Environmental Incident Classification and Reporting

9TP-PR-105/18.0

Procedure – Applicable to Infrastructure and Services

Divisional Management System

Status: Approved
Version: 18.0
Branch: Planning and Environment Services
Business unit: Environmental Management
Date of issue: 20 December 2017
Review date: 20 December 2018
Audience: Project Delivery/External TSR
Asset classes: ☒ Heavy Rail; ☒ Light Rail; ☒ Multi Sites;
              ☒ Systems; ☒ Fleets
Project delivery model: I&S Project/Alliance/Novo Rail
Project type: Not Applicable
Project lifecycle: ☐ Feasibility; ☐ Scoping; ☐ Definition;
                  ☒ Construction readiness; ☒ Implementation;
                  ☒ Finalisation; ☐ Not applicable
Process owner: Director Planning and Environment Services
## Document history

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<th>Desksite no.</th>
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<tr>
<td>3.0</td>
<td>August 08</td>
<td>631781</td>
<td></td>
</tr>
<tr>
<td>4.0</td>
<td>23 Dec 09</td>
<td>696779_4</td>
<td>This document is updated to reflect the new document owner.</td>
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<tr>
<td>5.0</td>
<td>13 Aug 10</td>
<td>867157</td>
<td>Reformatted for TCA transition and revised governance structure.</td>
</tr>
<tr>
<td>6.0</td>
<td>01 Oct 11</td>
<td>835272</td>
<td>This document is updated to include Incident classification Legislative requirements Incident and non-compliance reporting procedure.</td>
</tr>
<tr>
<td>7.0</td>
<td>21 Oct 11</td>
<td>867157_9</td>
<td>Definitions and Environmental Incident Sections – amend definition of environmental incident to read”…impact has occurred, is occurring, or is likely to occur.” This is consistent with POEO Act. 6.2 – update to reflect changes to SA-FO-002 6.3 – remove &quot;or a contract/alliance-specific report form that is consistent with 9TP-FO101.&quot; 7 – update title of SA-FO-002</td>
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<td>1 Nov 11</td>
<td>867157_12</td>
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<td>9.0</td>
<td>2 Feb 12</td>
<td>1750099_1</td>
<td>Updated to include new legislative requirements as a result of changes to the Protection of the Environment Operations Act 1997.</td>
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<tr>
<td>10.0</td>
<td>1 Aug 12</td>
<td>867157_22</td>
<td>Revised section 6 and figure 1 of the document to reflect the use of the Incident Management System in incident/non-compliance reporting.</td>
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<td>11.0</td>
<td>21 Mar 14</td>
<td>867157_23</td>
<td>A paragraph on incidents related to the discovery of asbestos is added to clarify that such incidents are to be reported as safety incidents in the INX.</td>
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<tr>
<td>12.0</td>
<td>29 May 14</td>
<td>867157_25</td>
<td>Inclusion of incident investigation process and root cause analysis.</td>
</tr>
<tr>
<td>13.0</td>
<td>14 Apr 15</td>
<td>867157</td>
<td>Updated to be published to TINSW website</td>
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<tr>
<td>14.0</td>
<td>28 Apr 16</td>
<td>867157_31</td>
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<td>15 Nov 16</td>
<td>867157_33</td>
<td>Re-branded to I&amp;S (cover page only)</td>
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<td>16.0</td>
<td>27 Sep 17</td>
<td>867157_35</td>
<td>Flowchart updated to reflect position title change. Dead hyperlink removed.</td>
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<td>17 Nov 17</td>
<td>867157_37</td>
<td>The name of the system updated to INX.</td>
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<td>18.0</td>
<td>20 December 2017</td>
<td>867157_39</td>
<td>IMS is replaced by INX System in Figure 1 &amp; 2.</td>
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1. **Purpose and scope**

The purpose of this document is to identify the process and procedure to be followed when classifying and reporting an environmental incident or non-compliance that has occurred during work being undertaken by, or on behalf of, Infrastructure and Services (I&S) and defines I&S standard.

This procedure applies specifically to the reporting of environmental incidents and non-compliances to I&S and relevant regulatory authorities, particularly the NSW Environment Protection Authority. It does not provide guidance on management responses or corrective actions required in response to those incidents, which should be detailed in the relevant environmental management plan or other management document as required for the project.

