



Environmental Incident Reporting Standards

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1. Introduction

The purpose of the environmental incident reporting standards is to ensure action is taken following an environmental incident and that the circumstances are appropriately investigated.

It is also required that relevant incidents are reported to the relevant regulatory body, such as the Environment Agency (England), Natural Resources Wales (Wales) or Scottish Environment Protection Agency (SEPA) etc.

Observations and minor incidents are important learning opportunities, and all reporting will help us continually improve. Lessons learnt from incidents are shared across the organisation and relevant third parties.

It is the responsibility of all teams to report environmental incidents and observations (including regulator contacts).

2. Definitions

Harmful substance: A substance either prohibited from being emitted /discharged to a receiving medium (atmosphere, ground or water) or a substance released in sufficient quantities to cause environmental pollution or damage.
Environmental incident: The release, either accidental or malicious, of a harmful substance, for example: <ul style="list-style-type: none"> ▪ Chemical or fuel / oil spillage; ▪ Uncontrolled release of a harmful substance to the atmosphere (e.g. asbestos fibres), dust / noise; ▪ Uncontrolled release of a harmful substance to the sewerage system (e.g. high pH liquid, silt); ▪ Uncontrolled release of a harmful substance to the water environment (e.g. silt into watercourse / waterbody); and ▪ Uncontrolled release of a harmful substance to land (e.g. silt, adblue).
Level 4 - Environmental observation: Inadequate storage/ poor housekeeping / waste controls
Level 3 - Minor: A small release (less than 5 litres or less than 1 metre in diameter) that has been contained
Level 2 - Significant: Where a significant (greater than 5 litres or greater than 1 meter in diameter) or a large (greater than 25 litres) release occurs that has the potential to cause significant

environmental damage, and which may lead to regulatory involvement.

Level 1 - Major incident:

An incident requiring or may lead to the involvement of a regulatory authority due to the severity of the incident / volume or toxicity of the harmful substance released

Refer to observations and incidents flowchart at section 8.

3. **Reporting procedure**

All environmental incidents must be reported, even if minor in nature. This would be to the Site Manager (construction) and Shift Supervisor (manufacturing).

The Site Manager / Shift Supervisor must take immediate steps to prevent the harmful substance from causing further environmental pollution or damage.

The Site Manager / Shift Supervisor must undertake an initial investigation to categorise the incident as major, significant or minor. The Group Health, Safety & Environment Advisor should be contacted for advice if deemed necessary.

The Site Manager / Shift Supervisor must complete an environmental incident report and email a copy to the local Group Health, Safety & Environment Advisor within 24 hours of the incident.

Where witnesses to the incident, details must be provided on the form and where appropriate photographs taken. In the case of an incident that has been categorised as a major or significant incident appropriate management must be contacted via phone immediately.

Refer to EMS Form [007](#) – Environmental Incident Report or;

Refer to [Mobile Form](#)

All environmental incident reports must be kept in a secure place so that they can only be accessed by authorised personnel and must be kept for a minimum of three years.

4. **Investigation**

The appropriate level of time and resource must be allocated to the investigation of environmental incidents. The local Group Health, Safety and Environment Advisor will carry out the investigation with input from senior members of the HS&E Department where necessary.

If a significant or major incident occurs, the local Group Health, Safety & Environment Advisor must undertake a review meeting with the Managing Director within 10 days of the incident and agree actions to prevent recurrence.

Refer to EMS Form [007b](#) – Incident Review Report

5. **Notifying the regulator of an environmental incident**

If a significant or major environmental incident occurs this will be reported to the relevant regulator under the direction of the Group Environment Manager. Site management and local HS&E Advisors must not contact the regulator without prior authority of the Group Environment Manager.

6. **Contacted by an environmental regulator**

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If an environmental regulator makes contact about any environmental incident or issue this must be reported without delay to the local Group HS&E Advisor, who must also be provided with a completed regulatory authority contact form. For the purpose of environmental matters, the regulator could be the environmental/ planning department of the Local Authority, Environment Agency, Natural Resources Wales or the Scottish Environment Protection Agency etc.

Refer to EMS form [006](#) – Regulatory Authority Contact or;
Refer to [Mobile Form](#)

If an enforcement notice is issued by the regulator, the local Group HS&E Advisor or Group Environment Management will complete the enforcement notice review report, aiming to undertake a review meeting with the Managing Director within 10 days after receiving the notice.

Refer to EMS form [006a](#) – Enforcement Notice Review Report

7. **Reporting**

The HS&E Department will record all environmental incidents, to monitor for trends. Where incident trends are identified, Group level corrective actions will be implemented.

All relevant environmental incident data is included in relevant management and performance reports.

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8. Observations & incident response flowchart

See table below which gives examples of different types of observations and incidents and actions required. Note: the lists are not exhaustive as other types of incidents may occur. Contact the local Group Health, Safety and Environment Advisor for advice when required.

