



# Olam Agri

Olam Agri Australia/

Queensland Cotton

Pollution Incident Response  
Management Plan

Wee Waa Cotton Gin

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## 1. Introduction

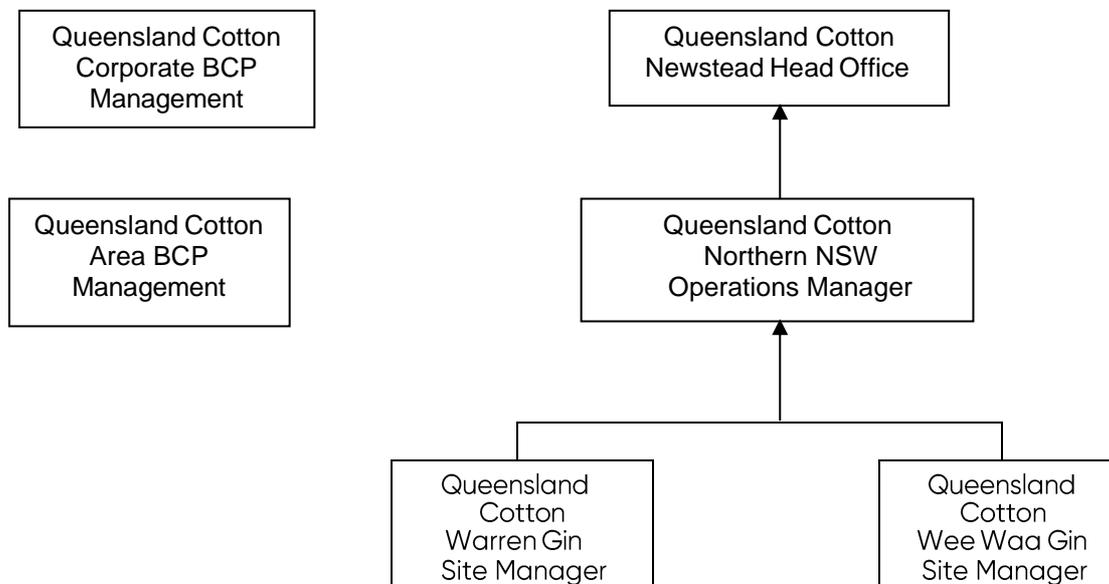
As the holder of four environment protection licences (EPL No. 5515; EPL No. 11556; EPL No. 11558 and EPL No. 11499) Queensland Cotton (Olam Agri) Operations in New South Wales is required to comply with the new requirements introduced by the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act). The POELA Act introduces several changes to improve the way pollution incidents are reported, managed and communicated to the general community. The Act includes a new requirement under Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act) to prepare, keep, test and implement a pollution incident response management plan.

The specific requirements for pollution incident response management plans are set out in Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009 (POEO (G) Regulation). In summary, this provision requires the following:

- All holders of environment protection licenses 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 license 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).

Queensland Cotton (Olam Agri) Pollution Incident Response Management Plan (PIRMP) is part of the Environmental Management System and associated documents. These programs are document controlled and contain confidential information to ensure business.

### Business Continuity Plan Organization (Also ERT)



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The EMS and the Business Continuity Plan (BCP) contain the following information:

- General information regarding plan administration and the day-to-day running of business resilience and recovery
- Response procedures for the plan. They differ according to the nature of the risks each plan deals with
- Roles and responsibilities contain the Team Structure to put this plan into action
- Useful documents to support the response as well as the incident reports, briefing and planning guides
- Contact information that may be needed to support the response.

When an incident constitutes an emergency a process is enacted to respond to the event. The process outlines the initial escalation, notification and response stages. This process also applies if a pollution incident occurs at Queensland Cotton (Olam Agri) such that material harm to the environment (within the meaning of Section 147 of POEO Act 1997) is caused or threatened.

Incidents that happen at site will vary in the severity of the impact they create. Many can be handled as part of normal operational procedures and will not require escalation to an emergency.

### Definitions

**Emergency Procedures** are the processes that ensure the safe evacuation of personnel and first aid treatment, if necessary.

**Incident Management** means the immediate steps taken to re-establish/ maintain services and/or supply to customers requiring external resources beyond those normally available through a local work team.

**Crisis Management** refers to an escalated incident that requires the immediate attention of the regional and Corporate Management Team. The situation is one that may cause, or have potential to cause, a major impact on the organization, its customers, the community or the environment. Regional or Area Managers and Supervisors are expected to be aware of the type of circumstances that will lead to a crisis and initiate the plan accordingly.

**Disaster** focuses on a major event that threatens or has seriously damaged a major facility or capability of the organisation. It includes any sudden unplanned event that seriously threatens the commercial viability or reputation of the organisation or is deemed to inhibit the organisation from achieving its business plan objectives. Regional Managers are expected to be able to recognise a disaster situation and initiate the plan accordingly.

**Contingency Planning** is the carefully considered alternatives to the way of running the business at regional level. Regional or Area Managers are expected to facilitate this process or review plans in consultation with Head Office at least annually.

**Pollution incident** means an incident or set of circumstances during or as a consequence of which there is or 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.