2. **Accountabilities**

The Director Planning and Environment Services is accountable for this Procedure. Accountability includes authorising the document, monitoring its effectiveness and performing a formal document review.

Project directors are accountable for ensuring the requirements of this document are implemented within their area of responsibility.

Project directors who are accountable for specific projects/programs are accountable for ensuring associated contractors comply with the requirements of this document where required under TfNSW Standard Requirements (TSR).

Contractors are accountable for compliance with this document, where this document forms a part of their contract.

3. **Definitions and acronyms**

All terminology in this procedure is taken to mean the generally accepted or dictionary definition with the exception of the following terms which have a specifically defined meaning:

- **ADEM**: Associate Director Environmental Management
- **Environmental incident**: An environmental incident is an occurrence or set of circumstances, as a consequence of which pollution (air, water, noise, or land) or an adverse environmental impact has occurred, is occurring, or is likely to occur. Adverse environmental impact includes contamination, harm to flora and fauna (either individual species or communities), damage to heritage items and adverse community impacts.
- **Environmental non-compliance**: A non-compliance with any condition of approval, license condition or any other statutory approval or requirement relevant to the activity and/or area where the activity occurs.
- **Environmental issue**: Any occurrence or set of circumstances that has the potential to cause or lead to an environmental incident or non-compliance if not rectified.
- **EM**: Alliance/contractor environmental manager
- **EMR**: Environment management representative
- **EPA**: NSW Environment Protection Authority
- **EPL**: Environment protection license
- **EPM**: Environment and planning manager
Environmental Incident Classification and Reporting
Planning and Environment Services : Environmental Management
Project type: Not Applicable

ERM
Event report manager

INX
INX system

Investigation
The process by which the cause(s) of an incident, non-compliance, issue or event is examined and identified.

Material harm to the environment
Has the meaning as defined in Section 147 of the POEO Act.

Harm to the environment is material if:
(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations), and

loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

Moderator
Person assigned with a lead role under an incident investigation, to determine it’s scope etc.

Notifiable event
Any environmental incident or non-compliance that triggers a specific statutory requirement to notify a regulatory authority.

PD
I&S Project director

PM
Alliance/contractor project manager

POEO Act

Pollution
Pollution, air pollution, water pollution, noise pollution and land pollution all have the meanings as defined in the Dictionary to the POEO Act.

Pollution incident
Has the meaning as defined in the Dictionary to the POEO Act:
an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed of on premises, but it does not include an incident or set of circumstances involving only the emission of any noise.

SME
I&S Senior Manager Environment

TfNSW
Transport for New South Wales

TSR
TfNSW Standard Requirement

4. Legislative requirements

There are a number of Acts and Regulations that include a specific requirement to notify a regulatory authority as a result of pollution, contamination or environmental harm occurring, including impacts to heritage items. Infrastructure and Services (I&S) has defined such incidents as notifiable events.

4.1. Notifiable events

A notifiable event is:

Any environmental incident or non-compliance that triggers a specific statutory requirement to notify a regulatory authority.
For further guidance on the statutory requirements for the notification of environmental harm or pollution refer to the I&S EMS document Environmental Legislation Summary – 2TP-SD-090. Some event types are summarised in Table 1 below.

