



# Emergency Management Procedure

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## Emergency Management Procedure

### Definitions

**SCEMT** – Southern Cotton Emergency Management Team

A structured organisation that will initiate an appropriate response to emergency situations. **SCEMT** consists of chief warden, deputy chief warden, communications officer, area wardens.

**Emergency** – Any event that arises internally or from external sources, which may adversely affect persons or the community generally, and which requires an immediate response.

**Authority** – During emergencies, instruction given by **SCEMT** personnel shall overrule normal management structure. Once an emergency is declared, the powers of wardens and deputy wardens shall override all normal non-emergency management procedures. Area wardens have the authority to marshal all staff and any visitors to designated emergency assembly areas.

### Control Point (CP) – Front Gate.

- The CEO will relay the information to other agencies if the Chief Warden or his Deputy has not already done so
- Keep phone lines open
- Inform management, Chief Warden or his / her Deputy of any communications received
- In the event of an evacuation the Office Warden will ensure that the site Visitors Log Book, Vehicle Log Book and Staff IN / OUT Board are brought to the assembly area and report to the Emergency evacuation Co-ordinator or his Deputy.

**Co-ordination with Other Agencies** – Police, NSW Fire Brigade and local council are to be provided with site layout and copies of emergency procedures.

**Warden Identification** – control of emergencies is greatly assisted if key personnel can be quickly identified. The Chief Warden shall be identified by a red helmet. The deputy chief warden will be identified by a yellow helmet.

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**1. Background**

Southern Cotton Pty Ltd (Southern Cotton) operate a cotton gin at Whitton in the Murrumbidgee Irrigation Area. The Southern Cotton gin facility (the Gin) is located at 881 Darlington Point Whitton Road, Whitton (refer Appendix 2).

The Gin has been in operation since 2012. The Gin processes a maximum of 200,000 tonnes of cotton per annum and the cotton trash generated during production is stockpiled onsite and either removed for offsite composting/disposal or composted onsite.

The operations are comprised of the following:

- Residential dwellings
- Cotton gin facility
- Module pads
- Road infrastructure
- Bale warehousing facilities

The ginning process involves separation of lint cotton, cotton seed and removal of by-product material such as leaf and stalk. The raw seed cotton is delivered to the site from cotton farms in round or square modules and stored on open gravel (module) pads until processing occurs. Once processed, the lint cotton bales are stored onsite and/or trucked by cotton merchants to warehouse facilities in Melbourne. Cotton seed is sold into the regional feedlots, dairies and containerised in Melbourne for export.

The Gin operates 24 hours per day, seven days per week during the ginning season (April to September). Maintenance and cotton seed and bale out loading is undertaken during the remaining months.

The day to day operation of the Gin is managed by Southern Cotton staff, including 30 full time staff and up to 50 seasonal staff.



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### **1.1 Purpose**

The Emergency Management Procedure outlines the actions and procedures undertaken in the event of any emergency.

This Emergency Management Procedure (EMP) has also been updated to satisfy obligations under the *Protection of the Environment Operations Act 1997* (POEO Act) and associated *Protection of the Environment Legislation Amendment Act 2011* (POELA Act) for licensed facilities.

The POELA Act requires holders of Environment Protection Licences (EPLs) to maintain a Pollution Incident Response Management Plan (PIRMP), which sets out the requirements for the notification, response and management of pollution incidents as defined in the POEO Act and the Protection of the Environment Operations (General) Regulations (2009).

Southern Cotton operates under EPL 20723 (refer Appendix 1). The EPL is issued under Section 55 of the POEO Act by the NSW Environment Protection Authority (EPA). The EPL contains requirements to report pollution incidents as outlined in condition R2:

*Note: The licensee or its employees must notify the EPA of incidents causing or threatening material harm to the environment immediately 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 seven days of the date on which the incident occurred.*

Under Southern Cotton's Emergency Management System, detailed emergency response procedures are already in place for the classification and management of incidents. Under the provisions of Part 3A 98B(2) of the Protection of the Environment Operations (General) Amendment (Pollution Incident Response Management Plans) Regulation 2012, requirements may be integrated into existing plans. This update of the EMP incorporates the requirements of the POEO legislation.

The EMP is held by the CEO and is applicable to all Southern Cotton operations. It outlines responsibilities and response actions for staff in the event of an emergency incident and to be able to effectively respond to such emergencies, so as to minimise any adverse impact on the



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safety or health of people, or on the environment. The contents of the EMP should be passed on to all employees. This is achieved through ‘toolbox talks’.

The EMP incorporates simple and clear information regarding:

- Risks associated with Southern Cotton operations
- Identification of potential pollutants and safety equipment
- Incident response and notification procedures
- Emergency management roles and responsibilities
- Emergency contact details
- Training and review of the EMP.

**1.2 Availability of the EMP**

The EMP will be kept in written form at the Southern Cotton premises and will be made available to all personnel responsible for implementing the plan, and to an authorised officer (as defined in the POEO Act) on request.

An abridged version of the EMP will be made publicly available within 14 days of finalisation (taken to be authorisation of the EMP by the CEO) via the Southern Cotton website. No personal information (within the meaning of the Privacy and Personal Information Protection Act 1998) will be made publicly available.



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**2. Pollution Incident Response Planning**

**2.1 Risk assessment**

A risk assessment was conducted on site between GHD and the Southern Cotton CEO during a site visit on 7 October 2016. The main hazards identified through the assessment along with control measures to minimise the occurrence and consequences (people and environment) of the identified risks are outlined in [Table 2-1](#).

This risk assessment table is reviewed annually.