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

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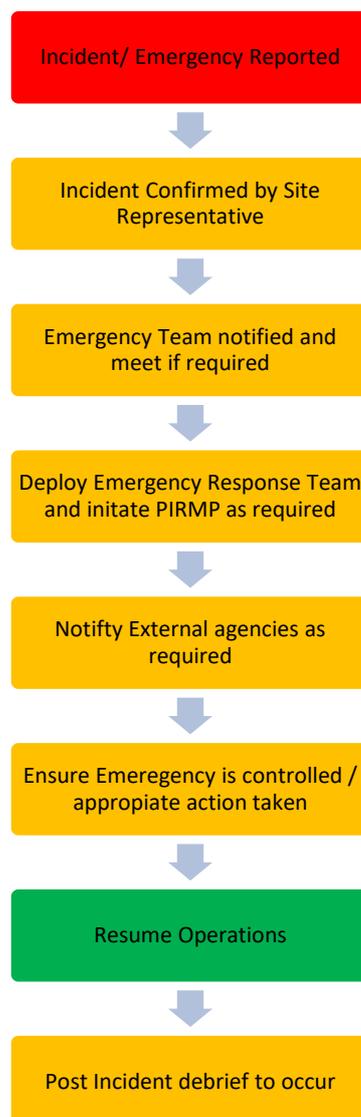
- (a) harm to the environment is material if:
- (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other 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 Events may be:

- Air Pollution caused by a fire
- Water pollution caused by release of chemical in water way
- Noise pollution due to unshrouded machinery

Queensland Cotton (Olam Agri) shall report pollution incidents immediately to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the local council. '

### Business Recovery Flow Chart



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## Objectives and Priorities

The Pollution Incident Response Management Plan (PIRMP) as a subset of the *Emergency Response Plan* (ERP) sets out actions that need to be taken in the event of an environmental emergency at Queensland Cotton (Olam Agri).

The top priority for the ERP is for the protection and preservation of life, the environment and property. The ERP is an effective mechanism for escalating an incident to the business resilience team when necessary.

The objectives of the PIRMP are to:

- Ensure comprehensive and timely communication about a pollution incident to staff at the premises, the Environment Protection Authority (EPA), other relevant authorities specified in the Protection of the Environment and Operations Act 1997 (such as local councils, NSW Ministry of Health, WorkCover NSW, and Fire and Rescue NSW)<sup>1</sup> and people outside the facility who may be affected by the impacts of the pollution incident
- Minimise and control the risk of a pollution incident at the facility by requiring identification of risks and the development of planned actions to minimise and manage those risks
- Ensure that the plan is properly implemented by trained staff, identifying persons responsible for implementing it, and ensuring that the plan is regularly tested for accuracy, currency and suitability.

## Objectives

The objectives of this *Emergency Response Plan* are to provide a framework to facilitate management of crisis and achieving maximum output from available resources. The prime tools are found in the procedures section that includes general and predefined agendas.

This plan details the procedures and resources required to ensure the survival and recovery of the Queensland Cotton (Olam Agri) operations in the NSW region and regional response, in the event of a disaster.

## Plan

- Enables the rapid transfer of certain operations to pre-determined site(s)
- Ensures continuation of critical functions and operations at the same or alternate sites(s) and a speedy return to normal business processes.

## Scope

This plan identifies responsibilities, action steps to be followed and the necessary infrastructure and information required to ensure that following any disaster the regional organisation will continue with minimum interruption or will be recovered and/or re-established to provide ongoing client service.

This plan responds to all relevant types and/ or levels of disaster. It creates an interface of available resources between locations.

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## Key Terminology

- **Crisis** – A localised event normally handled at local level unless it has corporate implication. For example a mechanical failure or temporary outage.
- **Disaster** – Either developing out of a crisis situation or as the result of a traumatic event, a disaster is defined as an event which in the judgement of the assessor will or has caused any one of the following:
  - ~ loss of life
  - ~ business interruption to operations
  - ~ reputation damage to Queensland Cotton (Olam Agri).
- **Contingency** – the actions taken by the business unit to maintain full or partial business continuity. For example transfer of cotton seed and or baled cotton during flood periods.
- **Salvage** – Activities and procedures necessary to return the business unit to normal operations. For example the removal of debris and restoration of a gin site after a major fire.

## Priorities

1. Maintaining continuity of services to our customers by returning the business to full operation following disruption
2. Protecting the assets, reputation and shareholder value of Queensland Cotton Corporation Pty Ltd (Olam Agri).

## Determination of Objectives

Objectives will vary according to the type of disruption. There is a set of standard objectives that will need to be addressed in every situation, these are:

- Return to full operation
- Continuing to manage the business
- Maintaining a positive image with all stakeholders
- Identify opportunity – thinking long-term.

## Location Managers Review

It is essential that each location in Queensland Cotton Corporation Pty Ltd (Olam Agri) determine and regularly review the key issues that may threaten the smooth running of the business. The following list is offered as a guide only and Managers are encouraged to develop their own checklists specific to their needs and exposures. Establishment of statement of continuity objectives:

- List of plant/ equipment, suppliers, and possible alternatives
- Identification of key personnel (and their alternatives)
- Specifications of critical machinery and other equipment
- Service requirements for critical systems
- Salvage and debris clearance

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- Available off-site locations that could be used to resume business in the short term
- Modifications to sales and marketing strategy that may be necessary
- Availability of utility plant, e.g. boilers and generators
- Critical data/ records to enable business functions to continue to operate
- Raw materials, suppliers, transportation and customer detail
- Liaison as necessary with consultants, insurers, adjusters and contractors
- A system of tracking and recording additional costs and expenses incurred.

