



## Version History:

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1.0	April 2017	
1.1	Oct 2017	Clarification of 'Event' plus a number of minor amendments.
Review Date: April 2018		

## What is this document about?

This document explains:

- our role
- impacts
- and how we categorise incidents

Reference should be made to our [Incident Management Enabling Plan](#) for our further incident management activities.

Our overall purpose is to ensure that the environment and natural resources of Wales are sustainably maintained, enhanced and used, now and in the future. Incident management is one of our most important core functions and is maintained on a 24 hour 365 day basis.

An incident is an occurrence within our statutory roles and responsibilities that may:

- Have potential or actual environmental or operational impact,
- Require us to respond.

The key decision is whether we:

- Respond immediately (High Level Impact Incidents), both in and out of normal office hours, or;
- Respond later (Low Level Impact Incidents), via routine operational work during office hours, or;
- Do not respond (complaint, event or not in remit)

Our immediate response to high level impact incidents will be to take appropriate actions to mitigate harm to people, communities and the environment of Wales. Our response may or may not include attendance.

We may respond to low level impact incidents either through the exercise of our day to day business, regulatory functions, or simply use the information received as intelligence to inform our future work programmes.

We will also record information about events and complaints, to determine trends and future preventative work programmes.

## Who is this document for?

This document is for our customers to understand what incidents we will respond to, how, and when. It must be followed by our staff who assess and categorise incidents (including events and complaints) notified to NRW via the incident hotline 0300 065 3000, in order to determine our response.

## Contact for queries and feedback

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## 1. Introduction

We have developed an integrated incident categorisation policy as part of our overall approach to delivering natural resource management and the prevention of environmental damage. The categorisation of potential and actual incidents allows us to use a risk based approach to prioritise our work to ensure we secure the highest benefits to the environment, people and economy of Wales.

Preventing incidents from occurring in the first place is our ultimate goal, both to ensure our natural resources are appropriately managed, and as an intrinsic part of our incident preparation and regulatory work.

As an evidence based organisation we will use data and analysis to communicate a compelling narrative on the clear benefits to communities, the economy and environment from preventing environmental incidents.

## 2. Our incident response role

We are a Category One Responder under the Civil Contingencies Act 2004, giving us an important legal responsibility to respond directly to incidents and to support the incident management roles of other organisations such as the emergency services, health boards and local authorities by providing advice and information.

Our incident management role is underpinned by a range of statutory duties and powers, Wildlife and Countryside Act 1981, Plant Health Act 1967, Forestry Act 1967, Environment Permitting Regulations 2010, the Flood and Water Management Act 2010 and the Civil Contingencies Act 2004 as outlined above, amongst others. Our service is funded from the Welsh Government and it needs to be focussed to deliver efficient and effective value.

We are not an emergency service, it is the police who usually co-ordinate the overall management of a major incident when the incident has the potential for public safety impacts, and local authorities who lead the provision of community support and recovery.

- As a **regulator** and advisor we work to minimise the frequency and impact of incidents.
- As an **advisor** we provide specialist technical advice and data on a wide range of topics to assist our professional partners in how they undertake their incident management roles and start the recovery work early to minimise environment impacts.
- As an **operator** we minimise the likelihood of incidents occurring on the land we manage and maintain our specific incident management assets, such as flood defences. At all times we will deal with any incident in its entirety, considering its direct and indirect consequences including the measures used to manage it.

We have strategic, tactical and operational led work to ensure we have correct governance in place for preventing, preparing, responding, deploying staff and recovering from the



- serious impact to the natural resources of Wales (including impacts to air, land, water, fisheries and biodiversity) and the effect on conservation and economy;
- actual or potential flooding of property or infrastructure;
- our involvement in a multi-agency incident response;
- media interest and/or risk to our reputation.

We use the data of all types of incidents to understand where our greatest risks are to influence our prevention work. For example we will provide advice to farmers regarding slurry storage to prevent slurry spills and water pollution incidents. This leads to less frequent and less severe environmental incidents, benefitting the environment, people and economy of Wales.

In responding to incidents we will follow the Polluter Pays Principle and where applicable, we will seek cost recovery of our time in responding to and preventing incidents causing harm to the environment.

