment Fencing is to be deployed and installed along the perimeter of areas where there is a potential of sediment/contaminants runoff into water or stormwater drains.	 **Figure 9.** Stormwater drain equipped with sediment mesh  **Figure 10.** Sediment fences installed along the foreshore  **Figure 11.** Sediment fences installed along perimeter of affected area by pollution incident

Activity / Pre-emptive Actions	Figure
Spillage of material into harbour from loading gantry and unloading activities **Action: Wharf Procedure, bund around ship in water and on berth** During bulk liquid unloading activities, the Wharf Procedure is followed. The Procedure includes the requirement of a bund to be ready for deployment around the ship within the harbour when unloading activities occur to contain any bulk liquid spills in the water around the ship. Any spills (grain, oils, fertiliser or cement) on the berth would be contained in bunded areas. Pipe and other equipment are maintained and tested to the equipment's specifications. The unloading activity is supervised constantly by GrainCorp personnel on the berth. Grain spillages on the berth would be easily contained with bunding and collected using brooms and shovels. Any spillages from the gantry are unlikely and would be contained within the gantry itself, the berth or the ship. The Port Authority has a row boom trailer available to respond and contain spills on the water. GrainCorp's responsibility is limited to immediately notifying the Port Authority, as they have their own response capabilities.	 **Figure 12. Wharf Area**

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
- Stormwater cut-off valve

7.3. Inventory of Potential Pollutants

The main potential pollutants associated with the PKT activities are listed in Table 5 and Table 6. They include various types of bulk grains, bulk liquids and fertilisers. The capacity of site products at the PKT is 266,000 tonnes (T) of grain, 20,000 tonnes of fertiliser and 1,250 m^3 of bulk liquid storage. Total capacity of throughput for the terminal is approximately 1.2 million tonnes per annum. This throughput is impacted by the weather conditions season to season.

Port Kembla Terminal operates under Dangerous Goods License number NDG028308. An inventory of all potential pollutants, including quantities and SDS register, is maintained onsite and on ChemAlert. A summary of pollutants and maximum quantity of any pollutant is outlined in Table 6 below.

Table 5. Shipped bulk material and storage capacity at Port Kembla Terminal

Shipped Bulk Material	Location	Storage Capacity
Grain (e.g. Canola, Wheat, Barley)	Silos	22 x 10,000 T, 8 x 5,000 T, 3 x 2,000 T
Diesel Oils (Yubase 3, Yubase 4, Yubase 6, Group II 150R & Group II 600R)	Bulk Liquid Terminal	10 x 1250 m^3 (only 9 in operation)
Fertiliser (MAP, MAP & DAP Plus Flutriafol Fungicide, Muriate of Potash, NPK Blends, Pasture Blends, SuPerfect, Gram-Am)	Fertiliser Distribution Centre	Total approximate 20,000 T 4 x bays 4000 T (volume is dependent on product density e.g. urea is 2,800 T and SuPerfect is 5000 T in same bay) 1 x bay 1500 T 2 x bays 300 T 1 x bay 500 T 4 x bay 100 T
Cement (NSW Cement)	Southern Silos (A1/2 & B1/2)	4x 9,000 T

Table 6. Chemicals stored onsite at PKT

Use	Location	Chemical	Approximate Quantity
Fumigant Treatment	Fumigation houses	Mebrom Methyl Bromide Fumigant 1000 (Methyl Bromide)	3600 Kg
		ECO_2Fume (Phosphine)	3600 Kg
Pesticide Treatment	Hazardous Chemical Store	Cislin 25 Professional Insecticide (Deltamethrin)	30 L
		Py Aerosol cans (Pyrethrin)	20 L
		Diplomat 500EC (Chlorpyrifos – Methyl)	30 L
		Glyphosate 360 (Herbicide)	40 L
		Rizacon S IGR Grain Protector (Methoprene and Hydrocarbon liquid)	15 L
		Sumithion 1000EC Insecticide (Fenithrothion)	30 L
Fertiliser Distribution Centre	Inside Fertiliser Distribution Shed	Basis XC	3000 L
		Genfarm Flutriafol 500 SC Fungicide	3000 L
		Sodium Molybdate	3000 L
		Gran-Am Map Map Plus Flutriafol Fungicide Muriate of Potash NPK Blends Pasture Blends SuPerfect	Total approximate 20,000 T 4 x bays 4000 T (volume is dependent on product density, e.g. urea is 2,800 T and SuPerfect is 5000 T in same bay)
Grain Operations	Oil Store	Meropa 68, 100, 150, 220, 320, 460, 680, 1000	1800 L

Use	Location	Chemical	Approximate Quantity
		Molygrease EP 2	11 kg
	Fuel Store and Bag Shed (Fertiliser)	91 Octane Petrol (Regular)	100 L
		Diesel	2000 L
		Paint and Paint thinner	150 L
		Petroleum Spirit	20 L
	Workshop	Acetylene	7 m^3
		Moisture Stripper	30 L
		Oxygen, Compressed	8.9 m^3
		Spray paint and other aerosols	2 Kg
		Argon	10 m^3
		Hyspin AWS 32 / Rando 32	400L
		Sigma Fluid MOL	400L

There are no underground storage facilities at the Port Kembla Terminal site. Chemical storage locations are detailed on Map 2, Appendix A. Chemical storage locations are adequately bunded and secure.

7.4. Safety Equipment

Under GrainCorp's Safety Management System 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, caps or hard hats (dependent on task) and safety glasses. Other on-site safety related equipment includes:

- Onsite safety sign-in and inductions for all employees, contractors and suppliers
- Gas monitoring meters
- Dust extraction systems
- Emergency stop/shut down and alarm points
- Chemical wash stations/showers
- Spill kits
- Online SDS Register (ChemAlert)
- 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 and Injury Management Standard (HSE-3-01) For detailed information refer to the Incident Management Chart in the GNC intranet document management system and see also Appendix C). The incident notification is also detailed in the appropriate sections of the existing Port Kembla ERP and the Wharf Procedure. Refer to these procedures to 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 Port Kembla 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 actual or potential material harm to the environment (as defined under s147 of the POEO Act) at the PKT, the following notification procedures must be undertaken immediately, and 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. (Refer to Table 8 for contact details).