## Definition of Disruption

**An event that may materially and adversely affect the business operation of the site**

Disruption to the Business generally has the following characteristics:

- Loss of buildings, machinery and stock
- Denial of access
- Deterioration of property (smoke damage or other contamination)
- Lack of access to critical information
- Increased costs of working
- Short/ medium term loss of profits
- Long term loss of market share.

There are normally three problems:

1. Perception of what the disruption is and how it is being handled
2. The problem itself
3. Someone has to continue running the business.

## Accountabilities

The Safety Manager and Business Continuity Team are accountable for preparing, maintaining and implementing the PIRMP with assistance from the Emergency Response Team and Business Continuity Team, as required.

## Document Maintenance

This plan will be reviewed annually and after any incident or test, which provides suggestions for improvements. Additionally, changes can be made as a result of:

- Practice reviews
- Local regulatory or procedural changes
- Amendments to Queensland Cotton (Olam Agri) policies and procedures.

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## 2. Emergency Response

The Emergency Notification Procedure can be found in the Emergency Response Plan. The ERP provides detailed emergency response guides for all identified types of potential emergencies (people, environmental, asset related incidents) at Queensland Cotton (Olam Agri). A summary of the following environment pollution related emergency guides is provided in this PIRMP.

Pollution incidents that could cause possible offsite material harm are limited to offsite water pollution, of which there are a number of scenarios.

### Emergency Response Guides

The ERP provides detailed emergency response guides for all identified types of potential emergencies (people, environmental, asset related incidents) at Queensland Cotton (Olam Agri). A summary of the following environment pollution related emergency guides is provided in this PIRMP.

Pollution incidents that could cause possible offsite material harm are limited to offsite water pollution, of which there are a number of scenarios.

### First Notice and Response

In the event of an incident likely to cause major loss or injury it is the responsibility of the **first** person on the scene or noticing the problem to raise the alarm and **call** the emergency services

i.e. Fire Brigade, Police and/ or Ambulance on 000.

If the incident is a fire, this action may simply confirm that the automatic detection/alarm system has already delivered that request.

**DO NOT ANTICIPATE THAT THIS HAS OCCURRED. IT IS BETTER TO DOUBLE UP RATHER THAN DELAY RESPONSE BY NOT CALLING.**

### Emergency Response Plans

Each site or location must develop and maintain site emergency response plans. These should include:

- Evacuation
- Emergency Response (If appropriate)
- All forms of Emergency, such as:
  - ~ Fire
  - ~ Flood
  - ~ Gas Leak
  - ~ Bomb Threat.
- Identify wardens and other key emergency response personnel.

These plans should be checked periodically by the ERT Area Manager to ensure they are current and well understood.

### Contacting the ERT Area Manager or Business Management Team

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The second call is to contact the first available person on the Area Manager's contact list. That person should confirm intent to attend the scene immediately or make appropriate arrangements and whilst doing so, contact the other members of the Business Management Team requesting them to attend as soon as possible if appropriate. In the event that all members are not contactable then call any member of the Queensland Cotton (Olam Agri) Business Management Team.

*That person must commence the contact process outlined above and if necessary proceed with the Disaster Assessment process.*

### Disaster Assessment Guidelines

It is the responsibility of the Location ERT Team to liaise with the ERT/ BCP Area Manager and his BCP Team and if possible for the team to attend the scene, identify the extent of the incident and decide:

- 1) Whether the asset loss/ damage, the failure or other emergency situation constitutes a significant interruption to the organisation's services and thus **constitutes a 'Disaster'**.
- 2) On the degree of disaster, measured in terms of likely time delay before the restoration of normal operations or business function.

*As a general guideline, any interruption likely to exceed 7 days is considered a Disaster in the terms of this Procedure.*

Area or the location manager must inform Corporate (most senior contactable person) of the status and likely interruption/ outcome and location of the Command Centre, as soon as possible after the assessment has been completed.

### Primary Disaster Decision

**Time frame decisions** - Once a disaster has been declared based on discussions with the Regional Manager and or corporate Management a decision is required as to whether the recovery can be made at the existing site and in what time frame this can be accomplished.

If the existing premises can be recovered to allow business to continue with **minimal interruption within the required 7 days**, then the Disaster Command Centre (DCC) should be based on or near the site and all efforts expended to restore full business operations as quickly as possible.

If this cannot occur within reason and practicability then one of the alternate premises must be set up for DCC operations. The DCC is primarily established to make the key decisions regarding the business and to deal with local authorities and the media, its role is to facilitate the contingency arrangements and logistics and help take the weight off local management

The business units move to an alternate site or the provision of new equipment and facilities can then be arranged as soon as possible. These decisions then form the basis for all following activities under this BCP.

### Disaster Notification

The first member of the Area Management Team informed should contact their Corporate Manager and (if necessary) assemble the Regional BCP Committee as quickly as possible. To save time, allocate phone contacts to the first (2) two members contacted so the task is shared.

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## Area Disaster Command Centre (DCC)

As part of the initial assessment, the Regional BCP team should decide which of the predetermined locations are suitable for the DCC or whether this should be elsewhere and inform corporate accordingly. The nominated Committee members would assemble there at the agreed time. Corporate requirements would also need to be accommodated in this decision.