## 4. Definition of an incident

A potential or actual incident is defined as:

*‘A specific occurrence, which is brought to our attention, is within our areas of responsibility, which may have an environmental and/or operational impact and may require NRW response.’*

Issues arising which we may not class as an incident include occurrences brought to our attention that are:

- not within our statutory responsibilities,
- and/or do not have an environmental impact,
- and/or do not have an impact upon our own work and reputation.

## 5. What’s within and without our remit

With respect to incidents, our remit includes the following (of particular note if they occur on an asset we manage):

- damage or risk to the natural environment;
- damage or risk to our assets;
- pollution of water, land or air;
- poaching or illegal fishing, including angling, netting and cockling;
- illegal tree felling;
- fish in distress or dead fish;
- tree disease;
- wildlife crime that has already been committed (current incidents should be reported to the police via the non-emergency number, 101);
- potential or actual flooding caused by:
  - severe weather, tidal conditions and/or the obstruction, failure, breach or damage of a flood defence or asset,

- the building of a structure that might pose a risk of flooding, including flooding from a non-main watercourse that is part of our estate;
- debris with the potential to cause blockage in a main watercourse;
- all fly-tipping and illegal deposits of industrial/commercial waste on our land;
- fly-tipping and the illegal dumping of hazardous waste or large amounts of industrial/commercial waste, (>20 tons, or a tipper load) not on our land;
- incidents involving odour, noise, dust, pests and vermin, litter, mud & debris on public highways at sites we regulate, such as landfill sites, waste transfer stations etc.;
- burning of commercial, industrial or hazardous waste, such as asbestos, without a licence;
- abstraction from, discharges to, or alterations to, watercourses, without our consent;
- unusual drops in river flow;
- collapsed or badly damaged river or canal banks;
- damage to Sites of Special Scientific Interest or other protected sites;
- illegal waste sites and unlicensed waste carriers;
- sightings of live or dead otters;
- dead animals, but only when they are believed to have died due to pollution, or they are in a main river and likely to cause flooding or pollution;
- destruction of bat roosts.

Events outside our remit include the following:

- gas leaks or interruption of gas supply;
- burst water mains or interruption of water supply;
- interruption of electricity supply;
- discolouration or abnormalities in odour or taste of drinking water;
- flooding from burst domestic pipes or overflow from highway drains;
- fly-tipping of household rubbish or small amounts of commercial waste, not on our land;
- domestic noise nuisance;
- odours from domestic or premises not in our remit;
- burning of domestic or garden waste;
- domestic infestations (rats, insects, wasps etc.);
- smoke emissions from vehicles;
- road maintenance;
- blocked domestic drains and sewers;
- nuisance from sites we do not regulate;
- coastal erosion not on our land;
- land slips not on our land;
- anti-social behaviour on land that we do not manage;
- complaints about a NRW regulated site regarding an issue that relates to an activity outside our remit;
- wildlife welfare issues, destruction of bird nests offences, destruction of hedgerows etc. not on designated sites;
- wildlife poisoning – reports of suspicious deaths or poisonings of wild or domestic animals can be made to the [Wildlife Incident Investigation Scheme](#);
- sightings of invasive/non-native species;
- dead animals;
- marine strandings (unless on land we manage) - the [UK Cetacean Strandings Programme Website](#) has details on how to file a report.

## 6. How we categorise incidents

Following receipt of incident call we categorise occurrences at one of the following five levels, according to the degree of impact and response required:

- High Level Impact Incident
- Low Level Impact Incident
- Event
- Complaint
- Not in remit

### Receipt of incident call

We will record, refer and categorise an incident within one hour of receipt of call.

### High Level Impact Incidents: how we will respond and by when

**High Level Impact Incident: an incident whose impact requires an immediate response on a 24 hour basis, in order to mitigate the impact of the incident.**

An immediate response to a High Level Impact Incident is any activity undertaken immediately after categorisation, whether within office hours or in out-of-hours, to reduce the impact of an incident to the environment, people and economy. Response may include the following activities as soon as practically possible and within four hours, as required:

- providing formal notifications
- providing technical advice via phone and email;
- issuing flood warnings, remotely monitoring levels;
- attending multi agency command groups, liaison etc.;
- gathering specific environmental crime intelligence;
- responding to media enquiries;
- attending site and on-site activities, sample collection etc.