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**Table 2-1 Hazards**

Location	Hazard	Likelihood	Escalating factors	Consequence	Control measures
Seed shed	Increased risk of fire in stored seed when incoming cotton has greater than 12% moisture content	High	Wet cotton growing season	Destruction of property  Injury to site personnel  Loss of product	<ul style="list-style-type: none"> <li>Maintain moisture probes on outgoing seed line of gin identify high risk seed</li> <li>Segregate high moisture seed in the seed shed from dry seed</li> <li>Limit the storage to seven (7) days</li> <li>Fire hydrants surround seed shed</li> </ul>
Diesel storage (27,000L)	Risk of spills resulting in contamination	Low	Failure of bund  Failure of storage tank	Soil and/or groundwater contamination	<ul style="list-style-type: none"> <li>Maintain bunded storage for diesel</li> <li>Designate refuelling location</li> <li>Maintain spill kit onsite</li> <li>Maintain fuel security system to prevent unauthorised use of fuel bowser</li> <li>Store diesel pumps on bunded pallets</li> </ul>
	Risk of fire	Low	Failure of storage tank	Destruction of property  Injury to personnel	<ul style="list-style-type: none"> <li>Maintain fire system at designated fuel storage</li> <li>Maintain E-stop on fuel bowser</li> <li>Maintain shut off valve for fuel in adjacent shed</li> <li>Maintain water cart at diesel storage</li> </ul>



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Location	Hazard	Likelihood	Escalating factors	Consequence	Control measures
Trash storage	Risk of fire	Low	Wet cotton growing season	Destruction of property  Injury to site personnel	<ul style="list-style-type: none"> <li>• Maintain moisture probes throughout Gin to identify high risk product</li> <li>• Isolate hot trash</li> <li>• Turn trash as soon as practical to dissipate heat</li> <li>• Trash is stored in long windrows which limits the quantity of trash that would burn.</li> <li>• The trash yard is isolated from the main work area and module storage yards.</li> <li>• A trash yard fire would generate a reasonable amount of smoke but would not put people in danger.</li> <li>• Windrows to be kept at distance from each other to eliminate crossfire risk.</li> <li>• Gin trash management procedure (Ops-Site-SOP-001) reviewed annually</li> </ul>
Cotton Gin	Risk of fire	Low	Wet cotton growing season  Failure of moisture probes, arc detection systems	Destruction of property  Injury to site personnel  Loss of product	<ul style="list-style-type: none"> <li>• Maintain moisture probes in Gin to measure incoming modules and outgoing seed line</li> <li>• Maintain Arc Detection System throughout Gin</li> <li>• Maintain Fire Bale Procedure</li> <li>• Maintain sprinkler fire systems throughout Bale warehouse</li> <li>• Maintain fire truck on site</li> <li>• Train relevant staff annually in use of firefighting equipment</li> <li>• Maintain RFS training for Head Ginners</li> </ul>



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Location	Hazard	Likelihood	Escalating factors	Consequence	Control measures
LPG storage (76,500L)	Risk of fire	Low	Failure of storage tank	Destruction of property  Injury to site personnel	<ul style="list-style-type: none"> <li>Maintain emergency switches at the LPG storage and in the Gin console room</li> <li>Maintain E-stop and isolator in Gin console room</li> <li>Fire hoses and fire extinguishers are provided and maintained at tank.</li> <li>Fire truck is in close proximity to tank and other key infrastructure.</li> <li>Area surrounding tank is maintained be free of vegetation and ignition sources.</li> </ul>
	Risk of leaks	Low	Failure of storage tank	Air contamination	<ul style="list-style-type: none"> <li>Conduct annual checks by technicians (SupaGas)</li> </ul>
	Risk of explosion	Low	Failure of storage tank	Destruction of property  Injury to site personnel  Air contamination	<ul style="list-style-type: none"> <li>Tank is located a reasonable distance from the main gin building and office.</li> <li>Tank undergoes annual checks by technicians (SupaGas)</li> <li>Maintain emergency switches at the LPG storage and in the Gin console room</li> <li>Maintain E-stop and isolator in Gin console room</li> <li>Tank is designed with a pressure sensor to continuously monitor pressure inside the tank and to indicate the point at which the tank is considered full or nearing capacity.</li> <li>Tank is designed with an auto-shut off system, once the pressure within the tank reaches or exceeds a specified threshold or if a potential hazard such as a leak or rupture occurs, the auto shut-off system will be activated.</li> </ul>



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Location	Hazard	Likelihood	Escalating factors	Consequence	Control measures
Press oil tank (16,000L)	Risk of spills resulting in contamination	Low	Failure of storage tank or pump  Failure of bund	Soil and/or groundwater contamination	<ul style="list-style-type: none"> <li>Maintain bunded storage for Press Oil Tank</li> <li>Maintain underground tank that waste oil drains to</li> <li>Maintain monitoring system for Press Oil Tank in Gin console room</li> <li>Maintain shutoff valves at Press Oil Tank pumps</li> </ul>
	Risk of fire	Low	Failure of storage tank	Destruction of property  Injury to site personnel	<ul style="list-style-type: none"> <li>Maintain fire systems</li> </ul>
Chemical storage shed	Risk of spills resulting in contamination	Low	Lock breached  Failure of bund  Storage of large quantities of chemicals	Soil and/or groundwater contamination	<ul style="list-style-type: none"> <li>Maintain secure storage</li> <li>Maintain bunded storage</li> <li>Store minor quantities of chemicals</li> </ul>
Dirty water storage	Risk of spills resulting in contamination	Low	Storage maintained full with no capacity to receive additional flows	Soil and/or groundwater contamination	Maintain capacity in storage