Alternate Command Centre for Queensland Cotton (Olam Agri) The Warren  
Cotton Gin Main Office located at Carinda Road, Warren, NSW

## Offsite Water Pollution

Offsite water pollution has the potential to occur via the following scenarios:

- Hazardous Substance Spills
- Failure of Tailings or Water Storage Facilities
- Unplanned Effluent Discharge

## Hazardous Substances Spill

Queensland Cotton (Olam Agri) stores and uses quantities of hazardous substances, as listed in WorkCover Notifications of Dangerous Goods on Premises. Substances include, but are not limited to, fuels and lubricants used for equipment or machinery, waste materials or wastewater and chemicals used in cleaning or production processes.

The potential for an unplanned hazardous substance spill to cause material harm is present only if the spill has occurred in close proximity to the site tributaries and could not be contained on site through the emergency response procedures.

*Queensland Cotton (Olam Agri) Site Emergency Response Plan describes action to take in the event of a Hazardous Substance Spill.*

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### Failure of Tailings or Water Storage Facilities

Failure of storage facilities that contain tailings and poor quality water (including effluent) has the potential to result in offsite water pollution.

Failure of any of the dams leading to offsite flow may occur as a result of:

- Contents exceeding storage capacity and spilling from the dam
- Failure of water infrastructure linked to the dam (i.e. Pipes, valves, pumps)
- Major embankment failure.

The potential for material harm offsite if a dam failure occurs is in changes to the flow rate, Total Suspended Solids, Electrical Conductivity, or pH of the water leaving site via surrounding tributaries.

Queensland Cotton (Olam Agri) Site Emergency Response Plan/ BCP describes action to take in the event of a Flood or Storm event.

Scale of Crisis	Definition	Triggers/ Characteristics	Response
<b>Minor-crisis event</b>	Event or issue causing temporary/minor impact – <b>has possibility to escalate</b>	<ul style="list-style-type: none"> <li>▪ Rumours</li> <li>▪ Minor disturbance in production</li> </ul>	<ul style="list-style-type: none"> <li>▪ Put Site Business Management Teams (BMT) on standby</li> <li>▪ Monitor progress and be prepared to activate business continuity plans</li> <li>▪ Assess impact and whether the next BCP is put on action</li> <li>▪ Log events and actions</li> <li>▪ Inform Risk Management Support and Insurance Agent</li> </ul>
<b>Operational (Local)</b>	Event or issue does not extend beyond local impact but <b>may escalate</b> . The situation can be managed within local resources	<ul style="list-style-type: none"> <li>▪ Short term restricted access to site</li> <li>▪ Competitor has crisis</li> <li>▪ Breach of security</li> <li>▪ Industrial dispute</li> <li>▪ No media attention</li> </ul>	<ul style="list-style-type: none"> <li>▪ Declare crisis and activate Site BCP Teams</li> <li>▪ Activate business continuity plans as required</li> <li>▪ Inform BCP Site/ Local Teams and BMT as soon as possible (within 2 hrs)</li> </ul>

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<b>Tactical (Regional)</b>	<b>Event or issue is escalating and potential impact is wide</b>	<ul style="list-style-type: none"> <li>▪ Ongoing safety issue for own people/ visitors/ contractors</li> <li>▪ Impact on the environment</li> <li>▪ Impact on turnover or revenue generation</li> <li>▪ Adverse market perception</li> <li>▪ Adverse customer perception</li> <li>▪ Attracting regional or international media attention</li> <li>▪ Major supplier or customer has crisis</li> <li>▪ Market event which could lead to an opportunity</li> </ul>	<ul style="list-style-type: none"> <li>▪ BCP Site and Local Teams are activated</li> <li>▪ Regional Management is put on standby and BMT is informed</li> </ul>
<b>Strategic (Group)</b>	<b>Event or issue has major impact</b>	<ul style="list-style-type: none"> <li>▪ Any death or serious injury of employee(s) or person the organisation interact with</li> <li>▪ Major interruption to the business</li> <li>▪ Extended period of restricted access to site</li> <li>▪ Attracting adverse international media interest</li> <li>▪ Share price affected</li> </ul>	<ul style="list-style-type: none"> <li>▪ BMT is activated to assist affected Sectors and companies</li> <li>▪ BMT plans activated as required group aims to minimize impact and maximize on any opportunity</li> </ul>

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### 3. Management Procedures

#### Spill Management – Wee Waa Site

This document contains detailed procedures related to specific aspects of the Olam Agri Australia’s spill management procedure, for and includes:

- Chemical spills
- All types of oil and fuel (diesel) spills
- Pollution incident preparedness and response plan
- Emergency spill response procedures.

These procedures apply to the conduct of environmental management activities on all Olam Agri Australia sites.

