


EHS Management System Procedure Pollution Incident Response Management Plan	Document ID:	KDQM-2-5902	
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Kellogg's

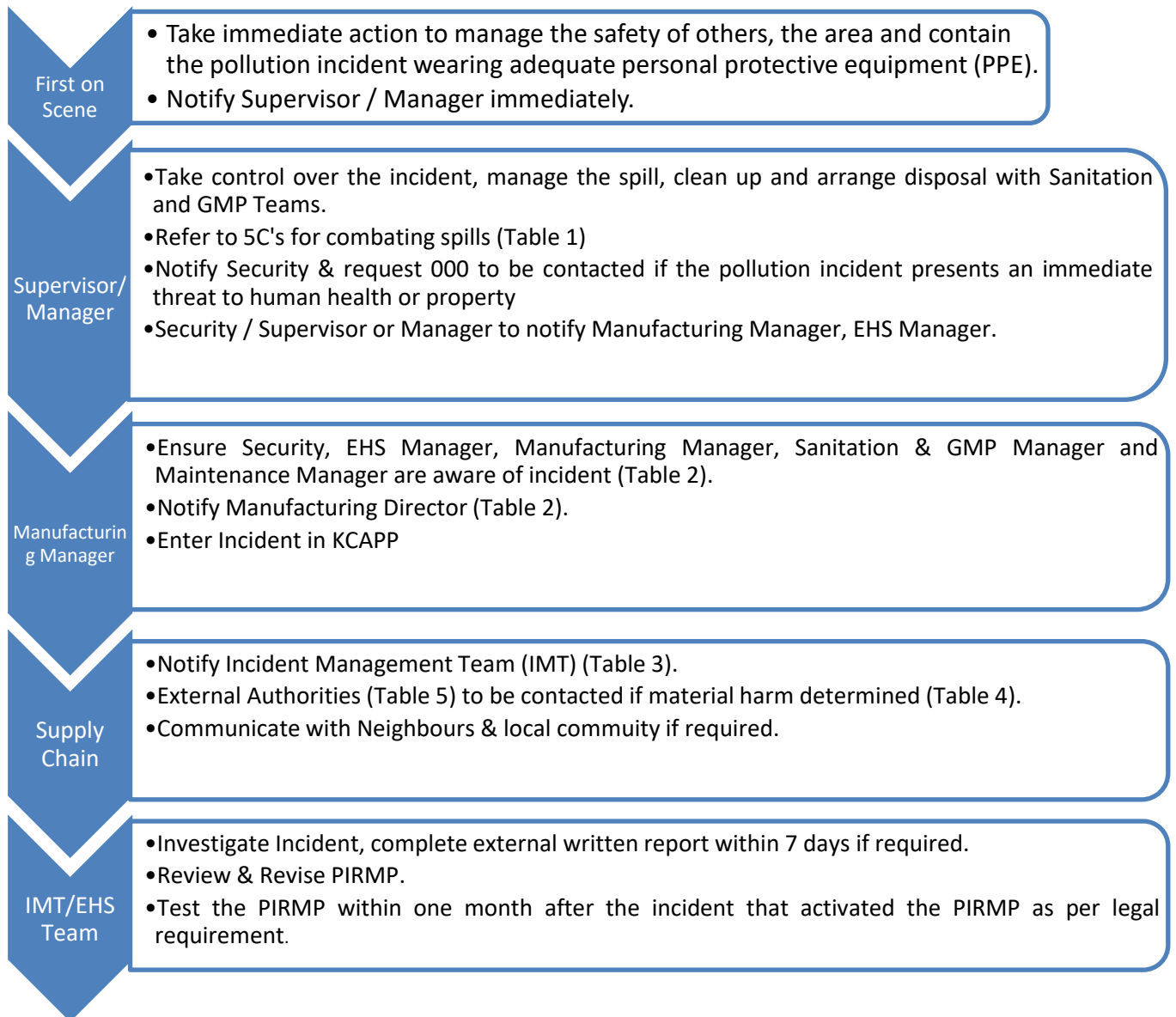
Pollution Incident Response Management Plan



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1 WHAT TO DO IF A REPORTABLE POLLUTION INCIDENT OCCURS



1.1 TABLE 1 – 5C’S FOR COMBATING SPILLS

5C’s	Aim	Action
1. Control	Stop or limit the flow of the spilt material	<ul style="list-style-type: none"> • Restrict area around spill. May have to stop traffic • If flammable remove ignition sources, collect fire extinguisher • Use of Safety Signage
2. Contain	Get spill kit/s + Use PPE + Refer to SDS	<ul style="list-style-type: none"> • Build dams use drain covers/plugs, before stormwater drains and off-site escape • Prevent spilt material entering the stormwater drains • Prevent contaminated stormwater going off-site (e.g. plug drains)
3. Communicate	Raise the alarm by informing Supervisor immediately	<ul style="list-style-type: none"> • Supervisor / Manager becomes Incident controller – Must delegate actions to keep order. • Assess scale; quantity, type of substance, location & where is it going? • Persons injured, Off-site release, DG spill or Complaints • IMT reports to the 5 Agencies in Table 5 (Section 4.2.1) in case of Material Harm Incident.
4. Clean Up	Mop up spilt material	<ul style="list-style-type: none"> • Specific bins for waste food stuffs • Undertake wet or dry cleaning • Using absorbents for smaller spills • Collecting damming or otherwise containing liquids
5. Correct Disposal	Clean up	<ul style="list-style-type: none"> • Store collected waste properly (DG consideration) • Dispose of waste material properly (waste regulations)

2 INTRODUCTION

Kellogg (Aust.) Pty. Ltd. is required to comply with the requirements of the *Protection of the Environment Operations Act 1997* (POEO Act) and the *Protection of the Environment Operations (General) Regulation 2022* by preparing and implementing a *Pollution Incident Response Management Plan* (PIRMP or Plan) for any sites that hold an *Environment Protection License*. This document contains the PIRMP for the Kellogg's Botany Plant, holder of the Environment Protection License No 823 under the POEO Act 1997.