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<b>Location</b>	<b>Hazard</b>	<b>Likelihood</b>	<b>Escalating factors</b>	<b>Consequence</b>	<b>Control measures</b>
Module Yard	Risk of Fire	Medium	A “hot” module that is delivered to the yard and ignites. External ignition source.	Destruction of property  Air contamination	<ul style="list-style-type: none"> <li>Southern Cotton has an extensive investment in firefighting equipment.</li> <li>The module yard is designed to allow firefighting equipment to drive between lanes of modules</li> <li>The module yard is separated from the main work areas and a fire would generate a reasonable amount of smoke but would not put people in danger.</li> <li>Any fire out-break would be quickly contained and extinguished.</li> <li>Any module that is suspect to being “hot” is to be isolated in designated area away from other modules</li> </ul>
Bale Warehouse	Fire – Stored cotton bales ignited by fire bales from gin.	Medium	Wet cotton  Fire in the gin producing fire bales	Destruction of property	<ul style="list-style-type: none"> <li>Staff are trained on identifying at risk bales and on the procedures to manage products which may be subject to fire.</li> <li>Identified fire bales are segregated from the stored bales for a period of fourteen days.</li> </ul>
Cyclone system	Dust	Low	Cyclone blocking causing dust emissions	Air contamination	<ul style="list-style-type: none"> <li>Cotton cleaning system designed to remove dust prior to gin stands in first stage cleaning.</li> <li>Cyclone systems modified to minimise dust emissions</li> </ul>

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**2.2 Potential pollutants and safety equipment**

A number of potential pollutants are stored, used and disposed of at the Southern Cotton Gin. These include chemicals, fuels, oils and LPG. A range of safety equipment/devices and alarms are maintained for use during emergencies.

Details of potential pollutants and safety devices are provided in [Table 2-2](#). The location of the items listed is shown on the maps in [Appendix 2](#).

Minimum Personal Protection Equipment (PPE) requirements are in place for all Southern Cotton operations for all employees, contractors, visitors and transport operators. Minimum PPE includes high visibility clothing, enclosed footwear, hearing protection, dust mask and eye protection. Other onsite safety-related equipment includes:

- Fire control systems
- Bunded storage for diesel fuel
- LPG monitoring system including cameras, fire control systems and emergency shutoff
- Dust monitoring devices
- Emergency stop/shut down throughout the gin and associated infrastructure and alarm points
- Spill kits
- Online MSDS Register
- First aid facility and kits
- Confined space equipment including gas detection and lanyards, and
- Camera surveillance of all equipment and areas of the Gin.
- Isuzu Fire Truck – at maintenance shed
- Kenworth Water Tanker – at maintenance shed
- Suppressant Foam – within fire storage shed
- 4 x 250,000L water supply – beside warehouse and fire pumps
- Access to unlimited water via channels and Whitton Malthouse lake
- Diesel water pump set – within fire shed
- Hydrant and hose reel system – multiple across the site

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- Fire extinguishers – multiple across the site

**Table 2-2 Inventory of pollutants and safety devices**

Location	Potential pollutant	Maximum quantity	Storage	Safety devices	Alarms
Diesel storage	Diesel	25,000L	Aboveground bunded tank	Bunded storage  Fire system  E-stop and shut-off valves  Security system to prevent unauthorised use	Nil
Machinery Shed	Fuels, oils and lubricants	620 L	Hazchem storage	Bunded storage  Secure storage	Nil
LPG storage	Liquefied Petroleum Gas	76,500L	Aboveground tank	Monitoring system including cameras, fire control systems and emergency shutoff	Yes
Press oil tank	Cotton oil	16,000 L	Aboveground bunded tank	Bunded storage  Monitoring system including cameras, shut-off valves  Fire system	Yes
Chemical storage shed	Herbicides	Minor quantities	Chemical storage shed	Bunded storage  Locked	Nil

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### 2.3 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 in Appendix 2:

- Southern Cotton locality map
- Southern Cotton features map.

### 2.4 Notifiable 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.*

Material harm is defined by 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.

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**3. Incident Response**

**3.1 Incident response and notification**

If a pollution incident occurs in the course of an activity so that material harm to the environment (within the meaning of section 147 of the POEO Act) is caused or threatened, Southern Cotton will notify any ‘material harm’ pollution incidents, in accordance with the requirements set out in the Act.

**Figure 1 Incident Response Flowchart**





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**3.2 General incident**

Southern Cotton maintain incident response procedures for other potential incidents including:

- Fire bale
- Site fire
- Spill response
- Emergency evacuation
- Security incident
- Medical emergency/First aid
- Explosion
- Vehicle accident
- Natural disaster.

Response procedures for these incidents are included as appendices.

**3.3 Emergency Contacts**

Contact details for Southern Cotton emergency response personnel and external agencies requiring notification is provided in Table 3-1 and. In the event of a fire in the seed shed that triggers immediate notification, the Southern Cotton GM is to notify all external agencies in Table 3.2

**Table 3-1 Southern Cotton emergency contacts**

<b>Name</b>	<b>Extension</b>	<b>Mobile / Channel</b>
CEO : Matthew Leonard	202	0439 495 207
Chief Warden: Justin Seaton	211	0427 455 954
Office Warden: Nathan Tuckett		0477 993 574
General Manager: Kate OCallaghan	206	0427 55 7277
Head Ginner: Russell Smith	212	0456 582 554
Head Ginner: Glenn Vitnell	212	0447 121 792
Warehouse Manager: Melissa Duffy	204	0429 360 881

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**Table 3-2 Emergency services contacts**

Organisation	Contact Details
Emergency Services	000
EPA Environment Hotline	131 555
Griffith Regional Office	02 6969 0700
Leeton Shire Council	02 6953 0911
Local Public Health Unit (Albury)	02 6090 8900
SafeWork NSW	13 10 50
Fire and Rescue NSW	1300 729 579
Whitton Rural Fire Service	02 6955 2717

**3.4 Emergency Roles and Responsibilities**

**3.4.1 Responsibilities – Immediate Notification Incident**

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

- The Chief Warden is responsible for actioning response to the incident.
- The CEO is responsible for notifying external authorities, potentially affected community and ensuring adequate resources are available for incident response.