We should only attend where this is a clear requirement to do so, where our presence on site will significantly contribute to mitigating the effects of the incident, and where our contribution cannot effectively be made remotely.

### Low Level Impact Incidents: how we will respond and by when

**Low Level Impact Incident: an incident whose impact does not require an immediate response, within normal office hours or if received outside office hours, the response can be delayed to normal office hours and dealt with as normal operational work ('day job' i.e. business-as-usual and within normal office hours).**

The response to a Low Level Incident is an activity within normal office-hours and may include the following activities. Response may include the following activities within office hours, as required:

- providing formal notifications
- providing technical advice via phone and email;
- gathering specific environmental data;
- responding to media enquiries;
- attendance, if required at all, see explanation below.

The majority of Low Level Impact Incidents will not merit attendance. We will only attend Low Level Impact Incidents if appropriate through planned attendance at a later date or time, as part of routine work, dependent on the risks and the assessment decision.

### Events, complaints and other occurrences not in our remit

In addition to being notified of occurrences we define as incidents, we receive notification of others that come close to, but don't meet, the definition of an 'Incident'. They are still specific occurrences, brought to our attention and within our area of responsibility, but they do not have an environmental and/or operational impact that merits a High or Low level incident response. Thus they are not classed as 'Incidents', and do not require an 'Incident' type of response. But we still wish to categorise and record the information.

Within ICG, there are three types of such occurrences, termed 'Events', 'Complaints' and 'Not in Remit'.

- **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.
- **Complaint (C)** - a Complaint is an occurrence or observation notified to us, but which has no environmental or operational impact and thus does not merit a high or low level response but the caller is complaining about it. The caller is pointing out that it's more than just an event (or observation) to them, it's sufficient that they wish to express their dissatisfaction about it. Frequently these types of call report 'nuisance value' or 'loss of amenity value'.

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.

- If the call includes or solely relates to a perceived or actual lack of action by us regarding the issue, the competent officer must follow the appropriate [Complaints Policy](#) and pass forward that part of the call appropriately.
  - Our Complaints Policy does not apply if this is an appeal by a third party against a 'properly made' decision by Natural Resources Wales where the relevant laws, policies and procedures have been correctly followed in arriving at a decision.
  - Both Events and Complaints may inform monitoring programmes and be addressed within future routine operational work.
- **Not in Remit**, most occurrences notified to us that are not in our remit will be filtered out before they enter ICG and WIRS (Wales Incident Recording System), and the reporter will be referred to the appropriate party.

But occasionally an occurrence will be regarded as a potential incident and be passed to a competent officer for assessment. That assessment may finally determine that actually the occurrence is not an incident, event or complaint as defined above, as it is not within

NRW's remit and responsibilities. Thus it is categorised as Not in Remit, and full details should be passed to the appropriate third party (e.g. local authority) as soon as possible.

### Role of our Incident Communications Centre during incident categorisation

ICC (Incident Communications Centre) will record, refer and undertake routine activities both inside and outside of office hours,

For some types of incidents (both High and Low) the ICC undertake routine activities such as industry and waste site specific notifications via email or fax, or distribution of notifications such as Chemical Meteorology reports (CHEMETs) and marine pollution reports (POLREPs). These ICC routine activities are often undertaken whilst the incident is still under ICG assessment by the competent officer. Although these activities do form part of NRW's overall response to an incident, they are not formally part of ICG and are not included in the service levels above.

## 7. Initial and Final Categorisation

We will assess an occurrence notified to us according to its potential or actual impact. Our assessment of this information determines how we initially categorise the occurrence, and that initial categorisation then determines our level of response.

A final confirmed categorisation is assigned once further information becomes known, perhaps as a result of our response, our attendance to site, or from further information from professional partners or others.

A change in assigned category from the initial assessment and categorisation to the final assessment and categorisation can occur. It is most likely to be considered for an incident e.g. an initial High level impact incident might be finally assessed as a Low level impact incident, or vice versa. Similarly, an incident may initially be classed as Low level, but when we come to make our response during office hours we may find there's been no environmental impact, in which case final categorisation could be 'Event'.

Events and complaints are less likely to change from initial to final categorisation, but it is possible that either could be re-assessed as an incident in light of further information received, particularly if a number of similar complaints are received contemporaneously.

Reviews and hot debriefs of incidents should ensure feedback on incident categorisation to minimise the likelihood of assigning the wrong initial category for similar future incidents.

