Pollution Incident Response Management Plan

Yamba Prawn Farm

166 O'Keefes Lane, Palmers Island, NSW 2463

September 2025

Revision	Date	Author	Comments	Approved
V1	15/02/2019	D Chetcuti	Update of PIRMP (GHD, 2013)	S Riley
V2	30/03/2020	C Lloyd	Update of PIRMP (Tassal, 2019)	D Chetcuti
V3	30/01/2023	K Paine	PIRMP (Tassal, 2020) updated following simulation test in mid-January 2023, including: • Number of settlement ponds • EPL 6432 is now included under EPL 4490 • Table 3 contact details • Appendix B site infrastructure updated	J Cooper
V4	25/09/2025	J Mulholland	Update of PIRMP	J Cooper

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1. Purpose

This Plan describes the obligations and associated procedures Tassal Group Limited (Tassal) is required to fulfil to effectively respond to incidents that will, or are likely to, result in pollution at its Yamba Prawn Farm (the Yamba Farm) located at 166 O'Keefes Lane and 65 McDermids Road, Palmers Island NSW 2463 (see location map at Appendix A).

2. Background

2.1 Yamba Prawn Farm

The Yamba Farm comprises two adjoining sites, separated by McDermids Road. 166 O'Keefes Lane was purchased in late 2018, and 65 McDermids Road was purchased in mid-2019. Both sites are operated by Tassal staff as one integrated Farm.

The Farm is located on the Romiaka Channel approximately 5km inland from the NSW coast. The Romiaka Channel flows to the Clarence River, which then flows to the ocean immediately south of Shoal Bay.

The activities conducted at the site are the operation of grow-out ponds and two prawn processing facilities. The Yamba Farm is approved to discharge between 2,000 and 20,000 ML of wastewater per year.

Infrastructure at the Yamba Farm includes:

- An inlet pond;
- 3 pumping stations;
- A series of inflow and outflow channels;
- 38 ponds for the farming of prawns;
- 3 settlement ponds;
- 3 settlement outflow channels; and
- Building and operational site infrastructure, including fuel tanks.

A site infrastructure map is at Appendix B.

2.2 Pollution Incident Response Management Plan (PIRMP) Up-date

This Pollution Incident Response Management Plan (PIRMP) has been prepared as an update to the *Yamba Prawn Farm PRIMP* (Tassal, 2023). The Farm has not been in operation since 2023. A reduced-scale operation is scheduled to commence in October 2025.

3. Legislative Requirements

The Yamba Farm operates under the following Environmental Protection Licence (EPL) issued to De Costi Seafoods (subsidiary of Tassal Group Pty Ltd) by the NSW Environmental Protection Authority (EPA) on 29 June 2023:

- EPL 4490 for 166 O'Keefes Lane, Palmers Island NSW 2463.

Licence holders have a duty to prepare, test, implement and keep pollution incident response management plans (PIRMP) in accordance with Part 5.7A of the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2009* (POEO (G) Regulation).

The EPLs require Tassal report pollution incidents as outlined in Section 6 (Reporting) as follows:

The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment as soon as practicable after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.

R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.

The introduction of the *Protection of the Environment Legislation Amendment Act 2011* (POELA Act) in February 2012 requires that holders of EPLs maintain a PIRMP. The POELA also requires that the EPA be notified 'immediately' of incidents causing or threatening material harm to the environment. This requirement is further detailed in Section 5.1 of this PIRMP.

4. Pollution Incident Response Planning

4.1 Risk Assessment

A risk assessment (see Table 1) identifies the main hazards onsite, along with control measures to minimise the occurrence and consequences (people and environment) of the identified risks.

Table 1 Hazards

Location	Hazard	Control Measure(s)	Consequence	Likelihood of material harm	Escalating Factors
Ponds, channels and settlement ponds.	Uncontrolled release of water into river that does not comply with EPL conditions.	Monthly sampling, control of inputs (including feed, chemicals and lime), water management and sufficient through-flow. Maintain adequate capacity in system to contain floodwater. Maintain monks, which control the flow of water in and out of ponds, in good working order. Maintain good grass coverage on pond walls and assess the integrity of pond walls annually in the dry out season to prevent erosion and/or pond wall failure.	Pollution of river downstream of site.	Low	Flood event. Unauthorised or uncontrolled chemical input. Pump breakdown. Pond infrastructure not maintained.
Fuel storage area.	Fuel spill.	New above ground self-bunded fuel tanks on site. Spill kit located in fuel storage area. Staff are aware and familiar with its use.	Polluted soil/ surface water/ groundwater.	Low	Vehicle collision. No alarm on fuel system (there is a site alarm for notifying all staff of an incident).