The CEO shall determine the most appropriate means of contacting potentially affected community including:

- Door knocking
- Phone
- Local media
- Signage.

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

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

As per EPL 20723, the licensee must provide written details of the notification to the EPA within seven (7) days of the date on which the incident occurred.

**3.4.2 Responsibilities – Emergency Management Roles**

The following personnel assume the primary responsibility for the emergency response:

- Southern Cotton leadership team
- Southern Cotton emergency management team (SCEMT), and
- All personnel.

**Southern Cotton Leadership Team**

The responsibilities of the leadership team are:

- Establish and implement emergency plans and emergency procedures
- Ensure that those affected by the plans and procedures are aware of them
- Monitor the effect of the plans and procedures on the organisation
- Where deficiencies or inaccuracies are identified, amendments will be made to rectify those deficiencies
- Determine the number of SCEMT personnel consistent with the nature and risk of the buildings, structures and workplaces
- Ensure that personnel are appointed to all positions on the SCEMT
- Arrange training of SCEMT personnel
- Arrange for conduct of evacuation exercises, and
- Determine who will implement emergency procedures.

The primary role of the SCEMT is to ensure that life safety takes precedence over asset protection:

- The SCEMT will meet as required (debrief after each exercise or actual evacuation) or at intervals not greater than six months, and

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- The SCEMT will review procedures after an emergency or an exercise and advise the Board of Directors of any changes that affect the emergency management plan.

Each officer in the SCEMT has clearly defined duties and responsibilities, as outlined below.

**CEO/Communications Officer**

The CEO is responsible for communication with authorities, potentially affected community member, and ensuring all resources the Chief warden requires are available.

The communications officer, on becoming aware of the emergency, shall take the following actions:

- Ascertain the nature and location of the emergency
- Confirm that the appropriate emergency service has been notified
- Notify appropriate Members of the Board
- Transmit and record instructions and information between the chief warden and the floor wardens and occupants
- Maintain a log of the events
- Act as directed by the chief warden.

**Chief Warden**

The Gin Manager is the Chief Warden and it is their responsibility, on becoming aware of an emergency, to assume control until the emergency services arrive and take the following actions:

- Ascertain the nature of the emergency and determine appropriate action
- Ensure that the appropriate emergency service has been notified
- Ensure that area wardens are advised of the situation
- If necessary, initiate evacuation and control entry to the affected areas
- Ensure the progress of the evacuation and any action taken is recorded in an incident log
- Brief the emergency services personnel upon arrival on type, scope and location of the emergency and the status of the evacuation and, thereafter, act on the senior officer's instructions
- To give the all clear to return to work.

**Deputy Chief Warden**



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The Head Ginners are the deputy chief warden and shall assume the responsibilities normally carried out by the chief warden if the chief warden is unavailable, and otherwise assist as required.

Specific wardens for each area include:

**Office Warden**

The Site Manager is the Office Warden it is his/her responsibility:

- To shut down his/her work area if time permits
- To ensure that everyone in the **office** and **weighbridge** office is accounted for.
- To collect the visitors sign in book
- To ensure all contractors on site are accounted for and directed to the Emergency Assembly Area
- To ensure all truck drivers waiting to come on site are directed to the Assembly area.
- To collect the Weighbridge dockets of all the trucks that are onsite, so the drivers can be directed to assembly area and accounted for
- To ensure visitors are accounted for and directed to the Emergency Assembly Area.
- To evacuate the **seed shed**. Direct all workers, contractors and truck drivers to the Emergency Assembly Area.
- Proceed to the Emergency Assembly Area
- Report information to the Chief Warden.

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**Gin Warden**

The Head Ginner is the Gin Warden, it is his/her responsibility to:

- Shut down his/her work area if time permits.
- Ensure that everyone in the Gin is accounted for.
- Ensure any contractors or tradesman working in the gin are directed to the emergency assembly area and accounted for.
- Proceed to the Emergency Assembly Area
- Report information to the Chief Warden.

**Bale Shed Warden**

The Warehouse Manager is the Warden it is his/her responsibility:

- To shut down his/her work area if time permits.
- To ensure that everyone in the Bale shed is accounted for.
- Truck drivers, contractors and tradesman working in the bale shed are to be directed to the Emergency Assembly Area so they can be accounted for
- Proceed to the Emergency Assembly Area.
- Report information to the Chief Warden.

**Wardens/Co-opt Persons**

Persons selected as wardens or by wardens may be required to carry out a number of activities, including the following:

- Act as floor or area wardens
- Operate the communication system
- Check to ensure fire doors and smoke doors are properly closed
- Search the floor or area to ensure all persons have been evacuated
- Ensure orderly flow of persons into protected areas
- Assist persons with disabilities
- Act as leader of groups moving to the Emergency Assembly Areas
- Report to the floor or area warden on shift on completion of required activities.

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**Media Liaison**

The CEO shall deal with, and is the only person authorised to deal with any media inquiries and public statements. The CEO may engage the services of a Communications Consultant to act as a Media Liaison in the event of a significant incident.

**3.5 Handing Over Incident to Public Emergency Services**

The Emergency Management approach is for an ‘early over – response’ appropriate to the size and type of incident. This means that:

- The scale of an incident governs the scale of response
- The type of incident governs the type of response
- The passage of time after an incident is first reported governs the type of response.

**3.6 Hand Over Control/ Command Centre**

When the external Combatant Agency arrives on site, their Senior Officer is called the Incident Controller. The external agencies will report to the Command Centre and staging area for emergency services to assess the incident.

The Chief Warden will brief the Incident Controller on the situation at the Command Centre to enable safe entry of emergency services. The Chief Warden will arrange if necessary, for the escort of the emergency services to the incident scene.

By law the Incident Controller has overriding authority for the incident.