- **the appropriate regulatory authority (ARA) – the NSW Port Authority the EPA, if it is not the ARA**
- **the Ministry of Health via the local Public Health Unit**
- **SafeWork NSW**
- **the local authority if this is not the ARA – Wollongong City Council**
- **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.

7.6. Contact Details

7.6.1. Internal Contact Details

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

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

Table 7. Table 7 - GrainCorp 24-hour Internal Notification details

Internal Notification		
Contact Position	**Contact Name**	**Contact Details**
Main Office	N/A	Office: (02) 4224 6444
SNSW Health, Safety and Environment Business Partner	[redacted]	[redacted]
Port Operations Manager	[redacted]	[redacted]
Site Manager	[redacted]	[redacted]
Operations Supervisor	[redacted]	[redacted]
Site Manager (Bulk Materials)	[redacted]	[redacted]
Maintenance Supervisor	[redacted]	[redacted]
Waste Management Service	[redacted]	[redacted]

7.6.2. External Notification

Due to its industrial location in a secured and restricted port quarantine zone, there are no immediately surrounding residential properties. 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.

After consultation with the regulatory authorities, if required the Operations Manager or 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.

Table 8 outlines the contact details of each relevant authority referred to in section 148 of the Act.

Table 8. External relevant authority contact details

Authority	Contact Details
First Responders: Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service	000
NSW Ports	(02) 4275 0700 (02) 4275 0701 1300 922 524
NSW Environment Protection Authority (EPA)	131 555
Port Authority of NSW	(02) 4275 0197
NSW Ministry of Health **Wollongong Public Health Unit (Illawarra Shoalhaven LHD)**	(02) 4221 6700 After hours: (02) 4222 5000, (Wollongong Hospital) - ask for Public Health Officer on call
SafeWork NSW	13 10 50
Wollongong City Council	(02) 4227 7111
Fire and Rescue NSW	1300 729 579 *Note: If the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again.*
Non-emergency – Hazmat Unit, Shellharbour	(02) 4224 2098
Non-emergency – Wollongong Fire Station	(02) 4224 2020
Non-emergency – Wollongong LAC	*(02) 4226 7899*
Non-emergency – Wollongong Ambulance Station	*(02) 4227 0222*
Non-emergency – Healthdirect Australia (24/7)	*1800 022 222*

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. Determining who to contact and when is up to the discretion of the terminal manager and upper management.

Table 9. Other key stakeholders and neighbours contact detail.

Agency	Phone Number
NSW Ports – Office Hours After hours – BSMS Security [redacted]	[redacted]
Port Kembla Port Corporation VTC	[redacted]
Australian Amalgamated Terminals (AAT) Terminal Manager -Evan Wissell	[redacted]
Autocare Security	[redacted]
Prixcar Services	[redacted]
CEVA Logistics [redacted]	[redacted]
AutoNexus	[redacted]
Port Kembla Coal Terminal	[redacted]
Pacific National	[redacted]
Quattro Port Kembla [redacted]	[redacted]
Svitzer [redacted]	[redacted]
SMC Marine [redacted]	[redacted]

7.6.4. Port Kembla Grain Terminal Contact Details

Contact details for the Port Kembla Terminal are publicly available via local directories and to surrounding industry via signage on the GrainCorp security gate. The contact details for Port Kembla Terminal are as follows:

Address: Corner of Tom Thumb Road & Farrer Road, Wollongong NSW 2500

Phone: (02) 4224 6444

Communication and updates to neighbours and staff regarding pollution incidents will be undertaken in accordance with existing procedures as detailed in the existing ERP, Incident & Escalation Procedure and contact details provided within this document.

Table 10. Table 10 - Procedures for stakeholder communication including existing ERPs

Document	Format
Port Kembla Emergency Response Procedure	Flipchart on site
GrainCorp Incident and Injury Management Standard (GNC-SHEQ-3-01)	Controlled document on SharePoint

8. Minimising the Risk of Harm to Persons on Premises

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 premises should an incident occur. Persons likely to be on site include employees of GrainCorp located at the PKT or visiting, contractors and sub-contractors.

At all times minimising harm to persons on premises shall be a priority and is achieved through the activation of the emergency evacuation procedure, engineering controls, administrative controls and standard site PPE enforced across site. 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 Port Kembla server. A full training matrix for personnel at the PKT is maintained at the terminal, including the requirement for attendance at the PIRMP toolbox and spill response fundamentals training.

8.1. Emergency Evacuation Procedure – Activation of a Warning Alarm

As is standard on site, the alarm may be raised by anyone noting an emergency situation. It is also crucial that personnel notify the Control Room on either **(0) 26408 or 02 4224 6808** 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
- 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 on Map 2, Appendix A. Port Kembla Terminal has in place comprehensive site-based emergency response and evacuation procedures, as detailed in the Emergency Procedures Manual.

8.2. Standard Site Controls

8.2.1. Engineering Controls

- Caged areas for gassed cylinders located at the Northern and Southern Fumigation Houses. All fumigants are stored in these secure locations.
- Correct bunding around hazardous liquids with spill kits readily available across site
- Fire extinguishers located throughout the plant
- Safety showers located at the Tank Farm, Fertiliser Distribution Centre, Northern & Southern Fumigation Houses, Electrical cable storage compound, Wharf Hut & Receival Pesticide House
- Confined space monitors and fumigation gas monitors carried around site.

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 (SWMS)
- Safety signage across the site
- SDS register
- Plant Checks
- Environmental Inspections
- Site Emergency Procedures flipchart containing contact details to emergency departments.
- Toolbox talks, safety alerts
- Training
- Maintenance of equipment

8.2.3. PPE

See Section 7.4 for required site PPE.

9. Actions to be Taken During or Immediately After a Pollution Incident

1. **Assess and notify of incident if required:** Follow the internal incident management procedures, including the Environmental Emergency tab of the *Port Kembla Emergency Response Procedure* (flipchart) and when unloading oil ships the *Bulk Liquids Wharf Unloading Procedure*. These provide 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 *Port Kembla Emergency Response Procedure (flipchart)* and the GrainCorp Incident and Injury Management Standard (GNC-SHEQ-3-01), report to Sphera and contact PKT neighbours.

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 and leaks
- Leak from underground piping network that carry oil
- Chemical spill from bulk liquid storage tanks into stormwater system
- Release of contaminants, including emissions, not in accordance with acceptable limits
- 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

In the event of a pollution incident for the hazards above, the actions as outlined in Table 11 are to be undertaken.