Term/ word	Definition
<b>Waste</b>	<p>Any material, whether solid, liquid or gas, which is unwanted and has no further use. Waste therefore includes, but is not limited to:</p> <ul style="list-style-type: none"> <li>▪ Discharges to air, both point source and diffuse, licensed and unlicensed, controlled or fugitive</li> <li>▪ Liquid effluent to waterways, sewer or irrigation systems</li> <li>▪ Used drums, containers and other packaging</li> <li>▪ Used tyres, conveyor belts, or other rubber components.</li> </ul> <p>Materials and equipment stored on site for which any future use or means of disposal is not apparent.</p>
<b>Disposal</b>	Means the discharge, deposit, injection, dumping, spilling, leaking, or placing of waste into or on any land or water so that such waste or any constituents may enter the air or be discharged into any waters, including groundwater
<b>Emergency</b>	Is a sudden unforeseen crisis (usually involving danger) that requires immediate action
<b>Chemical Waste</b>	Consists of oils, waste fuel, pesticides, agricultural chemicals, paints, batteries and other chemical material which may be used in operation, maintenance or management of the site
<b>Liquid waste</b>	Defined as a waste that does not meet the non-liquid waste criteria and is not a gas
<b>Leak</b>	Is a slow discharge over time such as a drip at a join which is not tight, worn or under pressure
<b>Spill</b>	<p>A spill is a large discharge in a small time such as a hydraulic hose splitting or a drum which overturns. Several factors determine whether a spill is minor or major, the volume of the spill and risk to the environmental and human health. Minor spills are categorized as spills involving quantities of 200 litres or less, while major spills are greater than 200 litres.</p> <p>Major spill - is a spill where any of the following applies:</p> <ul style="list-style-type: none"> <li>▪ the responsible party and/or material spilled is unknown</li> <li>▪ the material spilled is highly toxic</li> <li>▪ a significant fire hazard may be present</li> <li>▪ the material has the potential to reach the environment</li> <li>▪ advanced personnel protective equipment is required.</li> </ul> <p>Minor spill - is a spill where all of the following applies:</p> <ul style="list-style-type: none"> <li>▪ the responsible party is at the scene</li> <li>▪ the material spilled is known</li> <li>▪ the material spilled is not highly toxic</li> <li>▪ there is no fire risk</li> <li>▪ the material has little or no potential to reach the environment.</li> </ul>

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## Procedure – General Waste

The purpose of this procedure is to define the Olam Australia processes for the management, handling, treatment and disposal of waste substances and materials generated on site. The procedure identifies the waste streams likely to be generated across Olam Australia sites and the methods of control required to ensure that legislative requirements are not breached.

This procedure provides the generic process that should be used across all Olam Australia sites. This procedure applies to all Olam Australia sites where waste is generated. This procedure addresses the management of liquid, solid and hazardous wastes at each site.

This procedure has been developed with reference to the following Statutes and Regulations (and associated amendments) and Olam Australia sites policies, procedures and guidelines.

## Hazardous Waste Operating Procedure

This procedure applies to all hazardous wastes. Hazardous wastes are both solid and liquid wastes that have either the short or long term potential to harm human health and/or the environment. Waste streams that are identified as hazardous include:

Any waste that meets the criteria for assessment as a dangerous good (refer to Safe Work Australia)

- Declared chemical waste
- Sharps waste
- Oil liquid waste (winter oil, hydraulic oil, engine oils, etc).

From an environmental perspective, these types of waste will contaminate soil and waterways if sent to landfill and are governed by both health, safety and environmental legislation and best practice guidelines.

## Hazardous Liquid Waste

According to these guidelines and legislation liquid waste should be classified according to the following types and labelled and stored appropriately. Please refer to the Hazardous Substances and Dangerous Goods Industry Guidelines.

Wastes (liquid) that are classified as hazardous include:

Group A – Non-aqueous liquid and controlled aqueous liquid waste

Group B – Liquid food waste and liquid grease-trap waste resulting from the preparation.

## Maintenance Waste Operating Procedure

This procedure applies to all maintenance spillage which is generated from maintenance activities which could be metal parts, different oil types (hydraulic or engine oils), plus used machine parts and packaging materials. This operating procedure does not apply to asbestos waste.

Brick, concrete, timber, metals, plasterboard, paper and packaging, glass, plastics and soil waste from site works are to be sorted on site by the building contracting company and sent to dedicated recycling facilities where practical.

All Contractors must ensure all spillage removed from Olam Australia sites is conveyed to and disposed in a place lawfully designated as a waste facility.

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Procedures covering all asbestos and asbestos related materials, all SMF material and all PCB material waste shall be handle by professional asbestos removal business and not by Olam Australia Employees. All Contractors must be licensed hazardous material removal company and must comply with all state and national environmental and work health and safety legislation and codes of practice.

### Clean Up Procedure

The cleanup procedure for liquid (oil and diesel) spillage on the cotton module pads is as follows:

- Area contaminated by spill from trucks or plant equipment will be clearly identified by hi-vis marker, to ensure no spread of spill and where possible identify the source
- Area to be cover with absorb material to soak up as much as possible any liquid, once all oil is absorb, material will be collect in thick plastic bags, which are clearly identified
- Spillage which has soaked into the ground will be dig up and removed and disposed of through legal disposal pits, along with absorb material, which are run by council
- Area to be back filled with clean soil which is then packed down if on the module pads
- All information is recorded on an **Incident Report**.

### Training

Spill management information is available on the Processes Hub for Employees and Contractors. Spill management responsibilities for Contractors are covered by the Olam Agri Induction process.

### Chemical Waste

Chemical spillage on sites should be located such that they are not in flood prone areas. When removing chemical spillage from the operations area, all Employees must ensure the following processes are used:

- All chemical spillage from the operations will be stored in designated containers in a designated area ready for removal
- Where necessary bunding will apply to the designated area, e.g. earth wall or concrete contained area
- Where possible chemical spillage will be removed to the back area of the site away from the main operations area.

### Roles and Responsibilities Employees

#### (Workers)

Ensuring that routine control and disposal measures are followed, and any unusual occurrence is reported immediately.

