Environmental Incident Reporting, Investigation and Management Procedure

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Contents

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Amendments

Revision Number	Revision Date	Description of Key Changes	Section / Page No.
12	17/01/2024	• Added Reporting Work Instructions • Updated Training links • Updated References	Section 4, 10 & 12
11	13/06/2024	• Remove Factsheet, Work Instructions (superseded) • iRoads SharePoint links updated	Section 12
10	28/03/2024	Revised to include the new: • Title of the Owner (DEH) • Title of Branch (EHB)	All
9	14/10/2022	Revised to include the: • Target timeframes for closure of incidents and actions; • The requirement for approval to be obtained where an investigation is not required to be undertaken. • Updated terminology for Historic Heritage; • Updated government names.	Section 6.2.2, Tables 1 & 3, Table 2 & Appendix 2
8	27/08/2021	Revised in line with Portfolio Risk Reference Tables (as of 30 June 2021). • Table 3: Consequence Categories, Definitions and Examples - Definitions updated. • Table 5: Risk Rating Table – Consequence & Likelihood axis swapped.	Section 5

Revision Number	Revision Date	Description of Key Changes	Section / Page No.
7	20/05/2021	Revised to: • Use Main Roads new corporate template. • Document interaction with Web EOC • Align with current Main Roads processes. • Include an amendment to the Unauthorised Vegetation Clearing definition in Table 1. • Include an amendment to Consequence Categories, Definitions and Examples in Table 3. • Include an amendment to the selection of Likelihood requirement in Section 5.2 • Include State-wide update in Section 9 • Include updated government acronyms. • Include reference to Learning Hub Training	All
6	22/03/2019	Incident procedure revised to reflect the introduction of EQSafe and include guidance on environmental investigations.	All
5	May 2016	Update document to ensure consistency with the Corporate Risk Management Process and incident categories. Removed reference to and processes regarding iSafe. Included the requirement to complete an ICAM assessment for moderate, major and catastrophic incidents. Updated document to follow new corporate branding.	Various
4	Oct 2015	Incident procedure revised to reflect the introduction of the electronic Safety, Health and Environment incident management system, as well as changes to incident classification, responsibilities, reporting and notification requirements. Incorporated corporate risk assessment. Improved categories definitions and examples.	Appendix A
3	Sep 2006	Remove inconsistencies regarding notification period for incident reporting. Minor wording changes. Update logo.	All
2	Oct 2005	Include revised definition of nonconformity and clarify scope and responsibilities	Section 5.3, 5.4, 5.5, and 5.6
1	Jan 2005	Replace "Main Roads Representative" with "Contract Manager/Main Roads Supervisor"	Section 3.0
0	Dec 2004	Add the definition of "Main Roads Supervisor"	-

1 PURPOSE

This procedure outlines Main Roads Western Australia (Main Roads) procedure for the reporting, investigation and management of environmental incidents.

All environmental incidents must be identified, managed, reported, investigated and reviewed. Appropriate corrective actions are to be undertaken and processes revised as appropriate to prevent recurrence. A flowchart summarising the process to report and manage environmental incidents is provided at Appendix 1.

EQSafe is Main Roads electronic system for the recording and management of all incidents. Within EQSafe, all incidents are referred to as **events**, however for the purpose of this Procedure, they will herein be referred to as **incidents**.

Where an environmental incident results in serious injury, incident or near miss to one or more individuals, Main Roads Safety Health and Wellbeing (SHW) Branch should be contacted for guidance on the SHW aspects of the incident.

The *Emergency Management Act 2005* enables Hazard Management Agencies (HMAs). HMAs (e.g. WA Police, Department of Fire and Emergency Services, Department of Water and Environmental Regulation, Department of Mines, Industry Regulation and Safety) to take control and responsibility of an incident on the road network. If this occurs, Main Roads as a support organisation will work alongside and at the direction of the respective HMA to undertake specific emergency management activities or support functions. HMA controlled incidents must be reported in accordance with this procedure.

2 WHAT ARE ENVIRONMENTAL INCIDENTS

An environmental incident is any event resulting from the activities of Main Roads, Main Roads contractors or third parties that has the potential to cause or has caused an adverse effect on the environment or has resulted in a complaint relating to an environmental issue.

An environmental incident may include actions of non-compliance with legislation (i.e., licences, permits, or approval conditions) or corporate processes (i.e. failure to follow the Environmental Management System or Environmental Assessment, Approval and Compliance Procedure).

An environmental incident may be classified into one or more of incident types as shown in Table 1.

Table 1. Types of Environmental Incidents

Environment Incident Type (EQSafe Event Subtype)	Definition of Incident Type
Impact to Aboriginal Heritage site	Incident involves impacts or potential impacts to Aboriginal heritage site or values (e.g.: breach of CEMP requirements to avoid a site, disturbance to an aboriginal heritage site, failure to submit an Activity Notice under the Noongar Standard Heritage Agreement prior to activity or failure to obtain approval under Section 18 of Aboriginal Heritage Act to disturb a site). Non-compliance with an administrative or reporting requirement of a Section 18 approval should be considered a 'Non-compliance with approval conditions (No environmental impact)' so long as there were no impacts to the Aboriginal heritage site.
Impact to Historic Heritage site	Incident involves impacts or potential impacts to Historic heritage site or values. (i.e.: disturbance to a Historic heritage site or failure to obtain approval to impact a Historic heritage site). Non-compliance with an administrative or reporting requirement of a related approval should be considered a 'Non-compliance with approval conditions (no environmental impact)' so long as there were no impacts to the Aboriginal heritage site.
Impact to Threatened Plants or Ecological Communities	Incident involves impacts or potential impacts to vegetation that is Threatened Flora, Priority Flora, Priority Ecological Community or Threatened Ecological Community (e.g. parking of vehicles or machinery within a site of threatened plants or communities). Non-compliance with an administrative or reporting requirement of a related approval should be considered a 'Non-compliance with approval conditions (No environmental impact)' so long as there were no impacts to the Aboriginal heritage site.
Emission of Dust / Degradation of Air quality	Dust emissions and / or degradation of air quality. (i.e.: Winds blowing dust from construction activities or air quality levels exceed agreed standards).
Erosion and Sedimentation	Wind or water erosion or sedimentation enter watercourses or wetlands. (i.e.: stockpile material washes into nearby river after heavy rains or betters not stabilised and are significantly eroded).
Fire	Impact by fire (i.e.: lightning strike and wildfire or machinery breaks down and catches on fire leading to vegetation being burnt or prescribed burn out of control and burns to roadside vegetation).
Impact to Ground or Surface Water Quality	Direct discharge of polluting substances or sediment filled water into a wetland, watercourse or into a water catchment area.
Impact to Native Title	Undertaking an activity that affects Native Title rights (i.e.: undertaking an invalid future act).
Emission of Noise / Vibration / Light	Emission of noise, light or vibration has an impact on local residents, native fauna or adjacent buildings.
Contamination intercepted (Inherited and not asbestos)	Inherent hazardous or contaminated material is intercepted during works (e.g. buried drums of hazardous fluids). This does not include Asbestos Containing Materials.
Spill of hydraulic oil	Discharge of oil from a failed or damaged hydraulic hose or associated fixture (i.e.: O-ring).