## 8. Substantiated and unsubstantiated reports

An occurrence is recorded as substantiated if what was reported **actually took place**. It does not have to have caused an environmental or operational impact, nor be attended. Substantiated occurrences that result in no environmental impact, or where the impact cannot be confirmed, can be recorded as an Event.

It is not necessary to attend an incident to be confident that what was reported occurred. Incidents can be set as substantiated and the impact classified based on the information or

evidence (e.g. photographs) provided by the reporter. The reliability of the reporter and the nature of what is being reported should be taken into account. For example, a nuisance complaint or a description of a pollutant and its effect may be open to interpretation and not reliable. Multiple reports with the same description would indicate reliability, as would reports by local authorities, trusted sources and other professional partners.

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

An incident should be recorded as unsubstantiated where, based on inspection or assessment, **there is no evidence** of what was reported.

## A1 Appendix: High and Low level incident categorisation guidance

These appendices are guidance for our staff responding to incidents and include technical language.

### A1.1 Impact on public health

Any incident that has or potentially could have a significant affect upon public health or senses.

Examples include:

- danger/risk to visitors to our estate;
- public exposed to hazardous substances through exposure to a pollutant, includes emissions to air (from an NRW regulated source or NRW activity), to water (surface and ground) or land (including noxious or hazardous material illegal or unauthorised disposal);
- surface water and groundwater contamination with potential to cause public health risk including abstractions;
- blue green algal incident at an NRW owned or managed waterbody or a new site that has not been previously affected by Algal blooms;
- major plant/animal disease outbreak;
- Fire Service response – change in firefighting techniques that could potentially release hazardous substances to air, or any release of hazardous substances to water or land;
- nuclear/Radioactive Substances Regulations incident involving radioactive materials and contamination requiring countermeasures;
- noise abnormal and prolonged impact from an operation we regulate;
- odour offensive and persistent enough to cause significant effect on human senses from activities regulated or conducted by NRW.

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<ul style="list-style-type: none"> <li>• fatality, acute or significant effect on human health (hospitalisation) as a result of the incident. People requiring GP treatment or multiple numbers complaining of minor health effects as a direct result of the incident.</li> <li>• public exposed to concentration levels over a widespread or local area giving rise to serious and known health risks in the longer and short term following an incident at an NRW regulated site, that are likely to cause evacuation or advice to shelter, or closure/restriction of high level amenity resource.</li> <li>• a Multi-Agency Strategic (Gold) Co-ordination Group, a Tactical (Silver) Co-ordination Group or other multi-agency group has been or may be established and requests Air Quality Cell (AQC) support.</li> <li>• there is deemed to be significant potential risk to public health or the environment through exposure to pollutants released to air as identified by Air Quality Cell.</li> <li>• odours - from an NRW regulated source that is likely to cause severe and damaging offence to human senses, including self-evacuation.</li> <li>• noise - from an NRW regulated Source that is very offensive to human senses and prevents sleep in a residential area or sensitive receptor e.g. residential home or hospital.</li> </ul>

	<ul style="list-style-type: none"> <li>• Pests, vermin - from an NRW regulated Source that is affecting a sensitive receptor e.g. hospital or a residential area.</li> <li>• public safety incident on our land – fatality or loss of limb of visitor (incident to be managed through incident management process).</li> </ul>
Low minor impact	<ul style="list-style-type: none"> <li>• minor injury or effect on human health (single numbers of people complaining of health effects) as a direct result of the incident.</li> <li>• public exposed to concentration levels that present a minimal risk to health.</li> <li>• likely to be offensive to senses (likely public response is closure of windows etc.).</li> </ul>

### A1.2 Impact on or from NRW assets

Any incident that is or potentially could affect an NRW owned or managed asset, or any incident resulting from an NRW owned or managed asset.

Examples includes storm or severe weather damage, flooding, landslide affecting life, properties, business premises and important infrastructure, or public safety incident on our land – fatality or loss of limb of visitor (see also reputational risk, incident to be managed through incident management process).

