

Environment Protection Authority

# Transport Emergency Response Planning for Dangerous Goods

August 2023



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Transport emergency response planning is a key requirement for transporters of dangerous goods. This document provides guidance on how to prepare a transport emergency response plan.

Advance preparation increases the chance that incidents will be effectively managed and will reduce any negative impacts on the community and environment.

# 1. Introduction

A transport emergency response plan (TERP) deals with dangerous situations to minimise the impact on people, the environment and property. You need a TERP to meet your legislated duties.

Dangerous incidents are often chaotic. Having a TERP will make sure everybody knows their role, what needs to be done, the information they need to gather and resources to deploy. It should include training and exercises and is a “living document” which needs to be reviewed regularly.

A well-designed TERP will account for the profile of the transport organisation. The types of goods, quantities, packaging, vehicles used, and locations serviced are all relevant. For example, a line-haul mixed freight transporter needs a different TERP to a transporter of bulk petroleum products. Dangerous goods transport legislation prohibits prime contractors and rail operators from transporting placard loads – and persons from consigning placard loads – without an emergency plan. A prime contractor (or rail operator) is expected to provide information and resources that relate to the vehicle – and the load that is on the vehicle – at the time of the incident. The consignor is expected to be able to advise on the properties of the dangerous goods being transported, including the packaging the dangerous goods are transported in.

A lack of preparation means people make up their response as events unfold, which slows down the response, impacting on emergency services and the community. A TERP provides a more effective incident response, less downtime and lower costs to you, insurance companies and other road (or rail) users.

Under section 177 of the Dangerous Goods (Road and Rail Transport) Regulation 2022 (Dangerous Goods Regulation), a prime contractor or rail operator must not transport a placard load – and a person must not consign a transport load for transport – if they do not have an emergency plan for the transport of the goods. The maximum penalty for non-compliance is 40 penalty units for an individual or 200 penalty units for a corporation.

Note: This document does not introduce any new duties or obligations on prime contractors, rail operators and consignors in the dangerous goods transport industry. If you need to prepare a TERP, it will help in providing plain language guidance on preparing the TERP, and if you already have one you can review it against this document to identify areas for improvement.

## **There are completed examples of templates throughout this document**

These can be used for your own TERP. You don't have to use the EPA's templates, but if you want to, blank copies are available from the EPA's website. They are intended to help relatively simple transport operations to cover likely scenarios.

For more complex operations, these templates won't be enough. In these cases, you might need to employ or engage someone with more extensive skills and experience in developing a transport emergency response plan, if you do not already have someone available for this.

With the exception of the phone numbers for emergency services, the EPA and Safework, the phone numbers used in these templates will not connect. You must use phone numbers that are relevant for your operation.

# 2. Developing and implementing a TERP

## 2.1. Dangerous goods business profile

For the TERP to be useful, it needs to be tailored to the needs of the business. For smaller businesses, you may find the template at Appendix F to be useful. Larger businesses, with more complex operations, will probably need multiple plans and even sub-plans.

At the end of this section, you should understand:

- What types and volumes of dangerous goods do you transport?
- When and where do you transport the dangerous goods?
- What kinds of incidents can happen, and what are the likely effects if the dangerous goods are involved in an incident?

## 2.2. What dangerous goods are transported?

- What kinds of dangerous goods does the business transport? (Some dangerous goods have hazards that make them far more difficult to manage in an incident.)
- How many vehicles does the prime contractor operate?
- What packagings are used for the dangerous goods?
- What volumes of dangerous goods are transported?
- Are there placardable units being transported?
- Are there seasonal changes in the dangerous goods transport?
- What is the staffing profile of the business? (A business that employs a lot of casual staff will need to consider what kinds of training are provided to these staff.)

## 2.3. When and where are the dangerous goods transported?

- Where are the dangerous goods transported?
  - Are they transported to remote areas where contact and services are more challenging?
- Is there seasonal variation in the dangerous goods transport?
  - Are there changes in volumes or locations at different times of year that need to be accounted for?

## 2.4. What can go wrong?

With an understanding of what dangerous goods are transported – the kinds of vehicles, packagings and locations the dangerous goods are transported to – you can think about the types of incidents that could happen.

Most dangerous goods incidents can be broadly categorised as:

- the dangerous goods are at risk of spilling or leaking, but remain contained
- the dangerous goods are spilled or leaked,
- the dangerous goods or vehicle are involved in a fire which might affect them.

While transport incidents fall into these broad categories, you need to consider how the dangerous goods will affect what can happen in these incidents. For example, toxic substances and flammable substances need to be treated very differently when there is a spill or leak.

You should also give thought to including incidents that may not necessarily be a dangerous situation, but could escalate to one, such as breakdowns.

## 2.5. What specialist resources will be needed to manage this?

For all incidents resulting in a dangerous situation, prime contractors, rail operators and consignors must – as soon as practicable after being asked by an authorised officer or an officer of an emergency service – give the officer information about:

- the properties of the dangerous goods being transported
- the safe methods of handling the goods
- the safe methods of containing and controlling the goods in a dangerous situation
- provide the equipment and other resources necessary to control the dangerous situation, and
- contain, control, recover and dispose of dangerous goods that have leaked, spilled or accidentally escaped.

If you are transporting dangerous goods in larger packagings or in large quantities – especially placardable units (such as intermediate bulk containers (IBCs), tanks or tank vehicles) – you may need to make specialist resources available to effectively manage an incident.

Tasks, activities, and equipment that may be needed include:

- containing and controlling spills
- decanting dangerous goods from damaged packages or tanks
- providing information on how to gain access to tank vehicles that have rolled over for pump-outs
- providing pumps, hoses, spears, compressors, static control, and other equipment
- providing work lighting and support equipment for personnel on the scene
- receiving receptacles or vehicles for the recovered dangerous goods
- Personal protective equipment (PPE) for personnel involved in responding to the incident

Note: your plan must not rely on emergency services providing equipment or PPE for your emergency response.

You will need properly trained, skilled and experienced personnel who can perform these tasks and are available to attend incidents.

While incidents involving smaller packages of dangerous goods may be able to be managed without using specialist resources, you must consider what specialist resources might be needed, especially if larger quantities of dangerous goods are affected.