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

Hazard	Potential Impact	Expected Response
Use and storage of chemicals on site	**Minor Chemical Spills/Leaks** Generally, small quantities of hazardous materials are held on site and are managed following strict procedures and used by trained and experienced staff. Fully stocked spill kits are provided as appropriate near these storage locations.	• Raise the alarm to alert the Site Manager as per the PK Emergency Response Procedure (flipchart) • Identify the material spilt and contain in accordance with SDS (protect drainage using methods outlined in SDS), if it is safe to do so • **If unable to contain**, dial 000 and give name, location and details to the operator, secure the area and, if required, evacuate the site • Ensure access and guidance for emergency services • Account for all personnel (including visitors) • Follow GrainCorp reporting requirements within the Group Incident Notification & Escalation Procedure • Notify stakeholders (internal and external) • Work with authorities • DO NOT ATTEMPT TO CLEANUP IF UNAWARE OF SUBSTANCE NATURE
Use, storage, loading and unloading of bulk chemicals on site	**Chemical spill from bulk liquid storage tanks into stormwater system** Bulk liquid tanks are in a concrete bunded area. All liquid from the bunded area must travel through an oil interceptor pit before entering the stormwater system. The stormwater shut off valve located on the interceptor pit is always open and automatically closes when oil loading occurs to prevent any accidental release to the stormwater. The bund valve located on the tank bund around the oil storage area is permanently closed unless manually opened when a controlled release is scheduled. Any potentially contaminated water is captured, treated in the interceptor pit, tested as per the EPL and then manually released. Impacts could occur from faulty values, bunds and equipment although this is unlikely.	• Raise the alarm to alert the Site Manager as per the PK Emergency Response Procedure (flipchart) • Contain spillage to minimise impact • If unable to contain, dial 000 and give name, location and details to the operator, secure the area and, if required, evacuate the site • Ensure access and guidance for emergency services • Account for all personnel (including visitors) • Follow GrainCorp reporting requirements within the Group Incident Notification & Escalation Procedure • Notify stakeholders (internal and external) • Work with authorities • Follow scheduled maintenance requirements for equipment

Hazard	Potential Impact	Expected Response
Fumigation activities carried on site	**Release of contaminants, including emissions, not in accordance with acceptable limits** Venting of fumigants above EPL levels. Diesel boiler located at the bulk liquids storage facility with emissions above EPL limits entering the atmosphere. Release of water from interceptor outside EPL limits.	• Alert the Site Manager as per the PK Emergency Response Procedure (flipchart) • If able to contain, quantify level of exceedance against relevant criteria • Determine if communities / environment has been harmed • Follow escalation / notification and PIRMP procedures including required regulatory authority notification, more specifically required contact with NSW EPA.
Use and storage of gas vessels on site (mainly for fumigation activities)	**Uncontrolled release of emissions** Escape of fumigant gases from faulty equipment, a breached storage or from the unsafe unloading of fumigants from the supplier's truck on site. This type of incident is most likely to be a release to air or water. The receiving environment including sensitive receptors may be impacted.	• Cease release immediately if safe to do so. 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 • Ensure access and guidance for emergency services • Alert the Site Manager as per the PK Emergency Response Procedure (flipchart) • Follow GrainCorp incident escalation procedure for environmental emergencies • Report to EPA and appropriate authorities on the breach immediately.
Loading and Unloading operations (ship, truck or rail)	**Dust from loading/unloading operations Ship/Truck/Train** Dust generated as a result of grain and fertiliser transfer	• Cease operation • Assess dust extraction systems functionality • Assess dust suppression systems functionality and method of loading/unloading. • Recommence as appropriate following risk assessment

Hazard	Potential Impact	Expected Response
Loading and Unloading operations using the conveyors systems on site (ship, truck or rail)	**Spillage of bulk grain, fertilizer, cement into stormwater drains** Spills generally contained within storage and conveyor areas (internal with no access to stormwater). Impact as a result of accidental spillage at external transfer points.	• Raise the alarm to alert the Site Manager as per the PK Emergency Response Procedure (flipchart) • Contain spillage to minimise impact and use spill kit controls at nearby unprotected stormwater drains in the event of rainfall • Notify stakeholders (internal and external) • Clean up spillage before rainfall
Loading and Unloading operations using the loading gantries	**Spillage of bulk material (grain, oil, fertiliser, cement, oil) into harbour from loading gantry** Uncontrolled release of grain and/or oil into the Port Kembla harbour and berth. Non-compliance with '13-208 Bulk Liquids Wharf Unloading Procedure' including environmental controls and notification requirements	• Raise the alarm to alert the Site Manager as per the PK Emergency Response Procedure (flipchart) • Contain spillage to minimise impact • Notify stakeholders (internal and external) including the EPA and NSW Ports as per the Environmental Emergency procedure (flipchart) • Clean up spillage • Work with authorities

10. Staff Training and PIRMP Testing

Site staff will be trained in the PIRMP every year via Toolbox or training session 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 Port Kembla server. A full training matrix for personnel at the PKT is maintained at the terminal, including the requirement for attendance at the PIRMP toolbox and spill response fundamentals training.

This PIRMP is 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 including checking phone numbers and key personnel. The ERP will be reviewed in concurrence with the PIRMP since they are linked documents.

The PIRMP is also tested and reviewed within one month of any pollution incident occurring in the course of the sites 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.

The PIRMP and any other procedures associated with the plan, including the Bulk Liquids Wharf Unloading Procedure, are reviewed following a pollution incident.

A history of review, testing and training exercises for the PIRMP and associated ERP is outlined in Table 12.

