JALCO AUSTRALIA PTY. LTD

Unit 1/8 Johnston Crescent, Horsley Park,NSW,2175

POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN

Pollution Incident Response Management Plan
Licence number: 21740

Approved By: Rojli Rajon
Position/Title: Site Operations Manager
Signature: see hard copy
Date: 05/09/2025

Purpose:

JALCO AUSTRALIA PTY. LTD holds an Environment Protection Licence with the NSW Environment Protection Authority (EPA) for 8 JOHNSTON CRESCENT HORSLEY PARK NSW 2175, As per the Protection of the Environment Operations Act 1997 (the POEO Act), the holder of an Environment Protection Licence must prepare, keep, test and implement a pollution incident response management plan (PIRMP) that complies with Part 5.7A of the POEO Act in relation to the activity to which the licence relates.

*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, Jalco Australia Pty Ltd must **immediately** implement this plan in relation to the activity required by Part 5.7A of the POEO Act.*

A copy of this plan is kept at the main office building in reception on the premises and will be made available on request by an authorised EPA officer and to any person who is responsible for implementing this plan. This plan is also available on Jalco Website (https://www.jalco.com.au/contact-us/).

***Note:** This plan has been developed in accordance with the Protection of the Environment Operations Act 1997, the Protection of the Environment Operations (General) Regulation 2022 and in reference to EPA's Guideline: Pollution incident response management plans.*

Environment Protection Licence (EPL) Details	
Name of licensee: (including ABN)	JALCO AUSTRALIA PTY. LTD 45 075 091 833
EPL number:	21740
Premises name and address:	UNIT 1/8 JOHNSTON CRESCENT, HORSLEY PARK, NSW, 2175
Company or business contact details	**Name:** Michael Beaton **Position or title:** General Manager Manufacturing Operations Contract Manufacturing **Business hours contact number/s** **After hours contact number/s**: 0418 456 418 **Email:** Michael.Beaton@pactgroup.com
	Name: Tina Nicolitsis **Position or title:** Divisional WHSE Manager **Business hours contact number/s**: 0417 261 939 **After hours contact number/s**: 0417 261 939 **Email:** Tina.Nicolitsis@pactgroup.com
Jalco Emergency Contact	**Emergency Contact:** 1800 242 176
Website address:	https://www.jalco.com.au (Jalco Group – Australia Jalco | Group)
Scheduled activity/activities on EPL:	Chemical Production
Fee-based activity/activities on EPL:	Soaps and Detergents Production > 5000T Annual Production Capacity

PIRMP Site Contacts	
Pollution Incident Response Management Plan Activation and Managing response to pollution incident/ Control Coordinators	**Name of person responsible:** Rojli Rajon **Position or title:** Site Operations Manager **Business hours contact number/s**: 0431 777 657 **After hours contact number/s**: 0431 777 657 **Email:** RojliM.Rajon@pactgroup.com
	Name of person responsible: Gary Wilson **Position or title:** WHSE Lead **Business hours contact number/s**: 0410 220 892 **After hours contact number/s**: 0410 220 892 **Email:** gary.wilson@pactgroup.com
	Name of person responsible: Deepinder Singh **Position or title:** Maintenance Manager **Business hours contact number/s:** 0404 818 719 **After hours contact number/s:** 0404 818 719 **Email:** Deepinder.Singh@pactgroup.com
	Name of person responsible: Pat Omprakash **Position or title:** Manufacturing Manager **Business hours contact number/s**: 0425 305 863 **After hours contact number/s**: 0425 305 863 **Email:** Pat.Omprakash@pactgroup.com
	Name of person responsible: Chris Harvey **Position or title:** Warehouse Manager **Business hours contact number/s**: 0405 147 423 **After hours contact number/s**: 0405 147 423 **Email:** Chris.Harvey@pactgroup.com
	Name of person responsible: David Jazzini **Position or title:** Process Manager **Business hours contact number/s**: 0447 825 945 **After hours contact number/s**: 0447 825 945 **Email:** david.jazzini@pactgroup.com
	Name of person responsible: Shalini Singh **Position or title:** QA Manager **Business hours contact number/s**: 02 9757 6315 **After hours contact number/s**: 0404 818 746 **Email:** Shalini.Singh2@pactgroup.com
Notifying relevant authorities	
	Name: Tina Nicolitsis **Position or title:** Divisional WHSE Manager **Business hours contact number/s**: 02 8784 49501125 **After hours contact number/s**: 0417 261 939 **Email:** Tina.Nicolitsis@pactgroup.com **The Divisional WHSE Manager can nominate General Manager Manufacturing Operations or Site Representative to notify relevant authorities.**

Relevant Authorities		
Fire and Rescue NSW / Rural Fire Service	**Contact number/s:** **Contact number/s:**	000 02 9493 1101
Bonnyrigg Heights Fire Station **Horsley Park Fire Station**	**Contact number/s:** **Contact number/s:**	02 9493 1101 02 9620 1386
EPA	**Contact number/s:**	131 555
NSW Health	**Relevant Area Health Code:**	Liverpool Public Health Unit Business Hours 02 9794 0855

	Contact number/s:	After Hours 02 8738 3000
SafeWork NSW	**Contact number/s:**	13 10 50
Fairfield City Council	**Contact number/s:**	02 9725 0222 mail@fairfieldcity.nsw.gov.au
Sydney Water St Marys	**Contact number/s:**	Ph: 02 4736 9153 Fax: 02 4736 9153 Emergency 24 hours: 13 20 90
Roads and Maritime Services	**Contact number/s:**	1800 814 813

Notification of Neighbours and the Local Community		
UPS Health Care	Unit 2/8 Johnston Crescent, Horsley Park, NSW, 2175	02 9582 7232 02 8865 6903
Piccolo Me	Unit 4/8 Johnston Crescent, Horsley Park, NSW, 2175	0491 9448 712
Holman Industries	Unit 1/10 Johnston Crescent, Horsley Park, NSW, 2175	02 9933 6500 (Press 4 General Enquires)
Tennant Australia	Unit 2/10 Johnston Crescent, Horsley Park, NSW, 2175	1800 226 843 (Press 6 General Enquires)
Rhomberg Sersa Rail Group (RKR)	Unit 3/10 Johnston Crescent, Horsley Park, NSW, 2175	02 9627 8200
Fienza	Unit 2/12 Johnston Crescent, Horsley Park, NSW, 2175	07 3490 6700 (Head Office ,Press 1)
Speedpanel	Unit 1/12 Johnston Crescent, Horsley Park, NSW, 2175	03 9115 6666 (Press 6 General Enquires)
Amazon Fulfilment Centre	5 Johnston Crescent, Horsley Park, NSW, 2175	02 9506 1467 0403 454 674
Nu-Pure Beverages	4 Johnston Crescent, Horsley Park, NSW, 2175	1300 199 107
Williams Sonoma	2A Johnston Crescent, Horsley Park, NSW, 2175	02 8046 3400
DHL	2A Johnston Crescent, Horsley Park, NSW, 2175	02 9851 3736 (Press 3 other safety emergencies) - 02 9851 3734
Knauf Sydney West Fulfilment Centre	Unit 2/2 Johnston Crescent, Horsley Park, NSW, 2175	02 4731 2888
Hino	Unit 1/2 Johnston Crescent, Horsley Park, NSW, 2175	02 9914 6629 - 02 9914 6631

Public Residences on Greenway Place, Horsley Park, NSW,2175

=Notification Process of Neighbours and the Local Community

In the event of a determined material harm incident, community notification will be undertaken by the Pollution Incident and Control Coordinators. When contacting adjacent companies and neighbours the following notification process is to be used:

Warnings: In the event of an incident, same day face to face contact and telephone notification will be employed to update affected landholders.