Table 1 Examples of notifiable events

<table>
<thead>
<tr>
<th>Event type</th>
<th>Legislation</th>
<th>Notification to</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pollution incident</td>
<td>POEO Act</td>
<td>Immediately after becoming aware of the incident to each relevant authority:</td>
</tr>
<tr>
<td></td>
<td>POEO (General) Regulation 2009</td>
<td>• EPA Environment Line</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Local Council</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Ministry of Health (via the Local Public Health Unit)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• WorkCover Authority</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Fire and Rescue NSW</td>
</tr>
<tr>
<td>Land contamination</td>
<td>Contaminated Land Management Act 1997</td>
<td>EPA in writing as soon as practicable after becoming aware of the contamination,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>where required as prescribed in the EPA 'Guidelines on the Duty to Report</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Contamination under the Contaminated Land Management Act 1997'</td>
</tr>
<tr>
<td>Discover aboriginal relic</td>
<td>National Parks and Wildlife Act 1974</td>
<td>Director-General of the Department of Premier and Cabinet in writing within a</td>
</tr>
<tr>
<td></td>
<td></td>
<td>reasonable time after becoming aware</td>
</tr>
<tr>
<td>Discover Aboriginal Remains</td>
<td>Commonwealth Aboriginal and Torres Strait Islander Heritage Protection Act 1984</td>
<td>Commonwealth Minister of Environment in writing as soon as practicable after</td>
</tr>
<tr>
<td></td>
<td></td>
<td>becoming aware</td>
</tr>
<tr>
<td>Discover relic</td>
<td>Heritage Act 1977</td>
<td>Heritage Council in writing within a reasonable time after becoming aware</td>
</tr>
</tbody>
</table>

Further information on reporting pollution incidents to EPA is provided in section 6.4.

5. Incident classification

5.1. Environmental incident

Infrastructure & Services has defined an environmental incident as:

An occurrence or set of circumstances, as a consequence of which pollution (air, water, noise, and land) or an adverse environmental impact has occurred, is occurring, or is likely to occur.

Adverse environmental impact includes contamination, harm to flora and fauna (either individual species or communities), damage to heritage items and adverse community impacts.

Table 2 Examples of environmental incidents

<table>
<thead>
<tr>
<th>Type</th>
<th>Example incident</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air</td>
<td>Odour that travels beyond the site boundary</td>
</tr>
<tr>
<td>Air</td>
<td>Dust exceeding reasonable levels without active management measures in place</td>
</tr>
</tbody>
</table>
### Type | Example incident
---|---
Air | Operation or maintenance of plant in a manner that causes or is likely to cause air pollution
Water | Discharge of water on or off site in a manner that causes or is likely to cause water pollution
Noise | Noise that travels beyond the site boundary as a result of poorly maintained plant or operation of plant in an inefficient manner
Noise | Failure to comply with the approved hours of work
Land | Cause any substance to leak, spill or otherwise escape (whether or not from a container) in a manner that harms or is likely to harm the environment
Land | Spill/deposit material or allow material to be deposited on land in a manner that causes or is likely to cause land pollution
Land | Cause contamination of land
Land | Dispose of waste in a manner that harms or is likely to harm the environment
Flora/ Fauna | Harm or “pick” a threatened species, endangered population or endangered ecological community
Flora/ Fauna | Damage to vegetation, fauna or habitat including watercourses
Heritage | Damage, disturbance, destruction or works to heritage items/relics
Heritage | Damage, disturbance, or destruction of Aboriginal objects or places

Note: an environmental incident may also be an environmental non-compliance.

### 5.2. Environmental non-compliance

An environmental non-compliance is a non-compliance with any condition of approval, license condition or any other statutory approval relevant to the activity and/or area where the activity occurs.

Examples of environmental non-compliances are given in the Table 3 below.

#### Table 3 Examples of environmental non-compliance.

<table>
<thead>
<tr>
<th>Example non-compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Works without the required planning approval</td>
</tr>
<tr>
<td>Failure to comply with a condition of approval</td>
</tr>
<tr>
<td>Works without the required EPL</td>
</tr>
<tr>
<td>Failure to comply with an EPL condition</td>
</tr>
<tr>
<td>Works undertaken without any other required statutory approval</td>
</tr>
<tr>
<td>Failure to comply with any other statutory requirement that does not result in an adverse environmental impact or pollution</td>
</tr>
</tbody>
</table>

Note: an environmental non-compliance is not necessarily an environmental incident.

### 5.3. Environmental issue

An environmental issue is any occurrence or set of circumstances that has the potential to cause or lead to an environmental incident or non-compliance if not rectified.
Environmental issues may be identified during formal or informal inspections undertaken by an alliance, contractor, I&S employee or environmental management representative/environmental representative. Issues identified during inspections (i.e. those conducted by I&S employees or representatives) should be documented using the form: Environmental Site Inspection Report Template – 9TP-FT-307.