Table 12. History of PIRMP testing

PIRMP Testing		
Attendees	**Date**	**Method**
Mark Jelbart / Brendan Moss/Paul Rickard/Neil Johnstone/Dan Kadwell	January 2018	Desktop Review and Simulation
Mark Jelbart / Brendan Moss / Scott Tonkin	February 2018	Desktop Review and Simulation
Stephanie Jurd / Brendan Moss / Jane Curran / various operations staff	26/02/2019	Desktop Review and Simulation
Brendan Moss / Tom Zimmermann / Mick Davies	29/04/2020	Desktop Review and Simulation
Dylan Clarkson, Tom Zimmermann, Mick Davies	26/05/2021	Desktop Review and Simulation
Kevin Edward, Damien O'Connell, Ana Costa	28/02/2022	Desktop Review and Simulation
Kevin Edward, Damien O'Connell, Ana Costa	11/05/2022	Desktop Review and Simulation
Kevin Edward, Ana Costa	09/06/2022	Desktop Review and Simulation
Kevin Edwards, Rod Newton, Lucas Mayne, Ana Costa	16/6/2023	Desktop Review and Simulation
Rod Newton, Damien OConnell, Lucas Mayne, Matt Anderton	20/6/2024	Desktop Review and Simulation

PIRMP Testing		
Attendees	**Date**	**Method**
Rod Newton, Nick King, Mick Davis, Matt Anderton, Lucas Mayne	20/6/2025	Desktop Review and Simulation
Rod Newton, Damien OConnell, Mick Davies, Michael Kennedy, Emma Stephens	24/02/2026	Simulated Desktop Review (Annual Review)
Rod Newton, Damien OConnell, Mick Davies, Anne Herbert, Michael Kennedy	21/04/2026	Post-Incident Review

Appendix A: Maps

Figure 13. Map 1: Overall site map (Port Kembla Grain Bulk Liquid Terminal and fertiliser Distribution Centre)

Figure 14. Map 2: Site layout (Port Kembla Grain, Bulk Liquid Terminal and Fertiliser Distribution Centre)

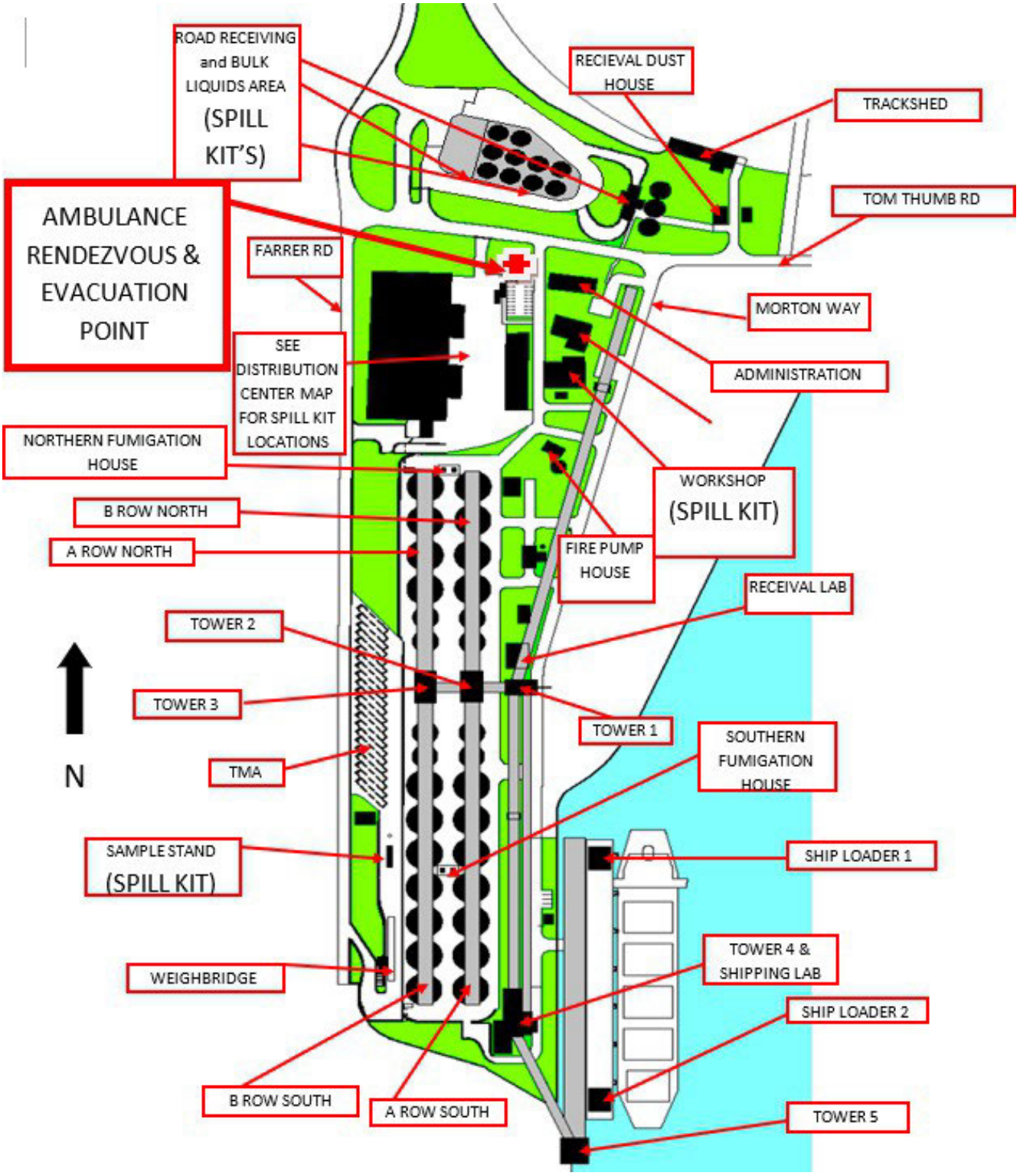


Figure 15. Map 3: Site Monitoring Points (potential sources for air and water pollution)