Environment Incident Type (EQSafe Event Subtype)	Definition of Incident Type
Spill of polluting substances other than hydraulic oil	Discharge of substance including fuels or materials, usually through an accident or mechanical failure. (i.e.: diesel fuel spill, solvents, chemicals or other polluting substances). These spills are not caused by a failed or damaged hydraulic hose or associated fixture
Introduction / Spread of Weeds, Pests or Disease	Actions caused or may have caused the introduction or spread of weeds, pests or disease (e.g. dieback) (i.e. machinery not clean on entry or weed and weed-free stockpile sites not managed appropriately).
Unauthorised Vegetation Clearing	Incident may include clearing of native vegetation that: • was not internally approved or • considered compliant with the requirements of a clearing permit, an exemption, a Ministerial or other lawful means or • is beyond the limits of clearing communicated to the contractor. Incident may include a potential environmental impact (near miss).
Unauthorised Waste Disposal	Disposal of waste materials in unauthorised location or manner.
Impact to Fauna	Incident may include a fauna entrapment, injury or death.
Other	Any other environmental incident not captured or defined in this table.
Asbestos Containing Materials intercepted (Natural or man-made)	Incident may include interception, usually unexpected, of Asbestos Containing Materials (i.e. man-made or natural) during activities.
Spill of primer or seal in runoff following significant rainfall	Incidents may include the loss of primer or seal in runoff due to insufficient time to cure before rainfall event.
Non-compliance with approval conditions (no environmental impact)	A Main Roads environmental incident may include a non-compliance with an approval condition that did not result in an environmental impact (e.g. failure to comply with clearing permit annual reporting conditions or failure to provide offset funding within the agreed timeframes).

3   IMMEDIATE REMEDIAL ACTION

The eyewitness must initiate any immediate actions necessary to stop, control or contain the incident to minimise harm to environmental and public health and prevent further damage, hazards and loss of materials if considered safe to do so. For example, with a fuel spill, the tank valve should be turned off immediately, absorbent materials used and/or drainage channels blocked.

NOTE: YOUR SAFETY IS PARAMOUNT.

For incidents that cause significant pollution contact Main Roads Environment and Heritage Branch (EHB) and / or Department of Water and Environmental Regulation (DWER) Pollution Response Unit for advice / assistance on remediation actions to be undertaken. For insignificant, minor or moderate incidents that cause pollution, contact EHB, the nearest DWER office or the local council for advice.

DWER responds to serious pollution incidents, taking action to stop the discharge, minimise *environmental harm*, directing clean-up works and collecting evidence of environmental offences. DWER maintains a Pollution Response (HAZMAT) Unit (PRU) in Perth that can be deployed quickly around the state in the event of major or catastrophic pollution incidents. DWER Regional Offices also have ability to respond to pollution incidents and can obtain support from PRU as required. Local governments can generally manage minor pollution issues.

Contact details for assistance with response to incidents are provided in Appendix 2.

4   REPORTING OF ENVIRONMENTAL INCIDENTS

All environmental incidents resulting from the activities of Main Roads, Main Roads contractors or third parties that has the potential to cause or has caused an adverse effect on the environment or has resulted in a complaint relating to an environmental issue must be reported.

The following process is to be followed once an environmental incident has been identified. The process is also provided as a flowchart in Appendix 1.

- Immediate remedial actions (Section 3).
- Immediate Notification of serious environmental incidents to Manager Environment (Section 4.1).
- Reporting incident using EQSafe (Section 4.2) or Environment Incident Reporting Form (Section 4.2.1).
- Reporting to Executive Directors (Section 4.3).
- Reporting to External Agencies (Section 4.4).

4.1   Immediate Notification of Serious Environmental Incidents of Manager Environment

The Director Environment and Heritage (DEH) must be notified (by telephone or email) of all moderate, major and catastrophic environmental incidents as soon as possible and no later than 24 hours from identification of the environmental incident.

It is the responsibility of the eyewitnesses and /or the eyewitnesses' relevant supervisor / site supervisor to ensure that this is undertaken.

4.2   EQSafe Reporting

EQSafe is Main Roads electronic system for the recording and management of all incidents. All Main Roads employees and selected contractor representatives have access to EQSafe.

Contractors who have not been granted access to EQSafe will utilise the Environment Incident Reporting From as described in Section 4.2.1.

The *Submitter* must report all environmental incident via EQSafe within 24 hours for all catastrophic, major and moderate environmental incidents and within 3 days for all insignificant and minor environmental incidents from identification of the environmental incident.

Where the incident has an environment and safety component then a separate SHW incident must also be reported into EQSafe.

