



CS ENERGY PROCEDURE FOR  
**ENVIRONMENTAL INCIDENT MANAGEMENT**  
**CS-EMSP-4**

Responsible Officer: Portfolio Environment Manager

Approved: GM Portfolio Services

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## 1. Purpose

The purpose of this document is to outline the minimum requirements for establishing an environmental incident management process.

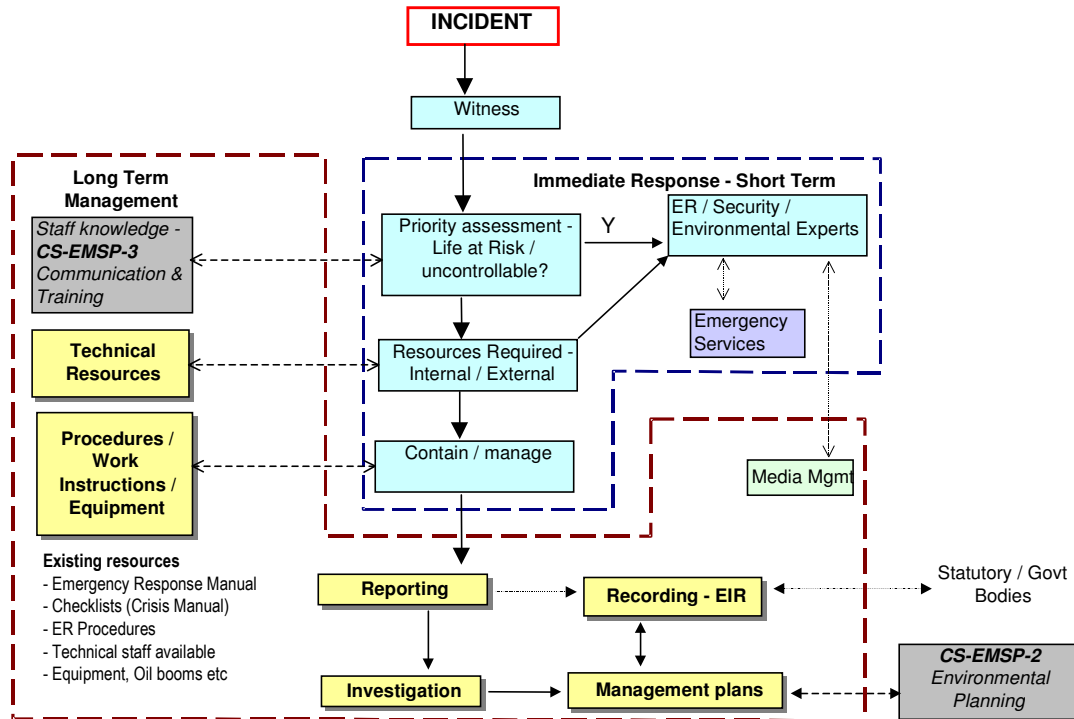


Figure EMSP-4: Environmental Incident Management Flow Diagram.

## 2. Scope

This procedure applies to the management of environmental incidents occurring on or extending off site. Incidents include complaints from people external to the business. It does not specify the requirements for managing Health and Safety incidents, however it does describe the links/relationship with the management process for Health and Safety incidents.

## 3. Actions

The Incident Management System comprises the following elements:

### 3.1 Incident Management Training

It is a requirement that staff are able to:

- Identify what is an environmental incident - refer to EMS Manual, Section 8.1;
- Take appropriate immediate action to control an incident; and
- Know the reporting requirements.

Refer also to CS Energy Corporate procedures CS-IM-1 Incident Management which covers health, safety, environmental and operational incidents and CS-IM-2 Crisis Management.

Information provided to staff must reflect the following hierarchy in their immediate response to an incident.

- Ensure Health & Safety first;
- Shut off the source if possible;
- Contain contaminants;
- Report; and
- Clean up.

### **3.2 Incident Management Resources and Documentation**

Incident management procedures should be appropriate to:

- The site;
- Scale of the environmental incident (i.e. Category 1 to 4);
- Resources available; and
- Geographical location and sensitivity of receiving environment.

Examples of resources, documentation and procedures are detailed below.

#### **Resources and Documents**

- Technical information on contaminants e.g. Material Safety Data Sheets, ChemAlert database, environmental effects, site specific disposal options.
- Site plans/maps showing relevant information e.g. drainage, hazardous substances locations and quantities.
- Contact information for emergency services and external specialists/resources.
- Environmental Issues Register information.

#### **Procedures/ Work Instructions**

- Checklists (Action cards specific to an officer's role and responsibilities) shall be prepared that detail staff responsibilities, actions to be taken and notification requirements.  
*(NB: Ensure that checklists cover staff such as security, operating staff, line management, technical specialists, media liaison officer)*
- Procedures shall be prepared that detail site-specific response actions.

### **3.3 Corrective and Preventive Action Process**

It is a requirement that a system be established to manage incidents in the longer term to ensure that appropriate follow up action is completed with the aim of improving environmental performance. The elements of the system are:

- Reporting and recording;
- Investigation; and
- Corrective actions including action plans.

## **Reporting incidents – immediate response**

The minimum information to be collected or requested on an environmental incident should meet the requirements of the site's environmental approvals and may include:

- Witness name(s);
- Date and time of incident or when discovered;
- Description of the incident or complaint details; and
- Initial action taken to prevent impact, contain material or respond to complaint.

## **Investigation and long term management**

Once an incident has been controlled and initial information from witness recorded, the following events must occur and be recorded:

- Incident investigation report as per CS-IM-1 (Incident Management Procedure);
- Future actions required by management or environmental staff for prevention; and
- Any specific statutory authority notification details.