Updates: Follow-up telephone calls will be made to all landholders who were notified in the initial warning. Updated information will be provided if and or when it becomes available and necessary to be passed on. Updates will be provided to the community as follows:

- Face to face contact or telephone call.
- Letterbox drops.
- Publication of updates on Jalco's Website.
- Emailing of updates; and
- Doorknocking.

Description & Likelihood of Hazards

Pollutants that are applicable to Jalco Australia Pty Ltd Horsley Park include potential emissions to water, air, noise and land. The premises has identified the following hazards that can present harm to health or environment:

- Spills and unintended discharge from storage of chemicals including: material transfer points (unloading stations), DAF plant wastewater, chemical storage areas, above ground holding tanks and pipes and the generation or storage areas for waste materials;
- Failure of plant and equipment including: ruptured containment tanks, uncontrolled release of gas, breakage of pipes, malfunctioning of valves, disruption to manufacturing processes, power failure and fire;
- Failure to adhere with day, evening and night noise limits as indicated in EPL 21740; and
- Offensive fugitive odour emitted from the site DAF plant, failure of the carbon filtration/ extraction system, fragrance containing products.

The following risk matrix is based on PACT Group WHSE categorisation of the risk level on the likelihood and consequence of an event.

Risk Analysis – Likelihood vs Consequence (PACT Group WHSE Risk Matrix)

Likelihood	Consequence				
	1 Very Low	2 Low	3 Moderate	4 High	5 Very High
5 (Almost certain)	Moderate (C)	High (B)	High (B)	Very High (A)	Very High (A)
4 (Likely)	Moderate (C)	High (B)	High (B)	Very High (A)	Very High (A)
3 (Possible)	Low (D)	Moderate (C)	High (B)	High (B)	Very High (A)
2 (Unlikely)	Low (D)	Moderate (C)	Moderate (C)	High (B)	Very High (A)
1 (Rare)	Low (D)	Low (D)	Moderate (C)	Moderate (C)	High (B)

Risk Analysis – Action Required

Level	Description
Almost certain	Is expected to occur (More than 50 times per year or 1 time per week)
Likely	Will probably occur (10-50 times per year or more than once a month but less than once a week)
Possible	May occur at some time (More than once a year but less than once a month. Or has occurred on another site)
Unlikely	Is not anticipated to occur (Less than once every 5 years, but has occurred on another site)
Rare	May occur only in exceptional circumstances (Less than once every 5 years)

Level	Consequence	
	Safety	Environmental
Very High	· Fatality · Notification to the Authorities Required · Lost Time Injury	· Definite risk of fines, prosecution and director liability · Toxic offsite release off site with detrimental effect · Emergency response likely
High	· Medical treated incident which may require future lost time or hospitalisation · Restricted Work Injury	· Breach of environmental regulation, licence conditions, company environment policy · Off-site release with substantial impact on environment · Emergency response may be required
Moderate	· Medical treatment required · Serious Near Miss	· Breach of environmental procedures, licence conditions, environmental regulation · Noticeable impact on environment, remediated or rehabilitation required · On site release contained with outside assistance
Low	· First aid treatment · Consequences can be addressed with internally	· Minimal environmental impact · Minor unnecessary use of resources, generation of waste · On-site released, immediately contained
Very Low	· Near miss incident · Consequences can be addressed through routine operations	· No environmental impact, or minimal impact that will recover naturally

Ratings:	
Very High (A):	Immediate action by senior management required
High (B):	Senior Management attention required
Moderate (C):	Management responsibility must be specified
Low (D):	Manage by routine controls and procedures

1. Storage of Chemicals

Area/ Operation	Hazard Cause	Hazard Consequence	Likelihood	Consequence	Risk Level	Pre-emptive Actions Required or In Place
Raw Material Store (Warehouse H including class 5.1,8 & 9)	Dislodgement from racking Package dropped from forklift Forklift misalignment, resulting in puncture of package	Potential environmental release	Unlikely (2)	Low (2)	Moderate (C)	• Warehouse H has segregated bunding & blind pits creating containment & eliminating access to stormwater. • Minor spillages HAZCHEM spill kits are available. The spillage will be collected and placed in disposal bags.
		Fall from height				• All pallets above ground level are wrapped & or strapped.
		Toxic Effects of Chemicals to Human Health Mix of incompatible goods (exothermic reaction)				• Incompatible materials are segregated. Segregation chart for chemicals compatibility displayed • Training provided for staff on chemical • Class 8 bases and acids are separated by bunding as per requirements. • Procedures for the retrieval and decanting of chemicals are in place. • Spill kits are located nearby chemical storage areas. • In case of spill, refer to SDS for appropriate handling. • Dangerous Goods are kept at designated storage locations. • Spill kits are located nearby chemical storage areas. • In case of spill, refer to SDS for appropriate handling. • Minor spillages HAZCHEM spill kits are available. The spillage will be collected and placed in disposal bags.

Class 3 Flammable Liquids Store (STDG)	Forklift misalignment, resulting in puncture of package. Package dropped from forklift. Dropped flammable IBC during onsite transportation.	Pool of flammable liquid, immediate ignition, and fire. Delayed ignition of flammable liquid and flash fire or explosion.	Unlikely (1)	High (4)	Moderate (C)	• The flammable liquids are stored in DG Container compliant with AS3780 -2008. • DG container has containment bund. • Fire extinguisher and fire hose/foam reel protection available in the area. • Forklift drivers are competent drivers and undergo periodic training. • There is no electrical equipment in DG container • Smoking is not allowed in the area. • Class 3 Dangerous Goods are kept in a designated storage location, segregated from incompatible materials. • Staff are trained periodically in Spill Response. • Procedures for the retrieval and decanting of chemicals are in place. Spill kits are located nearby chemical storage areas. In case of spill, refer to SDS for appropriate handling.
Raw Material unloading Stations Classes 3,8,9 & Non-DG	Leaks from valves, fittings, or pipework.	Potential environmental release. Mix of incompatible goods (exothermic reaction)	Unlikely (2)	High (4)	High (B)	• Driver over bund in accordance with bunding compliant with AS2890 • Unloading stations are segregated based on compatibility of chemicals. Signages of chemical and pumps in place. • Each unloading station has its own bund with a blind pit for any spills that are pumped to a bunded IBC. • Interlock system to close drain prior to commencement of unloading from tanker. • Emergency stop available at each station and inside warehouse for failures or catastrophic encounters. This shuts down the penstock valve at storm water pit 111/1 near the border between Jalco and its neighbour. • PIRMP training for relevant stakeholders. • Staff are trained in Spill response & Chemical Segregation.