The objectives of the PIRMP are to ensure clear and timely communication about a pollution incident at the Botany Plant to staff and contractors, the *Environment Protection Authority* (EPA) and other relevant authorities and to neighbours who may be impacted by a pollution incident on site. The current Environmental, Safety, Sanitation, GMP, Food Safety risk management, and emergency provisions for managing the Botany site form the core of the PIRMP for Botany Plant.

2.1 OBJECTIVES

The objectives of the PIRMP are to:

- Ensure all relevant Kellogg workers, managers and contractors are made aware of environmental incidents promptly and can respond accordingly
- Ensure site workers understand the immediate environmental incident reporting requirements and timeframes
- Ensure incidents are reported to enable monitoring, sharing of lessons learnt and response to emerging environmental incident trends
- Comply with Legislative requirements to report certain environmental incidents to regulators and other relevant government authorities.

2.2 DEFINITIONS FOR POLLUTION INCIDENT AND MATERIAL HARM

Pollution Incident	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. (Section 153F of the POEO Act 1997)
Material Harm	<p>(a) harm to the environment is material if:</p> <ul style="list-style-type: none"> (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial¹, 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 <p>(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.</p> <p>(2) it does not matter that harm to the environment is caused only in the premises where the pollution incident occurs. (Section 147 of the POEP Act 1997)</p>

2.3 IMMEDIATE NOTIFICATION FOR MATERIAL HARM TO ENVIRONMENT

Environment Protection Licensees and anyone conducting an activity or occupying a premise who becomes aware of a pollution incident that causes or threatens material harm to the environment are required to report the pollution incident immediately (under section 148 of the POEO Act). 'Immediate' means licensees need to report pollution incidents promptly and without delay. Safety and containment measures may be taken to manage the incident first before escalating and delegating tasks to ensure prompt reporting to authorities.

The duty to notify does not apply to a pollution incident involving only the emission of noise.

2.4 ACTIONS TO BE TAKEN DURING OR IMMEDIATELY AFTER A POLLUTION INCIDENT

The PIRMP in addition to the [Botany Plant Emergency Response Manual](#) provides details surrounding responses for emergencies that may occur on site. It should be referred to when responding to an emergency situation, including a pollution incident, to provide guidance on evacuations, muster locations, and in defining roles for Kellogg employees and or emergency response organizations such as Fire Brigade, HAZMAT and Police. It is available at the Botany Security Gatehouse, the EHS Department and the Frontline Team Office.

2.4.1 RISK OF HARM TO HUMAN HEALTH OR THE ENVIRONMENT

This may be addressed and minimised through the below by manufacturing manager / manufacturing director in consultation with IMT:

- Communication to employees surrounding the nature of the emergency and early warning to neighbours.
- Contacting emergency services to assist in emergency
- Provide first aid for any injuries
- Crowd management and evacuation if necessary
- Provide counselling if required
- Availability of safety equipment and or other devices including First Aid kits, Fire Extinguishers, Fire hose reels, spill kits (Appendix E), scrubbers, Roto clones, baghouses.

Refer to the [Botany Plant Emergency Response Manual](#) and Sections 3 and 4 of the PIRMP, for ways to minimize risk and for additional details surrounding actions to be taken during or immediately after a pollution incident respectively.

2.5 SITE MAPS

The EPA license 823 refers to the Kellogg Botany Plant, as located in the series of maps included in:

- Appendix A – Site Map,
- Appendix B – Map of Botany Industrial Park,
- Appendix C – Hazardous Chemicals on premises Map Including Maximum Quantities
- Appendix D – Stormwater Map and
- Appendix E – Spill Kit Locations

3 REQUIREMENTS OF THE PIRMP

Legislation	Requirement	Where this requirement is met	Publicly Available?
POEO Act: Part 5.7A Duty to prepare and Implement Pollution Incident Response Management Plans			
153A Duty of license holder to prepare pollution incident response management plan	The holder of an EPL must prepare a PIRMP that complies with this part in relation to the activity to which the license relates.	This PIRMP in conjunction with: The Botany Plant Emergency Manual.	
153C Information to be included in plan	A PIRMP must be in the form required by the regulations and must include the following: a) the procedures to be followed by the holder of the relevant EPL, or the occupier of the relevant premises, in notifying a pollution incident to: i) the owners (Kellogg Aust. Pty Ltd) or occupiers of premises in the vicinity of the premises to which the EPL or the direction under section 153B relates, and	Refer to Section 4 of this PIRMP.	✓
	ii) the local authority for the area in which the premises to which the EPL or the direction under section 153B relates are located and any area affected, or potentially affected, by the pollution, and	Refer to Table 5 of this PIRMP.	✓
	iii) any persons or authorities required to be notified by Part 5.7.	Refer to Table 5 of this PIRMP.	✓
	b) a detailed description of the action to be taken, immediately after a pollution incident, by the holder of the relevant environment protection license, or the occupier of the relevant premises, to reduce or control any pollution	Response procedures are specified in Section 2.4, 4 & 5.	
	c) the procedures to be followed for coordinating, with the authorities or persons that have been notified, any action taken in combating the pollution caused by the incident and in particular, the persons through whom all communications are to be made.	Refer to Section 4 of this PIRMP.	