Figure 16. Map 4: Bulk Liquid Terminal overview

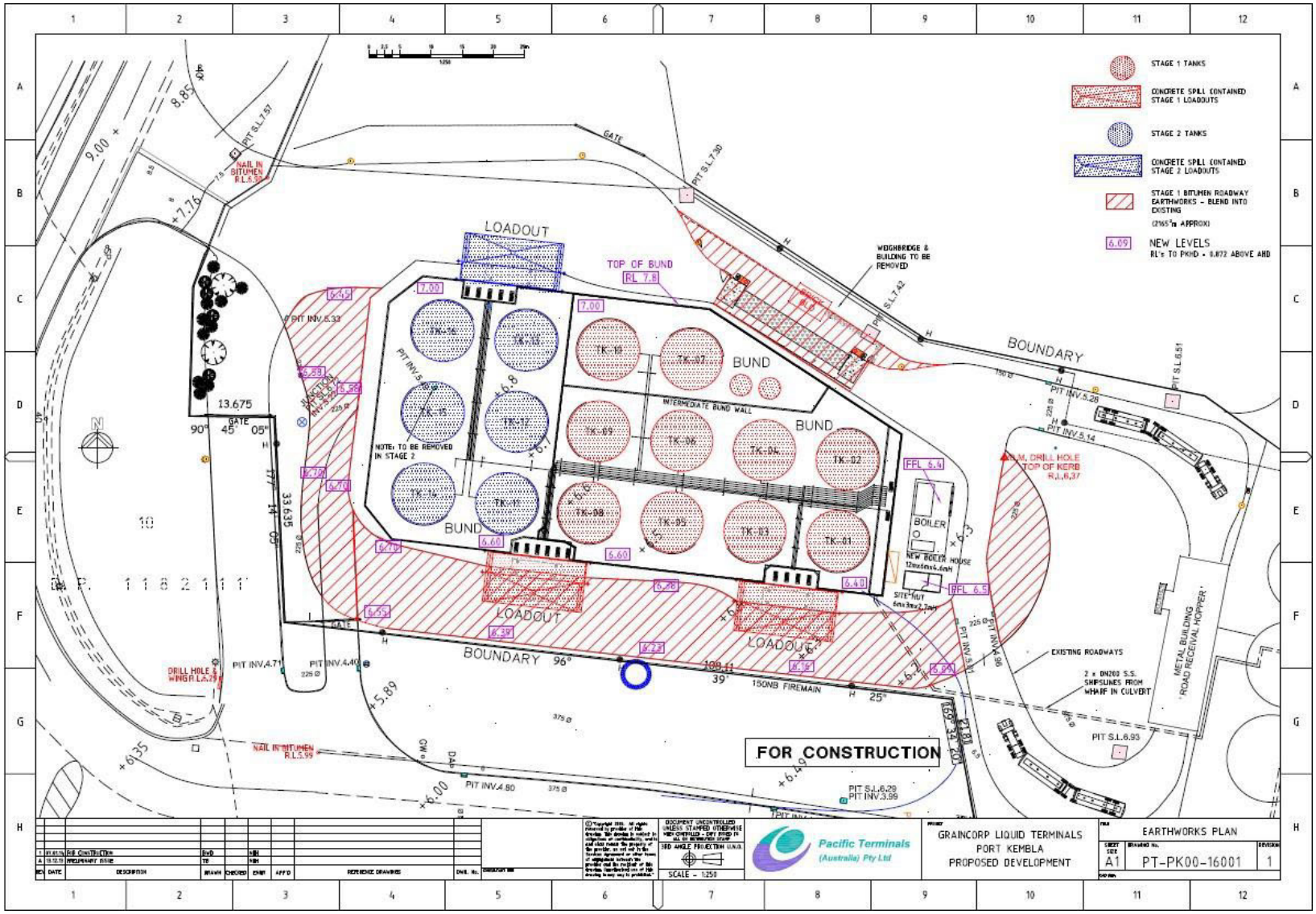
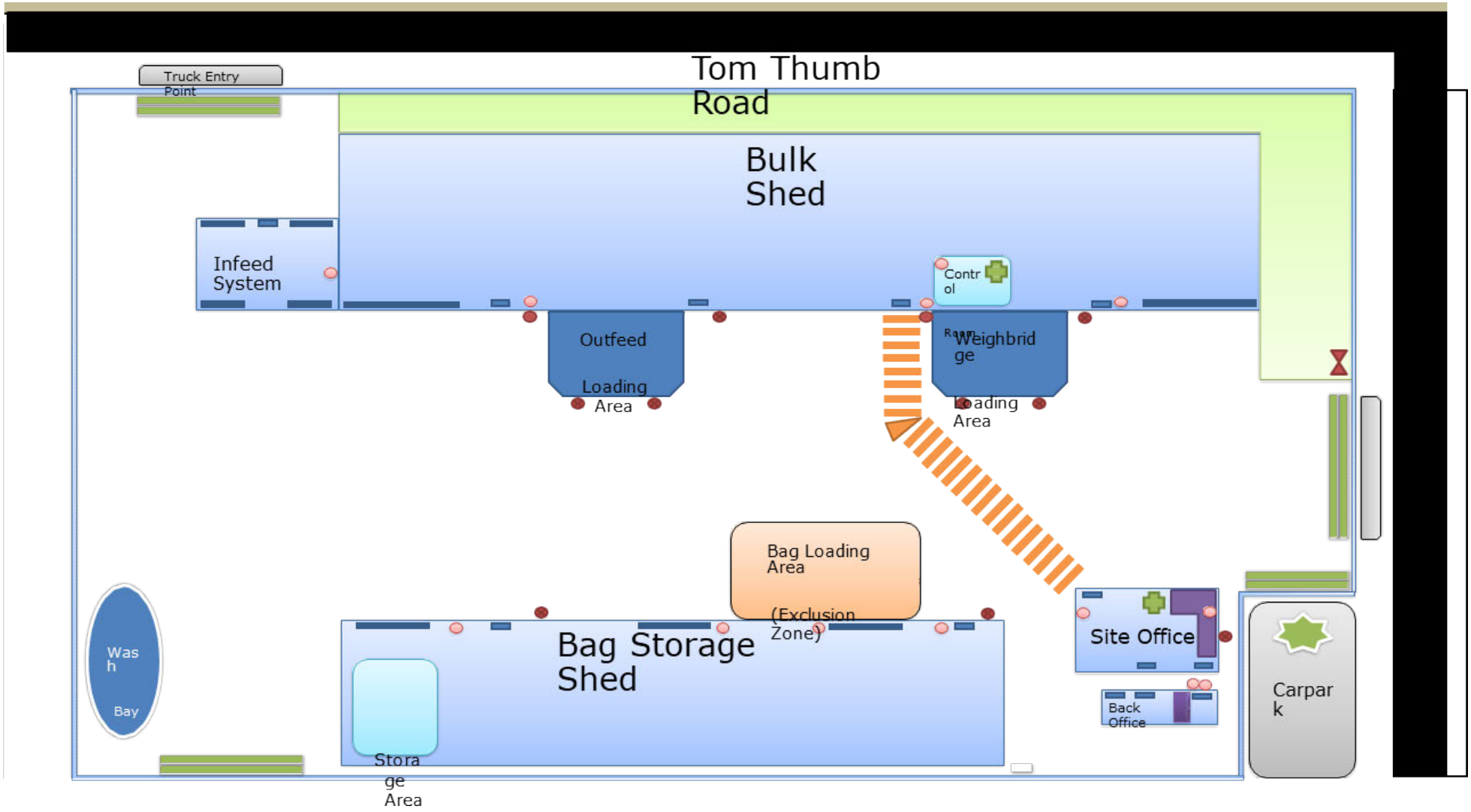