Are responsible for ensuring all waste control measures for the removal of waste are followed at all times, e.g. oil liquid placed in bags or recycled wasted placed in recycled bags.

Ensure awareness and understanding of the spill management procedures applicable to Olam Australia.

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### Supervisors

Ensuring that routine control and disposal measures are followed, and any unusual occurrence is highlighted for corrective action. Upon notification of an incident, verify the extent and degree of the environmental situation.

Ensure that an **Incident Report** has been filled in and forwarded to the relevant Manager for the area concerned and Unit Safety Advisor and email a copy to the Safety Manager.

Ensure corrective action has been implemented immediately when you become aware of an incident, which will stop or prevent environmental damage.

Investigate and report any breaches of Olam Environmental Policy and management system and forward a copy to the relevant Manager and Safety Manager.

### Managers

Ensure no Olam Australia Employee, Contractor or visitor will threaten the spill management of the area owned by Olam or neighbouring properties.

Ensuring that waste management control measures are in place and any unusual occurrence is highlighted for corrective action. Ensure an **Incident Report** has been filled in and forwarded to the Safety Manager.

Ensure corrective action has been implemented immediately when you become aware of an incident, which will stop or prevent environmental damage. Implement preventive measure to ensure the environmental incident cannot occur again.

Investigate and report any breaches of Olam Agri Environmental Policy and management system and forward a copy to Safety Manager.

### Safety Manager

Follow up on all environmental investigations and report any breaches of Olam Environmental Policy and management system to senior management.

Where necessary advise the relevant state authority of the environmental incidents when required.

### Executive Management Team

Follow up on all environmental investigations and report any breaches of Olam Environmental Policy and management system to senior management.

## 4. Post Event Requirements

At the completion of a Pollution event, ensure that appropriate notifications and reporting has been completed to the EPA. (See section 6 for reporting requirements)

A Pollution Incident Response drill shall be conducted within thirty days of the event concluding to identify any additional changes or improvements required.

To ensure the procedures have been adequate a review of the PIRMP must be completed and the PIRMP updated to reflect changes.

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## 5. ERP Roles and Responsibilities

### ERT/ BCP Area Manager (Regional Manager) – Responsibilities and Actions

1. **When alerted** – confirm your intention to attend promptly (if not already on site)
2. **Ensure building(s) evacuated** and emergency services have been called
3. **Contact other members of BCP Area Committee** (use cascade process if appropriate). Convene meeting (time/ place) and activate DRP process
4. **Check staff status** and liaise with HR Manager (send home/ call in, etc)
5. **IS THIS A DISASTER?** – Coordinate Regional Response, decide on immediate direction, notify Corporate BCP Team
6. **Assist Disaster Assessment Team activity**, call emergency contacts and request Loss Adjuster, activate salvage if necessary
7. **Ensure Regional contingency plans active** – maintain constant updates on status/progress and report to corporate
8. **BEWARE Media** – follow Queensland Cotton Corporation Pty Ltd (Olam Agri) Media Plan
9. **Alternate site(s)** – If necessary ensure alternate site acquired and set up process commenced. Maintain updates and assist as needed. Nominate appropriate BCP Regional Committee person to facilitate
10. **Communicate** – Alert other locations to implications
11. **Expenses maintenance**– delegate and check records being kept of costs incurred post event, activate appropriate accounting system, initiate expenditure authorisation process
12. **Grower and supply contact** – Arrange regional grower and supplier key contacts plan initiation. Liaise re appropriate message(s) with Corporate
13. **Updating staff** – Provide regular updates to staff
14. **Log actions taken and decisions made** (from first notification of disaster to full recovery)
15. **Work in progress** – Check that a log of 'work in progress' has been compiled. Check continuity of ongoing ginning programs and commitments
15. **Injury or death** – Where any staff member is injured or dies as a result of the incident. IMMEDIATELY – contact Safety Manager
16. Follow Safety Manager directions (liaise with Emergency Services as appropriate)
17. **Problem resolution** – Arbitrate regarding any unresolved issues concerning BCP application/ business recovery issues
18. **Administration** – Liaise regarding re-establishment of Administration functions whether on site or in alternate premises
19. **Recovery of documents** – Ensure access to and/or recovery of critical documents e.g. weighbridge notes, ginning schedules etc. from location safes/ files. Arrange replacement if necessary/ possible.

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**ERT Site/ Location Manager – Responsibilities and Actions**

1. **When alerted** – confirm your intention to attend promptly (or otherwise)
2. **Confirm** – site/ building evacuated and emergency services called. Provide Fire and Rescue with plans to building
3. **Check** with BCP Area Manager (Regional Manager) and Team that disaster assessment status has been determined
4. **Liaise** with BCP Area Manager (Regional Manager) re damage assessment, disaster notification and site/ location/ recovery decisions
5. **Alternate Site** – Facilitate move to alternate site or operating region – activate as needed. Ensure intentions are clear and alternate facilities are available. Contact Property Agent for alternate premises and acquire as needed (refer to corporate for legal assistance as needed with leases, etc)
6. **Staffing** – provide details to BCP Area Manager (Regional Manager) re staffing levels required and whether to organise ‘work-at-home’ or alternative arrangements with other sites if possible. Coordinate staff transport needs
7. **Reoccupation** – Is building/ site re-occupiable – in whole or part or alternate premises required? Provide input to and respond to BCP Regional Committee decision
8. **Emergency communications** – activate temporary mobile phone
10. **Asset Register** for affected site. Immediate copy may be accessed via BCP Kit if IT system backup is not available. Make available to Disaster Assistance Team (DAT) and Regional or Area Manager
11. **Contact suppliers**, co-ordinate deliveries and installations as required/ needed
12. **Contractors.** Liaise with insurance loss assessor to ensure authority for recovery and repair process is in place
13. **Media Management Procedure for Regional or Area Managers**
  - ~ In the event of a disaster occurring all information will be released from Queensland Cotton (Olam Agri) Corporate Office
  - ~ The steps of this plan should remain unchanged. What is flexible is the information that will be released which will vary as the situation develops.