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<p>Major adverse effect:</p> <ul style="list-style-type: none"> <li>• persistent or significant impact from plant disease or pest affecting one harvesting area or larger. Loss or potential loss of harvesting sites and re-distribution of operational work;</li> <li>• storm or severe weather damage or flooding;</li> <li>• major or significant land slide with imminent or potential damage to people or communities, infrastructure, major rail, road utilities network impact;</li> <li>• an incident (including multi-agency) on our land such as fire or wild fires requiring coordinated response;</li> <li>• danger or risk to public visitors on the NRW Estate</li> <li>• impact of our estate externally, i.e. 'supply' of flood waters, trees falling across the public highway. Damage to third party property;</li> <li>• anti-social behaviour events with over 100 people attending requiring emergency services.</li> <li>• Business Continuity incident with environmental or operational impact.</li> </ul>
Low minor impact	<p>Limited impact to the land we manage:</p> <ul style="list-style-type: none"> <li>• reversible small-scale, short-term damage to our land.</li> <li>• isolated impact from plant disease or pest.</li> <li>• limited impact from landslide affecting forest areas away from high public access.</li> <li>• isolated anti-social behaviour reports managed by the emergency services.</li> <li>• deforestation by third party (theft or alleged illegal felling) on land we own or manage.</li> </ul>

### A1.3 Impact on nature conservation and biodiversity

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<ul style="list-style-type: none"> <li>• major adverse effect on a statutorily protected site or species or Water Framework Directive (WFD) water body</li> <li>• significant adverse effect on a SAC/SPA/Ramsar site reaching or maintaining its favourable condition.</li> <li>• major/persistent long term deterioration in status (potential or actual) of a WFD water body that has a significant adverse effect on its reaching or maintaining its favourable condition.</li> <li>• damage to a European Protected Species or its habitat that has a significant adverse effect on its reaching or maintaining its favourable condition.</li> <li>• major or significant long term damage to a site of special scientific interest.</li> <li>• persistent, extensive or significant damage to a protected species (on any stage of the lifecycle) or their habitat.</li> <li>• 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</li> <li>• significant short term deterioration in status (potential or actual) of a WFD water body (within the 5 year reporting period).</li> <li>• section 30 offences (fish introduction), where the introduction of fish into a Mandatory Water poses a major risk to existing stocks or local ecology. Includes unconsented introduction of non-native fish into open waters or non-mandatory waters (enclosed waters) or non-compliance with (Import of Live Fish (ILFA) licence conditions.</li> </ul>
Low minor impact	<ul style="list-style-type: none"> <li>• reversible small-scale, short-term damage to a SAC/SPA/Ramsar/SSSI</li> <li>• cetacean marine stranding and mortality (upon our land holdings only)</li> <li>• no effect on the status or objectives of a WFD water body.</li> <li>• Section 30 offences, where introduction of fish poses no known risk to existing stocks or local ecology</li> </ul>

### A1.4 Impact from air

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<ul style="list-style-type: none"> <li>• release of materials which directly cause or will lead to significant exceedance of the standards in the UK Air Quality Strategy for a sustained period, over an extensive area from activities we regulate.</li> <li>• extensive and significant deterioration in air quality from a release of large quantities of toxic materials. This may follow a serious loss of control, major fire or major equipment failure. Noticeable and sustained deterioration in local air quality from visible sources (dust and particulate fallout) or emission of toxic materials from an activity we regulate</li> <li>• release of very large quantities of materials which are prohibited in production and/or use (such as, CFCs linked to global warming or ozone depletion). Release of very large quantities of materials which are prohibited in production and/or use (such as, CFCs linked to global warming or ozone depletion) from activities we regulate.</li> </ul>

	<ul style="list-style-type: none"> <li>• a Multi-Agency Strategic (Gold) Co-ordination Group, a Tactical (Silver) Co-ordination Group or other multi-agency group has been or may be established and requests Wales Air Quality Cell (WAQC) support; or</li> <li>• there is deemed to be significant potential risk to public health or the environment through exposure to pollutants released to air;</li> <li>• Major or significant effect on amenity value leading to cancellation or significant effect on an important recreation activity or public event prohibiting the normal range of activities.</li> </ul>
Low – minor impact	<ul style="list-style-type: none"> <li>• shorter term, local effect on air quality arising from smells or visible impact (smoke and dust).</li> <li>• Minor effect on amenity value and/or aesthetic quality.</li> </ul>