Table 1 Hazards cont…

Location	Hazard	Control Measure(s)	Consequence	Likelihood of material harm	Escalating Factors
Hazardous Materials and Molasses Storage Areas	Lime, hydrated lime or molasses spill.	Lime and hydrated lime are packaged from producer and stored in a shed with a concrete floor. Molasses is stored in a large poly tank within a bund.	Polluted soil/ surface water/ groundwater.	Low	Incorrect handing by staff.
Ponds, channels and settlement ponds.	Algal bloom released into river.	Control of algae through aeration, light (with dye) and pH. Ponds drained when not in use. Water management and sufficient through-flow.	Pollution of river downstream of site.	Low	Breakdown of aeration equipment or pump.

4.2 Potential Pollutants and Safety Equipment

Details of potential pollutants and safety equipment are listed in Table 2. The location of the items listed is shown on the Site Infrastructure Map at Appendix B.

Table 2 Inventory of Pollutants and Safety Equipment

Location	Hazard	Maximum Quantity	Safety Equipment
Fuel storage area	Fuel	Petrol – 1,000L Diesel – 2,500L	Bund Spill kit First aid kit
Hazardous substances store	Lime	10,000kg	P2 mask Gloves
Hazardous substances store	Hydrated lime	4,000kg	P2 mask Gloves Coveralls
Molasses storage area	Molasses	20,000L	Bund

4.3 Maps

Pollution incident response maps have been prepared to facilitate planning for incident response and provide readily accessible and accurate information to support the assessment of an incident and assist in the implementation of incident response procedures and clean-up.

The following maps are provided:

- Location Map (Appendix A); and
- Site Infrastructure Map (Appendix B).

4.4 Notifiable Pollution Incidents

A pollution incident is defined by the POEO Act as:

'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. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.'

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:

(1) For the purposes of this Part:

(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 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.

(2) 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.

5. Incident Response

5.1 Immediate Notification Incident

5.1.1 Incident Response and Notification

Industry is now required to report pollution incidents 'immediately' to the EPA, NSW Health, Fire and Rescue NSW, WorkCover NSW and the Local Council. 'Immediately' has its ordinary dictionary meaning of promptly and without delay (EPA 2012). As per the definition of an immediate notification incident in Section 3 and based on the risk assessment in Table 1, Tassal has identified the following incidents related to the Yamba Farm operations that will require immediate notification:

- Uncontrolled release of water into river that does not comply with EPL conditions; and
- Fuel leak exceeding bunding capacity.

Tassal's procedure for responding to a potential immediate notification incident is outlined in Figure 1.

Contact details for PIPF personnel and external agencies requiring notification are provided in Table 3 and Table 4.