Legislation	Requirement	Where this requirement is met	Publicly Available?
153D Keeping of plan	A person who is required to prepare a PIRMP under this part must ensure that it is kept at the premises to which the relevant EPL relates, or where the relevant activity takes place, and is made available in accordance with the regulations.	A printed copy of the PIRMP is kept onsite at the Security Gatehouse. An electronic copy is kept on the internal documentation system.	
153E Testing of plan	A person who is required to prepare a pollution incident response management plan under this Part must ensure that it is tested in accordance with the regulations.	Testing of the PIRMP will be undertaken in accordance with the regulations as set out in Section 10 of this PIRMP.	
153F Implementation of plan	If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147) is caused or threatened, the person carrying on the activity must immediately implement any pollution incident response management plan in relation to the activity required by this Part.	Noted. As addressed in this PIRMP	

Legislation	Requirement	Where this requirement is met	Publicly Available?
Protection of the Environment Operations (General) Regulation 2022: Part 4 Pollution Incident Response Management Plans			
71 Form of plan	1) A plan is to be in written form	This PIRMP.	
	2) A plan may form part of another document that is required to be prepared under or in accordance with any other law so long as the information required to be included in the plan is readily identifiable as such in that other document.	As noted, this PIRMP in conjunction with: The Botany Plant Emergency manual.	
72 Additional matters to be included in plan	1) General The matters required under section 153C (d) of the Act to be included in a plan are as follows: a) a description of the hazards to human health or the environment associated with the activity to which the license relates (the relevant activity),	Refer to Section 6 of this PIRMP.	
	b) the likelihood of any such hazards occurring, including details of any conditions or events that could, or would, increase that likelihood	Refer to Section 6 of this PIRMP.	

	c) details of the pre-emptive action to be taken to minimize or prevent any risk of harm to human health or the environment arising out of the relevant activity	Refer to Section 6 of this PIRMP.	
	d) an inventory of potential pollutants on the premises or used in carrying out the relevant activity	Refer to Section 6 of this PIRMP.	
	e) the maximum quantity of any pollutant that is likely to be stored or held at particular locations (including underground tanks) at or on the premises to which the license relates	Refer to Section 6 of this PIRMP.	
	f) a description of the safety equipment or other devices that are used to minimize the risks to human health or the environment and to contain or control a pollution incident	Refer to Section 2.4.1 of this PIRMP.	
	g) the names, positions and 24-hour contact details of those key individuals who: i) are responsible for activating the plan, and ii) are authorized to notify relevant authorities under section 148 of the Act, and are responsible for managing the response to a pollution incident	Refer to Section 4 of this PIRMP. Tables 2 & 3	
	h) the contact details of each relevant authority referred to in section 148 of the Act	Refer to Table 5.0 of this PIRMP.	✓
	i) details of the mechanisms for providing early warnings and regular updates to the owners and occupiers of premises in the vicinity of the premises to which the license relates or where the scheduled activity is carried on	Refer to Section 5.0 of this PIRMP.	✓
	j) the arrangements for minimizing the risk of harm to any persons who are on the premises or who are present where the scheduled activity is being carried on	Refer to Sections 2 & 6 of this PIRMP.	
	k) a detailed map (or set of maps) showing the location of the premises to which the license relates, the surrounding area that is likely to be affected by a pollution incident, the location of potential pollutants on the premises and the location of any stormwater drains on the premises.	Refer to 2.5 & Appendix A – E.	

Legislation	Requirement	Where this requirement is met	Publicly Available?
	l) a detailed description of how any identified risk of harm to human health will be reduced, including (as a minimum) by means of early warnings, updates and the action to be taken during or immediately after a pollution incident to reduce that risk	Refer to Section 2 and Table 4 of this PIRMP.	
	m) the nature and objectives of any staff training program in relation to the plan	Refer to Section 9 & 10 of this PIRMP.	
	n) the dates on which the plan has been tested and the name of the person who carried out the test	Refer to Section 10 of this PIRMP.	
	o) the dates on which the plan is updated	Refer to Section 10 of this PIRMP.	
	p) the manner in which the plan is to be tested and maintained.	Refer to Section 10 of this PIRMP.	
	2) Trackable waste transporters	Not applicable.	
74 Availability of plan	1) A plan is to be made readily available: a) to an authorized officer on request, and	The PIRMP will be made readily available to an authorized EPA Officer on request.	
	b) at the premises to which the relevant license relates, or where the relevant activity takes place, to any person who is responsible for implementing the plan.	The PIRMP is kept onsite at the Security Gatehouse.	