### A1.5 Impact from noise

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<ul style="list-style-type: none"> <li>• noise - From an NRW regulated source that is very offensive to human senses and prevents sleep in a residential area or sensitive receptor, e.g. residential home or hospital.</li> </ul>
Low – minor impact	<ul style="list-style-type: none"> <li>• mildly offensive, short-term and/or intermittent noise that causes minimal effect on human senses.</li> </ul>

### A1.6 Impact from Odour

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<ul style="list-style-type: none"> <li>• odour offensive and persistent enough to cause significant effect on human senses from activities regulated or conducted by Natural Resource Wales.</li> <li>• odour from an NRW regulated source that is likely to cause severe and damaging offence to human senses, including self-evacuation.</li> </ul>
Low – minor impact	<ul style="list-style-type: none"> <li>• mildly offensive, short-term and/or intermittent odour that causes minimal effect on human senses.</li> </ul>

### A1.7 Impact on Land

'Land' includes any impacts on soil, the built environment and anything which is part of the terrestrial ecosystem (such as plants and animals). For example this may include industrial spillages, illegal waste activities leading to land contamination.

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<ul style="list-style-type: none"> <li>• persistent and/or extensive contamination of land which has a major impact on the use or quality of that land and is likely to need extensive decontamination measures.</li> <li>• significant but localised contamination of land which has a significant impact on the use or quality of that land.</li> <li>• fly-tipping and the illegal dumping of hazardous waste or large amounts of industrial/commercial waste, (&gt;20 tons, or a tipper load) not on our land that involves toxic/hazardous or infectious wastes with an immediate risk of serious pollution or harm to humans. No de minimis for waste illegally dumped on our land with an immediate risk of serious pollution.</li> <li>• Major or significant effect on amenity value leading to cancellation or significant effect on an important recreation activity or public event prohibiting the normal range of activities.</li> </ul>
Low – minor impact	<ul style="list-style-type: none"> <li>• insignificant or temporary contamination of land having no overall effect on the use or quality of that land. For example, where a piece of land has been contaminated with small amounts of litter and causes minimal pollution.</li> <li>• all fly-tipping and illegal deposits of industrial/commercial waste on our land;</li> <li>• Minor effect on amenity value and/or aesthetic quality.</li> <li>• deforestation by third party (theft or alleged illegal felling).</li> </ul>

### A1.8 Impact on water, including fish kills

'Water' includes surface waters (inland freshwaters, coastal waters and relevant territorial waters as defined in Section 104 of the Water Resources Act 1991) and groundwater (all water which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil). A dry river bed is part of the watercourse and therefore part of surface waters.

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<p>A persistent extensive effect and/or significant effect on water quality which has a serious effect on the quality or use of that water.</p> <p>Serious</p> <ul style="list-style-type: none"> <li>• for surface waters, 'serious' effects include levels of dangerous substance(s) exceeding toxicity levels known to cause serious harm/death to aquatic life or dissolved oxygen levels falling to critical levels.</li> <li>• for groundwater, 'serious' effects is where contaminants are known to have caused or are in sufficient volume or concentration that they are likely to cause:</li> </ul>

- the serious effects described above for surface water as a result of contaminants being transmitted in the groundwater flow;
- exceedance of any relevant quality standard for hazardous or non-hazardous pollutant at a borehole, well or spring supply used for human consumption; or
- hazardous substances (as set out in the WFD/GW Regulations) discernible above pre-existing levels in the groundwater beyond 50m in any aquifer.
- necessary closure of a strategically important potable surface or groundwater abstraction, to prevent contamination or further contamination of that source, due to an actual deterioration in water quality.

#### Extensive

- for surface waters, 'extensive' means an effect over several kilometres of a watercourse or a large area of a still water or coastal waters.
- for groundwater, 'extensive' refers to incidents that due to the volumes and concentrations involved are likely to result in a contamination plume extending beyond 50m in any aquifer.

#### Persistent

- for surface water, 'persistent' means an effect is still evident at least 7 days from the date that contamination enters the water.
- for groundwater, contamination is nearly always likely to be persistent even for relatively small incidents.