A Main Roads Environment Officer (EO) will be the *Moderator* and will review the environmental incident following submission of the environmental incident into EQSafe. This *Moderator* is required to determine if the environmental incident sub-type (Table 1) and the consequence level (Table 2) of the incident assigned by the Submitter is appropriate and amend as required. The EO will then assign an *Event Report Manager*. The EO must moderate the environmental incident as soon as practicable in accordance with Environmental Work Instruction – Moderating an Environmental Incident (D17#128711).

As EQSafe currently allows only one incident sub-type to be selected, the incident sub-type that reflects the most significant environmental impact of the incident must be selected and the other types and impacts will be described in the notes of the incident. The incident must only be entered into EQSafe once.

A Main Roads Principal Environment Officer (PEO) will be the *Event Report Manager* and will be responsible for reviewing the environmental incident sub-type category (Table 1) and consequence rating to ensure accuracy and consistency. Consequence categories and definitions are detailed in Section 4.1. The PEO must manage the environmental incident in accordance with Environmental Work Instruction – Managing an Environmental Incident (**D17#88541**).

The *Event Report Manager* may also assign actions required to *Close Out* the incident. Actions may include the provision of additional information, clean up and/or remediation, notification of external agencies (Section 4.4) or the requirement to complete an environment incident investigation (Section 5.2). The *Event Report Manager* will inform the Superintendent of any proposed actions, including the requirement for a Contractor or Main Roads environmental incident investigation, to be assigned to the Contractor as part of the Corrective Actions for the incident.

4.2.1   Environmental Incident Reporting Form

Where EQSafe is not available or non-operational, the Environmental Incident Reporting Form (**D17#681519**) must be completed and emailed to EB via: environmentincidents@mainroads.wa.gov.au.

The PEO Policy is responsible for the management of this mailbox and will be checked regularly and any submitted Environmental Incident Reporting Forms will be reassigned to the relevant EO. The EO is responsible to assume the role of a *Submitter* and report the event into EQSafe.

4.2.2 Web EOC Reporting

Incidents on our network with potential or actual environmental impacts by third parties are managed by Main Roads Road Network Operations Centre (RNOC) and are recorded in WebEOC. WebEOC provides a record of incident details and associated actions, accessible to external incident response agencies.

Main Roads Environment and Heritage Branch uses the information for creating entries into EQSafe to allow investigation, action and reporting by Environment Branch.

The following documents have been developed to assist this process.

- Metropolitan Region Environmental Incident Process, Roles and Responsibilities (**D19#467318**)
- Third Party Incident Clean-Up and Repair Checklist (**D19#539582**)
- Environmental Work Instruction - Environmental Incident Reporting in WebEOC (**D20#463467**)

4.3 Reporting to Executive Directors

The DEH must report all major and catastrophic Incidents to relevant Executive Director(s) by email within 24 hours of being notified of the incident with a follow up telephone call as soon as practicable, but no later than 72 hours of being notified.

4.4 Reporting to External Agencies

All environmental incidents that involve a failure to comply with any legislative requirement(s) (including approval/permit/licence conditions) must be reported to the relevant regulatory authority.

The DEH is accountable for the reporting of all environmental incidents to the relevant regulatory authority and the responsibility is delegated in accordance with Table 2. Once completed, the *Event Report Manager* must ensure the letter or email of notification is entered into EQSafe, including the date of completion and TRIM Reference, and notify the PEO - Policy. The reporting of environmental incidents must be recorded in the Reporting of Environmental Incidents to External Agencies Register (**D18#898924**).

Table 2. Requirements and Responsibilities to Notify External Agencies

Impact Aspect	Agency	Requirement to Report	Contact Information	Responsibility	Reporting Timeframe
Clearing of native vegetation clearing	Department of Water and Environment and Regulation (DWER)	Notify CEO of unauthorised clearing of native vegetation	6467 5000; after hours 1300 784 782 (24 hours) or info-der@dwer.wa.gov.au	SEO – Policy	As soon possible but within 30 days of the incident *Submitter* and upon receiving sufficient information to enable reporting. This may include: 1. The Contractors incident investigation report, or 2. Confirmation of legislative non-compliance or other non-compliance (i.e. non-compliance with the contractual obligations to limit the area of clearing but within the boundary and limits of clearing as assessed and approved within PCIA and under CPS818 or outside the area assessed and approved
Discharge of Waste, spills, illegal dumping pollution		Notify CEO of discharges of waste likely to cause pollution or environmental harm (s72 of the EP Act).	Pollution Watch hotline on 1300 784 782 or pollutionwatch@dwer.wa.gov.au; and Written notice via Waste Discharge Notification Form; Controlled Waste on 6467 5299 or cwts@dwer.wa.gov.au	PEO IDD for environmental incidents related to IDD projects or PEO Operations for environmental incidents related to all non-IDD projects or other works	
Contaminated Sites		all known or suspected contaminated sites are required to be reported by landowners, occupiers and polluters	Contaminated sites information line on 1300 762 982 and complete the contaminated site reporting Form contaminated.sites@dwer.wa.gov.au		
Fish Kill	Department of Biodiversity, Conservation and Attractions (DBCA)	Fish kill, pollution or other incident in the Swan Canning River Park	9219 9000; after hours 0419 192 845 Fish Watch 24-hour hotline 1800 815 507 or enquiries@dbca.wa.gov.au		
Aboriginal Heritage	Department of Planning, Lands and Heritage (DPLH)	Any impact to a heritage site	1300 651 077 or info@dplh.wa.gov.au	Principal Heritage Officer	

Impact Aspect	Agency	Requirement to Report	Contact Information	Responsibility	Reporting Timeframe
Impacts to the environment	Office of the Environmental Protection Authority (EPA)	Breaches under the EP Act Part IV (i.e. non-compliance with EPA Ministerial Approval)	6364 7000 or info.epa@dwer.wa.gov.au	PEO IDD for environmental incidents related to IDD projects or PEO Operations for environmental incidents related to all non-IDD projects or other works	within PCIA and under CPS818).
Matters of national environmental significance	Department of Climate Change, Energy, the Environment and Water (DCCEEW)	Breaches under the EPBC Act (i.e. non-compliance with DCCEEW Ministerial Approval)	1800 803 772 or http://www.environment.gov.au/about-us/contact-us		

5 RISK ANALYSIS OF ENVIRONMENTAL INCIDENTS

All environmental incidents must be assessed and rated in accordance with Main Roads Environmental Risk Management Procedure (**D18#1030352**) for both consequence and likelihood.