**Note:** Queensland Cotton Corporation Pty Ltd (Olam Agri) makes all media releases through the Olam Agri Head of Country. The only other authorised person who may communicate with the media locally is the ERP/ BCP Area Manager

- ~ The Corporate BCP Committee will assist the media spokesperson to prepare the appropriate message, create the best possible image, apply the most suitable method of delivery and its timing
- ~ Of equal importance is the message that Queensland Cotton (Olam Agri) delivers to its Growers and local communities. The Executive Director or designated alternates will advise local community groups through the local managers by keeping them informed of the BCP recovery process as it progresses. The BCP Committee may also contribute to the content and timing of these messages.

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## 6. Notification to the Environmental Protection Agency

When a reportable pollution event has occurred, it is a requirement of the Licensee to report the incident to the EPA. The EPA shall be notified by the hotline (131 555) as soon as practicable. Additionally, a written report must be completed within seven (7) days and distributed to the EPA. Section R3.3 of the sites Environment Protection License outlines the information that is to be supplied in the report. The required contents of the report are listed below:

- the cause, time and duration of the event;
- the type, volume and concentration of every pollutant discharged as a result of the event;
- the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;
- the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
- action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
- details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
- any other relevant matters.

The EPA representatives may require additional information or updates to the report if the event continues over a period of time. (IE fire commences and is reported within seven days but continues for several additional days)

## 7. Neighbours and Community

### Communication of Environmental Incidents

NO EMERGENCY DETAILS TO BE RELEASED TO UNAUTHORIZED PERSONS MEDIA) WITHOUT GENERAL MANAGER'S PERMISSION

Communicating with neighbours and the local community is an important element in managing the response to any incident. Early warnings and regular updates (during and post incident) are to be provided (after appropriate internal approval) to the owners and occupiers of premises who may be affected by an environmental incident occurring at Queensland Cotton (Olam Agri). A current register of near neighbours and residents is kept internally and will be used to inform the necessary people of a pollution incident.

Communication mechanisms may include incident notifications placed on the Queensland Cotton (Olam Agri) website; the use of telephone calls or SMS, as appropriate to the circumstances. The most appropriate communication mechanism will be employed based on the particular details of the incident, such as time of day, incident severity, available communication mechanisms.

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### Notification to Neighbours and Community

Potential Pollution Emergency	Stakeholders to be notified	Key message	Possible Communication Mechanism During an Incident	Possible Communication Mechanism Post Incident
Hazardous Substance Spill	Near neighbours If road closures are required – likely traffic such as emergency services and school buses.	Avoid incident zone	Phone call/ SMS	Websitenotification Phone call/ SMS
Failure of Tailings or Discharge Dam	Downstream neighbours If road closures are required – likely traffic such as emergency services and school buses	Relocate livestock and equipment Keep clear of creeks and waterways Do not use water from the local creeks until further notice	Phone call/ SMS	Websitenotification Phone call/ SMS