#### Significant

- significant but normally localised effect on water quality which has a significant impact on the quality or use of that water.
- for surface waters - Impacts may be up to a couple of hundred metres in a larger water body or effects over several kilometres.
- for groundwater, a 'significant' impact is where contaminants are known to have caused or are in sufficient concentration that they are likely to cause:
  - the impacts described above on surface waters as a result of contaminants being transmitted in the groundwater flow;
  - hazardous substances discernible above pre-existing levels in the groundwater within 50 metres;
  - non-hazardous pollutants exceed the relevant environmental standards applicable to that groundwater beyond 50 metres.
- precautionary closure of a strategically important potable surface or groundwater abstraction to prevent contamination of that source.
- necessary closure of a minor unlicensed potable surface or groundwater abstraction (such as serving one or two households) due to an actual deterioration in water quality.
- significant action or treatment required by the operator to address a deterioration in water quality, such as blending with uncontaminated water.

	<p>Persistent impact on fish (major)</p> <ul style="list-style-type: none"> <li>• destruction or major damage to a fish population, habitat or ecosystem.</li> <li>• for a fishery, major damage is likely to involve a fish kill affecting the major part of the catchment or an outbreak of a notifiable fish disease affecting the majority of the fish population in an entire catchment. (e.g. an outbreak of Gyrodactylus)</li> <li>• destruction or major damage to a large or important area of fish habitat. This includes the destruction of areas known to be used for spawning by migratory salmonids.</li> </ul> <p>Significant impact on fish</p> <ul style="list-style-type: none"> <li>• significant damage to a fish population or habitat.</li> <li>• significant damage is likely to involve a mortality of 3 or more adult salmon/sea trout where the populations are classed as 'At Risk' or 'Probably at Risk'; or 50 adult trout (liaise with local fisheries technical officers)</li> <li>• or more than 100 juvenile migratory salmonids, or over 50 adult brown trout. (Note in Wales the average density of juvenile migratory salmonids in a 4 metre wide stream is about 50 per 100m<sup>2</sup>. Therefore an incident involving a fish kill over several 100m of stream is likely to be significant. Liaise with local fisheries technical officers).</li> <li>• for other species (e.g. eel, lamprey, bullhead minnow etc), this would normally involve the death of more than 100 fish, but depends on the ecology of the water body.</li> <li>• significant damage or localised destruction of fish habitat, especially spawning areas</li> <li>• gross contamination or extensive coverage of the bed of the watercourse, water column or surface.</li> </ul>
Low – minor impact	<ul style="list-style-type: none"> <li>• Low impact is likely from a fish kill of 1 or 2 adult salmon and or sea trout where the watercourse is classified 'Not at Risk' or Probably 'Not at Risk' (liaise with local fisheries technical officers)</li> <li>• limited and localised effect on water quality which has a minimal impact on the quality or use of that water.</li> <li>• for surface waters, impacts are normally localised around the point of discharge.</li> <li>• for groundwater, impacts are normally localised around the point of discharge and the pollution unlikely to spread within geological strata. Minimal effects</li> <li>• precautionary closure of an unlicensed potable groundwater or surface water abstraction.</li> <li>• minor action or treatment required by the operator to address a deterioration in water quality.</li> <li>• minor loss of fish habitat or minor fish mortality involving the loss of small number of minor species such as stickleback and/or no more than 10 coarse fish in a fishery.</li> </ul>

## A1.9 Impact on water, with reference to human health

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<p>Serious or significant effect on human health</p> <ul style="list-style-type: none"> <li>• fatality or serious effect on human health from direct contact/exposure to pollutants in surface waters, or through the supply of contaminated potable water following an incident in surface water or groundwater.</li> <li>• there is a risk to human health when algal toxin levels exceed the recreational or drinking water warning threshold values.</li> <li>• public exposed to concentration levels over a widespread area giving rise to serious and known health risks as a result of contamination of surface waters or groundwater following a pollution or algal incident.</li> <li>• supply of contaminated drinking water with levels of pollutants/pathogens exceeding toxicological limits known to cause serious health problems.</li> <li>• significant effect on human health from direct contact/exposure to pollutants in surface water or groundwater, or through the supply of contaminated potable water following an incident. For example, several individuals with gastroenteritis.</li> <li>• multiple complaints of minor health effects due to contamination of surface waters or groundwater following a pollution or algal incident.</li> </ul>
Low – minor impact	<p>Minimal effect on human health</p> <ul style="list-style-type: none"> <li>• public exposed to concentration levels giving rise to minor health problems due to contamination of surface waters or groundwater following a pollution or algal incident, or through the supply of contaminated potable water following an incident.</li> <li>• minor health problems include a few individuals with temporary sore throats. Apply High where multiple complaints of minor health effects are reported.</li> <li>• public exposed to concentration levels that present no known or minimal risk to health.</li> </ul>