5.1 Consequence

All environment incidents must be rated into one of five consequence categories (insignificant, minor, moderate, major and catastrophic). The assessment of consequence category must be based on the **actual impact** and not the potential / worst case scenario impact.

The definition of each consequence category for environment incidents, in accordance with Main Roads Environmental Risk Management Procedure (**D18#1030352**), and examples are provided in Table 3.

*Note: Non-compliance to legislation is not to be rated below moderate.

Table 3. Consequence Categories, Definitions and Examples

Class	Actual Consequence	Definition	Examples
1	Insignificant	Where the environmental impact is: • Minimal impact to isolated area. • Simple or no treatment required. • No lasting effect on local ecological communities, animal and plant populations it contains, and environmental and heritage values of the area.	• Contained oil spill in non-sensitive environment. • Unauthorised removal of non-native and not significant vegetation (i.e. the revegetation was not undertaken in compliance with a legal requirement and is not considered to hold any cultural value or significance to the community).
2	Minor	Where the environmental impact is: • Contained impact. • Rectified with standard treatment. • Short-term residual effect on local ecological communities, animal and plant populations it contains, and environmental and heritage values of the area.	• Contained spill (on bituminised ground) of hydrocarbon. • Dust suppression spray failure without causing off site impacts. • Dumping of spoil or excess material at an unapproved site • Dust monitoring results exceed NEPM criteria.
3	Moderate	Where environmental impact is: • Uncontained impact. • Rectified in short-medium term. • Medium-term residual effect on local ecological communities, animal and plant populations it contains, and environmental and heritage values of the area.	• Uncontained hydrocarbon spillage causing pollution. • Unauthorised clearing of any sized area of native vegetation that does not contain other significant environmental values such as threatened flora, priority flora, wetlands, Priority Ecological Communities, Threatened Ecological Communities, known or suspected threatened or priority fauna breeding sites (e.g. western ringtail possum dreys or black cockatoo breeding hollows), significant remnant vegetation in a significantly cleared area, or results in habitat fragmentation. • Unauthorised removal of non-native significant vegetation (i.e. the revegetation was undertaken in compliance with a legal requirement or is considered to hold cultural value or significance to the community). • Unauthorised and limited impact to an Aboriginal Heritage or Historic Heritage site.

Class	Actual Consequence	Definition	Examples
			• Non-conformance to EMS process, Legislation, or permit/approval/licence
4	Major	Where environmental impact is: • Substantial hazardous impact. • Rectified in long-term. • Substantial residual effect on local ecological communities, animal and plant populations it contains, and environmental and heritage values of the area.	• Unauthorised clearing of native vegetation that has significant impact to significant environmental values such as threatened flora, priority flora, wetlands, Priority Ecological Communities, Threatened Ecological Communities, known or suspected threatened or priority fauna breeding sites (e.g. western ringtail possum dreys or black cockatoo breeding hollows), significant remnant vegetation in a significantly cleared area, or results in habitat fragmentation. • Major pollution of waterways, causing multiple fauna deaths (e.g. by on-site or off-site spills, silting up of waterway etc.). • Major unauthorised damage to one or more Aboriginal Heritage or Historic Heritage sites. • Major non-compliance with legislation
5	Catastrophic	Where environmental impact is: • Severe uncontained hazardous impact. • Requires long-term treatment and monitoring. • Severe residual effect on local ecological communities, animal and plant populations it contains, and environmental and heritage values of the area.	• Unauthorised clearing of any sized area containing significant environmental value/s where the impacts were understood and the clearing was deliberate. • Extensive pollution of waterways, causing wide reaching fauna deaths (e.g. by on-site or off-site spills, silting up of waterway etc.). • Extensive unauthorised damage to one or more Aboriginal Heritage sites. • Major non-compliance with legislation
SOURCE: Transport Portfolio Risk (D15#699153)			

5.2   Likelihood

All environment incidents must be rated into a likelihood category. There are five likelihood categories in accordance with the Environmental Risk Management Procedure (**D18#1030352**) (Table 4) however as the incident has occurred, the likelihood of the environmental incident occurring will always be rated as (4) **likely**.

Table 4. Likelihood Categories and Definitions

	Level	Rating	Description	Frequency
LIKELIHOOD RATING	1	Rare	The incident or consequence may occur only in exceptional circumstances	Less than once every 50 years
	2	Unlikely	The incident or consequence could occur at some time	Once every 10 – 50 years
	3	Possible	The incident or consequence might occur at some time	Once every 1 – 10 years
	4	Likely	**The incident or consequence will probably occur in most circumstances**	**More than once per year**
	5	Almost Certain	The incident or consequence is expected to occur in most circumstances	More than once per month

5.3   Risk Assessment

EQSafe will automatically complete the risk rating in accordance with the Environmental Risk Management Procedure (**D18#1030352**) Process based upon the consequence and likelihood categories selected and entered into EQSafe (Table 5).

Table 5. Risk Rating Table

		LIKELIHOOD				
	CONSEQUENCE	Rare	Unlikely	Possible	Likely	Almost certain
HEATMAP	Catastrophic	7 - Medium	10 - High	15 - High	20 – Very High	25 – Very High
	Major	4 - Low	8 - Medium	12 - High	16 – Very High	20 – Very High
	Moderate	3 - Low	6 - Low	9 - Medium	12 - High	15 - High
	Minor	2 - Low	4 - Low	6 - Low	8 - Medium	10 - High
	Insignificant	1 - Low	2 - Low	3 - Low	4 - Low	5 - Low

6   MANAGING ENVIRONMENTAL INCIDENTS

6.1   Management

The *Event Report Manager* will manage the environmental incident by assigning management actions and responsibilities to the *Actionee*. Management actions and responsibilities are dependent on the type and the classification of the incident. Incident notifications are sent to relevant person(s) in the defined roles. The *Event Approver* will approve the management and *Close Out* of the environmental incident.

