

Incident Categorisation Guidance Guidance Note GN019 superseded OGN102 – Amendments Oct 2017

Introduction

Our Incident Categorisation Operational Guidance Note 102 was issued on 1st April 2017 and is a 'live' document subject to ongoing review to resolve issues. OGN102 has been superseded by Guidance Note GN019.

Background

In the first few months of using OGN 102 a number of issues have been raised and considered (see further below), the most significant of which is the definition of an 'Event', with particular respect to water industry incidents, and how it relates to legacy incident category 4.

There has been a significant amount of correspondence on this topic, including

- staff consultation
- water quality, I&E and incident policy workshops.
- training presentation prepared – shared with Operational, Water Quality and I&E staff for input and comment
- discussions externally with Water Company.

Amendments for Oct 2017

1 Change to Event definition

- **Event (E)** - an Event is an occurrence or observation notified to us, but which has no environmental impact, and **only minimal or** no operational impact and thus does not merit a High or Low level response e.g. a fallen tree across a footpath on our land.

Amendment: addition of the words *only minimal* regarding operational impact, which equates to routine work (required to validate no environmental impact) for such occurrences.

2 Changes to briefing table

Table showing differences in terminology			
Pre April 2017 Description	Post April 2017 Description	Legal definitions for final impact categorisation	External Description
1	High level Incidents	Major, Persistent, Extensive, Significant	Major
2			Significant
3	Low level Incidents	Minor	Minor
4	Event	-	No Environmental Impact/Routine operational work
-	Unsubstantiated	-	No evidence of event having occurred
-	Not of Interest	-	Not something we are interested in

Amendment: realignment of briefing table to clarify a legacy 'category 4' incident categorisation equates to an 'event'.

3 Other amendments

3.1 Amendment to definition of 'Complaint', to add the following text:

NOTE: Any reported occurrence including dust, noise or odour reports pertaining to EPR facilities regulated by NRW (e.g. industrial installations or waste facilities) must not be recorded as "complaints" on WIRS. These must be recorded as an "Incident" and assessed accordingly.

3.2 Add the following text to section A1.8 *Impact on water, including fish kills*, under *High/Significant*

- *non-hazardous pollutants exceed the relevant environmental standards applicable to that groundwater beyond 50 metres.*

3.3 Section A1.3 *Impact on nature conservation and biodiversity*, amend the item

- *implications under the Environmental Damage Regulations*

to be

- *implications under the Environmental Damage Regulations, including dredging, straightening or altering the course of a watercourse, or works to the bed or banks of a watercourse*

3.4 Section 8 *Substantiated and unsubstantiated reports*, after the second paragraph add the sentence

Note that an environmental permit amenity condition non-compliance has to be substantiated by an NRW officer.