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The briefing will cover:

- Location nature and status of emergency
- Details of personnel injured or trapped
- Action taken to date
- Location of all personnel involved
- Any other relevant information including:
  - Details of hazardous materials involved
  - Particular hazards
  - Location of equipment and plant
  - Access to building and plant.

The Chief Warden will continue to command all Southern Cotton Resources.

### 3.7 Incident Investigation

Following an emergency, a full investigation shall be carried out. This is overseen by the Board of Directors. At the completion of the investigation, the EMP shall be reviewed and revised as necessary.

Where required, trauma counselling shall be provided to personnel affected by the emergency to the extent that such counselling is considered to be required.

### 3.8 Statutory Investigations

A serious emergency may be subject to an official or statutory investigation. Evidence must therefore be protected and not disturbed. Southern Cotton will co-operate with the authorities in their investigations. Legal advice should be considered in relation to internal reports and statements.

Examples of potential investigations include:

- Coronial Enquiries

These will be held in the case of any fatality or notifiable emergency, which a coroner considers in the public interest.

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In these cases, preservation of evidence is critical. The Chief Warden will ensure that there is no cleaning up, repairs or movement of bodies apart from the necessary to control the emergency, without approval of the Senior Police Officer on site.

The police will manage all aspects of a coronial inquiry. Every co-operation should be given to the investigating police.

- Crime Scene

When the Chief Warden becomes aware that an emergency is potentially the result of criminal activity, it is essential that appropriate crime scene preservation measures are put in place. In such circumstances, the advice or requirement of the Senior Police Officer on site should be solicited before any action is taken. If the Police are not on site, telephone 000 for initial instructions.

- Fire Investigations

NSW Fire Brigades will investigate the cause of a fire that they attend and if this investigation causes suspicion that a crime has been committed (including breach of regulations) they may request the Police to prosecute.

For fires where the cause is not obvious, the NSW Fire Brigades may conduct a more thorough investigation to establish the cause of the fire. Consequently, the preservation of evidence in the vicinity of the origin of the fire is critical. Only that work necessary to actually extinguish the fire in this area should be conducted and no further hose-down or cleanup be performed until approved by the Incident Controller.

- Other Statutory Investigations (including Heavy Vehicle incidents/emergencies)

Other relevant Government authorities may decide to investigate an emergency, for example, NSW Work Cover Authority and the NSW Department of Environment, Climate Change and Water, *Independent Transport Safety Regulator (ITSR)*. These agencies should be directed in the first instance to the Emergency Incident Manager.

**Emergency Management Procedure**

**4. Training**

Personnel involved in Southern Cotton operations participate in a range of training to assist in the response to potential incidents and to test the adequacy of the EMP. The approach to training is summarised below with details of the training provided in Table 4.1.

- Sufficient training drills will be conducted to confirm an acceptable state of readiness to respond to emergency situations
- Where the hazard is high due to the volume or extreme toxicity of the hazardous substance the emergency services will be invited to participate in the drill
- A record will be maintained of the outcome of each drill
- Following every actual emergency or major training drill a formal debriefing session will be convened with representatives from Management, Employees and the relative Emergency Group(s). The purpose of this meeting will be to evaluate the “Lessons Learnt” to correct any deficiencies found and follow-up on recommendations made.

**Emergency Management Procedure**

**Table 4-1 Incident response training**

Type of training	Personnel involved	Frequency	Records
Induction	New staff	Once	Induction Questionnaire, HR/Safety Coordinator
	Contractors – low risk	Once	Induction Questionnaire, HR/Safety Coordinator
	Contractors – medium/high risk	Once Annual refresher	Induction Questionnaire, HR/Safety Coordinator
Confined space	Gin staff	As required by training provider	HR/Safety Coordinator
Emergency fire and safety training	All staff	Annually	HR/Safety Coordinator
Fire Warden training	Permanent staff	Annually	HR/Safety Coordinator
RFS training	Head ginners	Once	HR/Safety Coordinator
Toolbox meetings	Gin staff	Weekly during ginning season	Minutes
	All Southern Cotton staff	Weekly during ginning season	
Evacuation Exercise	All staff	Annually (during ginning season)	HR/Safety Coordinator, Evacuation Exercise Observer's Checklist
Emergency simulation	All Southern Cotton staff	Annually	Minutes
Incident debrief	Personnel involved in incident  Independent chair	Within one month of an incident	Minutes



**Emergency Management Procedure**

**5. Records**

Southern Cotton maintain the following records associated with emergency response and notification:

- Training records
- Toolbox meeting minutes
- Area Warden Checklist
- Evacuation Exercise Observer’s Checklist
- Fire Equipment Compliance Checklist
- Emergency simulation minutes
- Incident debrief minutes, and
- First Aid Kits Inventory.

**Emergency Management Procedure**

**6. Testing and review**

This EMP will be tested annually to ensure that the information included in the plan is accurate and up to date, and that each plan is capable of being implemented in a workable and effective manner. This will include:

- Reviewing the plan to:
  - Ensure staff details and organisation contacts are correct
  - Ensure the maps are accurate, with any new storage areas etc. included
  - Incorporate a material change to operations including modification of the EPL 20723, changes in procedures referred to in this EMP and changes to legislative requirements, and
  - Incorporate improvements and recommendations arising from an incident debrief, emergency drill or emergency simulation exercise.
- Conducting desktop simulations and practical exercises and drills.

The EMP will also be reviewed within one month from the date of any pollution incident that triggers immediate notification. This review will be carried out in light of the incident, to provide the information included in the plan is accurate and up to date and the plan is still capable of being implemented in a workable and effective manner.

The CEO is responsible for reviewing the EMP and updating the review register (refer Appendix 12).