Management actions, responsibilities and associated timeframes are shown in Table 6.

6.1.1   Director Environment and Heritage Authority to Review or Amend Environmental Incidents

The DEH has the authority to require actions to be changed, additional actions to be undertaken or to change the consequence and/or classification of any incident at any stage of the incident management process. However, this is only to be done where clear and reasonable evidence of the incident not being appropriately managed can by justified. The justification for the amendment must be documented in EQSafe.

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Table 6. Environmental Incident Management Actions, Responsibilities, Timeframes and EQSafe Emails

Action	Responsibility	Category	Timeframe	Reminder Email	Escalation Email
Notify DEH via email or telephone of the incident	Incident eyewitness / Supervisor / Site-supervisor	*Minor, Insignificant*	NA	NA	NA
		Moderate	1 day	NA	NA
		Major, Catastrophic			
Incident is submitted (i.e.: reported) using EQSafe	Incident Submitter	*Minor, Insignificant*	ASAP, but within 3 days of incident awareness	NA	NA
	Incident Submitter	*Moderate*	ASAP, but within 1 day of incident awareness		
		Major, Catastrophic			
Incident report is reviewed and sent to ERM	Moderator (EO or PEO)	*Minor, Insignificant*	ASAP	EO or PEO receives a notification email immediately.	NA
	Moderator (EO or PEO)	*Moderate*	ASAP		
		Major, Catastrophic			
Incident report management actions are assigned	Event Report Manager (PEO)	*Minor, Insignificant*	3 days	PEO receives a notification email upon completion of all actions.	NA
	Event Report Manager (PEO)	*Moderate*	1 day		
		Major, Catastrophic			
Incident report management actions are completed	The "Person" assigned the action	*Minor, Insignificant*	By action due date	"Person" assigned the action receives a notification email immediately and a reminder email 7 days prior to the due date.	Supervisor receives an escalation email when 7 days overdue
		Moderate			
		Major, Catastrophic			
Investigation Team Leader is assigned by ERM to conduct a detailed investigation	Event Report Manager (PEO)	*Moderate*	2 days	NA	NA
		Major, Catastrophic			
Detailed investigation undertaken and an investigation report is completed	Assigned Investigation Team Leader	*Moderate*	15 days	NA	NA
		Major, Catastrophic			
	RM/PD	*Moderate*	7 days	NA	NA

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Action	Responsibility	Category	Timeframe	Reminder Email	Escalation Email
Review and endorsement of detailed investigation report		*Major, Catastrophic*			
Approve the detailed investigation report	DEH	*Moderate*	7 days	NA	NA
		Major, Catastrophic			
Investigation report management actions are completed	The "Person" assigned the action	*Moderate*	By action due date	"Person" assigned the action receives a notification email immediately and a reminder email 7 days prior to the due date.	Supervisor receives an escalation email when the action is 7 days overdue.
		Major, Catastrophic			
Incident report is signed off and sent to the Approver (if classified Moderate or above)	Event Report Manager (PEO)	*Minor, Insignificant*	ASAP	Approver receives a notification email if the incident is moderate and above.	NA
		Moderate			
		Major, Catastrophic			
Approver(s) endorses the management of the incident and sends to the *Moderator* to *Closed Out*	Approver (DEH)	*Moderate*	7 days	NA	NA
		Major, Catastrophic			
Incident report is *Closed Out* in EQSafe	Moderator (EO or PEO)	*Minor, Insignificant*	ASAP	NA	NA
		Moderate			
		Major, Catastrophic			

EO – Environment Officer, PEO - Principal Environment Officer, DEH - Director Environment and Heritage, RM/PD – Regional Manager / Project Director

6.2   Investigations

The purpose of an environmental investigation report is to describe the environmental impact(s), the contributing factors and causes of the incident and make a recommendation on suitable corrective and preventative actions.

Investigations are not required when the environmental incident was caused by a third party.

Contractors must carry out investigations for all moderate, major and catastrophic incidents. A further Main Roads investigation may be carried out for moderate, major and catastrophic incidents at the discretion of DEH.

The requirement for and completion of Contractor and Main Roads incident investigations must be recorded in the Environmental Incident Investigations Register (**D19#202207**).

6.2.1   Contractor Investigations

The Contractor will be required to prepare an incident investigation report for all moderate, major and catastrophic environmental incidents within 30 days from the identification of the environmental incident. This report will form the basis for the Main Roads investigation, if required.

The Contractor may use the Main Roads Environmental Investigation Report Template (**D18#809693**).

6.2.2   Main Roads Investigations

The DEH must determine if a Main Roads incident investigation is required for environmental incidents where the actual consequence is moderate, major or catastrophic.

The DEH, in consultation with the *Event Report Manager*, will utilise the following criteria to determine if a Main Roads incident investigation is required:

- The Contractor's environmental incident investigation and report is inadequate in addressing the root causes of the incident,
- There is potential that the root cause, or part thereof, could be attributed to Main Roads activities, products or services, or
- If the action that resulted in the environmental incident is under Main Roads control or influence (i.e. actions are addressed by a Main Roads process, procedure or contractual documentation).

If the DEH determines that a Main Roads incident investigation report is not required, then the decision will be documented within the monthly incident review meeting minutes; and in EQSafe.

If the Main Roads incident investigation report is required, the incident investigation must be completed within 30 business days of receiving the Contractor's investigation report. The Investigation Team Leader may make a written request to the DEH for an extension to the deadline and approval for the extension must be in writing.

Where the investigation required is not solely of an environmental nature (i.e.: requires a Safety investigation to be undertaken as well), the DEH must determine the most appropriate approach and the minimum requirements of the investigation to avoid duplication.

The *Event Report Manager* will appoint an Investigation Team Leader to complete the investigation. Investigation Team Leader must not by directly involved in the incident occurring so they will typically be the *Event Report Manager*. The *Event Report Manager* must liaise with persons independently of the EQSafe workflow to ensure that the investigation is completed.