Legislation	Requirement	Where this requirement is met	Publicly Available?
	2) A plan is also to be made publicly available in the following manner within 14 days after it is prepared: a) in a prominent position on a publicly accessible website of the person who is required to prepare the plan, to any person who makes a documented request (who cannot access via web page).	The PIRMP is publicly available on Kellogg website - https://www.kelloggs.com.au/en_AU/our-story/ehs.html	✓
	3) Subclause (2) applies only in relation to that part of a plan that includes the information required under: a) section 153C (a) of the Act, and clause 72 (1)(h) and (i) or (2)(b) and (c) (as the case requires).	The publicly available PIRMP includes those sections referred to in the Act and Regulation (refer to the right hand column of this Table).	
	4) Any personal information within the meaning of the Privacy and Personal Information Protection Act 1998 is not required to be included in a plan that is made available to any person other than a person referred to in subclause (1).	Noted.	
75 Testing of plan	1) A PIRM plan must be tested-- (a) routinely at least once every 12 months, and (b) if a pollution incident occurred during an activity to which an environment protection licence relates, which caused or threatened material harm to the environment, within the meaning of the Act, section 147--within 1 month of the incident occurring.	Refer to Section 9 of this PIRMP.	
	2) The test must be carried out in a way to ensure the following-- (a) the information included in the PIRM plan is accurate and up to date, (b) the PIRM plan is capable of being implemented in a workable and effective way.	Refer to Section 9 of this PIRMP.	
	(3) A test carried out under subsection (1)(b) must assess the matters specified in subsection (2) in light of the incident.	Refer to Section 9 of this PIRMP.	

4 POLLUTION INCIDENT NOTIFICATION PROTOCOL

4.1.1 WHO DO YOU NOTIFY?

Firstly, notify Supervisor / Manager, who will contact Security. Security will be advised to call emergency services (000) if the incident presents an immediate threat to human health or property. If the incident does not require emergency services, Security / Supervisor will contact Kellogg Management with 24-hour contact (+61 293 847 444)

4.1.2 TABLE 2 - POLLUTION INCIDENT LEVEL ACTIONS

Incident Levels	Action	
1. Precautionary Reporting May wish to contact EPA for their information only / for their further advice where there has been a spill or escape of a solid, liquid outside of Kellogg's boundaries and where there is no material harm (as defined in sections 2.2 & 4.2), or it is uncertain whether or not there is material harm	Alarm Raising & Notification	<ul style="list-style-type: none"> Report incident to Supervisor / Manager Escalation to management including Manufacturing Director & IMT for possible notification to EPA. If a complaint is received, it is recorded & appropriate action is undertaken. Depending on the situation, it may be appropriate to contact the EPA officer that a minor incident has occurred and whilst Kellogg does not consider there has been material harm to the environment or does not have sufficient information to make that determination, Kellogg is nevertheless contacting the EPA for their information / further advice.
	Incident Response	<ul style="list-style-type: none"> If it is safe to do so, take steps to manage the safety of others. The Incident Controller to manage the spill/incident - Control, contain Stop and clean up
	Post Incident	<ul style="list-style-type: none"> Correct disposal organized with Sanitation & Pest Control Manager and the Manufacturing Team Enter incident into Insights. Information on archived incidents is available in KCAPP. If reported to EPA ensure the incident is reported in the EPL's annual return.
2. Material Harm (Emergency Services Not Required) Reportable as Material Harm (as defined in sections 2.2, 4.2), but does not require external Emergency services (e.g. a fire unit) as the incident can be adequately managed internally.	Alarm Raising & Notification	<ul style="list-style-type: none"> Report the incident to Supervisor / Manager If a controllable fire, or there are injuries, contact IMT (Table 3) EHS or Manufacturing Manager to inspect the incident / gain deeper understanding & if necessary, escalate incident to the Manufacturing Director. Upon becoming aware of incident scale, Manufacturing Director to organize for the 5 Authorities to be notified (Table 5). If a complaint is received, it is recorded, and appropriate action is undertaken. As this is a Material Harm Incident contact the 5 agencies as per Section 3.2
	Incident Response	<ul style="list-style-type: none"> Generally, the most senior person at the scene to take control as the Incident Controller. The Incident Controller to assess the scale of the incident and consider evacuation, first aid etc. and notify Security. Shut down any plant and equipment if it is contributing to the incident The IMT to become involved Contain the incident while applying appropriate safety measures The Incident Controller to manage the spill/incident - Control, contain Stop and clean up
	Post Incident	<ul style="list-style-type: none"> Clean up and organize disposal with Sanitation & Pest Control Manager and the Manufacturing Team If required arrange for the proper storage and disposal of any wastes resulting from the incident Report, Review & Improvement Planning – IMT & the EHS Team Revise, Plan and Record Changes – EHS Team Replace used equipment – Maintenance