### 2.5.1. Outsourcing of specialist resources

If you elect to outsource some of your recovery processes, you must make sure your chosen service provider can cover these requirements for you. You will be relying on them for a successful recovery however, you will retain the legal duties for managing the incident as a consignor and/or prime contractor.

### 2.5.2. How will I become aware of the incident?

After an incident has happened, the information needs to be relayed back to base. Methods of reporting could include:

- the driver reporting back to base (if not incapacitated)
- members of the public calling in about an incident
- emergency services contacting you directly
- the use of a telephone advisory service (if needed for transport).
- vehicles with automated systems that can report occurrences

You should consider how you will receive these reports, and what to do with them, and what maintenance these systems may need.

### **2.5.3. Support for personnel involved in the incident and response**

Complex incidents can run for a long time, and your planning should consider provisions for personnel attending the incident, including food, water and other items. This helps them to continue working safely and effectively. You should also make sure you have plans in place to manage fatigue and can swap personnel out, reducing the risks from tiredness.

Dangerous goods incidents can be large-scale, catastrophic and can have short and long-term psychological impacts on people involved, especially if there are injuries or fatalities. This includes those directly involved in the incident, and the response.

Consider the following:

- Will your plan need people to attend a scene where workmates have been injured, and can this be managed?
- Do you have alternative plans in place to reduce these impacts, such as using resources from another transport company?
- Will you have support services available after the incident, such as an employee assistance or counselling program?

### **2.5.4. Continued business activity**

When an incident happens, the rest of your business doesn't stop, especially if you have a larger operation. Managing the incident becomes the main priority, but you should ensure that your TERP considers how to manage ongoing operations. Your plans might divert resources away that you normally rely on. Make sure you think about how you will manage this, and include the details in the TERP if this might happen. Consider how to manage:

- diversion of personnel and equipment away from their normal work
- ongoing arrivals of vehicles into warehouses, and how they will be handled
- demands and enquiries from customers

## 2.6. Example of a TERP information record

This template can be used to record key information parameters about where and what kinds of incidents might happen, and covers the issues of personnel, training and deployment of resources. Understanding the scope of your operation will help you define what particular resources you will need to plan for in developing your TERP, or when auditing existing emergency response plans. You can also use this template for deciding the scope of a TERP sub-plan.

Example of a scope of dangerous goods operations template.

Date prepared	Prepared by
8 April 2022	Mike Smith
<b>Scope of dangerous goods operations</b>	
Where do we transport dangerous goods?	<b>In the Sydney metro area and along the South Coast and Southern Highlands.</b>
What vehicles / transport companies / contractors do we use?	<b>Own fleet of 3 semi-trailers, 1 small rigid and 1 B-double.</b>
Are there areas where we transport DG infrequently that need to be considered?	<b>Occasionally we might make deliveries to the Central Coast (NSW).</b>
What kinds of dangerous goods do we transport?	<b>Petroleum products</b>
What packages / volumes of DG do we transport?	<b>All our DG are bulk fuel deliveries from fuel terminals in Sydney.</b>
Is this going to change in the near future?	<b>Not likely</b>
Do we have seasonal variations in DG transport to account for?	<b>No significant variations</b>
Is our workforce consistent, or does it vary, e.g. contract drivers / labour hire?	<b>We sometimes need to get temporary drivers when regular drivers are not available.</b>
Does our TERP need to be divided into sub-plans for particular areas or scenarios?	<b>No</b>
Other notes	

## 2.7. Example of how to fill in a checklist for incident types

This template is used to evaluate the current state of your response abilities. Fill it out honestly, as it will help you to understand where extra work is needed.

You should carefully review any items that you identify as not being properly prepared for. These are areas where your incident response may not work properly. For example, in the below, extra work is needed to manage leaking packages and spills.

Incident types			
<b>Are we prepared for the following incident types and effects, and brief details of these plans?</b>			
Note: depending on types of DG and volumes transported, extra details and plans may be required.			
Vehicle breakdown	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Details	Arrangements in place with mobile mechanic/tow truck provider		
Roll over	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Details	Service agreement with Fuel Recovery Pty Ltd. They provide on-scene support for roll-overs, including product recovery. We are responsible for finding a receiving tanker and driver.		
Vehicle fire	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Details	PM program for maintenance using EPA truck fire guide. Drivers trained to prevent fire spreading to load where possible. If not successful, they are trained to contact emergency services immediately.		
Leaking packages/tanks	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Details	Recent review found that drivers don't know what to do if they identify a leak. We need to do more work with Fuel Recovery Pty Ltd on our processes for managing this, including actions the driver can take to prevent the leak getting worse, or causing pollution. <b>We need to develop an action plan ASAP.</b>		
Spills	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Details	Agreement with Fuel Recovery for on-scene support. But we need to do more training with drivers on preventing and reporting spills. Drivers were not aware of the importance of preventing spills entering waterways.		
Load fire	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Details	Drivers are trained to immediately contact emergency services in the event of a fire in the load. Drivers are only to attempt to extinguish very small fires and prevent them from spreading further.		
[Other incident types]	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input checked="" type="checkbox"/> Not applicable

## 3. Incident management

Once you have defined what can go wrong in a dangerous goods incident, you need to consider how you will manage an incident once you've become aware of it.

Note: Appendix B has a simple template for recording incident details, and appendix C has a template for recording when actions are done. This is a useful tool to understand what has been done so far and assists in post-incident debriefings.

At the end of this section, you should:

- understand what you need to know about the incident
- know how incident command and control is managed
- know your notification requirements and methods
- know what incident response plans you need
- know how the incident will be cleaned up.

### 3.1. What information should be recorded?

You need a simple method for recording and updating incident details quickly so you can provide the necessary information to the competent authority. Record the following details:

- When and where the incident occurred
- What happened, and how serious the incident is
- Who has already been told about the incident, and are emergency services required?
- What dangerous goods are being transported?

This information will help you meet your notification requirements. Keep in mind that the initial information you receive may not be accurate. You need to be able to update your response as new information comes in. The more information you can get, the more effective your response will be.

### 3.2. How will you maintain command and control of the incident?

You need an incident manager to make sure the recovery happens smoothly. The incident manager needs the resources, training and support to effectively manage the incident.