For any issues raised, a priority is to be given for action to be implemented, in accordance with the following:

<table>
<thead>
<tr>
<th>Priority</th>
<th>Action required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Immediate</td>
<td>Immediately and closed out on day of inspection</td>
</tr>
<tr>
<td>High</td>
<td>Within 24 hours</td>
</tr>
<tr>
<td>Medium</td>
<td>Within 3 working days</td>
</tr>
<tr>
<td>Low</td>
<td>Within 5 working days</td>
</tr>
<tr>
<td>Other</td>
<td>By the date noted</td>
</tr>
</tbody>
</table>

If any issues raised during an inspection are also considered to constitute an environmental incident and/or non-compliance then this must be noted on the inspection report, including reference to then relevant condition of approval or other requirement. Any such incidents or non-compliances must also be reported separately in accordance with Section 6.

6. Incident and non-compliance reporting

All environmental incidents and non-compliances must be reported to I&S. The environmental incident/non-compliance reporting procedure is illustrated in Figure 1, which includes requirements for verbal notification, recording the incident in the INX system and notification to the regulatory authority for a notifiable event, and EPA in the case of a notifiable pollution incident.

The Environmental Incident/Non-compliance Report – 9TP-FT-101 may be used for reporting in the following circumstances:

- where access to the INX system is not available
- for reporting non-compliances that do not require reporting in the INX system.

6.1. Verbal notification

The I&S EPM and project manager must be notified verbally immediately after the alliance/contractor becomes aware of the incident or non-compliance. The EPM or SME should provide advice to the alliance/contractor on the classification of the incident/non-compliance and whether notification to any regulatory authority is required.

6.2. Incident reporting

Environmental incidents must be reported to I&S within 4 hours of occurring or first being observed. The INX system is accessed via https://tfnsw.inxsoftware.com. Additional details of the incident are to be recorded in the INX system within 48 hours of the incident/non-compliance first being observed. Step by step guidance on how to use the INX system is provided in the I&S document Guide to Environmental Incident and Non-compliance Reporting – Using the INX System – 9TP-SD-005.

The event moderator (generally the SME) shall review the details and assign the incident to the EPM and/or relevant contractor’s personnel (generally their environmental manager) to
manage the incident and complete the preventative/follow-up actions and investigation. Details and completion dates of the actions are to be recorded by the SME and/or EPM and/or the contractor’s personnel who have been assigned the incident/non-compliance in the INX system. The alliance/contractor shall input details and findings for the incident investigation in the INX system if required. The SME shall review the report and close the incident when all the actions are completed.

For an incident related to the discovery of asbestos, the incident is to be recorded in the INX as a safety incident.

A senior safety officer is to assign the incident to both the EPM and the safety officer of the project in order to manage both the safety and environmental aspects of the incident and any associated actions (see Figure 2 on page 14). It is the senior safety officer’s responsibility to close the incident if all actions are completed.

6.3. Notification to regulatory authorities

If an incident or non-compliance is a notifiable event then a report must be provided to the relevant regulatory authority within the timeframe(s) specified by the relevant legislation. For notifiable events other than pollution incidents the alliance/contractor should seek advice from I&S on whether the notification is to be made by I&S or the alliance/contractor.

Requirements for reporting pollution incidents to EPA and other authorities are identified below in Section 6.4.

6.4. Reporting pollution incidents to EPA and other authorities

Pollution incidents which are causing or threatening material harm to the environment must be reported to each of the following authorities immediately after becoming aware of the incident, as required by Section 148 of the POEO Act. The contact numbers for these authorities are:

- EPA Environment Line 131 555
- Local Authority Local Council (specific to area)
- Ministry of Health Public Health Unit via 1300 066 055 (full local area contact details are available on the Public Health Units pages of the NSW Health website)¹
- Workcover Authority 131 050
- Fire and Rescue NSW 1300 729 579

Note: If the situation warranted calling 000 as a first point of notification, you do not need to ring Fire and Rescue NSW again.

Relevant information required to be given to EPA when making a notification is specified in Section 150 of the POEO Act as follows:

(a) the time, date, nature, duration and location of the incident
(b) the location of the place where pollution is occurring or is likely to occur
(c) the nature, the estimated quantity or volume and the concentration of any pollutants involved

(d) the circumstances in which the incident occurred (including the cause of the incident, if known)

(e) the action taken or proposed to be taken to deal with the incident and any resulting pollution or threatened pollution

(f) other information prescribed by the regulations.