3. Material Harm (Emergency Services Required) Reportable as Material Harm (as defined in sections 2.2, 4.2). Requires external Emergency services as the incident cannot be adequately managed internally.	Alarm Raising & Notification	<ul style="list-style-type: none"> • Report the incident to Supervisor / Manager • If an uncontrollable fire, explosion or there are injuries, contact IMT (Table 3) • As this is a Material Harm Incident contact the 5 agencies as per Section 4.2 • EHS or Manufacturing Manager to inspect the incident / gain deeper understanding and escalate to the Manufacturing Director. • Manufacturing Director to Contact IMT (Table 3). • If neighbours are affected refer to Section 5
	Incident Response	<ul style="list-style-type: none"> • Unless a full Evacuation required, continue with the following actions: • Most senior person at the scene to take control as the Incident Controller • IMT involved • Contain the spill or incident while applying appropriate safety measures • The Incident Controller to manage the spill/incident - Control, contain Stop and clean up • Manufacturing Director / Manufacturing Manager/ EHS Manager/shift Manager to liaise with Emergency Services when on site & follow instructions
	Post Incident	<ul style="list-style-type: none"> • Wait for Emergency Services to declare the emergency over • Clean up and organize disposal with Sanitation & Pest Control Manager and the Manufacturing Team • If required arrange for the proper storage and disposal of any wastes resulting from the incident • Report, Review & Improvement Planning –IMT & the EHS Team • Revise, Plan and Record Changes – EHS Team • Replace used equipment – Maintenance

4.2 - NOTIFICATION TO RELEVANT AUTHORITIES

Use this table to make the 5 phone calls to the agencies listed.
Provide brief description of the incident based on the information available.
Take written notes of each call, time, date, information provided by the agency, e.g. the incident number and their relevant response etc.

4.2.1 TABLE 3 – AGENCIES TO BE NOTIFIED FOLLOWING A MATERIAL HARM INCIDENT

1. NSW Fire and Rescue	Level 3 Incident - 000 Level 2 incident - 1300 729 579
2. NSW EPA (Environment Protection Authority)	131 555
3. Randwick SESI PHU (Randwick South East Sydney/Illawarra Area Health Service Public Health Unit) After Hours - Phone: (Prince of Wales Hospital) - ask for Public Health Nurse on call	9382 8333 9382 2222
4. Safework NSW (previously WorkCover)	131 050
5. Bayside Council Pollution Hot Line	9366 3598 or 0416 121 586

Where possible the following information to be furnished internally and to the above agencies when contacting them:

- the time, date, nature, duration and location of the incident,
- the location of the place where pollution is occurring or is likely to occur,
- the nature, the estimated quantity or volume and the concentration of any pollutants involved, if known,
- the circumstances in which the incident occurred (including the cause of the incident, if known),
- the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution, if known,

Note that all the above information may not be fully known at the time of the calls. Should relevant additional information become available then the agencies must be contacted again with the updated information.

4.3 WHAT INFORMATION MUST YOU PROVIDE TO THE EPA?

In the event of material harm being reported (by phone), Kellogg to provide written notification of the incident within 7 days to the EPA under:

- R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.
- Section 137(1)(b) of the POEO (General) Regulation 2022.

4.4 COORDINATION WITH AUTHORITIES

If emergency services has taken control of the incident Kellogg will act under instruction from emergency services to:

- Provide information and advice as requested by emergency services
- Take any action as directed to combat the incident and pollution caused by the incident.

All communications are to be made to coordinate with authorities through the EHS Manager / Manufacturing Director / Manufacturing Manager. Contact details are provided in Table 6.

4.4.1 TABLE 4 - KELLOGG CONTACTS

Title	24 Hour Contact
Community Hotline	+61 293 847 444

5 NOTIFYING A POLLUTION INCIDENT TO NEIGHBOURS

5.1 COMMUNICATION MECHANISMS

The communication response to impacted residents will depend on the circumstances of the event, and any direction that may be provided by the EPA and or emergency services.

Depending on the nature and circumstances of the incident, this may (but does not always require), approaches and systems such as the following to provide early warnings and updates to neighbours:

- door knocks of affected neighbours;
- letter drops to affected neighbours;
- sending out a media release; or
- posting information on Kellogg Australia's website and/or social media.

A 24-hour Community Hotline number +61 293 847 444 of the Botany Plant is available for neighbours to contact Kellogg Botany Security on a 24 hour, 7 days per week basis.

5.2 INFORMATION TO BE PROVIDED

In the event of a pollution incident, communication to the community may include specific information to minimize the risk of harm. For example, this may include instructions to close windows and doors and remain inside for incidents involving emission of air pollutants.

The information to be provided would be dependent on the nature and circumstances of the event.

6 POTENTIAL POLLUTANTS & HAZARDS

6.1 INVENTORY OF POLLUTANTS AND MATERIALS

The inventory of pollutants includes:

- a) Chemical Substances & applicable Ingredients Inventory – Available on the Kellogg [online Chemical database](#), including reference to safety data sheets. The Botany Plant has hazardous chemicals on site, which has been acknowledged by Safework NSW. The maximum quantities of pollutants and numbered locations are detailed in Appendix C as a reference for Emergency Services.
- b) Water - Liquid pollutants that may present a risk to Stormwater systems with potential to cause a reportable incident are detailed below. Refer to Appendix D for the site Stormwater map and Appendix E for Spill kit locations.
 - i. Treated or Untreated Wastewater from storage tanks or transfer locations.
 - ii. Liquid caustic (Sodium Hydroxide) if lost from bunded storage.
- c) Air – Pollutants are reported by the EHS Team annually to the EPA in the National Pollutant Inventory (NPI). The information is available from the EPA in their NPI database. Possible pollutants from the Manufacturing process, that may cause an adverse, notifiable include:
 - iii. Dust from baghouse filter units and silos due to leakage or explosion
 - iv. Dust from spillages that may become airborne due to wind.
 - v. Odour and smoke related to fire

6.2 ENVIRONMENTAL HAZARDS

The [Work Health, Safety & Environmental Risk Register](#) has been prepared by Kellogg (Aust.) Pty Ltd to ensure that potentially hazardous conditions relating to the Botany Manufacturing Plant and its production operations are identified, assessed and effectively controlled. The hazards documented in this register have been and will continue to be assessed in a systematic way considering the level of risk, namely - consequence and likelihood.