Good information flow is key. Relevant considerations include how you will make sure:

- the relevant people in your organisation are alerted about an incident
- the incident manager and on-scene personnel know how to contact each other
- lines of communication are kept open
- people are able to report information honestly and openly
- there are people who can provide backup and redundancy
- key personnel might be on leave, and serious incidents can be active for a long time. Backup and replacement staff are essential for managing these impacts.

While relatively small operations may be able to manage these within the normal operational structure, more complex operations should consider developing plans that include a dedicated

incident management team structure that is activated when an incident occurs. Such a team may be dedicated to transport incidents, or part of other emergency management operational plans.

### **3.3. Which authorities need to be notified?**

You should make sure the required notifications are included in your emergency response plan and training.

Reporting incidents to emergency services and authorities must not be unnecessarily delayed due to internal reporting, and personnel must be given enough authority to do notifications in a timely manner.

As soon as practicable after the incident, the driver of the vehicle needs to notify:

- emergency services (such as police, fire or ambulance) by calling 000
- the prime contractor
- the dangerous goods competent authority in the state the incident happened
  - in NSW this is the EPA, call 131 555.

Also, as soon as practicable after becoming aware of the incident, the prime contractor must notify:

- emergency services (such as police, fire or ambulance), by calling 000, and
- the dangerous goods competent authority in the state where the incident happened
  - In NSW this is the EPA, call 131 555.

You may need to make other notifications under other legislation as well:

- Work Health and Safety regulator
  - In NSW this is Safework NSW
- Environment Protection Authority
  - Note: only in NSW is the EPA also a competent authority for dangerous goods transport.

Within 21 days of the incident, the prime contractor needs to provide a written report to the competent authority about the incident.

Note: There is no penalty for reporting an incident that was later decided not to be a dangerous situation. If unsure, you should report the incident.

### **3.4. How will recovery resources and support be managed?**

Once the incident manager and team are aware of and are actively managing the incident, they will need to manage the following activities:

- activating and deploying incident resources such as recovery equipment, tow trucks and personnel
- getting up-to-date information to refine the response
- advising emergency services of estimated time of arrival for recovery resources
- coordinating information for internal and external stakeholders. This may be done directly or through an on-site intermediary, as the situation requires.

### **3.5. How will the financial aspects of an incident be managed?**

Dangerous goods incidents can be costly, and the longer they take to resolve the more expensive they become. Before an incident occurs, think about how the costs will be handled.

Considerations may include:

- What financial authority do incident managers need to do their role?

- Is my insurer aware that dangerous goods are being transported?
- What role will my insurer play in incident management?

These are discussions you should have before an incident happens, so it is one less thing to deal with when an incident is live. When dealing with an active incident you will be expected to provide resources in a timely manner. Delays due to financial constraints or an inability to get permission to act are not likely to be well-received by response authorities.

Emergency services or authorities may direct actions to be taken that could be subject to cost recovery in some cases.

### **3.6. What about media and outside communications?**

Dangerous goods incidents can be significant and may attract media attention. Vehicles with logos and branding may result in enquiries from media organisations. Consider whether your method for handling these negatively impacts your communications and management of the incident. For example, your organisation might have a “no comment” policy for media while an incident is active, but you need to make sure this does not affect open communications being maintained with emergency services and authorities.

### **3.7. How do I document all this information?**

To make sure staff know what they need to do and can be trained for their roles, you should detail how these plans will be put in place.

Record the following items to ensure this information is at hand when an incident happens:

- contact details for key staff members involved in incident management
- simple instructions for drivers to carry with them in the vehicle
- detailed plans for incident managers to follow, including notification requirements
- records of arrangements with recovery providers or other third parties
- details of insurance arrangements for dangerous goods vehicles.

### **3.8. Incident plans and sub-plans**

It is good practice to divide your TERP into a master plan that describes your incident response processes, and then a series of sub-plans that detail how particular incident types will be handled. Vehicles that transport dangerous goods should also carry emergency response instructions for drivers to make sure they have a quick reference they can use in an emergency.

#### **3.8.1. Master plan**

The master plan is common to all incident types and is used to manage overall incident response actions and requirements. An example of a simple TERP master plan is provided at 3.9 below. A master plan may take any form but should be readily understandable by the personnel who need to follow it. You may find flowcharts to be a useful shorthand description of the process.

It should describe:

- how incidents are reported internally and externally
- who the incident team is and their responsibilities
- how communications are handled during an incident
- general incident response arrangements, such as telephone advisory service providers
- authorisation processes for taking actions
- plans for operational continuity

### 3.8.2. Incident sub-plans

Incident sub-plans should be developed for the different types of incidents that you might face in transporting dangerous goods. An example of an incident sub-plan is provided at 0 below. These plans may take any form but should be readily understandable by the personnel who need to follow it. You may find flowcharts to be a useful shorthand description of the process.

Incident sub-plans are specific to these incidents, and should describe:

- how such an incident can arise
- potential corrective actions to manage the incident
- what specific actions should be taken by personnel responding to the incident
- response options that have been pre-determined
- post incident actions specific to the incident type

### 3.8.3. Emergency instructions for drivers

Drivers or vehicle crew should have a simple set of instructions that they can follow in the event of an emergency. An example of emergency instructions for driver is provided at 3.8.33.11 below.

The emergency instructions for drivers should describe:

- immediate incident response actions for the driver and safety precautions
- actions to take where safe and practicable to do so
- who to alert about the incident and how to do so

## 3.9. Example of a TERP master plan

This template makes sure a transporter has the critical contact information they need to manage an incident effectively. Every operation is different, and you need to make sure that the master plan is tailored to your specific needs.

Depending on the organisational arrangements, not all the contacts will be needed, or some roles may be performed by different people. Some organisations will need more detailed lists or processes, especially with larger or more diverse operations (e.g. extra competent authorities/internal contacts or recovery providers).

Enough authority must be provided to allow the TERP to be actioned as needed. The templates below are relatively simple but may be used to form the core of an effective incident response.

### 3.9.1. Incident management structure

In the event of an incident, the personnel below are responsible for following the TERP, and doing the tasks outlined below (as far as safe and able to do so).