The Investigation Team Leader must undertake and complete the investigation report in accordance with the Environmental Investigation Report Template (**D18#809693**).

The Investigation Team Leader is responsible for gaining endorsement and approval of the investigation report. The Regional Manager / Project Director is responsible for reviewing and endorsing the investigation report. The DEH is responsible for reviewing and approval of the investigation report.

Once the investigation report has been completed and approved, the *Event Report Manager* must enter the final report into EQSafe, including the date of completion and TRIM Reference, and enter and assign any improvement and corrective actions resulting from the investigation to an *Actionee*.

The DEH has the authority to require an independent investigation in addition to, or instead of the Main Roads investigation. Independent investigations must not be led by a person that was directly involved in the environmental incident or by a person that is located within the region where the event has occurred. The DEH will determine the team leader and / or persons for independent investigations.

6.2.3 Third Party and HMA Incidents

An investigation is not required where the event is managed and investigated by a HMA or where the event was caused by a third party and where Main Roads has reported all information to the relevant regulatory body for further investigation. However, incidents that are being managed by HMAs and other third-party incidents must still be reported into EQSafe, in order to ensure that actions are recorded and the even is *Closed Out*.

7   MANAGEMENT OF ACTIONS

7.1   Implementing Corrective and Preventative Actions

The *Event Report Manager* is responsible for the management of corrective and preventative actions and is responsible for ensuring that all assigned actions have been completed satisfactorily in EQSafe. Evidence that the action has been completed must be entered by the *Actionee*. Associated documentation / evidence (including photos, receipts, etc.) must also be appended into the EQSafe event report. The *Event Report Manager* will not be able to *Close Out* the management treatment until sufficient evidence has been provided showing completion of the action(s).

The *Event Report Manager* will liaise with the relevant person(s) as required for ensuring that the implementation of corrective actions has been completed satisfactorily.

The Contract Superintendent's Representative is responsible for ensuring that Main Roads Contractors have completed their actions. The Superintendent or Superintendent's Representative is required to report that the corrective action has been undertaken and that the effectiveness of the management treatment actions are communicated with the Main Roads Contract Supervisor.

7.2   Endorsement and Close Out

An environmental incident can only be *Closed Out* once all actions relating to the EQSafe event report (i.e.: corrective and preventative actions) have been completed and reviewed / endorsed for its adequacy by the *Event Report Manager* and the *Event Approver* (as required). An environmental incident will remain open in EQSafe until the *Moderator* has *Closed Out* the event.

For insignificant and minor environmental incidents, the *Event Report Manager* is responsible for reviewing and managing the *Close Out* of the incident. Once approved by the *Event Report Manager*, the incident will be work flowed to the *Moderator* who will review and approve on the *Close Out* of the EQSafe event report.

For moderate, major and catastrophic environmental incidents, the *Event Report Approver* is responsible for reviewing and managing the *Close Out* of the incident. The *Event Report Manager* will then work flow the EQSafe event report to the *Event Approver* who will review and endorse the EQSafe event report *Close Out*.

If endorsement has been rejected by the *Event Approver*, the EQSafe event report will be returned to the *Event Report Manager* with a comment included outlining a reason for the rejection.

If endorsed by the *Event Approver*, the EQSafe event report will be work flowed to the *Moderator* who will review and approve the *Close Out* of the EQSafe event report.

7.3   Records Management

In accordance with Main Roads Record Management procedures, all documentation must be recorded in TRIM.

All environmental incidents must be recorded and reported in EQSafe; and all associated documentation (i.e.: investigation reports, photos, emails, receipts, etc.) must be uploaded from TRIM and attached into the corresponding EQSafe event report. The *Moderator* is responsible for uploading the final EQSafe event report into TRIM.

8   REVIEW

The DEH is responsible for undertaking the review and evaluation of incidents at a corporate level. Incidents must be reviewed and analysed to ensure consistency in consequences, types and root causes. Preventative and corrective actions must be reviewed to assess their effectiveness at reducing the risk of the incidents re-occurring.

8.1   Monthly Environmental Incident Review Meeting

The review will be undertaken by personnel with key roles in the management of environmental incidents. Key attendees, meeting outcomes and links to the meeting minutes will be communicated via iRoads.

8.2   Biannual Review at Environmental Management Review Committee Meeting

The Environmental Management Review Committee (EMRC) will review the types, consequences and management of incidents biannually.

9 COMMUNICATION

Director Environment and Heritage is responsible for communicating the outcomes of the review process. Communication across the organisation may be achieved via one or more of the following:

- Lessons learnt via the iRoads Latest News page
- EHB's What's New page
- Monthly State-wide Environmental and Heritage updates
- Annual Environment Officer Workshop
- Environmental Management Review Committee

10 TRAINING

All new Main Roads employees are required to complete the online Environment Induction, which includes the management of environmental incidents.

All EOs are to receive training in the management of environmental incidents in accordance with this procedure, and in the use of EQSafe. The training is available in Learning Hub Environmental Incidents (Code OC590).

Learning Hub also has the following EQSafe Training

- Environmental Requirements | Environmental Incidents
- EQSafe | External Contractor Training
- EQSafe Fundamentals and Submitter Training
- EQSafe System Training

Contractors granted access to EQSafe will be provided and follow the Environmental Work Instruction (EWI) Submitting an Environmental Incident as a Contractor (**D17#88538**). Further details and guidance regarding Contractor's access to EQSafe is available on iRoads.

For face-to-face training attendance record sheets are recorded in **16/1576** by the Environment and Heritage Branch (Policy).