7 WASTE

All wastes which can be contained and collected from an incident will be managed according to Kellogg's waste handling systems. For example,

- Wastewaters sent to the Trade Waste Treatment Plant where appropriate
- Wet food waste managed using the wet food bins etc
- Hazardous waste – stored appropriately and disposed of using a licensed waste transporter

Kellogg classifies the liquid and non-liquid wastes it generates according to the [Waste Classification Guidelines](#). Kellogg complies with [the Protection of the Environment Operations \(Waste\) Regulation 2014](#), in relation to waste management.

Kellogg carries out activities in a competent manner, such as processing, handling, moving or storage of materials and substances, including wastes.

External pumps are fitted with leak trays, which are piped into trade waste drains so providing a risk reduction to stormwater from leaking glands and seals should leaks occur.

8 MAKING THE PLAN AVAILABLE

8.1 ACCESSIBILITY TO INTERNAL STAKEHOLDERS

The PIRMP Plan is stored electronically on the documentation control system. The referenced documents are electronically linked to the relevant sections in the PIRMP.

8.2 ACCESSIBILITY TO AUTHORISED OFFICERS

A complete printed copy with all references attached, will be available at the Botany Plant through the Botany Security Gatehouse. This copy will be made available to any authorized officer and to those identified as responsible for implementing the Plan.

8.3 ACCESSIBILITY TO THE PUBLIC

A summarized version of the PIRMP is placed on the Kellogg web site under 'Our Story – Environment, Health & Safety'.

9 STAFF TRAINING

9.1 STAFF TRAINING PROGRAM

Training on the PIRMP will be provided to all relevant personnel working at Kellogg's Botany plant. Training will be provided on the process to be followed in the event of a pollution incident, the notification protocol, and actions to be taken. Drills scenarios to test the PIRMP would be discussed based on the likely risks and potential incidents that could occur at the site.

9.2 FREQUENCY OF TRAINING

PIRMP training will be conducted in general phase with the Testing of the Plan in section 9:

- At least once every 12 months, or
- Within one month of any pollution incident occurring, which triggers a Material Harm incident.

9.3 TRAINING RECORDS

The EHS Team, HR and Operations teams maintain Kellogg training records, including competency of training.

10 TESTING OF THE PLAN

The PIRMP will be tested in accordance with the following:

- a) At least once every 12 months; and
- b) Within one month of a pollution incident resulting in Material Harm occurring that activates the PIRMP.

The objective of testing and conducting training is to assess whether the information included in the PIRMP is accurate, current and is capable of being implemented in a workable and effective manner. The routine testing will be a desktop assessment and may include a practical simulation to check for the effectiveness on the below components:

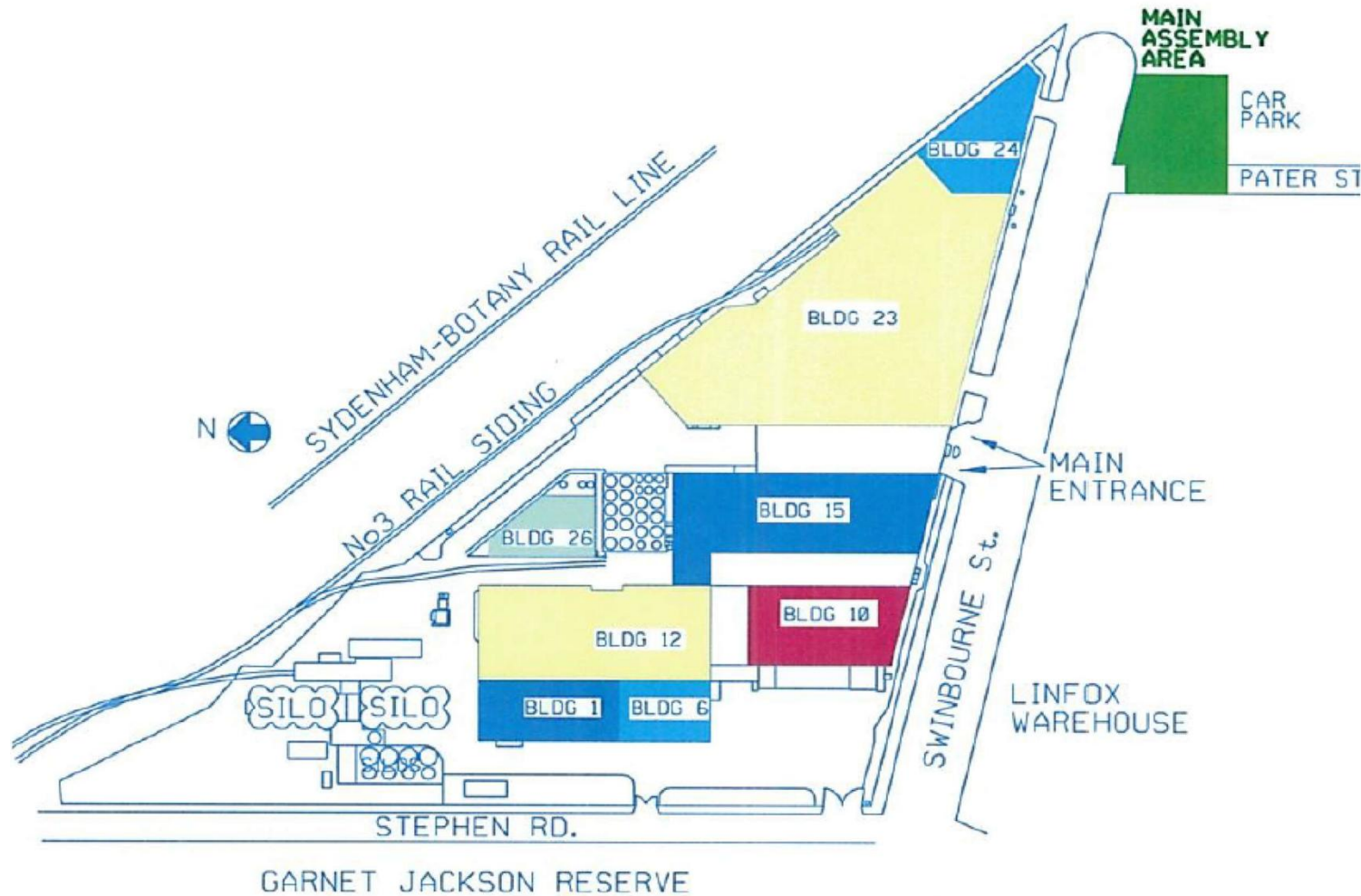
- contact details will be checked to ensure they are up to date
- procedures in the PIRMP will be checked to ensure they are workable and improved
- learnings from practical site exercises will be transferred to the PIRMP where applicable
- the effectiveness and understanding of the PIRMP training will be assessed.