Figure 17. Map 5: Fertiliser Distribution Centre layout



Appendix B: Stormwater Drainage

Figure 18. Map 6: Bulk Liquid Terminal drainage overview

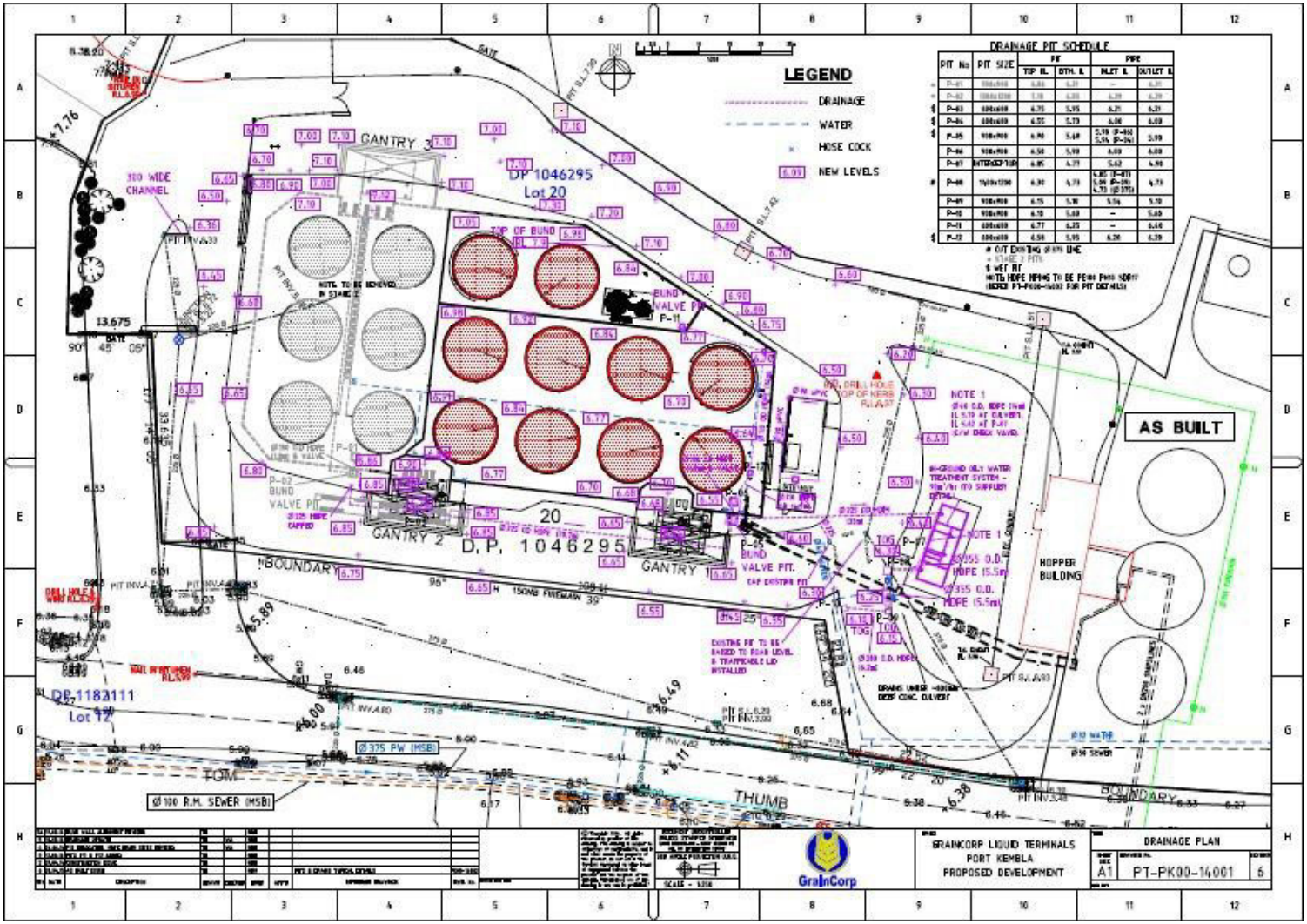