Title	Who	Role	Tasks
Company Management	CEO & General Manager	Oversight, authorisation and review	Stay informed about incident Do not interfere in incident response Ensure resources and authority are available Ensure incident is properly reported and corrective actions undertaken
Incident management	Ops Manager (primary) HSEQ Manager (backup)	Overall incident management	Ensure TERP is implemented and followed Ensure internal and external reports are made Keep management informed of incident Make decisions about actions to be taken Initial liaison with emergency services
Incident reporting	Driver	Initial reporting & on-scene response	Call emergency services Activate internal reporting system Follow emergency actions for drivers
Internal incident control	Allocator Admin personnel	Internal incident admin	Activate initial emergency response actions and internal alerts Keep communications open with incident scene. Record incident details in log
Response personnel	Maintenance Manager Mechanic HSEQ Manager Fuel Recovery Pty Ltd	On site response	On-site liaison with emergency services On site response and recovery Follow incident sub-plan procedures

### 3.9.2. Incident reporting processes

These processes should be followed as rapidly and as far as practicable. If certain actions are not possible to complete the incident manager is responsible for deciding alternative actions.

#### Driver

First take initial response actions (see emergency instructions for drivers)

1. Call emergency services and report incident.
2. Call internal incident report phone number and report incident.

#### Allocator

When the incident type is known, begin to follow relevant incident sub-plans

1. Report incident to the incident manager.
2. Liaise with driver to find out incident details and actions already taken. Verify incident details.
3. Call emergency services if not already completed.
4. Make initial report to the competent authority.
5. Make initial report to the recovery service provider to alert them.

## Incident manager

When the incident type is known, begin to follow relevant incident sub-plans

1. Check with allocator that mandatory initial reports have been completed. Where they have not, make sure they are made as rapidly as possible.
2. Alert company management that an incident has happened.

### 3.9.3. Incident contact list

Where a contact is only for a certain geographical area, you should note this, so the report is made to the correct person.

Government / Public Authorities	
Police / Fire / Ambulance	000
NSW EPA – Competent authority report	131 555
Safework NSW – WHS incident report	13 10 50
Internal Incident Reporting	
Internal incident report phone	0491 578 957 or 1800 975 707
Incident management team	0491 578 957
HSEQ manager	0491 571 491 or 02 7010 3645
DG specialist contact	0491 575 789 or 02 5550 1225
Recovery Provider / Resource contacts	
Emergency response report phone	1800 975 708 or 03 7010 2664
Tow truck provider (all areas)	1300 975 710
Mechanic (NSW)	0491 579 455
Waste disposal company	1800 975 709

### 3.10. TERP incident response sub-plan (sample)

These instructions provide a sub-plan for a particular incident type. It can be kept as a quick reference guide for staff who are expected to take actions in the event of an incident. This helps them to understand the framework for responding to the incident, key risks and critical actions to take. More detailed plans may be needed for some specific actions.

Each of the incident response guides you develop should be kept in locations where they are available to people who will need to follow them.

This template is based on the workflow the EPA developed with input from the fuel industry and Fire and Rescue NSW.

Incident type	Leaking tank vehicle (petrol)
<p>Minor leaks that can be stopped can be dealt with and the vehicle unloaded at its destination, then inspected and repaired. Bigger leaks are serious and require emergency services to attend.</p> <p>Where someone is unable to undertake actions (e.g. the driver is injured or incapacitated), alternative arrangements should be implemented as soon as possible.</p>	
<p><b>Incident identification – weeping / sweating / slow leak (no report to DG regulator required)</b></p>	
Driver	<ul style="list-style-type: none"> <li>• Follow the emergency instructions for drivers and secure the tanker.</li> <li>• First evaluate the size of the leak and notify allocator about the issue.</li> <li>• Weeping or sweating:               <ul style="list-style-type: none"> <li>○ Check the leak is not more severe than it appears.</li> <li>○ Go to destination and unload. Vehicle must not be reloaded.</li> </ul> </li> <li>• Slow drip:               <ul style="list-style-type: none"> <li>○ Plug or use a single-use putty product to stop the leak.</li> <li>○ If leak is from the tell-tale hole, use plug from top of the tank.</li> <li>○ You must verify the leak has been stopped before proceeding.</li> </ul> </li> <li>• Notify allocator you are continuing to destination and unloading.</li> <li>• The vehicle must be inspected and repaired before refilling.</li> </ul>
<p><b>Incident identification – leak unable to be stopped (dangerous situation)</b></p>	
Driver	<ul style="list-style-type: none"> <li>• Contact the emergency services and company emergency contact number</li> <li>• Advise of the incident and location.</li> </ul>
Incident Manager	<ul style="list-style-type: none"> <li>• Make sure emergency services have the Incident Manager's contact details.</li> <li>• Notify the DG regulator and company management</li> <li>• Designate an on-scene incident controller</li> <li>• Notify emergency recovery provider that they may need to attend the incident.</li> </ul>
Administration / Allocator	<ul style="list-style-type: none"> <li>• Allocate a staff member to act as a point of contact and start an incident log</li> <li>• Get details of the load on the vehicle at the time of the incident</li> </ul>
<p><b>Initial response to the incident – on scene</b></p>	
Driver and Incident Manager	<ul style="list-style-type: none"> <li>• Give details of leak to emergency services on arrival.</li> <li>• Emergency services will have control of the incident scene.</li> <li>• Response option (see below) must be decided along with the emergency services incident commander.</li> <li>• Provide support and technical info to emergency services to help manage incident</li> </ul>
Administration / Allocator	<ul style="list-style-type: none"> <li>• Determine what compatible tankers are available and where they are</li> <li>• Notify driver(s) that they may be needed to support the incident</li> <li>• Keep log of when incident actions are performed</li> </ul>