The details of the testing will be stored on the internal Kellogg drive and any updates to the PIRMP will be completed in Kdocs, through the document control program.

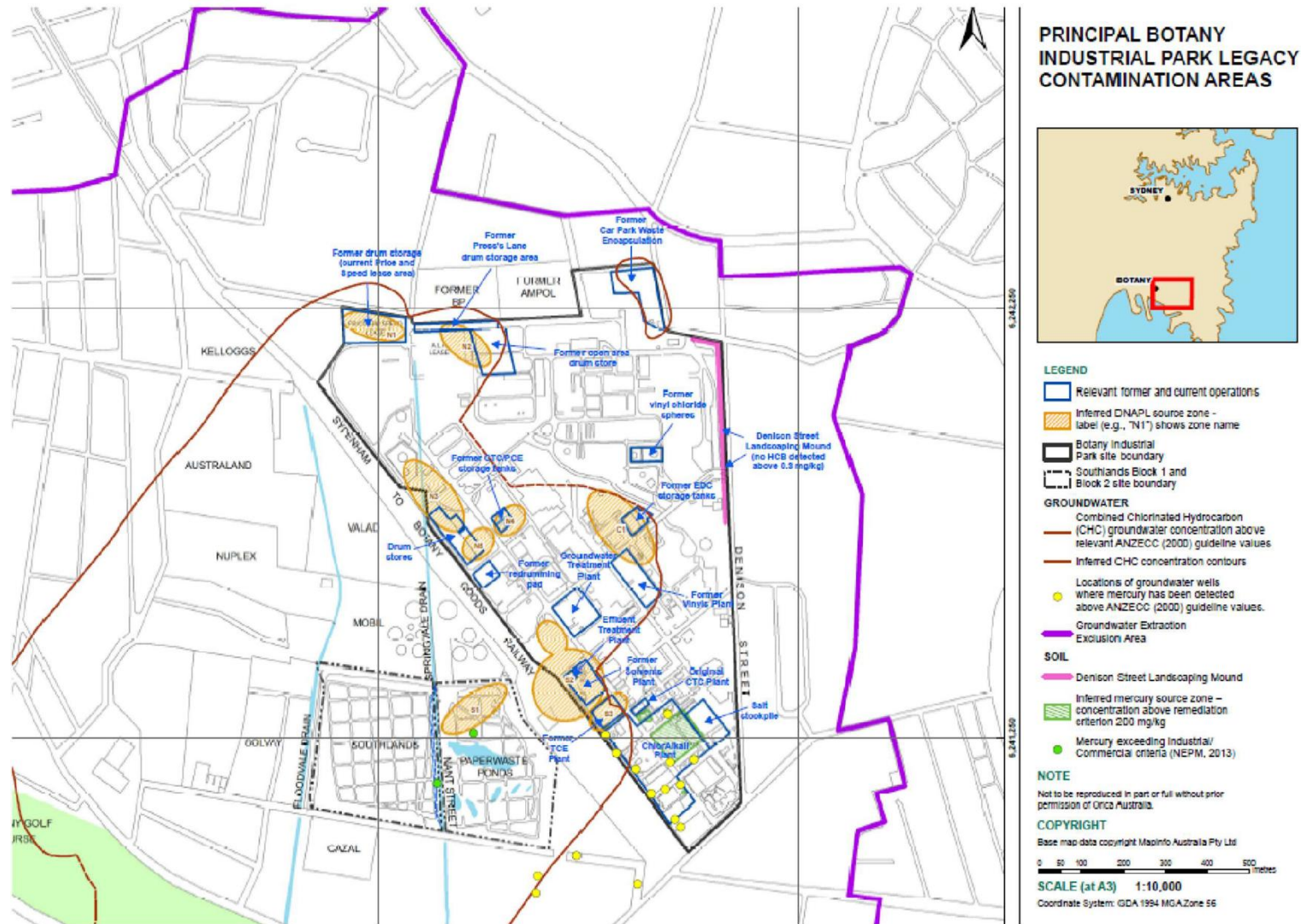
11 REFERENCE DOCUMENTATION

- [EPA license 823](#)
- [Hazardous Chemicals on premises Acknowledgement from SafeWork NSW](#)
- [Waste Classification Guidelines Part 1.](#)