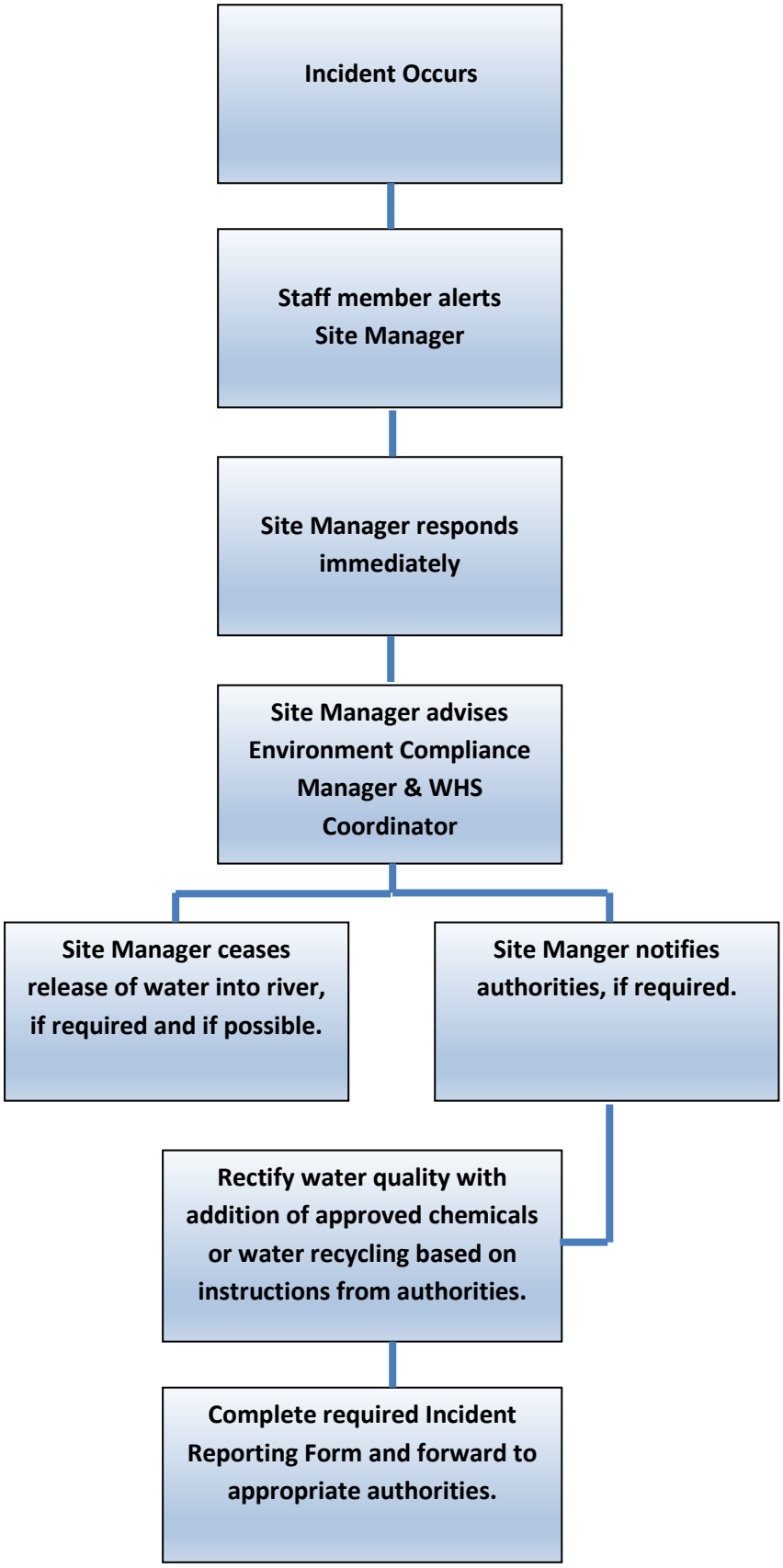


Figure 1 Incident Response Flowchart

Table 3 Incident Contact Details – Yamba Prawn Farm

Name	Role	Contact Number
Ross Dawes	Site Manager	0418 304 345 (and a/h contact)
Joel Cooper	National Environment Manager	0409 113 472
Grant Purdon	General Manager – Other Species	0427 510 822

Table 4 Incident Contact Details – External

Name	Contact Number
Emergency Services	000
EPA Grafton Regional Office	131 555 02 6640 2500
Clarence Valley Council After hours emergency contact	02 6643 0200 02 6626 6858
NSW Ministry of Health Lismore Regional Office	02 9391 9000 02 6620 2100
WorkCover	131 050
Fire & Rescue NSW Yamba Fire Station Maclean Fire Station	000 02 6646 2058 02 6645 4605

5.1.2 Responsibilities

In the event of an immediate notification incident, responsibilities for incident management are as follows:

- **Site staff** are responsible for reporting incidents to the **Site Manager** and providing support.
- **Site Manager** is responsible for:
  - ensuring adequate resources are available for incident response;
  - activating the site alarm to notify all staff of an incident;
  - implementing an immediate response to reduce impact of the incident;
  - notifying the Environmental Compliance Manager and WHS Manager and seeking advice, if required;
  - completing the required Incident Reporting Form (Appendix C); and
  - notifying external authorities and potentially affected community and liaising with the media.
- **National Environment Manager** is responsible for assessing the incident and the immediate response executed by the Site Manager, and providing advice to the Site Manager if further action is required.

The Site Manager, in conjunction with Tassal's People and Communities Department, shall determine the most appropriate means of contacting potentially affected community including:

- Door knocking;
- Letterbox drops;
- Phone;
- Local media; and
- Signage.

Information provided to the community will depend on the incident but could include:

- Description of the incident;
- Status of the incident;
- Response actions;
- Actions to minimise harm; and
- Likely duration.

6. Training and Review

6.1 Training

Personnel involved in site operations undertake a range of training to assist in the response to potential incident and to test the adequacy of incident response procedure and plans. Details of the training and testing of the PIRMP is provided in Table 5.