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## 8. Location Information

### Wee Waa Gin

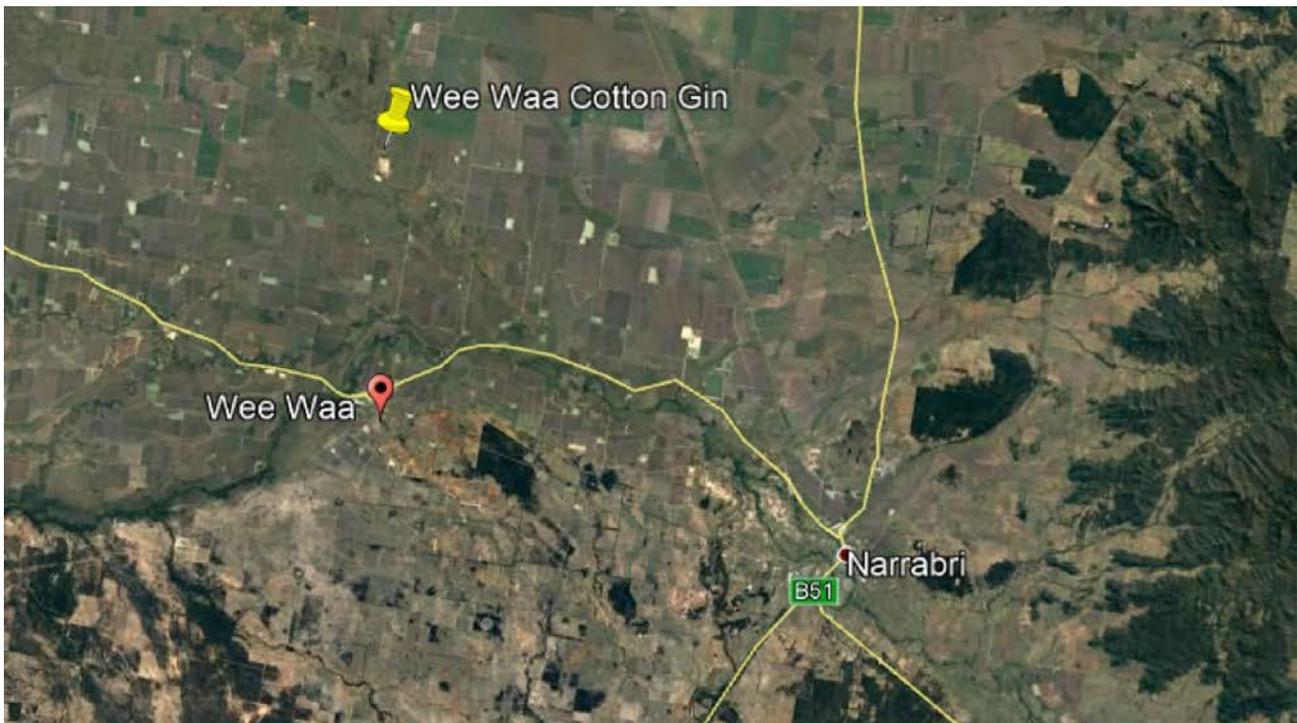
#### Overview

The Wee Waa Gin is capable of processing up to 1,000 bales of cotton per day, on average over 100 day period during the ginning season that occurs between March and August. The ginning processes include module storage, air drying of cotton, indirect drying, trash removal, seed extraction, filtering, humidifying, bale pressing and storage. The gin site is comprised of a total of 200 hectares (494 acres) approx.

During the ginning season the plan is to operate the plant 24 hours a day, 6 days a week in an average season but may increase this work rate in larger seasons. An alternative plan may be to operate a night shift only 6 nights a week Sunday night to Saturday morning. The duration of the season is generally 2 to 3 months. This may be extended if ginning rates are and hours are reduced.

#### Location Overview

The facility was constructed in 1995 and comprises the gin, dust house, trash house, seed hoppers, bale shed, wash down bay, and module storage yard. Specific areas in the yard have been designed to clean mobile equipment, e.g. moonbuggies to reduce the risk of a fire spreading in the module yard. The module storage yard is considered adequately separated from the gin buildings, however, the bale shed and gin are only 8m distant connected by a conveyor enclosure. The plant is situated in a rural area, 22km from the Namoi Valley town of Wee Waa.



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## 9. Contact Information

### Wee Waa

DISASTERPLAN – CONTACT CARD			
Name: John Fogarty		Location: Wee Waa Gin	
In the event that I am notified that the disaster plan has been invoked, I will need to:			
PRIORITY CALLS	PHONE	MOBILE	UHF
Ashish Govil	07 3250 3306	0457 342 428	
John Bambrick		0498 333 661	
Andrew Vanderstok	0429 23 23 03	0429 23 23 03	
Andrew Pippia		0408 008 192	
Nicole Carver		0405 728 083	
John Fogarty	02 6795 7188	0438 946 442	12
<i>Keep this card with you at all times. If found please return to: John Bambrick</i>			

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KEY CONTACTS LIST USEFUL NUMBERS AND CONTACTS			
Contacts	Name	Phone	Mobile
Electricity	Country Energy	132 080	
Communication	Telstra	12456	
Media Manager	Ashish Govil	07 3250 3306	0457 342 428
Police	Wee Waa	02 6795 8011	
Fire and Rescue	SES	000	
Medical	Dr Sivananthan	02 67 951100	
Security	Armtrol Security	02 6792 5017	
Insurers	Olam International Limited		
Broker	Willis	07 3229 4722	
Legal Adviser	Andrew Pippia		0408 008 192
Auditors	Price Waterhouse Coopers	07 3011 3343	
EPA Notification Line	EPA	131 555	
Other			
<b>In the event of a disaster</b> I must do the following key things:			
<b>Contact:</b> Ashish Govil / John Bambrick			
<b>Initiate:</b> BCP and Business Continuity Plans			
<b>Recover/ go to:</b> Wee Waa Town Office			

## 10. Document Change Control

Number	Section Title/ Page	Change/Reason for Change	Date	Author
All	All	EHS changed to SHS (Safety Health and Sustainability)	09/03/2020	G Saunders
1	2	Remove Colly Cotton Gin	09/03/2020	G Saunders
6	23/ 24	Update Maps	09/03/2020	G Saunders
8	26/ 27	Environmental Incident Report	09/03/2020	G Saunders
1	2	Updated NSW Ginning Business Continuity Plan Organisation – Remove Mungindi Gin	14/07/2020	G Saunders
All	All	SHS (Safety Health and Sustainability) add Q for Quality	08/07/2022	G Saunders
All	All	Updates to positions and personnel	8/07/2022	J Bambrick
All	All	Updates to positions and personnel	04/05/2023	J Bambrick
All	All	Added Pollution definitions and examples Added Section 4 Post Event Requirements Added Section 6 Notification to EPA Added EPA contact details to section 9	10/10/2023	J Bambrick
All	All	Update and review	24/07/2024	J Bambrick
All	All	Update and review	08/12/2024	J Bambrick

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