11 DEFINITIONS

Term	Definition
Actionee	All Main Roads staff and contractors with access to EQSafe can be assigned an action. The actionee must complete the assigned action and provide evidence for completion of the action to the satisfaction of the Event Report Manager. The actionee must liaise with the ERM directly where they are unable to complete the action by the due date.
Close Out	The process of reviewing the corrective and preventative actions of environmental incidents for completion and approval.
Closed Out	An environmental incident event is considered to be closed out when all of the relevant corrective and preventative actions have been completed to the satisfaction of the Event Approver or Event Report Manager and the event has been managed / approved.
Contractor's Representative	The person nominated by the Contractor to represent workers hired by the Contractor. This includes Contractor's engaged by Main Roads under any type of contract/agreement (e.g. Alliance, Direct Managed Works, AS2124, Design and Construct, Minor Works, Minor Capital Works, Rural Network Contract, etc.)
Contributing Factors	Also known as causes, are the range of factors, which collectively contributed to the environmental incident occurring.
Corrective Action	Action taken, or proposed, to stop, control or remedy the environmental incident.
EB	Main Roads Environment Branch.
Environment	Biological and social surroundings in which Main Roads operates, including interactions between air, water, land, natural resources, flora, fauna, heritage values (both Historic and Aboriginal), humans and their inter-relationships.
Environmental Harm	The alteration of the environment or an environmental value to its detriment or degradation. Environmental harm can be a direct or indirect result of any action.
Environmental Impact	Any adverse change (direct or indirect) to the environment resulting from the activities of Main Roads', Main Roads contractors or third parties.
Environmental Incident	Any event resulting from the activities of Main Roads, Main Roads contractors and third parties that has the potential to, or has caused environmental impact, or a complaint relating to an environmental issue. This may include environmental incidents where Main Roads does not comply with legislation (i.e. approvals, licences, permits, or approval conditions) or corporate processes (i.e. Failure to follow EMS or Environmental Assessment and Approval procedures).
Environmental Incident Category	The classification of the incident based on the severity and consequence of the actual impact. There are 5 categories of incidents – insignificant, minor, moderate, major and catastrophic.
Environmental Investigation Report Template	Main Roads document that must be used to document an investigation into an environment incident following the reporting of the incident.

Term	Definition
Environmental Officer	A Main Roads Environment Officer who holds a tertiary qualification in environmental science or equivalent or has demonstrated experience relevant to environmental impact assessment and incident management.
EQSafe	Main Roads electronic system which is used to record and manage all safety and environmental incidents.
Event	EQSafe Terminology for an incident.
Event Approver	An event approver signs off on certain event reports agreeing with the quality of the investigation and actions raised. Once all of the management actions for an event are completed, the event may be work flowed (depending on the severity of the event) to the approver asking them to approve (or reject) the management treatment.
Event Reader	Event Readers do not take part in the workflow. Event Readers have access to view the details of incident but have no role within the management of the event.
Event Report Manager	Event Report Managers (ERM) are required to complete Event Reports that are assigned to them. ERM's are involved in reviewing the event report information, assigning actions to relevant employees and contractors, organising detailed investigations and entering into EQSafe information pertaining to those investigations; and sending the report to an Approver for review and *Close Out*.
Extensive	Great in extent, range, application, amount or number.
HMA	Hazard Management Agency. Organisation under the Emergency Management Act responsible for ensuring Prevention, Preparedness, Response and Recovery process for nominated hazards and Westplans.
IDD	Main Roads Infrastructure Delivery Directorate.
Environment Incident Reporting Form	Main Roads EQSafe Offline Incident Reporting Form that must be used for the reporting of any environmental incident if unable to access EQSafe.
Incident Reporter	The person that identifies that an incident has occurred.
Main Roads	An employee or Main Roads contractor undertaking work on behalf of Main Roads.
Main Roads Environmental Incident	An environmental incident is any event resulting from the activities of Main Roads, Main Roads contractors and third parties that has the potential to cause or has caused an adverse effect on the environment or has resulted in a complaint relating to an environmental issue.
Main Roads Supervisor	A Main Roads employee who manages the works activities of other Main Roads employees (e.g. Project Manager), a Supervisor of a Main Roads partner (e.g. Alliances, ISP's – works supervisor), or a supervisor contracted directly by Main Roads.
Moderator	The Moderators role revolves around keeping the event in EQSafe moving. Moderators are required to ensure the quality of data entered, including review of the incident rating. If the moderator modifies the event rating, a reason for the change must be inserted into the Moderator Comment box. Moderator must assign the event to an Event Report Manager.
Non-conformance	Activity or event that does not meet legal and/or corporate requirements.