Bulk Liquid Tank Storage Acids,Bases Classes 8,9,3 & Non DG	Overfilling of tank. Punctured or deteriorated tank.	Environmental Release. Mixing of incompatible goods (exothermic reaction) Toxic Effects of Chemicals to Human Health.	Unlikely (2)	Low (2)	Moderate (C)	• The area is bunded in accordance with bunding compliant with AS3780 -2008. • Tanks are equipped with High level sensors and alarms to control overflow of tanks. • Minor spillages HAZCHEM spill kits are available. The spillage will be collected and placed in disposal bags. Disposable bag will be collected by certified waste collector. • Non compatible materials have segregated bunds. • Preventative maintenance, routine inspections including annual inspection by qualified contractor. • PPE must be worn in accordance with chemical SDS. • Incoming receiver checks delivery docket and identify which storage tank the chemical will be stored and ensure immediate storage in correct area controlled via SOP.
Waste Water Treatment Plant (WWTP)	Package dropped from forklift Forklift misalignment, resulting in puncture of package. Leak of chemical from IBC.	Potential environmental release. Mixing of incompatible substances (exothermic reaction) Injury & toxic emissions harmful to human health.	Unlikely (2)	Low (2)	Moderate (C)	• The area is bunded in accordance with bunding compliant with AS3780 - 2008 • There is a secondary containment for dosing equipment that is placed on individual chemical bund including drip trays. Major spillage is captured in pits within DAF plant and is recirculated to be treated. • Routine and preventative maintenance carried out. • Vents connected to balance, intermediate and sludge tank. • Personnel Protective Equipment (PPEs) are provided in the required area. • Dangerous Goods are kept at a designated storage location. Incoming receiver checks delivery docket and identify which storage area the goods will be stored and ensure immediate storage in correct area. Class 5.1 hydrogen peroxide is kept in a cabinet suited for Class 5.1 storage. • Spill kits are located nearby chemical storage areas. In case of spill, refer to SDS for appropriate handling. • Staff are trained in Spill response & Chemical Segregation.

2. Storage of Waste

Pre-emptive Actions to be Taken						
Area/ Operation	Hazard Cause	Hazard Consequence	Likelihood	Consequence	Risk Level	Pre-emptive Actions Required or In Place
Solid Waste manufacturing, production, warehouse and office. .	Waste not separated and categorised appropriately to allow for correct disposal. Failure to collect waste based on agreed frequency with licensed waste provider.	Incorrect disposal of waste. Illegal dumping of waste material.	Rare (1)	Very Low (1)	Low (D)	• A waste management plan is available that captures various waste streams and waste minimisation (JHAP-WMP-002 Waste Management Plan). • Wastes are separated into streams recyclable, returnable, metal, reuse, landfill. • The site has separate bins for cardboard materials that are emptied regularly to recycler. • For plastic recycling there are bailers that are sent for recycling. • Timber waste from pallets are reused or returned to supplier. • Glass waste is minimal at site and disposed of appropriately as per Glass Policy. • Waste from manufacturing, production and office areas are collected per agreement with licensed waste collectors. • A destruction certificate is issued to site once legally disposed and attached to invoice.

Waste Water Treatment Plant (WWTP)	Failure to collect sludge from DAF based on agreed frequency with licensed waste provider. Overflow of tanks containing waste liquid in WWTP Excessive rain causing overflow and lead to stormwater contamination as no physical separation between stormwater and wastewater system in production area.	Potential breach to Sydney Water Agreement. Illegal dumping from waste provider. Environmental release to stormwater Toxic gas release harmful to human health	Possible (3)	Moderate (C)	High (B)	• PIRMP training for relevant stakeholders. • Staff are trained in Spill response. • WWTP plant operated by trained operators. • Maintenance that includes monthly inspection service, calibration undertaken by Integra. • Sludge is collected by a licensed waste contractor – Envirowaste services. Envirowaste is licensed to treated sludge. EPL no. 13039 • WWTP operator monitors the sludge holding tank capacity daily. There is a high level alarm that triggers back to control panel. Tank capacity is available on control panel. • Vents are available on balance and sludge tanks that will eliminate toxic gases. These gases are treated by the sites Carbon & Hepa filtration system. • Spill kit is located in WWTP area, drain covers are available and located on hardstand. • WWTP tanks & bunds fitted with high level alarm sensors is integrated to notify manufacturing and maintenance of a fault. The faults are interlocked to internal trade waste pumps. • In the event of an overflow from wastewater plant, waste water will be contained in the bund, these bunds have high level sensors to alert operators of potential for overflow. Envirowaste services are available 24/7 if the potential of a bund overflow arises, and the bund can be pumped out. • Discharge of treated wastewater to sewer is completed by a trained Jalco operator and only required when trade waste agreement parameters are met. • WWTP plant is roofed that to prevent flooding during heavy rainfall.

Liquid Hazardous Waste, from manufacturing.	Quality impaired liquid from manufacturing process that is not fit for purpose	Liquid waste spill or contamination from hazardous waste.	Possible (3)	Low (2)	Moderate (C)	• A waste management plan is available that captures various waste streams and waste minimisation (JHAP-WMP-002 Waste Management Plan). • Waste is separated on site, with liquid wastes removed by licensed waste contractor. • Destruction certificate from is provided by licensed contractor to site with invoice. • Liquid and hazardous wastes are stored on bunded containers or IBCs. • Spill kits & drain blankets are available on hardstand areas external and inside manufacturing, production and warehouse areas.
Unloading station waste collection & storage	Minor spill during unloading of tanker	Potential environmental release to stormwater. Mixing of incompatible substances (exothermic reaction) Toxic emissions harmful to human health.	Possible (3)	Low (2)	Moderate (C)	• Driver over bund in accordance with bunding compliant with AS2890. • Unloading stations are segregated based on compatibility of chemicals. Signages of chemical and pumps in place. Each unloading station has a blind pit to pump waste to a bunded IBC. • Waste liquid produced can be treated at Waste Water Treatment Plant. • Staff are trained in Spill response. • Spill kits & drain blankets are available at unloading stations.

3. Potential failure of Containment

Area/ Operation	Hazard Cause	Hazard Consequence	Likelihood	Consequence	Risk Level	• Pre-emptive Actions Required or In Place
Hardstand or Waste Water Treatment Plant (WWTP)	Spill from ruptured IBC during unloading or site transportation. Overfilling of Bunds in WWTP.	Potential environmental release to stormwater. Mixing of incompatible substances (exothermic reaction) Toxic emissions harmful to human health. Potential environmental release to soil	Unlikely (2)	Low (2)	Moderate (C)	• WWTP is bunded. • WWTP chemical IBC's are on individual segregated bunds. • Spillages are captured inside bund and diverted & recirculated into WWTP treatment. • Where there is catastrophic failure and overflow of bund chemicals will be pumped into IBCs. • IBCs will be collected by licensed contractor for disposal. • Spill kits & drain blankets are available in the area for chemicals spilt outside bund. • Training provided to staff on chemical incompatibility and handling periodically. • Maintenance program in place for penstock valve at storm water pit 111/1 • PIRMP training for relevant stakeholders.
Unloading Stations	Spill of chemicals during unloading tanker process	Potential environmental release to stormwater. Potential environmental release to soil.	Unlikely (2)	Low (2)	Moderate (C)	• Driver over bund in accordance with bunding compliant with AS2890. • Interlock system to close drain prior to commencement of unloading from tanker. • Unloading station has a blind pit to pump waste to a bunded IBC.

4. Failure to meet noise limits

L2.1 Noise generated at the premises must not exceed the noise limits at the times and locations in the table below:

Location	Day-LAeq(15 minute)	Evening-LAeq(15 minute)	Night-LAeq(15 minute)	Night-LAFmax
All residential receivers	40	35	35	52

For the purposes of demonstrating compliance with condition L2.1:
a) Day means the period from 7am to 6pm Monday to Saturday and the period from 8am to 6pm Sunday and public holidays.
b) Evening means the period from 6pm to 10pm.
c) Night means the period from 10pm to 7am Monday to Saturday and the period from 10pm to 8am Sunday and public holidays.