Incident type	Leaking tank vehicle (petrol)
Recovery provider	<ul style="list-style-type: none"> <li>• Prepare to deploy to scene if attendance is required</li> <li>• Keep in contact with Incident Manager and deploy if needed</li> </ul>
<b>Response options (all actions to be consulted with emergency services)</b>	
Return to terminal (preferred option)	<ul style="list-style-type: none"> <li>• Incident manager to liaise with emergency services and terminal to determine if this is possible.</li> <li>• Consideration should be given to the distance to the terminal.</li> <li>• Prepare the tanker to return to the terminal under emergency services escort.</li> <li>• On arrival at the terminal, tanker is to be made safe and then unloaded.</li> </ul>
Unloading at destination	<ul style="list-style-type: none"> <li>• Incident Manager will liaise with consignor and nearby petrol stations to identify a suitable location to unload.</li> <li>• Choose the closest compatible station to unload, considering: <ul style="list-style-type: none"> <li>○ Access, layout, and capacity for emergency services to attend</li> <li>○ Ability to effectively prepare containment and an exclusion zone.</li> </ul> </li> <li>• Evacuate the petrol station prior to tanker arrival</li> <li>• Emergency services will maintain a safe zone for the duration of the transfer.</li> <li>• Any spilled product must be rendered safe as well.</li> </ul>
Roadside decant (Last resort option)	<ul style="list-style-type: none"> <li>• The situation should be fully evaluated with emergency services.</li> <li>• Consider if the vehicle can be moved a short distance to a better location nearby <ul style="list-style-type: none"> <li>○ A roadside decant is a risky operation, traffic flow increases this risk.</li> <li>○ An exclusion zone and equipment are needed to perform this safely</li> </ul> </li> <li>• Recovery provider will need to provide equipment &amp; trained personnel to undertake the decant. <ul style="list-style-type: none"> <li>○ Emergency services will not permit decant unless it is safe to do so</li> </ul> </li> <li>• A compatible receiving tanker is needed to take the fuel from the leaking tanker.</li> <li>• Tanker must be compliant before departing incident (documents, placarding, etc)</li> </ul>
<b>Key risks and mitigations – consult ANZ-ERG 2021 for more detail</b>	
Safety	<ul style="list-style-type: none"> <li>• Flammable vapour is a major concern. Make sure no ignition sources are present in the area near the spill.</li> <li>• Any decant/transfer must consider static risks. Earthing and bonding is critical</li> </ul>
Environmental	<ul style="list-style-type: none"> <li>• Spills should be adsorbed, and the adsorbent collected for disposal</li> <li>• Any contaminated soil will need to be remediated and lawfully disposed</li> <li>• Prevent any leaks from entering drains or waterways</li> </ul>
<b>Post incident actions</b>	
Vehicle inspection and repair	<ul style="list-style-type: none"> <li>• In all cases, the tank vehicle must be thoroughly inspected using the NSW EPA's Dangerous Goods Tank Vehicle Inspection Manual.</li> <li>• The inspection and repairs must be undertaken by a qualified and experienced mechanic at a workshop able to perform the repair work.</li> <li>• A copy of the inspection manual report must be kept on file.</li> </ul>
Report	<ul style="list-style-type: none"> <li>• Notify the DG regulator after the tanker has been repaired and returned to service</li> <li>• After the incident is resolved, the incident manager will prepare a written report to be kept on file and provided to the DG regulator within 21 days.</li> </ul>

### 3.11. Examples of emergency instructions for drivers

These are example instructions that should be given to drivers to use in an emergency. Make sure that they align with your company's emergency response plan.

Let drivers know what is expected of them beforehand – this should include training and instructions in these procedures. Make sure you provide the correct emergency numbers.

A copy of your instructions should be in the cabin of all vehicles. This will mean that drivers can follow it when an incident happens and don't have to guess what action they should take.

When an accident or emergency happens during transport, the driver and vehicle crew must take the following actions where it is safe and practicable to do so:

- Apply the braking system, stop the engine and isolate the battery.
- Put on a reflective vest if not wearing hi-vis clothing.
- When exiting the vehicle, take the transport documents and emergency procedure guides.
- Avoid sources of ignition. Do not smoke, use electronic cigarettes or similar devices, or switch on any electrical equipment.
- Where possible, make any mobile phone calls away from the vehicle.
- Inform the appropriate emergency services, giving as much information about the incident or accident and substances involved as possible.
- Contact emergency services.
- Put out breakdown triangles as needed.
- Keep transport documents readily available for responders on arrival.
- Do not walk into or touch spilled substances. Avoid inhalation of fumes, smoke, dust and vapours by staying up-wind.
- Use personal protective equipment appropriate to the dangerous goods being transported.
- Where appropriate and safe to do so, use fire extinguishers to put out small/initial fires in tyres, brakes and engine compartments. Use on board foam or water system if available.
- Drivers should only fight fires directly involving dangerous goods if it is safe to do so.
- Where appropriate and safe to do so, use on-board equipment to prevent leakages into the environment or the sewage system and to contain spillages.
- Move away from the vicinity of the accident or emergency. Advise other persons to move away and follow the advice of the emergency services.
- Remove any contaminated clothing and used contaminated protective equipment and dispose of it safely.

#### Emergency contacts for drivers

Police/Fire/Ambulance

**000**

Company Emergency contact number

**1800 975 708 or (03) 7010 2664**

## 4. Putting the TERP into action

When an incident occurs, the TERP provides the framework to help manage the response. This section shows how the TERP will be deployed.

You should understand this section and consider if your TERP contains enough detail to make sure these steps will be well managed in the event of an incident.

### 4.1. What are the expectations of emergency services?

The Dangerous Goods Regulation requires that equipment and other resources necessary be provided and mobilised as soon as practicable at the incident scene. Emergency services will expect this equipment to be available when the incident has been stabilised and the recovery process can begin. They will understand if specialist equipment needs to be transported to the incident location but are not likely to tolerate unnecessary delays.

Make sure whoever is managing the incident has contacted the incident controller. Keeping them updated, and ensuring a flow of credible, timely information, will allow good decisions to be made with the incident controller.

### 4.2. When does the incident end?

Even once the fire is out and the vehicle has been towed away, the incident may not be over. There could be issues that need to be completed, such as waste disposal remediation of contaminated soil, notifications and reporting.

The incident manager should work with emergency services, the EPA and other authorities to make sure the work is completed in accordance with any legislative requirements or obligations.

Remember that incidents can be traumatic for personnel who attend, especially where injuries or fatalities have happened. Make sure staff are provided with support or counselling services if they need them.