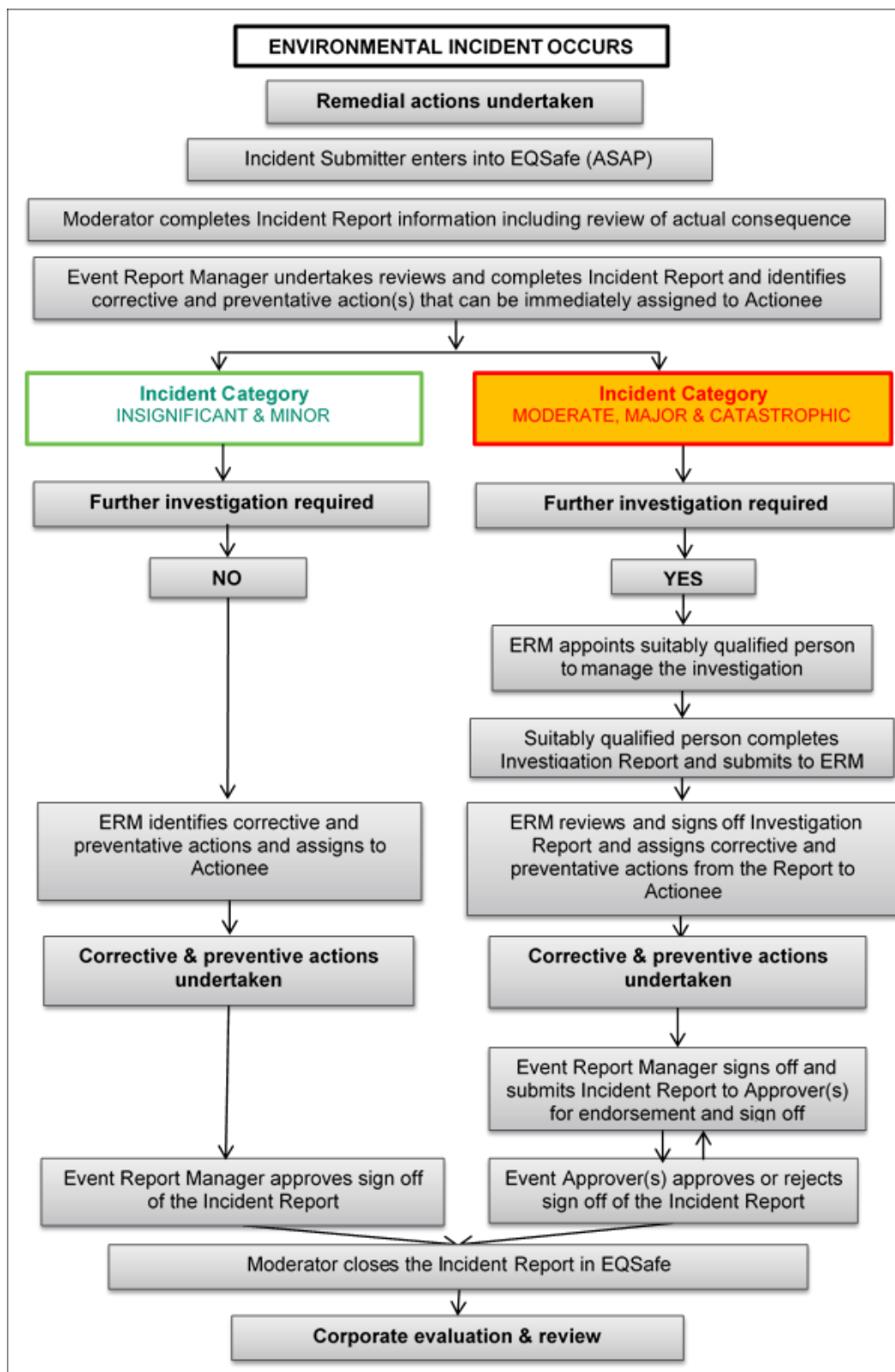| Term	Definition
Pollution	Is defined in the *Environmental Protection Act 1986* as an emission (can include emissions in the form of air, water or solids) causing direct or indirect detrimental change to the environment or environmental values.
Preventive Action	Action taken, or proposed, to prevent the occurrence of a similar environmental incident.
Remedial Action	The action taken to treat or control an environmental incident.
SHW	Main Roads Safety Health and Wellbeing Branch.
Site Supervisor	The person in charge or managing the project or work site.
Submitter	All Main Roads employees and contractors with access to EQSafe are able to submit (report) an event via the system.
Third Party	Any person or organisation not contracted, employed or directed by Main Roads.
Third Party Environmental Incident	Any event, which has caused environmental impact, resulting from activities done by a person, organisation or government body (that is not Main Roads) and not at the request of Main Roads (with or without Main Roads knowledge or consent).

12 REFERENCES AND RELATED DOCUMENTS

Information and references regarding environmental incident on iRoads is available on iRoads here.

Document Number	Title
D17#681519	Environment and Heritage Incident Reporting Form
D18#898924	Reporting of Environmental Incidents to External Agencies Register
D18#1030352	Environmental Risk Management Procedure
D19#202207	Environmental Incident Investigations Register
D18#809693	Environmental Incident Investigation Report Template
D18#977232	EQSafe – Environment Officer Training
D19#199831	Introduction to the EQSafe Environmental Module.
D18#118929	EQSafe User Manual
D17#88535	EWI – Submitting an Environmental Incident as a Main Roads Employee - Regions
D17#708630	EWI – Submitting an Environmental Incident as a Main Roads Employee - MEB
D17#88538	EWI – Submitting an Environmental Incident – Contractor
D17#128711	EWI – Moderating an Environmental Incident as a Moderator
D17#88541	EWI – Managing an Environmental Incident as an Event Report Manager
D17#262849	EWI – Approving an Environmental Incident close out as an Approver
D17#160116	EWI – Submitting an Environmental Improvement Action
D17#783131	EWI – Moderating and Managing an Environmental Improvement Action
D17#238420	EWI – Environment Branch Reports and Graphs
D17#561958	EWI – Searching for an existing Event Report
D17#864307	EQSafe Environmental Incident FAQs
D17#155616	EQSafe Governance Manual (PMO)
D18#854238	Guidelines for EQSafe on boarding External Access Package
D16#563770	Environmental Management for projects constructed under the AS2124 Contract
D21#1081244	Environmental Factsheet Environment and Heritage Branch Safety Incident Management
D24#37086	Training attendance record summary – Truck Crews, Environmental Incidents and Depot Management

13 APPENDICES

Appendix	Title
Appendix 1	Environmental Incident Management Flowchart
Appendix 2	Contact Details

Appendix 1: Environmental Incident Management Flowchart

Appendix 2: Contact Details

Agency	Area	Contact Details
Department of Water and Environment Regulation (DWER)	Clearing Regulation	6467 5000 or after hours on 1300 784 782 or info-der@dwer.wa.gov.au pollutionwatch@der.wa.gov.au
	Pollution Response Unit	1300 784 782 (24hrs)
	Contaminated Sites	1300 762 982 (9am to 5pm Monday to Friday)
Department of Biodiversity, Conservation and Attractions (DBCA)	Species and Communities Branch	9219 9000 or to report illegal wildlife activity 1800 449 453
	Rivers and Estuaries Division – Swan Canning Riverpark	9219 9000 after hours on 0419 192 845
Department of Planning, Lands and Heritage (DPLH)	Aboriginal Heritage	1300 651 077
Office of the Environmental Protection Authority (OEPA)	Environmental Biodiversity Protection and Impact Assessment	6364 7000
Department of Climate Change, Energy, the Environment and Water (DCCEEW)	Matters of National Environmental Significance	1800 803 772 epbcmonitoring@environment.gov.au