Area/ Operation	Hazard Cause	Hazard Consequence	Likelihood	Consequence	Risk Level	• Pre-emptive Actions Required or In Place
Failure to meet noise limits	Diaphragm pumps Blow down of boiler. Forklift traffic and constant beeping. Reverse alarms on trucks.	Noise exceeding limits set out in site EPL. Community complaints.	Unlikely (2)	Low (2)	Moderate (C)	• Blow down of boiler • Forklift traffic and constant beeping • Reverse alarms on trucks • Noise exceeding set out in site EPL • Community Complaints Unlikely (2) Low (2) Moderate (C)18mm marine plywood internal lining acoustic wall fixed inside purlins on southern elevation of Production area. Plywood lining has a minimum surface density of 10kg/m² and form continuous layer to full height 0.48mm steel. • Four sided enclosure rooftops fans, minimum enclosure height 1.0m above fan height. • There is no dispatch i.e. truck movement after 10 pm • Boiler is installed in a separate room inside the building that is enclosed • Waste collection permitted from 7am -10pm Monday – Friday as per SSDA. • Noise assessment completed within 12-month period and submitted to EPA within 30 days.

5. Potential release of air pollutants

- **Odour Audit conducted by approved consultant in January 2025.**
- **Report submitted to EPA.**
- **Carbon, Hepa & Odour Scrubbing extraction system operates onsite.**
- **Carbon Breakthrough Monitoring Plan in place.**

Area/ Operation	Hazard Cause	Hazard Consequence	Likelihood	Consequence	Risk Level	• Pre-emptive Actions Required or In Place
Potential release of air pollutants Emission Potentially Offensive Odour	Failure of control technology	Toxic effects of air pollutants to Human Health Release of potentially harmful environmental substances in air Dust	Unlikely (2)	Low (2)	Moderate (C)	• Carbon breakthrough monitoring plan in place. • Maintenance program in place for the Carbon, Hepa & Odour Scrubbing extraction system • Maintenance performed by independent specialist • Odour assessment completed as per EPL in January 2025 • Fragrance materials tightly closed and stored in allocated storage location. • Tank vats remain closed when not in use. • Damaged/ leaking containers removed or disposed of correctly. • Residual product on drums/equipment cleaned after use and cleaning material disposed appropriately. • Bunded areas cleared of waste liquid.

6. Other Hazards: Light Pollution

Area/ Operation	Hazard Cause	Hazard Consequence	Likelihood	Consequence	Risk Level	• Pre-emptive Actions Required or In Place
Poor or inadequate lighting	Lighting design allowance for artificial light to shine outward and upward into the sky	Nuisance for neighbours Complaints	Unlikely (2)	Low (2)	Moderate (C)	• Minimal intensity lights are used and point in specific direction • All lights at site are sensor or timed internally and externally. • Glass windows allows for natural light to seep through

Inventory & overall management of pollutants

Jalco Australia Pty Ltd Horsley Park hazardous materials are listed in the tables below.

The raw materials on site are converted into non-hazardous material due to volume of water content.

A chemical register is kept and maintained for all hazardous and dangerous good materials with location outlined on site manifest (Appendices 1) . Safety Data Sheets (SDS's) for each dangerous goods and site manifest are stored in HAZCHEM emergency box on the front gate eastern side of building.

Gate C, Coordinates (-33.8339977,150.8232814).

The Site Manifest is updated by the site annually or when required by legislation.

Dangerous goods are stored in raw material liquid shed (Warehouse H) that was designed as a containment/ bunded area.

Class 3 materials are stored in flammable storage containers located on hardstand protected inside unloading station.

In the event of a chemical spill in unloading stations, these are cleaned immediately and contained within bunded areas.

Chemical storage tanks located inside the facility are situated inside containment bunds.

If a spill occurs, depending on the type of dangerous goods and waste-water treatment capability, chemicals will be recovered into containers then removed offsite by Road Tanker to an appropriately licenced waste disposal facility.

HAZARDOUS CHEMICALS STORED IN TANK FARM – ABOVE GROUND TANKS									
Storage	**Type**	**Maximum storage capacity (KG)**	**UN #**	**Shipping Name**	**Class**	**PG**	**Product Name**	**Hazchem no.**	**Typical Quantity (KG)**
TK-14	AGT	33,000	1791	HYPOCHLORITE SOLUTION	8	III	SODIUM HYPOCHLORITE	2X	30,000
TK-13	AGT	33,000	1791	HYPOCHLORITE SOLUTION	8	III	SODIUM HYPOCHLORITE	2X	30,000
TK-12	AGT	33,000	1791	HYPOCHLORITE SOLUTION	8	III	SODIUM HYPOCHLORITE	2X	30,000
TK-11	AGT	42,000	1824	SODIUM HYDROXIDE SOLUTION	8	II	SODIUM HYDROXIDE 50% W/W	2R	29,000
TK-02	AGT	45,000	2586	ALKYLSULPHONIC ACIDS, LIQUID OR ARYLSULPHONIC ACIDS	8	III	GARDILENE SSAS	2X	28,000
TK-01	AGT	27,000	1760	CORROSIVE LIQUID, N.O.S.	8	II	GARDIQUAT 1450	2X	21,000

TK-15	AGT	68,000	1993	FLAMMABLE LIQUID N.O.S	3	III	PRAEPAGEN	3Y	48,000
TK-05	AGT	29,000	NA	NA	NA	NA	GLUCOPURE	NA	22,000
TK-06	AGT	35,000	NA	NA	NA	NA	TERIC	NA	27,000
TK-07	AGT	26,000	NA	PALMERA B1210	NA	NA	COCONUT FATTY ACID	NA	21,000
TK-09	AGT	72,000	NA	GARDINOL ESB70	NA	NA	GARDINOL ESB70	NA	54,000
TK-10	AGT	38,000	NA	NA	NA	NA	GLYCERINE	NA	29,000
TK-08	AGT	30,000	NA	NA	NA	NA	DEHYTON PK45	NA	23,000
AGT = Bunded Above Ground Tank; NA = Not Applicable									

ENVIRONMENTALLY HAZARDOUS WASTE LIQUID STORAGE TANKS –DAF)				
Area	**Storage Type**	**Name**	**Maximum storage capacity (Litres)**	**Tank contents**
Waste Water Treatment Plant	Bunded Above Ground Tank	Intermediate Tank	22,500	Waste liquid produced from cleaning of manufacturing tanks
Waste Water Treatment Plant	Bunded Above Ground Tank	Balance Tank	50,000	Waste liquid produced from cleaning of manufacturing tanks
Waste Water Treatment Plant	Bunded Above Ground Tank	Sludge Tank	22,500	Solid matter produced from the treatment of waste liquid

OTHER HAZARDOUS LIQUIDS STORED ONSITE (NOT IN TANKS)						
Area	**Storage type**	**Site storage name**	**Maximum storage capacity (Litres)**	**Typical quantities (Litres)**	**Chemical Classification**	**Packaging Group**
Warehouse H	Segregated bunded storage of liquid containers on pallets	HA	228,000	90,000	Class 8 (Acid & Bases)	II/III
Warehouse H	Segregated bunded storage of liquid containers on pallets	HA	8,000	4,000	Class 5.1 (Oxidising)	II
Warehouse H	Segregated bunded storage of liquid containers on pallets	HC	112,000	80,000	Class 9	III
Hardstand	Bunded flammable container	STDG1	16,000	6,000	Class 3	II
Hardstand	Bunded flammable container	STDG2	16,000	3,000	Class 8/Sub class 3	II