LEVEL 4 - OBSERVATION:	LEVEL 3 – MINOR classified as: Site incident or emergency which is contained on site and can be managed by onsite personnel and resources. This could also be any minor incident or equipment failure	LEVEL 2 – SIGNIFICANT classified as: Site incident or emergency which requires assistance from off-site third parties and resources to manage or contain the situation, e.g. Oil spill response contractors, EA / EHO, Fire Service, etc. Including any near miss / any fire / any breach of Environmental Permit	LEVEL 1 – MAJOR classified as: Worksite Incident or Emergency which requires assistance from off-site third parties e.g. As per Level 2 plus: Police, Local Authority / Environment Agency, Ecologist etc.
Example Environmental Incidents <ul style="list-style-type: none"> ➤ Inadequate storage/ disposal arrangements for hazardous substances. ➤ Poor waste segregation ➤ Failure to manage concrete / cementitious washout ➤ Poor management of fuel storage areas ➤ Failure to prepare / plan for nesting birds/bats ➤ Minor drips of oils onto ground ➤ Poor housekeeping ➤ Wildlife found on site – left undisturbed and allowed to leave of own accord (bats, fox, badger, birds) ➤ Failure to issue relevant permits 	Example Environmental Incidents <ul style="list-style-type: none"> ➤ Oil or other hazardous substance spills of less than 10 litres AND / OR requiring use of spill kit ➤ Failure of equipment – e.g. poorly lined concrete washout skip / road sweeper pit ➤ Minor disturbance to wildlife – birds nesting but not affecting works ➤ Unauthorised work in a Tree Protection Zone – no damage ➤ Breach of Planning Conditions ➤ Discovery or damage to archaeological artefacts ➤ Discovery of unknown contaminated land on site ➤ Nuisance - noise, vibration, dust and odour issue. 	Example Environmental Incidents <ul style="list-style-type: none"> ➤ Breach of Environmental Permit condition (e.g. water quality) ➤ Contaminated run-off / water leaving site (e.g. silty water, high pH etc.) – no visual impact/wildlife unaffected ➤ Unauthorised discharge to sewer / environment about to occur or already occurring ➤ Any instance of asbestos fibre release ➤ Fire or Flood - dependent on severity, e.g. skip fire ➤ Oil or other hazardous substances spills which have or may leave the site, over, underground or in pipes (of more than 10 litres) ➤ Disturbance to wildlife – birds nesting and affecting works / schedule ➤ Damage to tree or hedge branches or roots ➤ Waste has or is about to leave site but not fully documented (e.g. no permit, exemption, waste carriers licence provided) ➤ Repeated / ongoing nuisance complaints / s60 notice 	Example Environmental Incidents <ul style="list-style-type: none"> ➤ Breach of Environmental Permit condition leading directly to pollution event ➤ Contaminated run-off / water leaving site (e.g. silty water, high pH etc.) leading directly to pollution event ➤ Fishkill ➤ Fire or Flood - dependent on severity ➤ Oil or other hazardous substances spills which has left the site or contaminated shallow groundwater (of more than 100 litres) OR loss of control of the incident ➤ Serious damage to wildlife e.g. protected species / habitats ➤ Contamination that may or has caused damage to the environment and/or public health ➤ Waste illegally dumped – disposed at location other than documented or expected ➤ Wildlife fatality or nest/hive/den destroyed
CONTACTS (In order of Priority) <ul style="list-style-type: none"> ➤ Site Management Team ➤ Contract Manager 	CONTACTS (In order of Priority) <ul style="list-style-type: none"> ➤ Site Management Team ➤ Contract Manager ➤ Group Health, Safety & Environment Advisor 	CONTACTS (In order of Priority) <ul style="list-style-type: none"> ➤ Site Management Team ➤ Contract Manager ➤ Group Health, Safety & Environment Advisor ➤ Managing Director ➤ Construction Director ➤ Technical Director (if relevant to issue) ➤ Group Environment Manager ➤ Group Health, Safety & Environment Director <p>Group Environment Manager to determine requirement to contact the appropriate Regulator and / or Specialist Contractors etc.</p> <p>HS&E Director to determine requirement to contact the following:</p> <ul style="list-style-type: none"> ➤ Insurers ➤ Specialist Legal Advisor 	CONTACTS (In order of Priority) <ul style="list-style-type: none"> ➤ Site Management Team ➤ Contract Manager ➤ Group Health, Safety & Environment Advisor ➤ Managing Director ➤ Construction Director ➤ Technical Director (if relevant to issue) ➤ Group Environment Manager ➤ Group Health, Safety & Environment Director ➤ Regional Chairman (Senior GHSE Advisor to notify) <p>Group Environment Manager to determine requirement to contact the appropriate Regulator and / or Specialist Contractors etc.</p> <p>HS&E Director to determine requirement to contact the following:</p> <ul style="list-style-type: none"> ➤ Insurers ➤ Specialist Legal Advisor
ACTION: Site team / supply chain partners to complete Toolbox Talks relevant to observation to raise awareness. Monitor performance. POTENTIAL TO PROGRESS TO LEVEL 3	ACTION: Site team to complete EMS Form 007 – Environmental Incident Report POTENTIAL TO PROGRESS TO LEVEL 2	ACTION: immediately contact GHSEA Site team to complete EMS Form 007 – Environmental Incident Report HS&E Dept to complete “Environmental Alert” and “Lessons Learnt” investigation and communicate across Region and/ or Group. POTENTIAL TO PROGRESS TO LEVEL 1	ACTION: immediately contact GHSEA Site team to complete EMS Form 007 – Environmental Incident Report HSE Dept to complete “Environmental Alert” and “Lessons Learnt” investigation and communicate across Region and/ or Group.

VERSION ISSUED	Date
<u>Version 1</u> Sections; 1,2,3,4,5,6,7,8	04.07.22
<u>Version 2</u> Section 6 – added 006a form	08.07.22
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