An update of the EMP would trigger all staff to undergo refresher training as part of team toolbox meetings as per Table 4.1



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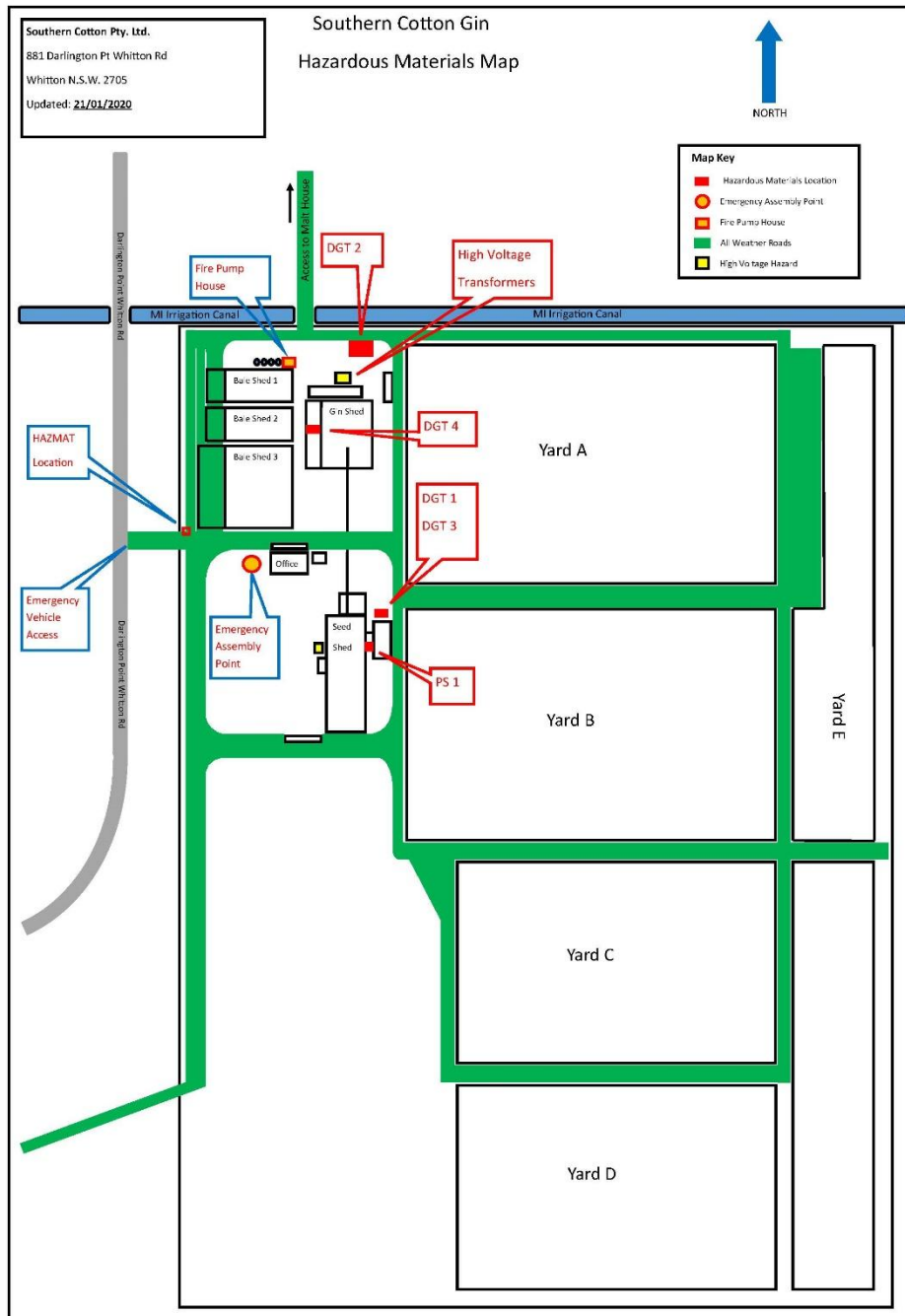
**Emergency Management Procedure**

***Appendix 1: Environment Protection Licence***

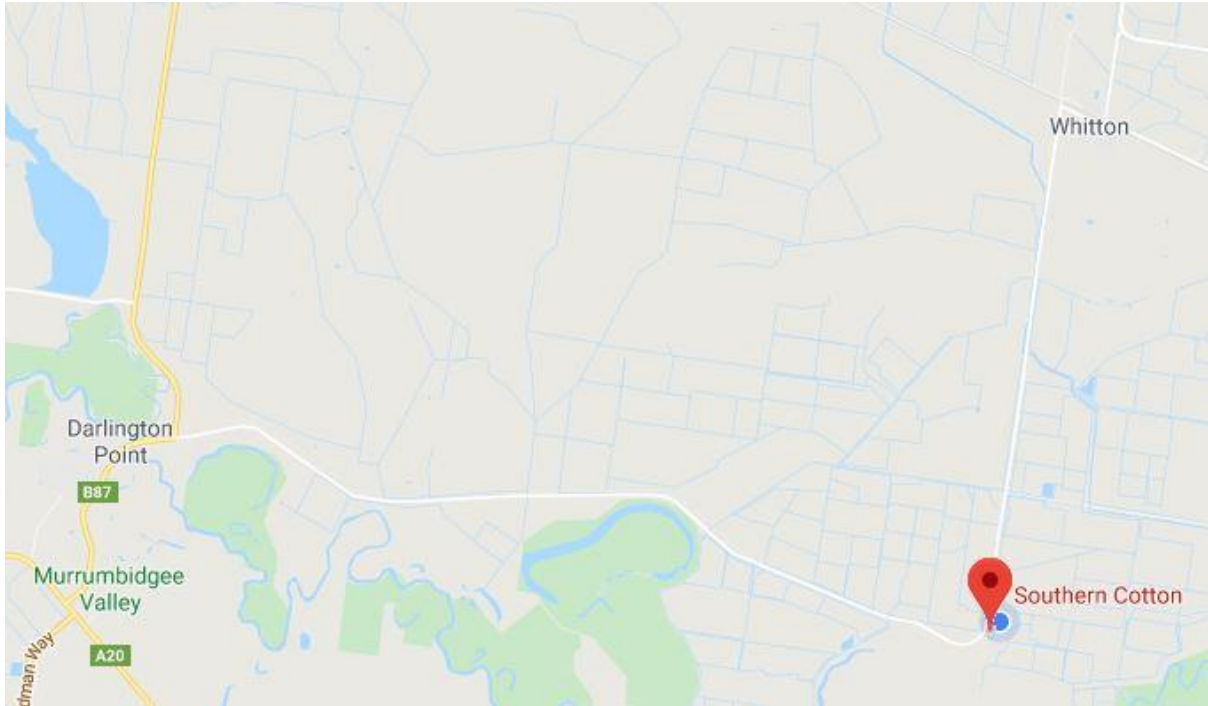
EPA Licence available on request.