CHEMICALS USED AT WASTE WATER TREATMENT PLANT							
Area	**Storage type**	**Site storage name**	**Product name**	**Maximum storage capacity (Litres)**	**Typical quantities (Litres)**	**Chemical Classification**	**Packaging Group**
Waste Water Treatment Plant	Bunded IBC	Warehouse J	Sulphuric Acid	1,000	1,000	Class 8 (Acid)	II
	Bunded IBC	DAF	Sodium Meta Bisulphites	1,000	1,000	Class 8 (Acid)	III
	Bunded IBC	DAF	Sodium Hydroxide	1,000	1,000	Class 8 (Alkali)	II
	Bunded IBC inside Corrosive cabinet	DAF	Hydrogen Peroxide	1,000	1,000	Class 5.1 (Oxidising)	II
	Bunded IBC	DAF	Clearflox 3401	1,000	1,000	Non-DG	Non-DG
	Bunded IBC	DAF	Polyflox 175	1,000	1,000	Non-DG	Non-DG

OTHER HAZARDOUS CHEMICAL/LIQUID STORAGE AREAS							
Area	**Storage type**	**Site storage name**	**Product name**	**Maximum storage capacity (Litres)**	**Typical quantities (Litres)**	**Chemical Classification**	**Packaging Group**
Workshop	Cage	CG	Compressed Argon	1,000	800	Class 2.2	NA
Warehouse	Cage	CG	Liquid Petroleum Gas	330	300	Class 2.1	NA
Dispensary	IBC's stored on racking	STOD	NA	60,000	50,000	Miscellaneous Non-DG	NA
Warehouse	Racking	STOA	NA	630,000	570,000	Class 8	III
Hardstand	Bunded flammable Container	STDG	NA	32,000	16,000	Various Class 3	II

Safety Equipment

The safety critical equipment implemented at Jalco Australia Pty Ltd Horsley Park site include emergency stops to automatically shut off valves for manufacturing or filing units, alarm system, high level sensors.

Emergency stop or shutdown applications are located at multiple locations across all production filling lines, manufacturing vessels, piping systems, pressure vessels and boiler unit. Spillages are contained in bunded areas and captured in pits that can be transferred to DAF plant for treatment. In a worst-case scenario event whereby an uncontrollable release of material exists the site, the 2350 tonne underground OSD Tank shall be closed at pit 111/1 to prevent contaminants polluting stormwater drainage. The site will arrange for a certified waste provider to pump material from OSD tank. Pit 111/1 is located at UPS Healthcare entrance at Unit 2/8 Johnston Crescent

In addition, there are interlock, monitoring sensors and alarm systems applied to plant and equipment to alert employees of emergencies that arise. The pumps and valves on site are designed with no reverse flow that avoids release of material that cause harm to people and environment. Instruments installed on tanks to control chemical overflows are linked to an alarm when there's an issue with a process.

The safety critical equipment are captured in a risk assessment in conjunction with an embedded preventative maintenance program to enable routine checks for functionality and efficacy

Personal protective equipment (PPE) is available in accordance with SDS especially for corrosive chemicals. PPE located at unloading stations, WWTP and manufacturing areas include safety googles EN166 or ASNZ 1337.1, chemical grade full length gloves EN374, face shield, PVC apron and protective garment PVC EN14605 or EN13982.

Safety Data Sheets are available for all raw chemicals and finished goods and are captured on chemical register for site. Chemical risk assessment is also completed for all raw chemicals and finished goods. Dangerous goods are labelled with UN information, pictogram and emergency contacts (this also includes chemical storage tanks for non-dangerous good materials).

Emergency Control team including first aiders will wear the following caps during an emergency:

Emergency Control Team	Cap Colour
Chief or Deputy Warden	White
Warden	Red
First Aider	Green

In an emergency a first aid kit and defibrillator will be taken to emergency assembly point.

Fire Fighting Equipment on premises include; Fire hose reels, Fire extinguisher, Hydrants, Exit lights, Exit Signages, Fire Indicator Panel and Sprinklers.

Evacuation diagrams are available at each fire exit door to assist employees, visitors and contractor in an emergency.

Eye wash stations and showers are installed at unloading stations, production filling lines, manufacturing mixing tanks, enzyme and dispensary areas. The eye wash stations are positioned 10 seconds from hazard as per AS4775.

240L Hazchem Spill kits (booms, absorbent pads, chemical compatibility absorbent material, PPE, anti-static shovels) are available across the premise including drain covers for hardstand area.

Divisional WHSE Manager or nominated delegate is responsible for notifying authorised listed above

Communicating with Neighbours and the Local Community
Refer to above section “Notification of Neighbours and Local Community”. Information of site processes is available on Jalco website for commercial and neighbours unable to attend site orientation.

Minimising Harm to Persons on the Premises

In case of an incident, all staff, visitors and contractors must follow the instructions of pollution incident control coordinators and emergency control. Unless instructed otherwise, everyone on site (including pollution incident control coordinators and emergency control) must immediately evacuate to emergency assembly areas located outside Gate A (main building and production) and Gate C (warehouse and collation).

In case of an incident, all staff, visitors and contractors must follow the instructions of pollution incident control coordinators and emergency control. Unless instructed otherwise, everyone on site (including pollution incident control coordinators and emergency control) must immediately evacuate to emergency assembly areas located outside Gate A (main building and production) and Gate C (warehouse and collation).

Using whatever means they have at their disposal, pollution incident control coordinators and emergency control shall ascertain numbers of staff, visitors and contractors present on site. Wardens will conduct a sweep of the site and once an office (including amenities), manufacturing, dispensary, production filling and warehouse is checked and cleared, it must be tagged out to ensure the facility is fully evacuated and all people on site are accounted for.

No-one shall re-enter the site until emergency services or site Chief or Deputy Wardens give the all clear signal.

Maps

Refer to appendices section for maps.

Actions to be Taken During or Immediately After a Pollution Incident

IMMEDIATE CONSIDERATION

- **If safe to do so contain the spill, leak or escape of pollutant -** In the event of a pollution incident, the spill leak or escape of pollutants will be controlled and contained. If operation of onsite plant or pumps is causing the pollution incident, then the affected system will be shutdown.
- **Call 000 in an Emergency** - The site must contact 000 if the incident presents an immediate threat to human health or property. Fire and Rescue NSW, the NSW Police and the NSW Ambulance Service are the first responders, as they are responsible for controlling and containing incidents.

INTERNAL NOTIFICATION

- **Report to Supervisor** - Prior to any other action, the initial observer will report the issue immediately to their supervisor or the Operations Manager.
- Operations Manager must follow PACT Group reporting protocols and protocols highlighted in JAHP-ERP-001 Emergency Response Plan

NOTIFICATION TO THE REGULATOR

- **Determine if a Notifiable Incident** - After the initial response to any events that may cause immediate harm to human health or property the Operations Manager in consultation with relevant stake holders will determine if the event constitutes an "actual or potential material harm incident"
- **In the event that the Penstock valve is initiated due to an environmentally hazardous spill, the Divisional WHSE Manager must be notified to alert the EPA**.
- **Notify Authorities -** In the event of a "material harm incident" the following authorities will be contacted as per notification of relevant authorities immediately after becoming aware of the incident, under the legislative duty to notify:
  - EPA
  - Fairfield City Council
  - NSW Ministry of Health
  - SafeWork NSW
  - NSW Fire and Rescue
  - Sydney Water St Mary

In the case of a "material harm incident" the following information will be noted and forwarded to the authorities when they are notified of the incident:

- Time and date.
- Nature and location of the incident.
- Duration of the incident.
- Location of areas that may be affected by the pollution incident.
- Pollutant involved and the estimated quantity/volume and concentration
- Circumstances in which the incident occurred.
- The proposed action to be taken in dealing with the pollutant and any further incidents that may result.