You are required to report the information known at the time of making the notification. If the information required by (c), (d) or (e) above is not known at the time of initial notification but becomes known afterwards it must be reported to each authority immediately after it becomes known. Verbal notification must be followed by notification in writing within 7 days of the date on which the incident occurred.

You are not required to report a pollution incident if:

(a) you are aware that the incident has already come to the notice of each of the notification authorities

(b) the incident is an ordinary result of action required to be taken to comply with an environment protection licence, an environment protection notice or other requirement of or made under the POEO Act

(c) the pollution incident involves only the emission of an odour.

Failure to report a pollution incident as required by the POEO Act is an offence.

Where any work or activity is regulated by an EPL, notification of a pollution incident must be made by the licensee. Thus, where the alliance/contractor holds the EPL for the project, notification shall be made by the alliance/contractor.

For any work or activity that is not regulated by an EPL, notification of pollution incidents to EPA shall be made by I&S, unless the alliance/contractor is instructed otherwise by I&S. This includes pollution incidents that occur as a result of pre-construction activities which may be undertaken prior to an EPL being required for a project. Pre-construction activities are determined by the planning approval and may include, for example, geotechnical investigations, surveys or fencing.

6.5. Incident investigations

Incident investigation should be completed for all environmental incidents logged in the INX system. The scope of the investigation is determined by the moderator of the incident in the INX system.

6.5.1. Incident investigation

Incident investigation is to be completed using the Investigation tab in the INX system, with reference to any investigation reports, attached using the document tab. The Investigation tab includes four sections.

1. Sequence of events
   This section is to record the sequence of events that led to the incident.

2. Findings
   Given the sequence of events, what are the key findings of the investigation (i.e. what are the main causes of the incident).

3. Management methods
4. Key learnings

What can we learn from this investigation into the incident? Are there any elements of this incident investigation that can be or need to be shared with other projects or the wider I&S as a Lessons Learned process, environmental alert or similar?

Further guidance is provided in Guide to Environmental Incident and Non-compliance Reporting – using the INX System – 9TP-SD-005.

6.5.2. Root cause analysis

Root cause analysis must be undertaken for incidents with a risk rating of high and above, and for other lower risk incidents where determined by the incident moderator. The Root Cause Analysis Checklist is presented in Appendix 1 and is located as a template checklist in the Procedures section of the INX system.

The Root Cause Analysis Checklist is designed to assist in the identification of the causal factors that contributed to the incident and provides the information to be included in the Findings section of the Investigation tab.

When this template is completed it must be attached to the Document tab of the INX system.

Further guidance is provided in Guide to Environmental Incident and Non-compliance Reporting - using the INX System – 9TP-SD-005.

6.6. Relationship to I&S Crisis Management Procedure

Incidents which are likely to cause major damage to the environment will be managed in accordance with the Significant Incident Management Procedure - I&S Delivered Infrastructure & Fleet Projects 1TP-PR-008. Determination of whether the environmental incident requires the activation of a crisis management team will be made by I&S in accordance with the assessment process and activation/escalation triggers identified in Sections 6.1-6.3 of the Crisis Management procedure.

7. Related documents and references

<table>
<thead>
<tr>
<th>Related documents and references</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Management System Manual – 1TP-ST-052</td>
</tr>
<tr>
<td>Environmental Site Inspection Report Template – 9TP-FT-307</td>
</tr>
<tr>
<td>Environmental Incident/Non-compliance Report – 9TP-FT-101</td>
</tr>
<tr>
<td>Guide to Environmental Incident and Non-compliance Reporting – using the INX System – 9TP-SD-005</td>
</tr>
<tr>
<td>Safety and Environmental Incident Report 90-FT-002</td>
</tr>
<tr>
<td>Significant Incident Management Procedure - I&amp;S Delivered Infrastructure &amp; Fleet Projects 1TP-PR-008</td>
</tr>
<tr>
<td>Environmental Legislation Summary – 2TP-SD-090</td>
</tr>
</tbody>
</table>
I&S Alliance / Contractor

Implement immediate corrective action to prevent/minimise environmental harm

Report environmental incident/ non-compliance verbally to Transport Projects' EPM & Project Manager immediately

Is incident/non-compliance a notifiable event?

