

BC Timber Sales Environmental Management System ENVIRONMENTAL OPERATING PROCEDURE - 04

EMS Incident Reporting and Investigation

SCOPE/PURPOSE: The scope of this environmental operating procedure (EOP) applies to significant environmental events associated with activities/operations within the scope of BCTS Environmental Management System (EMS) including harvesting, silviculture, access, and planning. The purpose of this EOP is to outline BCTS staff procedures and responsibilities for EMS incident reporting and investigation.

EMS INCIDENT REPORTING REQUIREMENTS:

- 1. Emergency Response Incidents:
- Fire: Any uncontrolled fire related to BCTS activities.
- Spills: Any spill exceeding BCTS reportable levels, or any amount spilled into or immediately
 adjacent to a stream, lake or running water.
- Erosion/Landslide Events: Any emergency or potential emergency, including abnormal soil
 movement or sedimentation creating a significant risk to the environment or public safety,
 movement, or an imminent risk of movement of a volume of material greater than 250 m3,
 or disturbance through erosion processes of a land area greater than 0.25 ha.
- Disruption to domestic/community water supply.
- Previously unidentified resource feature, resource value or sensitive area is found (e.g., species of management concern, bear den, wildlife habitat feature, culturally modified tree).

2. Potential Non-compliance:

• In the opinion of the person reporting, legislation and regulation has been violated and there may be an agency investigation to determine fact and possible enforcement action.

3. Significant Non-conformance:

- An occurrence or event that has or will likely result in a negative environmental impact and cannot be immediately rectified.
- When the EMS program has been severely compromised and or a "Notice to Comply" has been issued at the discretion of local management. This includes repeated nonconformances that may become significant.

Reportable Levels				
Substances	BCTS	EMBC		
Antifreeze	25 litres	25 litres		
Diesel fuel	25 litres	100 litres		
Gasoline (auto & saw)	25 litres	100 litres		
Greases	25 litres	100 litres		
Hydraulic Oil	25 litres	100 litres		
Lubricating Oils	25 litres	100 litres		
Methyl Hydrate	5 litres	5 litres		
Paints & Paint Thinners	25 litres	100 litres		
Solvents	25 litres	100 litres		
Pesticides	1 kg or	1 kg or		
	1 litre	1 litre		
Explosives	Any	Any		

C	conformances that may become significant.				
	PROCEDURE:	RESPONSIBILITY			
T A - Initial Report	 Initial Incident Identification For BCTS clients, notify any incidents (as defined above) to project supervisors and BCTS representatives within 48 hrs. BCTS staff, notify any incidents to BCTS woodland supervisor (WS), certification standards officer (CSO) and woodland manager (WM) within 48hrs. Take immediate corrective action to mitigate impacts to the environment. 	Clients/Staff			
CHK-009 PART A - In Incident Report	Complete CHK-009 Part A Initial Incident Report within 48 hrs of occurrence being reported. Submit report to BCTS representative or WS, WM and CSO.	Clients / Staff			
CHK-0	For an emergency response incident, ensure appropriate agencies (e.g., C&E, EMBC, BCWS, DFO, ABCFP) have been notified and ensure the reporting licensee / permittee / contractor or BCTS staff member has followed the requirements of the business area Environmental Emergency Response Plan.	Clients / Staff			
CHK-009 PART B - Preliminary Investigation	Complete CHK-009 Part B Preliminary Investigation for all reported incidents within 7 days of initial report. Purpose of preliminary investigation is to determine if full investigation under Part C CHK-009 is required. This section is to be discussed jointly and completed by BCTS WS, WM, CSO or designate, where possible. Determine if further investigation is necessary from reported information. CHK-009-Part C-Full Incident Investigation is required if the following apply: ✓ Any reported emergency response events associated to BCTS activities, i.e., Fires/Spills, Erosion/Landslide as identified above and outlined in CHK #09. ✓ Potential non-compliances or significant non-conformances associated in any way to BCTS activities (Roads, Harvesting, Planning/Development, Silviculture). ✓ There's a potential opportunity for continuous improvement to BCTS/BA standards or systems. Assign investigation (Team) including investigation responsibilities and target date for completion based on complexity and severity of occurrence/event and include risk and consequence. Investigation roles include lead and support. Ensure appropriate regulatory agencies (e.g., C&E, EMBC, BCWS, DFO, ABCFP) have been notified. If a full investigation is not required, provide a rationale for not conducting full investigation and complete CHK-009 -Part B. Incidents that don't have a significant impact on the environment, (i.e., Timber Transport and Marking) or incidents that can be immediately rectified (i.e., industrial waste left on site or a blocked cross drain culvert) don't require root cause investigation, but one may be initiated if it is a repeat or chronic issue. Record Management / Data Base ✓ Follow BA record management protocols accordingly. ✓ Timely update certification data base. ✓ Obtain LRM Issue ID#.	BCTS Staff only WS, WM & CSO			

	PROCEDURE:	RESPONSIBILITY
CHK-009 Part C – Full Incident Investigation	Complete CHK-009-Part C Full Incident Investigation report. Best practice is to complete report within 45 days, rationalize if extended timeline is needed. Conduct Full Incident Investigation to determine root cause and assess: Immediate actions undertaken and proposed to be undertaken to address impacts. Details of the incident including a timeline, contributing factors and root cause(s). Utilize root cause analysis techniques. Adequacy of response measures including training, equipment capabilities, procedures, etc. Licensee, permittee, contractor and company conformance to procedures or instructions. Control of impact including timeliness of response. Develop recommendations for appropriate corrective and preventative actions identifying: Immediate actions to address impacts. Measures to prevent re-occurrence Actions to address root cause(s). Present investigation report and recommendations to manager or designate.	Assigned Investigation Team
	 BCTS Manager or designate approves investigation report Approves report findings, and recommendations, Assigns & communicates roles and responsibilities including target dates for implementation and completion of actions. Responsibilities, timelines, and verification of completion of actions. Signs off final report, update CHK-009 Part C 	Assigned Manager or designate
	Record Management / Certification Data Base Follow BA record management protocols accordingly update records Timely update certification data base (details of investigations including status of corrective and preventative actions)	Assigned Investigation Team
СНК-009 Ра	 Implementation of Corrective and Preventative Action and Follow-up Updates records as per record management protocols, including required entry into LRM tracking system LRM User Guide https://intranet.gov.bc.ca/for/bcts/information/business-applications/lrm-reference-materials At BA's discretion, document completion of all actions under CHK-009 Part C, corrective & preventative action tables. Completes actions as per established target dates. Compiles necessary documentation/records to demonstrate completion. Communicates completion of actions to others. 	Assigned Personnel
	 Monitoring Incident, action plan for closure Actions and incident records are tracked to completion. Update LRM action plans accordingly. Action plan completion dates can be documented on CHK-009 Part C. If necessary, communicate out summary report to staff (best practice is to run regular ITS and action plan reports). 	WS, WM, CSO