### 4.3. What activities are needed after the incident is over?

The TERP should include a process for debriefing. This will include a review of why the incident happened, whether the incident response and the TERP was effective, and what procedures might be needed to manage risks. Any findings should be incorporated into the TERP.

As part of the debrief, make sure you consider the information that needs to be provided to the competent authority as part of the written report. Extra details on this is provided in the next section.

### 4.4. What notifications and reports must be completed?

#### 4.4.1. Notification to competent authorities

You must notify the competent authority in the jurisdiction where the incident happens. An initial incident report is needed when the incident happens, which can be done by phone. Within 21 days after the incident, you need to send a written report to the competent authority.

In NSW, this notification should be made to the EPA, which is the competent authority for road transport.

Where you have interstate operations, notify the relevant competent authority. If you are unsure about how to submit the report and the content that's needed, contact the relevant competent authority.

#### 4.4.2. Initial incident notification to the competent authority

You (the prime contractor) need to notify the competent authority (the EPA in NSW) when you become aware of the incident. Generally, the EPA expects this notification within one hour of you being notified internally of the incident.

When you phone the competent authority, you'll need to give these details:

1. where the incident happened
2. time and date of the incident
3. nature of the incident
4. the dangerous goods being transported; and
5. any other details the competent authority may need.

You should be prepared to advise:

1. what actions have already been taken to manage the incident
2. contact details for the incident manager and controller, and
3. what resources are being deployed to the incident scene.

In NSW, this report should be made by phoning the EPA on 131 555.

#### 4.4.3. Written report to the competent authority

Within 21 days, the competent authority (the EPA in NSW) must be given a written report with these details:

1. where the incident happened
2. the time and date of the incident
3. the nature of the incident
4. what the driver believes to be the likely cause of the incident
5. what the prime contractor or rail operator believes to be the likely cause of the incident
6. the dangerous goods being transported
7. the measures taken to control any leak, spill or accidental escape of dangerous goods and any fire or explosion arising out of the incident, and
8. the measures taken after the incident in relation to the dangerous goods involved in the incident.

In NSW, this report can be emailed to [hazardous.materials@epa.nsw.gov.au](mailto:hazardous.materials@epa.nsw.gov.au)

#### 4.4.4. Notification to other regulators

Other authorities often need to be told about incidents. You can make sure these obligations are met by including them in your TERP. For example, an incident that results in a dangerous situation is likely to be a notifiable incident under work health and safety legislation. Rail operators may need to notify dangerous goods incidents to the Office of the National Safety Regulator.

You need to seek your own advice, legal and otherwise, that applies to your situation.

## 4.5. Example of an incident record template

This incident record is designed to be a detailed record of the incident. Along with the incident timeline, it will form the core of your incident report to the competent authority.

<b>Incident date/time</b>		<b>Report date/time</b>			
9 May 2022 10:45am		9 May 2022 10:55am			
<b>Reported by</b>		<b>Reported to (who took the call)</b>			
Dave Smith		Jenny Phuong			
<b>Return phone number</b>		<b>Incident manager</b>			
0491 570 159		Matt			
<b>Incident location (address/cross streets/rail km/etc)</b>	Forest Rd, near Shell Service Station				
<b>Vehicles involved (description/regos/etc)</b>	Our semi-trailer, 1 car, 1 light truck				
<b>Incident type(s) (check all that apply)</b>	<input checked="" type="checkbox"/> Left road	<input type="checkbox"/> Vehicle collision	<input type="checkbox"/> Spill/Leak		
	<input type="checkbox"/> Derailment	<input type="checkbox"/> Fire	<input type="checkbox"/> Injuries		
	<input checked="" type="checkbox"/> Rollover	<input type="checkbox"/> Explosion	<input type="checkbox"/> Fatality		
	<input type="checkbox"/> Breakdown	<input type="checkbox"/> Other: _____			
<b>Location type</b>	<input type="checkbox"/> Built-up area	<input type="checkbox"/> Train station			
	<input type="checkbox"/> Load / unload facility	<input type="checkbox"/> Shunting/marshalling yard			
	<input type="checkbox"/> Regional/rural road	<input type="checkbox"/> Open rail			
<b>Weather conditions</b>	<input type="checkbox"/> Dry road	<input checked="" type="checkbox"/> Wet road	<input checked="" type="checkbox"/> Rain		
	<input type="checkbox"/> Mist/Fog	<input type="checkbox"/> thunderstorm	<input type="checkbox"/> Snow/Ice		
	Temperature: _____ °C				
<b>DG vehicle/package type(s)</b>	<input checked="" type="checkbox"/> Tanker	<input type="checkbox"/> Isotank	<input type="checkbox"/> IBC	<input type="checkbox"/> Gas cylinders	
	<input type="checkbox"/> Drums	<input type="checkbox"/> Bags	<input type="checkbox"/> Boxes	<input type="checkbox"/> Freight container	
	<input type="checkbox"/> Other: _____				
<b>Incident consequences</b>	Injured: <u>1</u>	Property damage:	\$ <u>300,000</u>		
	Fatalities: <u>0</u>	Environmental damage:	\$ <u>200,000</u>		
<b>Spill?</b>	<input checked="" type="checkbox"/> Spill occurred	<input type="checkbox"/> Risk of spill	<input type="checkbox"/> Spill not likely		
	Est. volume lost (or at risk): <u>about 2000</u> L / kg				
<b>Product(s) (detail the dangerous goods involved in the incident)</b>	<b>Proper Shipping Name</b>	<b>UN no</b>	<b>Class</b>	<b>PG</b>	<b>Consignor/Customer?</b>
	Petrol	1203	3	II	Rapid Energy
	Diesel	N/A			Rapid Energy

**Incident description (Get sufficient detail to begin incident response. Add/update as new information is obtained)**

Light vehicle entered from side street without warning. Tried to steer around and vehicle rolled after clipping another vehicle. Leak from compartment 2.  
 Driver wasn't injured and reported it to us about 10 mins after the incident. Put triangles out after calling 000. Police and Fire brigade on their way.  
 Out front of service station. Driver asked service station to shut down.