Yes

Is incident a pollution incident?

Yes

Does the Alliance/Contractor hold an Environment Protection Licence (EPL) for the project?

No

Notify EPA and other required authorities immediately

No

Seek advice from I&S on whether notification is to be made by I&S or Alliance or contractor

Notify EPA and other required authorities immediately

Is incident/non-compliance a notifiable event?

Yes

Report notification orally to I&S Project Manager and SME or other as agreed

Enter details of the incident/non-compliance in INX System within 24 hours of incident/non-compliance.

Investigate incident/non-compliance/ environmental issue & implement preventative actions in accordance with the allocated priority.

Enter any additional information into INX System including responses to I&S requested information or actions within 48 hours of observing the incident/non-compliance.

For notifiable event provide Written Report to EPA within 7 days of notification or to other regulatory authority as required.

Close out incident / non-compliance.

Infrastructure and Services (I&S)

Advise ADEM & EMR

Provide advice on incident classification & notification requirements

Advise Legal Counsel and relevant PD

Advise relevant Project Director of notification

Review details of the incident in the INX System and provide advice on incident investigation as required

Enter additional details of the incident in INX System

For notifiable event, provide written report to EPA within 7 days of notification, or to other regulatory authority as required

LEGEND

CRM: I&S Compliance Reporting Manager
EM: Alliance/Contractor Environmental Manager
EPM: I&S Environment Planning Manager
EMR: Environment Management Representative
PD: I&S Project Director
PM: Alliance/Contractor Project Manager
ADEM: I&S Associate Director Environment Management
SME: I&S Senior Manager Environment
I&S: Infrastructure and Services

*Note:
1. The observer may be an employee of Transport NSW, contractor, alliance or other.
2. Contractor/alliance to procure specialist advice or equipment as necessary.
3. Authorities required to be notified are listed in section 6.5.
4. Not required if written report is to be submitted by Transport NSW.
5. Only where notification is made by Transport NSW as required by EPL, or as otherwise requested by EPA.

Figure 1 Environmental incident/non-compliance reporting procedure
Incident/event reported as a safety event in INX System

Moderator (Safety) assigns event to Safety ERM and Environment ERM

Safety ERM to manages Health & Safety aspects of the event

← Communication →

Environment ERM manages environmental aspects of the event

Moderator to close the event report

Figure 2 Reporting asbestos find process
# Appendix 1 Root Cause Analysis Checklist

## Environmental factors / work site description (Tick all that apply)
A description of the immediate and surrounding environment that are contributing factors to the incident or event

<table>
<thead>
<tr>
<th>Sensitive receptors / receiver</th>
<th>High winds</th>
<th>Vibration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lighting/ light levels</td>
<td>Snow / Ice</td>
<td>Noise</td>
</tr>
<tr>
<td>Surface water / storm water or natural drainage</td>
<td>Rain</td>
<td>Vegetation or ecology</td>
</tr>
<tr>
<td>Groundwater</td>
<td>Heat/humidity</td>
<td>Fauna or fauna habitat</td>
</tr>
<tr>
<td>Geology and soils</td>
<td>Slippery surface</td>
<td>Trip hazard</td>
</tr>
<tr>
<td>Access and transport</td>
<td>Signage</td>
<td>Other (specify)</td>
</tr>
</tbody>
</table>

Specifically describe how the factor contributed to the occurrence.