A detailed record will be kept of all steps involved in dealing with each incident and kept on site in case additional information is required. After the initial notification of a material harm incident, it is the responsibility of the Pollution Incident and Control Coordinators to coordinate with any authority that is contacted.

RESPONSE TO INCIDENT

If the incident does not pose any threat to human health or property, all possible actions will be taken to control the pollution incident and minimize health, safety and environmental consequences. These actions will be employed to the maximum extent possible to:

- Provide for the safety of people at and within the vicinity of the site; and
- Clean-up the pollution incident.

The Jalco Australia Horsley Park emergency evacuation assembly point is located on footpath in front of main building in between [Gate A] and warehouse [Gate C]. There is an emergency assembly point signage at both locations. In the event of an evacuation the Jalco Australia Pty Ltd Horsley Park Emergency Response Plan needs to be followed (JAHP-ERP-001 Emergency Response Plan).

DUTIES DURING AN EMERGENCY EVACUATION

Managers that have not been designated for a particular role (e.g., Chief Warden) are responsible for the following duties during an evacuation:

Managers are responsible for helping Area Wardens evacuate their areas. Managers shall provide support to ensure staff immediately evacuate and proceed directly to the evacuation assembly area.

Managers shall report to the Area Warden and have their names recorded. They are then to assist in the confirmation that all staff have been evacuated and to ensure that the staff remain at the assembly point until approved to leave.

Managers shall then be “on call” to help any duties required by the “Chief Warden”.

Managers shall assist in diverting away deliveries or visitors to the site during the emergency. The backup facility for Jalco Australia Pty Ltd Horsley Park, is Jalco Promotional Packaging located at 10 Interchange Drive, Eastern Creek. Where possible, deliveries should be diverted to this site after consultation with the receiving department and Distribution Centre Manager at Eastern Creek.

Managers are to consult with the General Manager NSW Operations about the need for delaying or cancelling any following shift, if the emergency is thought to close the plant for an extended delay.

DUTIES AFTER THE EMERGENCY

Management shall collaborate with Chief Warden when emergency has terminated and satisfied health, safety and environmental requirements. This includes

The emergency services return control to site Chief Warden or Emergency Plan Committee

Declaration by Chief Warden in liaison with Emergency Plan Committee that emergency has been terminated.

Management is responsible for assessing the impact of the emergency on company property, stock, work in progress, and delays in orders. This must be quantified as part of any insurance claims.

Management is responsible for taking action to get the plant safe and operational again.

RELEASE OF INFORMATION

In case of a Major Emergency only a Company Director or Contract Manufacturing Executive General Manager may release information to the public, e.g., media, customers, suppliers etc.

A description of actions taken to combat pollution caused by the incident are described in each relevant listed incident safety section.

Coordinating with Persons

The Chief Warden shall ensure that the required emergency services and Company General Manager have been called and the evacuation siren activated.

The Chief Warden will assume overall supervision of the site during an evacuation of personnel and liaise with the attending Emergency Service (e.g., Fire Brigade, Ambulance), upon their arrival.

The Chief Warden must liaise with Area Wardens to ensure all personnel are accounted for.

Obtain the site manifest (if applicable) and have ready to present to Emergency Services on arrival.

Liaise with the site Maintenance Manager concerning site services actions. E.g., isolation of gas, electricity, closure of storm water gates

Liaise with First Aiders to determine if there are any injured personnel.

Direct additional Evacuation Procedures to those initiated by Area Wardens.

The Chief Warden is to liaise with Emergency Services and update them with:

- Location of all personnel and details of anyone not accounted for;
- What the emergency situation is and where;
- Location of Dangerous Goods (Provide manifest if applicable to site for dangerous goods);
- Status of site services (e.g., gas mains shut, electricity); and
- Advise of any injured personnel
- Provide assistance to Emergency Services for the duration of the emergency; and
- Maintain regular contact with Company General Manager Manufacturing Operations as to current situation.

The Chief Warden, with the help of Area Wardens and Company Management, shall ensure that no personnel leave the assembly point to retrieve personnel items or vehicles during the emergency unless authorized by Emergency Services.

The Chief Warden shall wait for clearance from Emergency Services before informing personnel when they may return to specific areas or all areas, inform the Wardens concerned to issue appropriate instructions.

The Chief Warden will assume overall supervision of the site during an evacuation of personnel and liaise with the attending Emergency Service (e.g., Fire Brigade, Ambulance), upon their arrival. The Chief Warden will provide assistance to emergency services.

General Manager NSW Manufacturing Operations is the emergency commander liaising with Executive General Manager, Pact Group risk team and legal team. General Manager NSW Manufacturing Operations is responsible to activate emergency plan for major catastrophes, notify regulatory bodies, customers, suppliers, media and manage process unless otherwise delegated to alternate an General Manager, Divisional WHSE Mananger or site personnel.

Staff Training

Staff will undertake desktop exercise or scenario, as well as participate in drills and practical exercises. The objective of staff training is as follows:

All Employees (including contractors) –

- Understand pollution incident procedures, their roles, responsibilities and how to activate these in a pollution incident situation.
- Contents provided within pollution incident response plan in the form of a site presentation.

Cross Functional Team (Department Leads) –

- Response teams have detailed understanding of their roles, how to support each other, mobilise, work together to resolve the pollution incident. The training will include formal training and desktop/ practical scenarios.
- Contents provided within pollution incident response plan.

Note: Individuals heavily involved in dealing with chemicals are required to undertake formal practical training and/or drills.

Records of staff training will be maintained on site.

Testing and updating of the PIRMP

The testing of this pollution incident response plan will be undertaken on an annual basis during the life of EPA License. Testing will be undertaken in the form of desktop simulations, practical exercises and drills at Jalco Australia Pty Ltd Horsley Park site. The pollution incident response plan will be tested within one month of any pollution incident occurring or at least once every 12 month period.

In the circumstance significant changes occur such as increase in production capacity, new plant and equipment, significant upgrades and installation plan will be reviewed. In addition, a new risk assessment will need to be completed to reflect changes.

Pollution incident response stimulation and practical exercise records will be maintained at Horsley Park site and revisions available in Document Control section of this plan. Pollution Incident Response Plan will be reviewed following each mock incident to ensure it remains up to date with current site conditions.

Furthermore, Fire and Rescue NSW will be invited to participate in or observe pollution incident response plan in the first year of EPL issuance and significant changes to plant and equipment to site. This will allow Fire and Rescue NSW to raise their awareness of the site, provide feedback and update their incident plans.