**Emergency Management Procedure**

**Appendix 2: Southern Cotton Site & Locality map**



**Emergency Management Procedure**



**Emergency Management Procedure**

**Appendix 3: Fire bale procedure**

SWP 7.3 Fire bale procedure is available on the Southern Cotton intranet upon request.

**Appendix 4: Site fire procedure**

SWP 9.1 Site fire procedure is available on the Southern Cotton intranet upon request.

**Appendix 5: Security incident procedures**

*Southern Cotton has considered an action that should be taken by its employees / contractors in the event of an unwanted security threat namely e.g.*

- *Armed hold-up,*
- *A disgruntled threatening customer or*
- *A violent threatening person,*
- *Bomb threat,*

*This company wishes to inform you that your physical safety is our primary goal and request if possible that you carry out what is known as “Threat Reaction Procedures” for:*

- *Armed hold-up,*
- *A disgruntled threatening customer or*
- *A violent threatening person.*

The procedure for responding to a security incident is as follows:

- Assess the Threat
- If possible, ensure that a counter or desk is between yourself and the person
- Speak calmly but firmly with the offender, DO NOT argue with the person
- Carry out any demands that maybe imposed on you and DO NOT try to protect any of the company’s assets
- Move away from the person and alert others to move away also

**Emergency Management Procedure**

- Do not allow others to surround the person and avoid sudden moves
- Make it easy for the person to leave the building / area
- IF ABLE TO, without compounding the Threat, Call for the Supervisor or other Staff
- DO NOT at any time attempt to physically subdue the person
- Calmly resolve the Problem with two or more staff if possible
- Make a mental note of the person's description and / or motor vehicle including where the person went to
- Observe where and what the person has touched, secure that area and do not touch for forensic purposes
- Call for assistance. ( POLICE 000 )
- Request everyone to stay and keep calm if anyone has witnessed the threat or if able to
- Debrief all concerned of the above and record the incident

**Bomb Threat** – ensure all staff are evacuated form the threatened area, contact management and ring POLICE 000.

**Emergency Management Procedure**

***Appendix 6: Emergency evacuation procedure***

Wardens are located in each area and have been trained to assist and direct in an emergency situation. On hearing the alarm, or as instructed by the SCEMT all occupants should:

- Evacuate the building immediately via the nearest exit
- Follow any instructions given by wardens
- Make your way to the applicable Emergency Assembly Area.

**Chief Warden**

Upon notification of an emergency, the Chief Warden will assume control, until emergency services arrive, and take the following actions:

- Ensure that the applicable alarm has been activated
- Arrange notification of Deputy Chief Warden
- Go to Control Point
- Co-ordinate evacuation activities
- Make contact with the emergency site via the megaphones and / or internal phone systems and / or hand held radio system
- Transmit clear and concise evacuation instructions
- Take steps to ensure no person enters the building until the Emergency Services give the all clear
- Pass on all available information to Emergency Services.

**Deputy Chief Warden**

Upon notification the Deputy Chief Warden will:

- Go to emergency control point
- Assist with evacuation activities
- Co-ordinate evacuation activities if Chief Warden is not in attendance.

**Floor Area Wardens**

On hearing the alarm, becoming aware of an emergency affecting your area or being instructed to be ready by the Chief Warden:

**Emergency Management Procedure**

- The Ginner in charge of the facility and or equipment is responsible for initiating and completing an emergency shutdown in accordance with the planned procedure and the Emergency Plan.
- Respond according to your local emergency evacuation plans
- Instruct all occupants to evacuate the area and proceed to the designated assembly area
- Report to the Chief Warden, or person in charge at the control point when your area has been cleared
- Ensure all persons are accounted for at the Emergency Assembly Area
- Wait at the Emergency Assembly Area for instructions from the Chief Warden, or Emergency Services.

**All Staff**

All staff are required to:

- Follow instructions given by any Warden
- Proceed to designated Emergency Assembly Area
- Remain in the Emergency Assembly Area until all clear is given by Chief Warden or Emergency Services Personnel.

**Visitors including Contractors**

All visitors including contractors are required to:

- Follow instructions given by any Warden
- Proceed to designated Emergency Assembly Area
- Remain in the Emergency Assembly Area until all clear is given by Chief Warden or Emergency Services Personnel.

**Prohibited Behaviour**

In the event of an emergency, staff, visitors and contractors will not:

- Continue to carry on with your business
- Try and contact anyone to find out what is going on
- Obstruct or hang around the building.



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**Emergency Management Procedure**

**Emergency Phone Numbers**

***In the event of a medical emergency:***

- Contact the nearest first aider (list of first aiders on first aid kits)
- If necessary, call an ambulance on 0-000
- If an ambulance is called, notify area manager to facilitate ambulance access on to site

REMEMBER TO DIAL AN EXTERNAL LINE DIAL 0 for example 0-000

***Refer to for Emergency Services Contacts.***

**Emergency Management Procedure**

***Appendix 7: Spill response procedure***

It is important to know what you are handling in the first place. Only those people trained in the storage and handling of dangerous goods should have access to them.