Long term management of an incident or the cause of an incident is to be managed in accordance with the CS-EMSP-2: Developing Environmental Planning. Under this procedure long-term management is to be attributed to Environmental Issue Management Plans or Risk Management Plans.

## **Recording of incidents – EIR - All Incidents (& Complaints)**

All Environmental Incidents are to be entered into the EIR and linked to an Environmental Issue where possible.

To do this the following steps must be undertaken:

- Enter the incident details into the EIR as a new incident.
- Identify an existing issue from the EIR or log a new issue according to the process outlined in the EMS Procedure Environmental Issues Identification.
- Link the incident to the selected issue.
- Set/enter actions as required.

## **Reporting of Incidents**

Some environmental incidents or activities causing or threatening environmental harm are reportable to the Department of Environment and Resource Management (DERM). This may be either as a condition of the site environmental approvals or in accordance with Section 320 of the Environmental Protection Act. In such cases the Site Environmental Coordinator in consultation with the Portfolio Environmental Manager prepares the report which is authorised for dispatch to the DERM by the Site Manager.

All procedures relating to incident management will be reviewed after an incident where procedures are found to be deficient and any deficiency corrected.

### **3.4 General Environmental Duty**

The *Environmental Protection Act* (Section 319) imposes a General Environmental Duty on all employees, namely that “ A person must not carry out any activity that causes, or is likely to cause, environmental harm unless the person takes all reasonable and practicable measures to prevent or minimise the harm.”

CS Energy employees are authorised to take whatever action is necessary to meet their Environmental Duty.

Power Station operators have a specific duty to operate plant within environmental approval limits.

## **4. Responsibilities**

In addition to the responsibilities below, further responsibilities for environmental incident management are included in Section 6 of Procedure CS-IM-1.

### **4.1 General Managers**

- Approval and allocation of resources for incident management and close-out.

### **4.2 Line Managers**

- Manage activities under their control to comply with policies, procedures and environmental approval limits.

### **4.3 Portfolio Environmental Managers**

- Updating of procedure in accordance with changes in policy.
- Implementing requirements of this procedure.
- Providing technical advice / liaison with government departments.

### **4.4 Site Environmental Coordinator**

- Entering plans / actions into the Environmental Issues Register (EIR).
- Providing technical advice / liaison with government departments.
- Review of site incident management procedures as required and after incidents.

### **4.5 Power Station Operators**

- Operate plant within environmental approval limits.

### **4.6 Employees and Contractors**

- Following site procedures including environmental procedures.
- General requirement to prevent environmental harm.
- Control and report incidents.

## **5. Review**

The following items are described in CS-EMSP-7 Environmental Audit, Review & Performance Evaluation:

- The EMS Audit Program encompasses the checking of this document;
- Incidents are collated and reported as part of the Environmental Issues Review; and
- Incidents are collated and reported to corporate environmental management on a monthly basis.

## 6. Auditable Outputs

The following items are outputs of this procedure:

- EIR Report – Log of Environmental Incidents

## 7. Definitions

Definitions to the following are found in the EMS Manual Glossary: Environmental Incidents, Environmental Issue, EIR (Environmental Issues Register), Contaminant, and Environmental Issue Management Plans (EIMPs).

## 8. Reference Documentation

CS Energy / General	QA Doc No.	Location
EMS Procedure – Developing Environmental Planning	EMSP-2.doc	K:\Corprocs1\Environment
EMS Procedure – Environmental Communication & Training Process	EMSP-3.doc	K:\Corprocs1\Environment
EMS Procedure - Environmental Audit, Review & Performance Evaluation	EMSP-7.doc	K:\Corprocs1\Environment
Incident Management	CS-IM-1	K:\Corprocs1\PlantManagement\IncidentManagement
Crisis Management	CS-IM-2	K:\Corprocs1\PlantManagement\IncidentManagement
Environmental Legal Compliance Manual		Intranet – Environmental Management
Environmental Protection Legislation	N/A	<a href="http://www.legislation.qld.gov.au/OQPChome.htm">http://www.legislation.qld.gov.au/OQPChome.htm</a>
Health & Safety Manual		Issued in hard copy
ChemAlert	Chem Alert 3	Intranet – Health & Safety

## 9. Attachments

None

## 10. Document History

Issue Date	Nature of Changes
27.1.1999	Original Issue
17.5.2000	Updated responsibilities
3.7.2000	New Section 3.4 General Environmental Duty
28.8.2000	Added diagram
17.11.2000	Added Review and Auditable outputs
24.11.2000	Minor editorial changes, Expanded Section 3.3 Reporting of Incidents
16.02.2001	Update Document History

31.10.2001	Mica Creek reference documentation updated, Corporate IM procedures referenced, legislation references added
18.11.2002	Reference to ChemAlert, minor changes to titles, minor editing.
25/11/2003	Minor editing, review of responsibilities
04/06/2005	Section 4 – Responsibilities - responsibilities of Line Managers and Power Station Operators; change to responsibilities for employees; document owner; minor editing; updated Reference Documentation including reference to CPM Env Mgt Implementation Plan.
19/04/2006	Update to ISO 14001:2004; clarification and amendment to Section 3.2; reference to CS-IM-1 responsibilities in Section 4; update organisational titles; include contractors in Section 4.6; minor editing.
6/07/2009	EPA replaced with DERM; references to site-specific documentation removed; references to 'licence' or 'authority' changed to 'approval'; update organisational titles; minor editing.