Figure 19. Map 7:Fertiliser Distribution Centre drainage overview

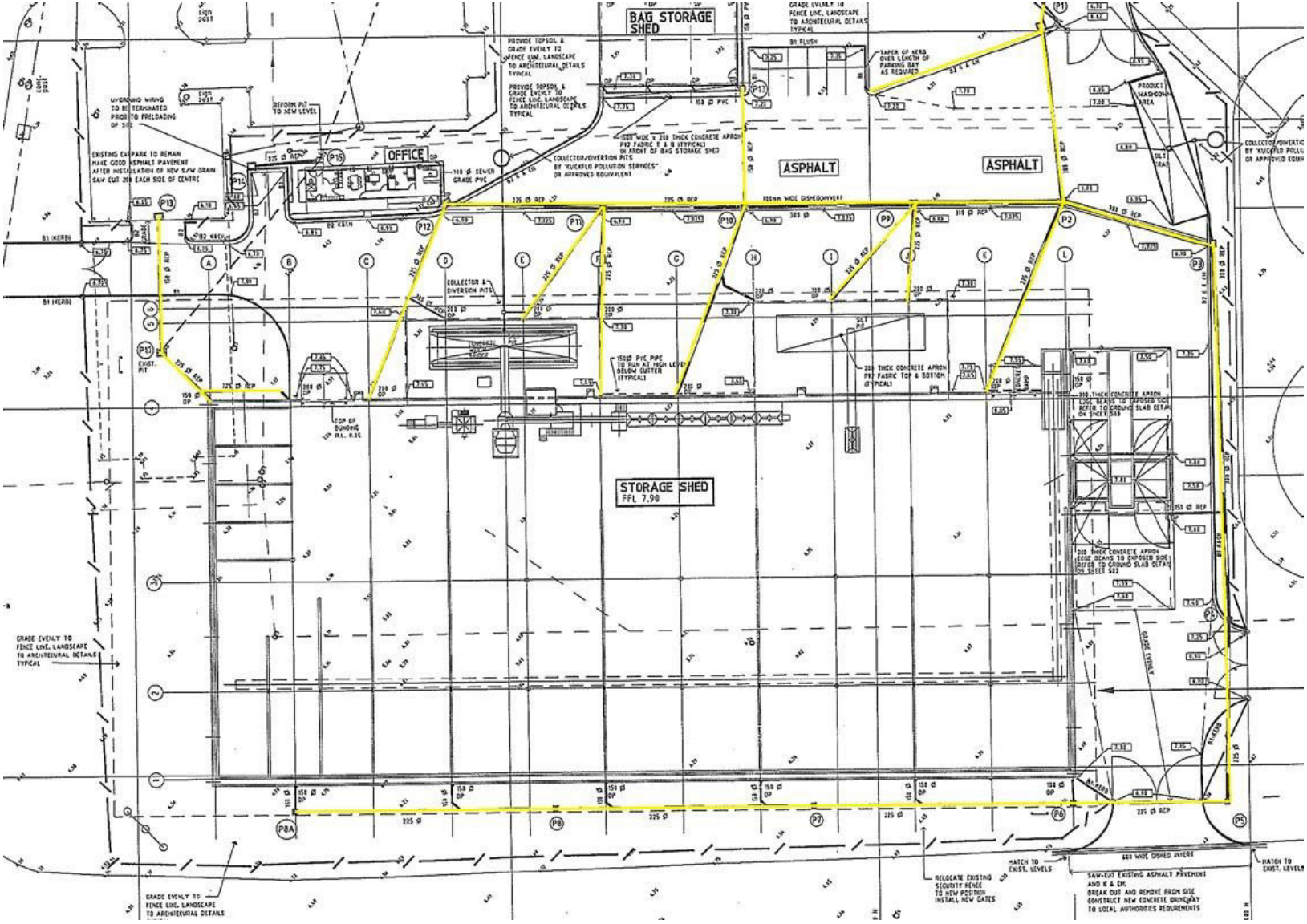
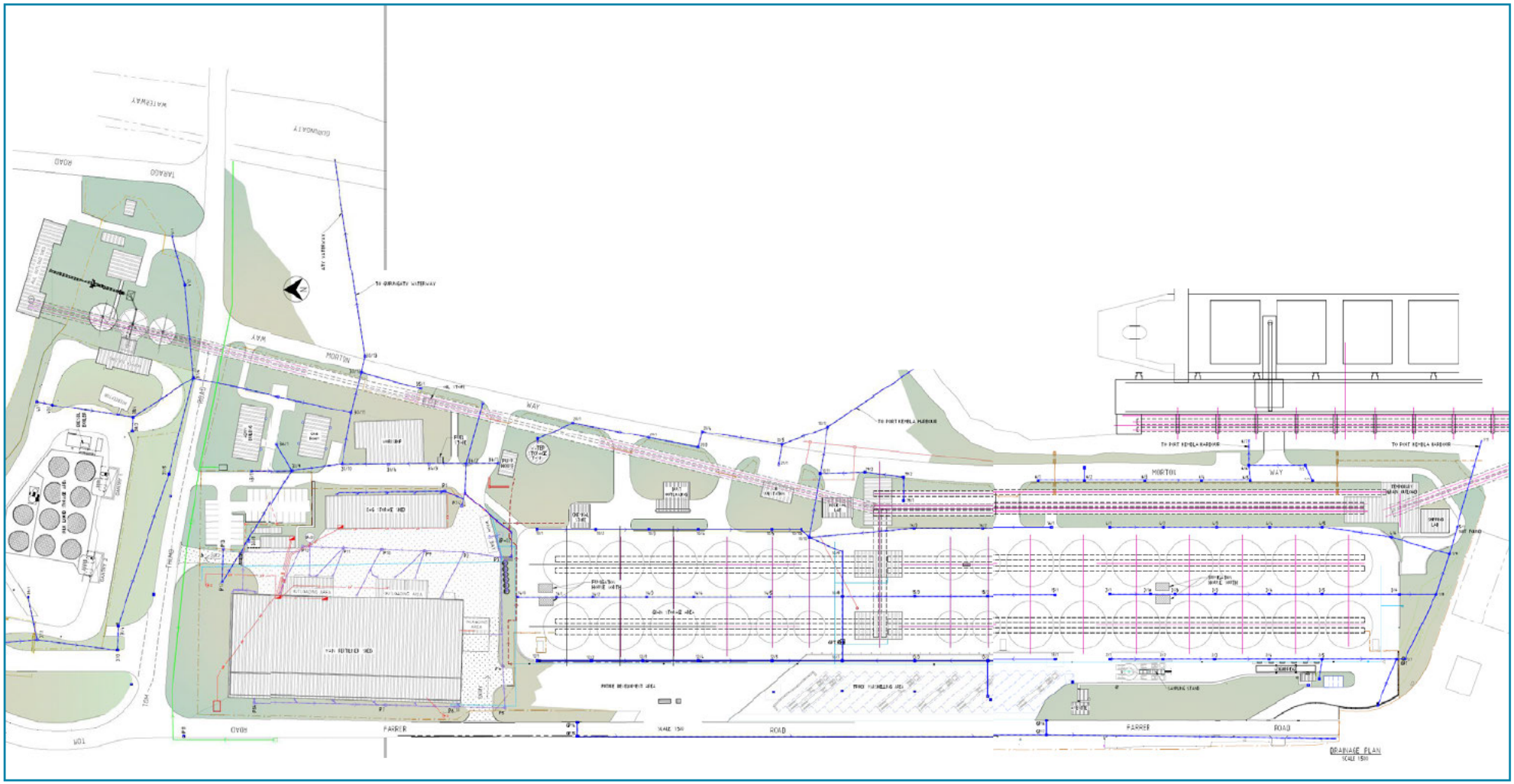