Table 5 Incident Response Training

Type of Training	Personnel Involved	Frequency	Records
Site Induction	All site staff	Once	WHS Coordinator
Harvesting Training	All staff involved in harvesting	Once per harvesting season	WHS Coordinator
Toolbox Meetings	All site staff	As required (approximately weekly, or daily during harvesting)	WHS Coordinator
Incident Debrief	All site staff	Following any notifiable incidents	WHS Coordinator
Plan Testing	All site staff	Once per year	WHS Coordinator

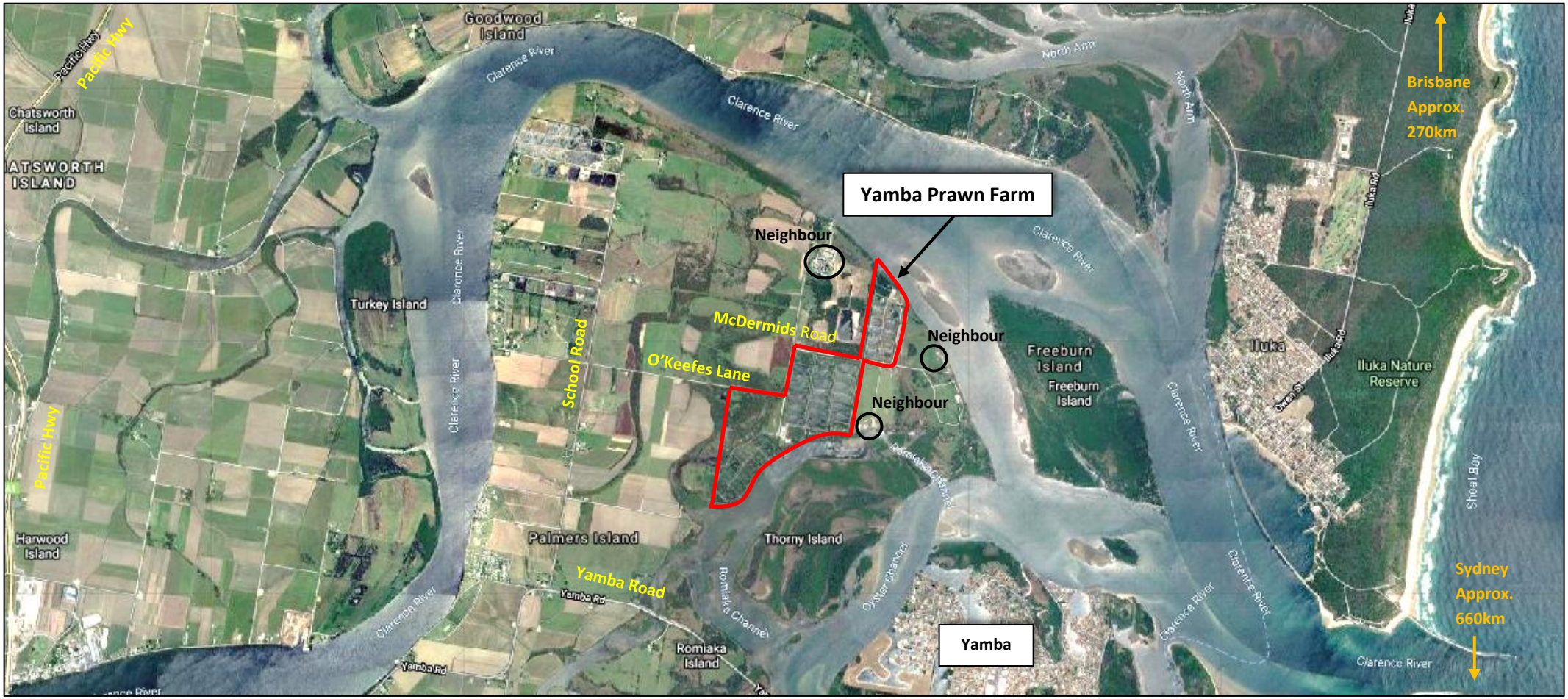
6.2 PIRMP Review

The PIRMP will be reviewed yearly, within one month of a pollution incident, or when there is a material change to operations including, but not limited to:

- Modification of EPL 4490;
- Changes in standard operating procedures referred to in this PIRMP;
- Change in legislative requirements; or
- Recommendations arising from an incident debrief emergency drill or emergency simulation exercise.

The responsibility for reviewing the PIRMP is with the Site Manager. An update of the PIRMP will trigger all staff to undergo refresher training as part of team toolbox meetings as per Table 5.

Appendix A – Location Map



Appendix B – Site Infrastructure Map

Appendix C – Incident Reporting Form

Incident Record – Yamba Prawn Farm	
Date of incident	
Time of incident	
Location of incident	
Nature of incident	
Possible impacts of incident (environmental/ health)	
Estimated volumes of pollutants involved	
Concentrations of pollutants involved	
Action taken	
Notification required	
Personnel responsible	
Other relevant information	
Notification submission details	