

Purpose

The purpose of this procedure is to identify near misses or environmental incidents and report their occurrence so that corrective and preventive actions may be taken to:

1. minimise environmental or health effects
2. maximise efficiency and effectiveness of corrective actions
3. prevent recurrence of such incidents or ‘near misses’ for the future.
4. ensure appropriate dissemination of information to the correct people or agencies.

Scope

This procedure applies to any unplanned event that occurs where;

1. It impacts upon the site environment (either short-term or long-term)
2. It impacts on the site’s environment and impacts on the environment beyond the boundaries of the site (either short-term or long-term)

For the purposes of this procedure, a near miss can be considered as any event resulting in release of a potentially polluting substance where environmental damage has not occurred but may have occurred if prompt action had not been taken: e.g. a person knocks over a drum of clean water, or sludge is spilled on a sealed surface but is cleaned up immediately and no further polluting effects have occurred.

In both these examples an unplanned event has occurred but due to either the nature of the materials spilled, or due to the prompt action taken for a local spillage on a sealed surface there has been no polluting effect.

However, in the event that the liquid spilled was acid, or that the sludge spilled had not been cleaned up promptly or spilled on a surface where floor integrity was compromised then the likelihood of environmental pollution is real – this pollution may either be contained on site and/or leave site, but in any case it is an environmental pollution incident.

Health & Safety

All Environmental incidents have the potential to impact on a person’s Health & Safety – spillages creating slip, trip hazards or exposure to harmful substances as two examples.

Risk assessments & COSHH Assessments are undertaken to determine the likely impact on Health & Safety as well as identifying all measures necessary to protect Health & Safety of employees and the public.

All personal protective equipment, respiratory protective equipment and engineering/procedural controls shall be maintained and inspected on a weekly or monthly basis to ensure that health & safety of all persons is preserved.

Responsibilities

Position	Responsibility
QHSE Department	<ul style="list-style-type: none"> • Investigating causes of environmental incidents and near misses, and environmental complaints. • Reporting findings to the Company Directors and/or Environment Agency. • Identifying potential problems and making recommendations for improvements to prevent recurrence.
Heads of Department	<ul style="list-style-type: none"> • Acting to correct and prevent incidents and near-misses • Coordinating resources to reduce environmental impact of any pollution incident or potential pollution incident. • Report environment incidents to the Environment Agency outside/within normal working hours.
All staff	<ul style="list-style-type: none"> • Operating plant/processes in accordance with written rules, procedures, etc... • Shut down operating plant/processes as safely/quickly as possible where an environmental incident has occurred. • Report as soon as possible to any management representative of the company that can be contacted.
Directors	<ul style="list-style-type: none"> • Review corrective/preventive actions at regular monthly intervals. • Investigating incidents/complaints linked to product/process performance. • Providing resources to prevent recurrence of incidents and/or near misses.

Environmental

Ensure environmental aspects, or environmental control measures are re-assessed in line with:

- Findings from incident / near-miss investigations
- Proposed changes to working processes, practices or plant & equipment.

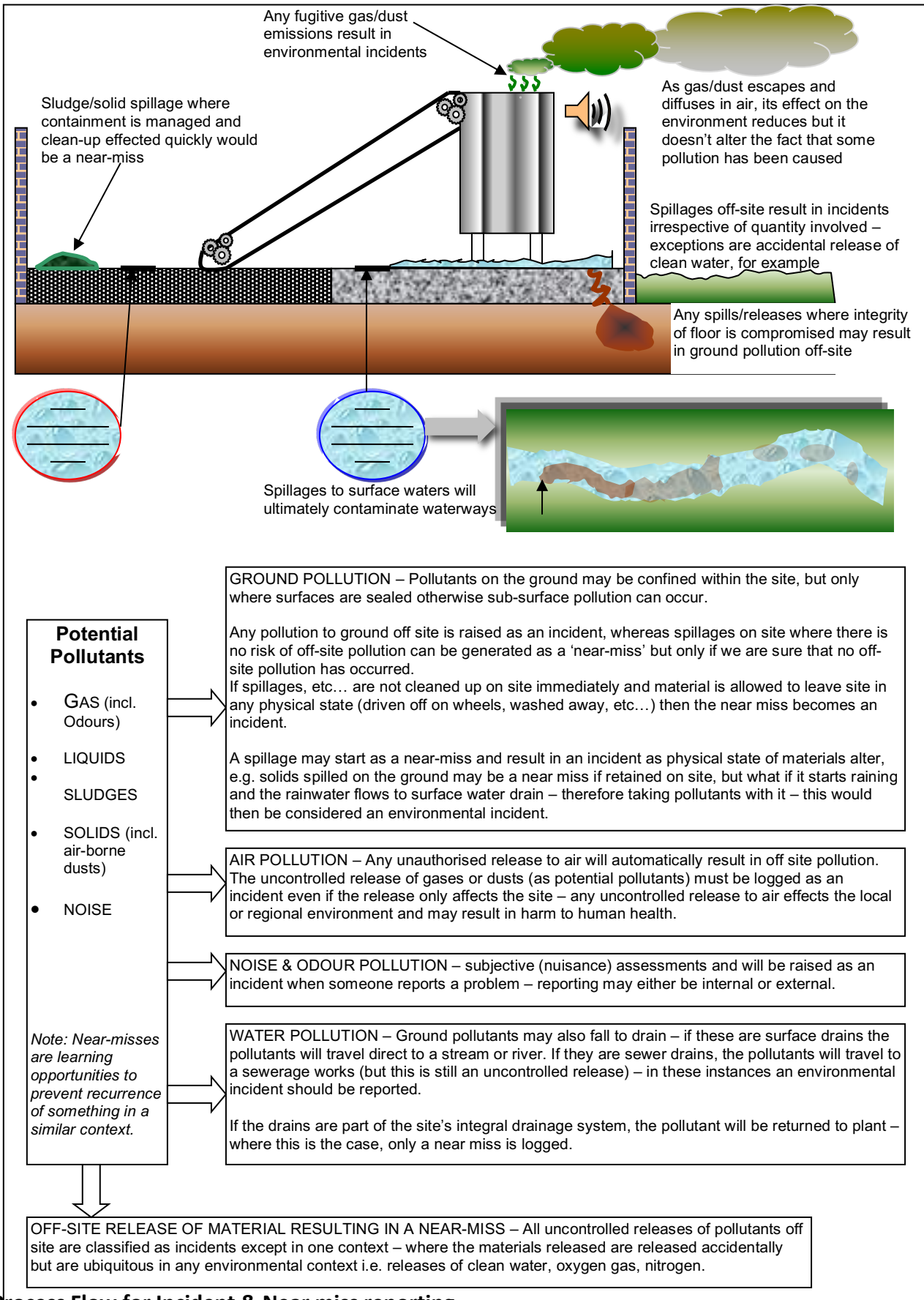
Ensure that all environmental control measures are in place and working for maximum preparedness in the event that an incident or near-miss should occur.

Records

IT Spreadsheet Recording Platform
Non-conformance & Complaints register;
Complaints record.

So how do we pollute the environment?

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Process Flow for Incident & Near miss reporting