PIRMP Testing Details

Date tested	Tested by (to include the names of all people involved in testing)	Details of test (e.g., nature of the test, involvement of other agencies) Note: Testing must cover all components of the plan.	Finding of test, including issues identified	Next scheduled testing date (must be within 12 months from current test)
03/07/24	Omprakash Vardaraj, Farooq Sharif, Rojli Rajon, Deepinder Singh, Tina Nicolitsis, Shalini Singh, Chris Harvey, Joytika Devi	- Desktop drill with review of PIRMP - Roles and responsibilities of all relevant people. Risks and controls for the site		03/07/25
14/08/24	Kimvouch Sie, Md Raquib Iftekher Hasan, Chris Harvey, Anthony Wong, Duong Sek, Ricky Pedder, Dharmesh Lal, Terry Thai, Rojli Rajon, Shane Irving, Eang Heng, Peni Tauiili, Omprakash Varadaraj, Arnold Wiryanto, Ajayswamy Vadika, Joytika Devi, Deepinder Singh, Christine Payne, ShaliniS Singh, Tina Nicolitsis, Ken	- Spill Response and Practical Exercise - Environment and spills - Containment and clean up - Safe handling of chemicals - Equipment and spill kit - Evacuation - Reporting		14/08/25

	Hanna, Arnold Wiryanto, Praneel Singh, Sray Kouch, Shaleshni Prasad			
29/08/25	Inamullah Khan, Robert McCormick, Deepinder Singh, David Jazzini, Ryan Boon, Christine Payne, Arnold Wiryanto, Joytika Devi, Mey Sray Kouch, Chris Harvey, Gary Wilson, Tina Nicolitsis, Giselle Berghouse	- Desktop drill with review of PIRMP - Roles and responsibilities of all relevant people. - Notification & Reporting process. - Spill Response. - Penstock valve operation.		29/08/2026

Document Control Register				
Date	Reason for update (e.g., address issues identified in testing, contact details/personnel have changed)	Details of updates (nature of changes to PIRMP)	Date the updated version uploaded to website (if applicable)	Author
20/11/2023	New	New document established for Jalco Australia Horsley Park site. In consultation with Gopi Dhanekula (Engineering Manager and site Chief Warden), Aaron Colautti (Pact Group Environmental Manager), Tina Nicolitsis (Regional Health, Safety and Environmental Manager), Rojli		Christine Kazzi

		Rajon (Site Operations Manager).		
13/06/2024	Review	Details of Relevant Manager updated. Contact details of Authorities Updated. Neighbour details updated. Risk Assessment Updated		Farooq Sharif
23/09/2024	Review the risks	Rationalized the risks and removed those not applicable		Tina Nicolitsis
5/9/2025	Review	Site contact details of updated. Chemical storage quantities & classes updated. Add annual PIRMP drill details.		Gary Wilson

Appendix 1: Pollution Incident Response Management Mock Incident Form

Date of Exercise:29/8/2025			
Start Time:10am		**Finish Time:11am**	
Mock Pollution Incident Coordination Team Members			
Leader	Inamullah Khan		
Members	Robert McCormick, Deepinder Singh, David Jazzini, Ryan Boon, Christine Payne, Arnold Wiryanto, Joytika Devi, Mey Sray Kouch, Chris Harvey, Gary Wilson, Tina Nicolitsis, Giselle Berghouse		
Description of Mock Pollution Incident Scenario: Onsite transportation from Warehouse H to the Waste Water Treatment Plant (WWTP) of an IBC of Hydrogen Peroxide and the IBC is punctured & spilled.			
Pollutant Name	**Type of Pollution (Air/ Noise/ Water/ Land etc.)**	**Approximate amount of pollutant release**	
Hydrogen Peroxide	Stormwater	800L	
Potential Risks of Pollution: Pollutant can access stormwater drains in hardstand area.			
Immediate actions taken: Leader sent member for PPE & SDS for personal safety at WWTP. Leader acted to activate penstock valve. Leader sent another member to source spill kit. Leader sent another member to stop site traffic.			
External Notification: x Yes □ No (Check Internal Notification Guideline)			
Notification to be done by: Would be performed by Tina Nicolitisis			
x EPA □ Council □ SafeWork NSW □ Ministry of Health □ Fire & Rescue NSW			

Notification to Neighbour: Not required as spill was isolated to onsite detention tank.

□ **Face to face contact or telephone call**

□ **Letterbox drops**

□ **Publication of updates on Jalco's Website**

□ **Emailing of updates**

□ **Doorknocking**

PIRMP Section Tested and Findings

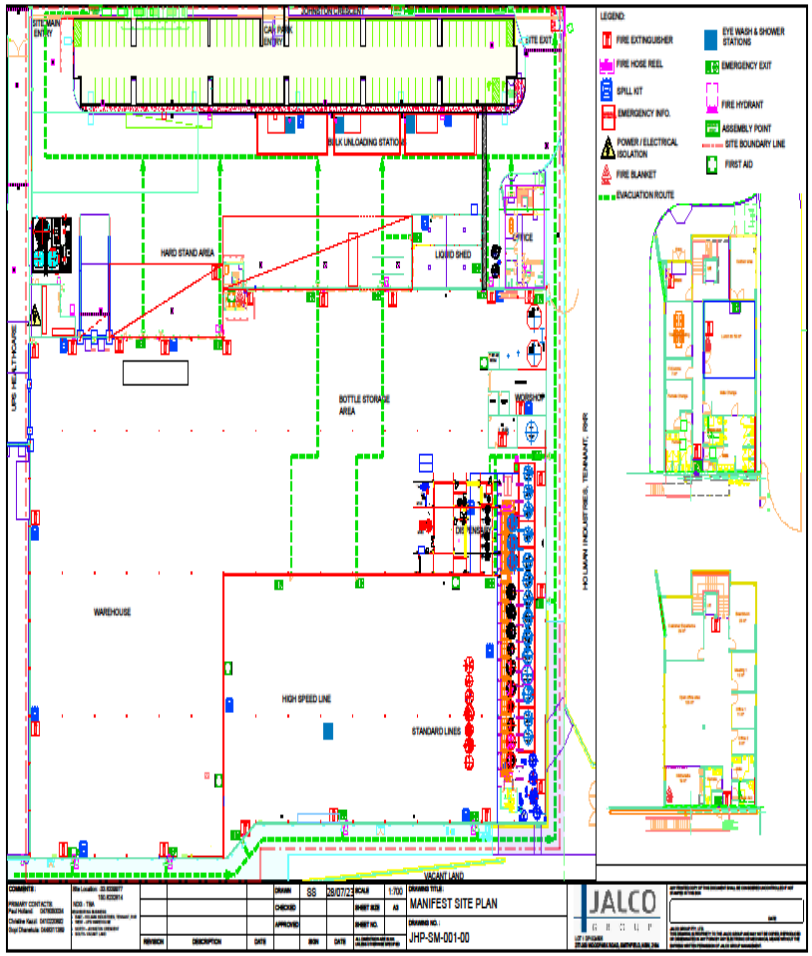
Section	Finding
Notification of incident	Notification process of incident workshopped at time of drill. Escalate to Operations Manager and/or site WHSE Lead, and they can escalate to Divisional Heads. Only need to contact the EPA at their request as Penstock valve was activated. Not released from site in this exercise therefore, no need to notify other contacts in PIRMP.
Inventory of Pollutants	800L of Hydrogen Peroxide
Safety Equipment on Site	PPE available from WWTP. Additional emergency PPE stations to be installed closer to hardstand area.
Control Measures to minimise the risk of pollution	Penstock valve isolation & use of spill kits.
Actions taken during and immediately after an incident drill	Leader & members discussed distance to be covered between WWTP and area of spill as well as the functionality of the penstock valve and making sure that it is fully closed.
Staff Training	It was agreed that the hardstand is the area of the highest risk due to the number of stormwater drains in the area. Information on the operation of the penstock valve to be rolled out across all shifts.