- [Botany Plant Emergency Response Manual](#)
- [Work Health, Safety & Environmental Risk Register](#)

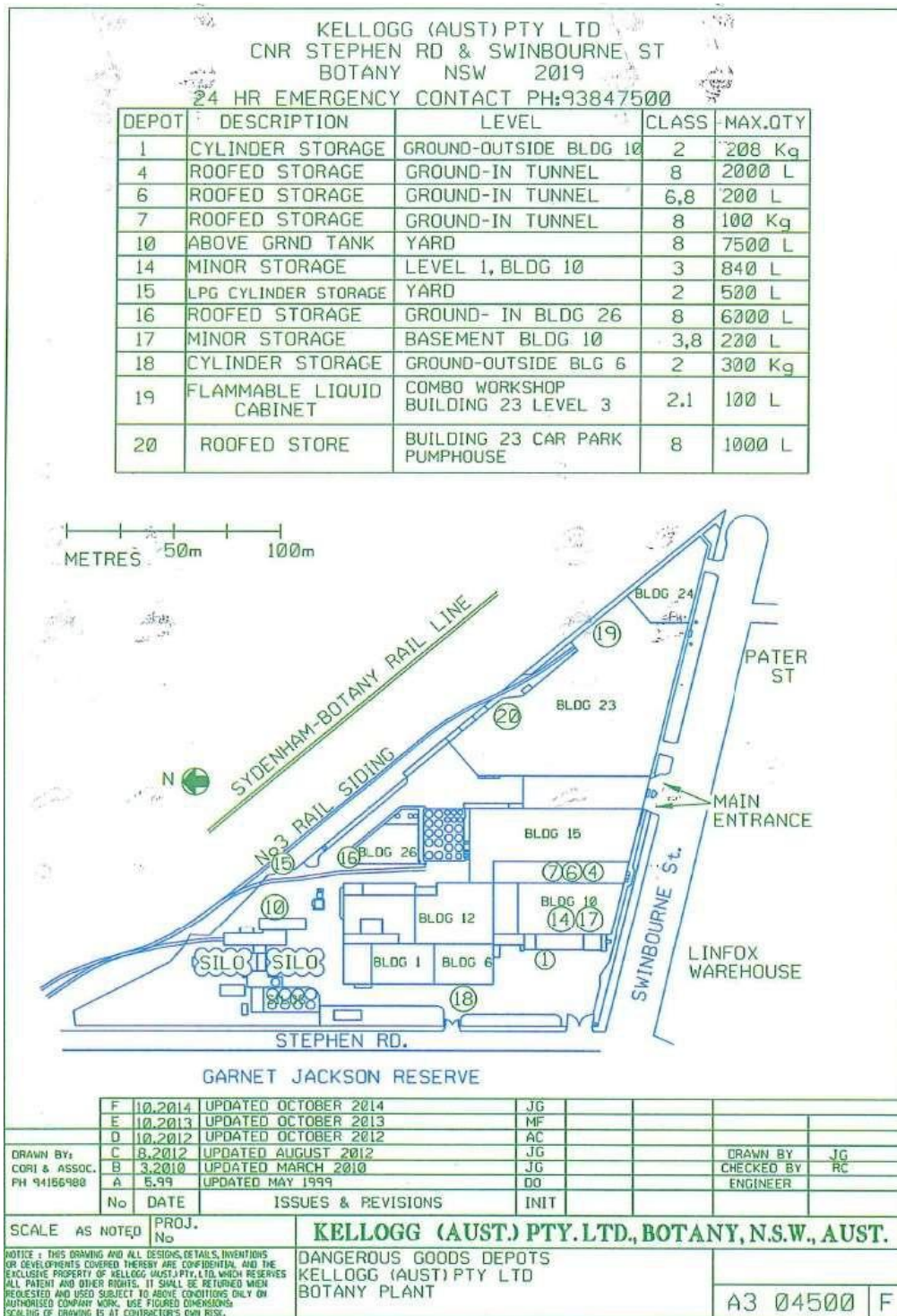
APPENDIX A - KELLOGG BOTANY PLANT SITE MAP



APPENDIX B – BOTANY INDUSTRIAL PARK – NEIGHBOURS THAT MAY BE IMPACTED BY A POLLUTION INCIDENT



APPENDIX C – HAZARDOUS CHEMICALS ON PREMISES



MAP

APPENDIX D - STORMWATER DRAINAGE SYSTEM FOR THE KELLOGG BOTANY PLANT