Figure 20. Map 8: Overall Site Drainage overview



Appendix C: Emergency Access to PKT

Figure 21. Map 9: Site Emergency Access

Appendix D: GrainCorp Risk Assessment Matrix

RISK ASSESSMENT MATRIX

LIKELIHOOD / MOST LIKELY CONSEQUENCE	**Almost certainly will occur** (Occurrence expected to occur on a weekly basis or more frequently)	**Good chance it could occur** (Occurrence expected to occur more than once in 3 months, but less than once a week)	**Likely to occur** (Occurrence expected to occur more than once a year, but less than once in 3 months)	**Unlikely to occur** (Occurrence expected to occur more than once in 3 years, but less than once a year)	**Extremely unlikely to occur** (Occurrence has not occurred and is expected to occur less than once in 3 years)
Disastrous	**Score 25**	**Score 24**	**Score 22**	**Score 19**	**Score 15**
Critical	**Score 23**	**Score 21**	**Score 18**	**Score 14**	**Score 13**
Serious	**Score 20**	**Score 17**	**Score 12**	**Score 9**	**Score 6**
Moderate	**Score 16**	**Score 11**	**Score 8**	**Score 5**	**Score 3**
Minor	**Score 10**	**Score 7**	**Score 4**	**Score 2**	**Score 1**

Level of Risk	Risk Score	Recommended Action
High Risk	**20-25**	Immediately notify Site Manager Immediately implement controls to reduce risk before task commences Long-term control strategies to be implemented & documented in Site Improvement Plan
Medium Risk	**13-19**	Notify Site Manager Dept mgers to review risk ass to ensure all possible control measures are identified & implemented Communicate hazard/aspect details to affected personnel Control hazard/aspect before task commences Communicate/review risk ass at appropriate consultative committees (may also be in SHE IMP)
Low Risk	**7-12**	Notify Department Manager Implement controls where possible Communicate hazard/aspect details to affected personnel Review risk assessment as scheduled or as change occurs
Very Low Risk	**1-6**	Notify your direct manager/team leader Communicate hazard/aspect details to affected personnel Review risk assessment as scheduled or as change occurs

HIERARCHY OF CONTROL

Engineering Controls

1st Elimination / Design Out - Try to ensure that hazards/aspects are "designed out" when new materials, equipment and work systems are being planned for the workplace.

Substitution/ Replacement - Remove the hazard/aspect or substitute with less hazardous materials, equipment or substances

3rd Safer / Redesigned Process - Adopt a safer/less environmentally harmful process.

4th Isolation - Enclose or isolate the hazard/aspect through the use of guards or remote handling techniques.

5th Effective Ventilation - Provide effective ventilation through local or general exhaust ventilation systems.

Administrative Controls

6th Administration - Establish appropriate administrative procedures such as:

- Process documentation & SOPs
- Job rotation to reduce exposure or boredom; or timing the job so that fewer workers are exposed;
- Routine maintenance and housekeeping procedures;

or

- Training on hazards and correct work procedures.

Personal Protective Equipment

7th Personal Protective Equipment - Provide suitable and properly maintained Personal Protective Equipment and training in its use.

Incident Management Classification and Escalation Process

This matrix is designed to ensure that critical incidents are immediately notified and appropriately escalated within the organisation. The matrix 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.

Step 1: Use the **Incident Classification Matrix** below to classify the incident (default to the higher level if in doubt).

Step 2: Use the **Incident Notification Table** below to determine who needs to be notified.

- ***Please note*** that some trigger events need another trigger in that section to apply.

Note: a 'Critical Incident' is defined as a level 4 or 5 incident.

INCIDENT CLASSIFICATION MATRIX 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 outside site boundary meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Destruction of, or permanent damage to, important populations of habitat, species, or natural environment.	Loss of containment / spills outside site boundary meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised and measurable medium-term (e.g. temporary) impact on habitat, species or natural environment.	Loss of containment / spills within site boundary meeting any of the Property Damage, Regulatory or Community / Reputation criteria below. Localised and measurable short-term (e.g. temporary) 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 immaterial 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 >24 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 >12 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 >6 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 >2 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. Customers/ suppliers abandon relationship..	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.

INCIDENT ESCALATION	**CRITICAL INCIDENTS**		**NON-CRITICAL INCIDENTS**		
	Extreme (Level 5)	**Major (Level 4)**	**Moderate (Level 3)**	**Minor (Level 2)**	**Negligible (Level 1)**
Safety **Health** **Environment**	**CRITICAL SHE INCIDENT** Site/Plant/Terminal Manager to immediately notify: • SHE Manager/ Environmental Advisor (for environmental incidents) • Health and Wellbeing Manager (for injuries) • Regional Operations Manager or Ports Operations Manager in ECA • National Operations Manager National Operations Manager to follow **Critical Incident Escalation Process**		**NON-CRITICAL INCIDENT** Incident to be managed by local management as part of BAU activities. Standard Incident Management investigation and resolution protocols apply.		
Property Damage **Assets and Supply Chain** **Regulatory & Legal** **Community / Reputation** **Product Safety, Quality or Contamination** **External Disasters**	**CRITICAL INCIDENT** Site/Plant/Terminal Manager to immediately notify: • Regional Operations Manager or Ports Operations Manager in ECA • National Operations Manager National Operations Manager to follow **Critical Incident Escalation Process**				

Incident Management Chart

INCIDENT OCCURS

If an immediate threat to life, property or environment exists, manage / control the threat of situation **immediately**.
Call emergency services or regulatory authorities as required.

Is the incident an **ACTUAL** or **POTENTIAL** level 4 or 5 or Recordable Injury?

NO → **Manage in accordance with business requirements**

YES

Site Manager to notify:

- Relevant Line Manager
- Relevant Head of Ops/ Commerical
- Group General Counsel
- GM Ops/ Commercial
- COO
- GM Risk
- CEO (informed of Level 5 and LTI)

For SHE Incidents, (additional)

- **Within 24 hours – Site Manager to Complete SHE Incident Escalation Report by email**
- Site SHE Manager / H&W Manager (for injuries) → **Report "notifiable" incidents to relevant regulatory body**
- SHE Business Partner/ Environmental Manager → **Notify Legal Team Incidents as appropriate**
- GM of SHE
- Chief People and Transformation

Are critical functions, activity, business disruption potentially impacted >24-hours?

NO → **Incident Investigation Process initiated as per GNC-STD Incident Reporting and Management**

YES → **Crisis Management Team (CMT) initiated by GM Risk**

Escalation / notification to occur immediately as made aware via phone or text (which must be acknowledged).

GrainCorp