Internal reports (check off as reports made)	<input type="checkbox"/> Line Manager	<input checked="" type="checkbox"/> WHS Manager	<input type="checkbox"/> CEO
	<input type="checkbox"/> Crisis Team	<input checked="" type="checkbox"/> Public relations	<input type="checkbox"/>

External reports (check off as reports made)	<input checked="" type="checkbox"/> Fire/Ambulance	<input checked="" type="checkbox"/> EPA	<input checked="" type="checkbox"/> Competent authority
	<input type="checkbox"/> Police	<input type="checkbox"/> Safework	<input checked="" type="checkbox"/> Consignor / product owner

Recovery support (check off as reports made)	<input type="checkbox"/> Tow truck	<input type="checkbox"/> Mechanic	<input checked="" type="checkbox"/> Recovery response provider
	<input type="checkbox"/> Receiving vehicle	<input checked="" type="checkbox"/> Waste transport	<input type="checkbox"/> Consignor / product owner

Recovery information  
 (Record information about the recovery here)

**Details kept in incident timeline**

## 4.6. Example of an Incident timeline

This timeline should be as detailed as possible, it will allow you to investigate what happened, if changes are needed, and to prepare your report for the competent authority. Include information about what external responders did.

Time	What happened at this time?	Who's responsible?
10:55am	Received call from Dave about the incident. Started recording details.	Jenny
11am	Called Fuel Recovery Services and gave details. Asked them to activate their response plan for us.	Matt
11:05	Called 000 with more information about the incident	Jenny
11:15	Called EPA and reported incident to them.	Jenny
11:25	Received call back from Fuel Recovery. Was told they are getting ready.	Matt
11:30	Checked in with Dave and got more info about the incident.	Matt
13.30	EPA at scene at 13:30. EPA said recovery crew might need an escort to the scene due to traffic.	Matt

# 5. Keeping the TERP up to date

Once you've defined how the incident will be managed, package this information into a form that is useful for the people who will need it. Review the TERP regularly so it is ready to use.

At the end of this section you should understand:

- how you will store the TERP and its plans
- how you will make sure staff know their roles in incidents
- what training and capacity building you need
- how often you will do exercises and reviews of the TERP
- how you will make sure it stays up to date.

## 5.1. How the TERP should be recorded and stored

A TERP needs to be a "written plan". Appendix B provides a template guide for recording key information, including any details that may be necessary to make your plan work.

Once this has been done, make sure the TERP is accessible to staff who need to use it.

## 5.2. How will people know what to do in an incident?

An incident manager needs to know how the entire TERP fits together, but others don't need to be overwhelmed with details.

For example, a driver should know what they are expected to do, the information they'll need to communicate, and what steps they should take while waiting for help. This can be simplified into a single page of emergency procedures and information that can be carried in the emergency information holder. The appendix includes an example you might find useful.

## 5.3. What training is needed for staff members?

Staff members who have a role to play in managing the incident response will need specific training to make sure they can carry out their role. In some cases, this can be managed in-house, while other tasks might need specialist training (for example, how to pump out dangerous goods from a rolled-over tanker).

The need for training, instruction and supervision includes following the appropriate procedures for a dangerous situation that involves the transport of dangerous goods. Staff need to be instructed and trained to know what is expected. You should evaluate whether they need extra training. TERP exercises are a great time to make sure the instruction and training you've provided is achieving its aims.

## 5.4. What exercises are needed to maintain the TERP?

Training exercises will help key personnel and staff familiarise themselves with the TERP. Depending on the business's needs, you could do:

- a desktop exercise to make sure the contact numbers are still correct
- a simulated notification to familiarise staff with notification protocols
- field training on recovery equipment for staff who will respond to the scene.

Get someone to monitor and take notes, and key things to look out for include:

- what went right during the exercise?

- what problems happened?
- how could the plan be improved?
- did anyone not know what they were expected to do?

Checking that everyone knows their roles can involve reviewing whether:

- drivers know what they should do if they are involved in an incident
- people with communication roles understand what is expected of them
- people know where to find copies of the TERP.

## **5.5. How to review and update the TERP**

Assign someone to review the TERP and inform staff about updates. In larger organisations a health and safety, environmental or quality manager or similar would do this task. You should review the plan:

- after incidents when the TERP is activated
- after any exercise using the TERP
- whenever there is a significant change in business profile, or key personnel join or leave the business.

Some of the items you should consider in the review include:

- how has the business changed recently, and what impact could that have?
- what went wrong during the use or exercise of the TERP?
- what learnings can you take from other contacts in the industry?

Then:

- update the TERP with your findings.
- replace any old versions/copies of the TERP.

## 5.6. Example of a checklist for personnel, skills, training and resources

### Personnel, skills, training and resources

This checklist will help you audit your systems and personnel. If you answer no to any question, or are not sure, you should investigate why so you can make changes and be prepared.

Are all staff aware of the TERP, where they can find a copy, and their expected roles?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Do they know what to do if they receive an incident report?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Do incident manager(s) know they have a role in incident management?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Are incident managers aware of where the TERP is? Are they aware of what processes they need to follow?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Are support staff aware of their role in incident management?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Do support staff know where to find a copy of the TERP?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Do drivers know what is expected of them if they are involved in an incident?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Do all vehicles have a copy of the instructions for drivers?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Are all critical staff members fully trained for their response?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Do we have resources in place ready to deploy, or arrangements to get resources as soon as they are needed?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Is our insurer aware of the dangerous goods we transport?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Does the TERP have a review period to make sure it is kept up to date?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> Not applicable
Has the TERP been exercised recently, and updates made to it (if needed)?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> Not applicable

#### Notes:

Need to do more frequent exercises, and not all critical staff have undergone complete training in their roles. New transport manager is familiar with emergency response, but we need to run through our specific company requirements.

# 6. What is a dangerous situation?

## 6.1. What is the definition of a dangerous situation?

Any incident that results in a dangerous situation must be reported to the competent authority. The regulation defines a dangerous situation as

*a situation that is causing, or is likely to cause, imminent risk of serious injury to a person, significant harm to the environment or significant damage to property.*

To support understanding of these obligations, we've provided an expanded definition below that can be used to decide when an incident is a dangerous situation and must be reported.