The following procedure should be activated on identification of a spill, emission or leak of a liquid substance:

- Assess the nature of the chemical spill, emission or leak and the danger to people
- Assist persons in immediate danger – only if safe to do so
- Restrict the danger area by shutting door/s on the spill area – only if safe to do so
- Locate SDS on online register
- If flammable – shut off all ignition sources – only if safe to do so
- Raise the alarm
  - Notify Chief Warden and/or Deputy Warden / Communications Officer
  - Notify Fire Brigade on 0-000 in all cases regardless of severity (requirement under the NSW Fire Brigade Act)
    - Chief Warden will assume control until Fire Brigade arrive
- Attend to the emergency – only if trained and it is safe to do so
- Note the wind direction – this is important if an evacuation is required
  - Know whereabouts and use spill kits for minor non-hazardous spills
  - Properly place and dispose of waste

The following procedure should be activated on identification of a gas leak:

- Assist persons in immediate danger immediately – only if safe to do so
- If Flammable – shut off all ignition sources – only if safe to do so
- Alert Chief Warden and management
- Evacuate to the designated Emergency Assembly Area
- Stay there until accounted for and instructed that you may leave
- An alternative Emergency Assembly Area may need to be used if the weather conditions are transporting vapours toward the primary assembly area
- Listen for instructions and take note of unusual smells and conditions.

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***Appendix 8: Explosion response procedure***

The highest explosion risk at Southern Cotton is the LPG storage. The following procedure should be activated on an explosion occurring:

- Assess the situation and check for the possibility of further explosion or fire if safe to do so
- Assist anyone in danger if it is safe to do so
- Notify the Chief Warden or his / her Deputy and the duty first aider, who will decide whether an evacuation is necessary
- The Chief Warden or his / her Deputy will organise to isolate and contain any hazards resulting from the explosion
- In case of a bomb, extreme care must be taken because there may be other bombs. Disturb as little as possible to preserve evidence for the police investigation.

***Appendix 9: Motor vehicle or aircraft accident procedure***

In the event of a crash of a motor vehicle or aircraft, the following procedure should be activated:

- Assess the situation to ensure that the area is safe. Check for live wires, petrol spills (aviation gas is highly volatile), fumes, damaged structures, other vehicles or traffic and any other possible dangers
- Call a runner if necessary and notify the Chief Warden or his / her Deputy and the duty first aider, who will call Emergency Services and decide whether an evacuation is necessary
- Keep bystanders away
- Assist anyone in danger if it is safe to do so
- If injuries have occurred, assist wherever possible until the Ambulance arrives

**Emergency Management Procedure**

***Appendix 9: Storm, flood, bushfire procedure***

In the event of a severe storm, regional flood or bushfire, the following procedure should be activated:

- Stay calm
- Notify the Chief Warden or his / her Deputy and the duty first aider
- Stay off the telephones unless calling Emergency Services 0-000
- Assess the situation, if plant or equipment is at risk shut it down – only if safe to do so
- Keep everyone onsite until danger has passed or an evacuation is required
- In the event of a power blackout, provision has been made throughout the site for emergency and evacuation lighting.

***Appendix 10: Medical emergency response procedure***

Contact nearest first aider. List of first aiders located on first aid boxes.

***Medical priorities at the incident scene***

- Check and remove any danger to the victim or yourself
- Check conscious state of victim

***Conscious***

- Check and treat any serious bleeding and manage any life threatening condition
- Contact the Ambulance service
- Stay with victim until professional help arrives

***Unconscious***

- Place victim on their side
- Have someone contact the Ambulance service
- Clear the victim's airway (mouth) and check their breathing and pulse
- If the victim is not breathing commence appropriate resuscitation
- Call loudly for someone to contact the Ambulance service
- Do not leave the victim



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**Emergency Management Procedure**

***Emergency Services***

When calling emergency services, it is necessary to provide the following information:

- Medical condition of victim
- Your location including building
- Directions for the ambulance to entry gate

Send a runner to direct ambulance officers to incident site.

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**Emergency Management Procedure**

**Appendix 11: WorkCover Dangerous Goods Notification**

Workcover Dangerous goods notification available on request in HAZCHEM Manifest

<b>Hazardous chemicals stored in tanks</b>							
<b>Proper shipping name</b>	<b>UN No.</b>	<b>Class/ Division</b>	<b>PG</b>	<b>Type</b>	<b>Design capacity</b>	<b>Typical quantity</b>	
<b>Environmentally Hazardous Substance, Fuel Diesel</b>	UN 3082	4	III	AGT	25,000L	21,000L	
<b>Petroleum Gases, Liquefied LPG</b>	UN 1075	2.1	N/A	AGT	90,000L	76,500L	

**Emergency Management Procedure**

**Appendix 12: Review register**

Date of test	Name of personnel conducting test	Manner of testing	Summary of changes (include brief details and section number)	Date of update
11.2.19	Kate O'Callaghan	Desktop	Update contacts	11.2.19
16.7.19	Ben Bagust	PC	Update contacts, attached missing appendices	16.7.19
4.2.20	Ben Bagust	Desktop	Update Appendix 11, Update site map, Update table 2-1	4.2.20
2.2.21	Kate O'Callaghan	Desktop	Update contacts  General Manager – changed to CEO in roles	2.2.21
1.2.24	Kate O'Callaghan	Desktop	Update contacts  CEO changed to CEO in roles	1.2.24
11.2.25	Kate O'Callaghan	Desktop	Change frequency of evacuation drills	11.2.25
14.1.26	Kate O'Callaghan	Desktop	Hazard register reviewed & updated.  Contacts updated	14.1.26