General Comments (including improvement required on response, PIRMP document update, debrief questions: what worked?, what would we do the same next time? What would we do differently next time? What needs did we identify? Staff training, safety procedures, additional equipment etc.)

Maintenance department to develop training for their team across all shifts so they are fully aware of the isolation options available to prevent pollutants accessing the stormwater.

Testing & maintenance of penstock valve is handled by ESR (property landlord) PIRMP Drill team decided that the penstock valve should be included on a site maintenance schedule also.

Appendices 2: Site Plan



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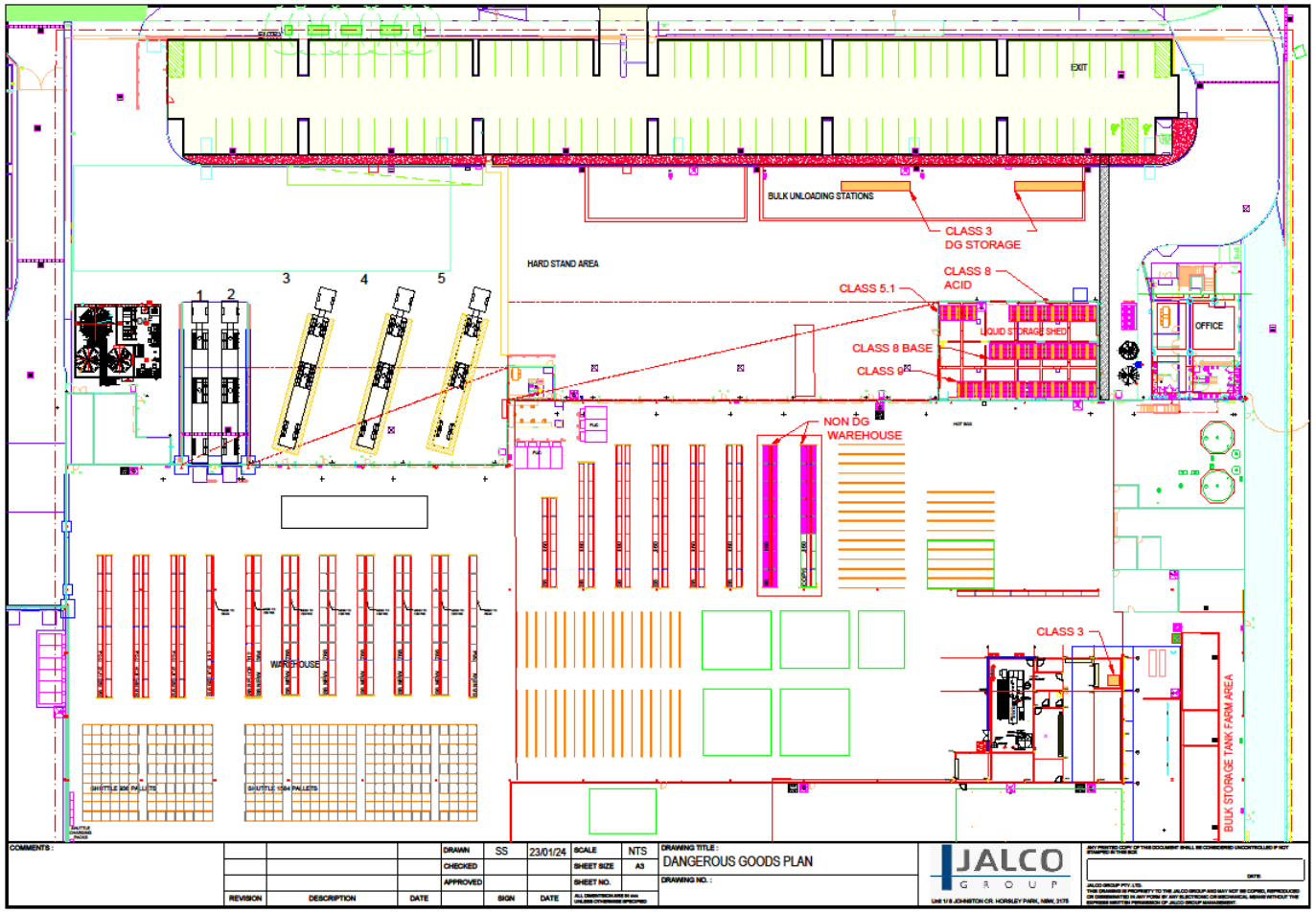
Appendices 3: Dangerous Goods Plan



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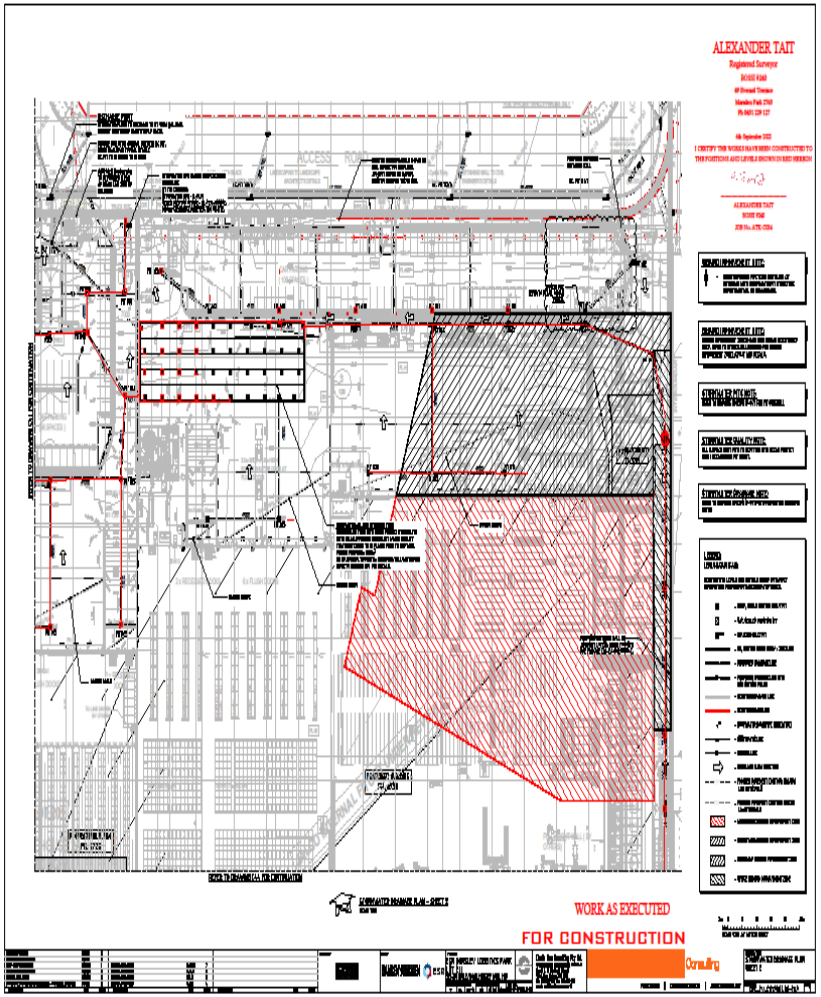
Appendices 4: Stormwater Plan



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Appendices 5: Jalco Australia Pty Ltd – Neighbours

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