## 6.2. When does an incident need to be reported?

You need to report (and your TERP needs to be activated) for any:

- incidents where there is a loss – or risk of loss – of dangerous goods from tank vehicles, intermediate bulk containers, portable tanks or demountable tanks (receptacles defined as placardable units in the regulation), and/or
- if the dangerous goods are not in a placardable unit, then if there is a loss – or risk of loss – of a placardable quantity of dangerous goods.

Note: A “placardable quantity” is equal to the placard load limit for the load. If the load has a placard load limit of 250L, and 250 L or more is at risk, it is a dangerous situation.

## 6.3. What is “loss or risk of loss”?

“Loss or risk of loss” of containment is defined as:

- spillage or likely spillage of the dangerous goods (including leaking gas)
- a fire involving the dangerous goods
- a risk of loss of containment in the recovery phase (for example, when decanting/bulk transfer of dangerous goods product is a likely process)
- damage (or a reasonable suspicion of damage) to product containment elements such as a tank shell, pipework or packagings
- evasive action or intervention was needed to prevent the dangerous goods leaking or being impacted (for example, by a wheel fire that needed to be extinguished).

## 6.4. What incidents aren't a dangerous situation?

It is not a dangerous situation when an accident or breakdown happens and there is no damage or suspected damage to the product-containing elements or packaging.

An example of an incident that isn't considered a dangerous situation would be a prime mover involved in a collision without damage to a trailer carrying the dangerous goods.

However, if the dangerous goods need to be decanted to recover the vehicle, the situation would then be classified as a dangerous situation and the exclusion would not apply.

## 6.5. What if I'm not sure if an incident is a dangerous situation?

It is not an offence to report an incident to the EPA which doesn't meet the definition of a dangerous situation. If you are not sure if an incident is a dangerous situation, you should report it. This supports better understanding of why incidents occur.

# 7. Frequently asked questions

## 7.1. What are the legal requirements for a TERP?

The Dangerous Goods Regulation requires that before any transport of a placard load takes place, the consignor and prime contractor (or rail operator) must have a written plan in place to manage dangerous situations arising during the transport of the dangerous goods.

The TERP is a written plan for dealing with any dangerous situation arising from the transport of goods. It is prepared having regard to any guidelines prepared by the Standing Council on Transport and Infrastructure or by the Transport and Infrastructure Council.

The current guidelines were approved in 2003 by the predecessor to the Infrastructure and Transport Minister's Meeting, and a copy is available from the National Transport Commission or the EPA.

On becoming aware of a dangerous situation involving a placard load, the prime contractor, rail operator or consignor of a placard load must do everything the emergency plan for the transport of the load requires them to do that is relevant to the situation.

## 7.2. TERPs for rail operators?

The rail transport context is different to road transport, but rail operators are also subject to the legal requirements for a TERP when transporting dangerous goods.

Rail operators that are required to have emergency management plans under the *Rail Safety National Law (NSW)* can incorporate the TERP requirements into those plans. It is not necessary for a rail operator to have a TERP that is a stand-alone document. Including this information in the safety management system will help to reduce duplication and the potential for confusion.

While this guide is primarily written for road transport, rail operators may find the content useful in understanding their obligations for emergency planning and evaluating the plans they have in place for dealing with incidents while transporting dangerous goods.

## 7.3. Who should be involved in preparing the TERP?

Preparing a TERP is generally a team effort, and the size of the team will depend on the organisation. Larger organisations are likely to have staff dedicated to tasks that involve incident planning and risk management. These include operations, health, safety, environmental, quality or risk managers, who are often skilled or trained to prepare emergency plans. But the process needs input from people who have experience in what can go wrong and how to manage it. This includes drivers, loaders and recovery crews. There are likely to be financial impacts, so input from financial controllers will help manage cost considerations and financial authorisation.

Consider developing the TERP using a small group that has good, practical, problem-solving skills and a solid understanding of the organisation and its profile. Then test it with different staff. For organisations who are outsourcing much of this, make sure that discussions with the providers are open, honest and result in a solution that meets the needs of the transporter.

## 7.4. Maintaining and updating the TERP

A TERP must be regularly updated, it is not a one-off job. By keeping the TERP current – and staff training up to date – you can devote all your efforts to managing the emergency, instead of fixing what is wrong or missing in the TERP.

## 7.5. What is the TERP's purpose?

Emergency incidents share common features and problems. The TERP provides a structure so these factors can be managed, while providing cognitive space to deal with the many details that arise. It helps to make sure

- incidents are managed as effectively as possible
- the incident is resolved with minimum risk to emergency services and response personnel
- the environmental impacts are mitigated.

The TERP can be used for non-emergency breakdowns by providing relevant information in a readily available and accessible format. This supports awareness of the TERP and its use.

## 7.6. Does a TERP need to be a standalone document?

In an organisation with multiple emergency plans, the TERP can be part of other emergency plans. It needs to be able to be understood and used when needed, and the organisation should be able to show how it meets the requirements of a TERP.

Organisations with safety management or risk management systems may consider including the TERP into these systems. The internal auditing processes that are generally a feature of these systems can assist with making sure the TERP is well maintained, exercised as needed, and updated when necessary.

## 7.7. Can the recovery process be outsourced?

The regulations don't require you to do it all yourself. The decision to use an outsourced service provider may be a good fit for your business. Recovery resources may be expensive and are hopefully used infrequently. So even if most of the recovery is handled in-house, you may use some external service providers.

Regardless of your decision, the duty to provide equipment and other resources necessary applies to the consignor, prime contractor and rail operator. If you choose to outsource this work, you need to be aware that the duty to provide these resources is not handed over to the recovery provider.

## 7.8. If I'm a consignor, can my prime contractor handle any emergencies?

Prime contractors are often in a better position to support incident recovery, so if you are a consignor and intend to rely on your prime contractor(s) to provide recovery services, you need to discuss this with them in advance. They will need to know how to get information from you on the dangerous goods (if it is needed) and be able to relay that information or connect you with the people managing the dangerous situation.

## 7.9. What if I already have a TERP?

If you already have a TERP, think about whether it needs updating. If it has been sitting unused for some time, you might need to consider a full review. While this guidance document doesn't introduce any new duties or obligations, a review could save you a lot of time and effort.