## Equipment / tools (Tick all that apply)
Identify what equipment was being used and how it contributed to the incident occurrence

<table>
<thead>
<tr>
<th>Type of equipment 1 (Specify make and model)</th>
<th>Type of equipment 2 (Specify make and model)</th>
<th>Type of equipment 3 (Specify make and model)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equipment malfunction</td>
<td>Inappropriate equipment</td>
<td>Pre-operation checks</td>
</tr>
<tr>
<td>Faulty equipment</td>
<td>Maintenance schedule</td>
<td>Incorrect use</td>
</tr>
<tr>
<td>Instruction/training on use on equipment</td>
<td>Safety device bypassed / lack of guarding</td>
<td>Unsafe equipment use</td>
</tr>
<tr>
<td>Operated beyond specifications</td>
<td>Difficult to use</td>
<td>Not trained on equipment</td>
</tr>
<tr>
<td>Inappropriate / inadequate storage or stowage</td>
<td>Design / controls site layout problem</td>
<td>Operator not familiar with equipment</td>
</tr>
<tr>
<td>Other (specify)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Specifically describe how the factor contributed to the occurrence

### Communication and training (Tick all that apply)

Identify what training, information and communication occurred or did not occur that contributed to the incident

<table>
<thead>
<tr>
<th>Appropriate formal training</th>
<th>Refresher training</th>
<th>Pre start briefing or tool box talk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shift debriefing / handover</td>
<td>Risks and hazards identified / communicated</td>
<td>Induction</td>
</tr>
<tr>
<td>Confusing message</td>
<td>Incomplete message</td>
<td>Hand signals</td>
</tr>
<tr>
<td>Language barrier</td>
<td>Accent difficulties</td>
<td>No communication</td>
</tr>
<tr>
<td>Communication method / type</td>
<td>Speech issues</td>
<td></td>
</tr>
</tbody>
</table>

Other (specify)

Specifically describe how the checked factor contributed to the occurrence

### Procedures / task instructions (Tick all that apply)

What procedures applied to the task, were they appropriate and were they understood and followed?

<table>
<thead>
<tr>
<th>Procedure not correct for task or non existent</th>
<th>Procedure not documented</th>
<th>Procedure not communicated</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Deviated from procedure</td>
<td>Procedure not trained</td>
<td>Procedure or training not reinforced</td>
<td></td>
</tr>
<tr>
<td>Not familiar with procedure</td>
<td>Procedure / Task too difficult</td>
<td>New procedure or task or recent task change</td>
<td></td>
</tr>
<tr>
<td>Failed to plan for task</td>
<td></td>
<td>Other (specify)</td>
<td></td>
</tr>
</tbody>
</table>

Specifically describe how the checked factor contributed to the occurrence (point form) (mandatory if box ticked)
### Individual factors (Tick all that apply)

<table>
<thead>
<tr>
<th>Fatigue</th>
<th>Stress</th>
<th>Peer pressure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Body size or strength</td>
<td>Personal event</td>
<td>Workplace distraction / interruption</td>
</tr>
<tr>
<td>Memory lapse (forgot)</td>
<td>Situational awareness (failed to identify hazard or risk)</td>
<td>Time constraints</td>
</tr>
<tr>
<td>Failure to adhere to policies or procedures</td>
<td>Job / task experience</td>
<td>Physical health / medical condition (hearing / sight / other)</td>
</tr>
<tr>
<td>Other (specify)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Specifically describe how the checked factor contributed to the occurrence (point form) (mandatory if box ticked)

### Leadership / supervision (Tick all that apply)

Identify what leadership or supervision factors were relevant or contributed to the incident occurrence

<table>
<thead>
<tr>
<th>Planning / organisation of task</th>
<th>Prioritisation of task</th>
<th>Delegation of task</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unrealistic attitude or expectation</td>
<td>Amount or availability of supervision</td>
<td>Responsibility not assigned to task</td>
</tr>
<tr>
<td>Communication of requirements</td>
<td>Coordination of task</td>
<td>Workload management</td>
</tr>
<tr>
<td>Other (specify)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Specifically describe how the checked factor contributed to the occurrence

### Organisational/culture factors (Tick all that apply)

Identify if any organisational / organisation cultural factors were relevant to the incident.

<table>
<thead>
<tr>
<th>Provision of resources – people</th>
<th>Provision of resources – other</th>
<th>Corporate change or restructure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Previous corrective / preventive actions or other audit findings</td>
<td>Normal or accepted practice</td>
<td>Complacency with work processes</td>
</tr>
<tr>
<td>Other I&amp;S policies or directives (specify)</td>
<td>Conflicting policies or procedures</td>
<td>Risk / hazards not properly identified</td>
</tr>
<tr>
<td>Financial constraints</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Specifically describe how the checked factor contributed to the occurrence