## A1.10 Impact on water, with reference to amenity value

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<p>Major or significant adverse effect on an important recreational activity or national event.</p> <ul style="list-style-type: none"> <li>• for example, cancellation or postponement of a national angling match, boating activity, or a major triathlon.</li> <li>• necessary closure or adverse effect on an EC protected bathing beach or other popular bathing beach, and restriction of normal activities. For example, notices advising against bathing at a highly popular beach for a week at the height of summer or over a bank holiday.</li> <li>• includes incidents where groundwater has been contaminated and where it is considered likely that delayed surface water contamination will directly result in an adverse impact on the event.</li> <li>• includes major water use recreational activities which are partially or fully suspended due to algal outbreaks.</li> </ul>

	<ul style="list-style-type: none"> <li>• significant adverse effect on a recreational activity or event appropriate to the surface water affected.</li> <li>• includes suspension of swimming events in reservoirs, raft racing, jet skiing due to cyanobacterial scums where the water body owner must erect warning notices.</li> <li>• significant adverse effect on aesthetic quality, e.g. gross sewage debris deposited in surface waters adjacent to private dwellings or popular recreational areas.</li> </ul>
Low – minor impact	<p>Minor effect on amenity value</p> <ul style="list-style-type: none"> <li>• minor impact on amenity value and/or aesthetic quality. For example a small amount of litter in stream, thin oil film, thin non-toxic algal growth, or non-harmful colour changes.</li> </ul>

### A1.11 Impact on water, with reference to agriculture and commerce

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<p>Major or significant damage to agriculture/ commerce</p> <ul style="list-style-type: none"> <li>• damage, including financial damage, to agricultural activity. This could be caused by: <ul style="list-style-type: none"> <li>– destruction of, or damage to, fish farm stock, crops or livestock, including groundwater-fed watercress farms, due to abstraction/use of contaminated water following a pollution incident.</li> <li>– destruction of, or damage to, shellfish or fish farm stock due to toxin producing algae.</li> </ul> </li> <li>• necessary or precautionary closure of an important agricultural abstraction, required to prevent contamination or further contamination of that source. This includes incidents where the water quality is judged unfit for stock watering, or could cause damage such as the loss of part of a crop.</li> <li>• disruption to commercial interests such as extended closure of an industrial site or serious interruption of production.</li> <li>• extensive contamination of product or long-term interruption of production (a day as a guide) due to the abstraction and use of contaminated water following a pollution or algal incident.</li> <li>• significant damage, including notable financial damage, to agricultural activity. This could be caused by: <ul style="list-style-type: none"> <li>– significant damage to fish farm stock, crops or livestock, due to abstraction and use of contaminated water following a pollution incident.</li> <li>– significant damage to shellfish or fish farm stock due to toxin producing algae.</li> <li>– the closure of an agricultural abstraction. This includes incidents where the water quality is judged unfit for stock watering, or could cause damage such as the loss of part of a crop.</li> </ul> </li> <li>• significant disruption to commercial interest due to: <ul style="list-style-type: none"> <li>– limited contamination of product or short-term interruption of production (several hours as a guide) due to the abstraction and use of contaminated water following a pollution or algal incident.</li> <li>– Closure of an industrial abstraction.</li> </ul> </li> </ul>

Low – minor impact	<ul style="list-style-type: none"> <li>ground or surface water affected resulting in minor impact and minor financial damage to agriculture or commerce.</li> </ul>
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## A1.12 Impact on fisheries

### Key point

All responses are dependent on resource availability

Only Officers appointed as Water Bailiffs under the Salmon and Freshwater Fisheries Act 1975 (SAFFA) can attend reports of illegal fishing and only those warranted under the Marine and Coastal Access Act 2009 (MACA) can respond to illegal cockling complaints.

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<p><b>Migratory salmonids</b></p> <ul style="list-style-type: none"> <li>illegal activity involving the use of any prohibited instrument (e.g. spear, gaff, net) in an area where salmon or sea trout may be present, e.g. estuaries or rivers, in catchments where the status for either species is 'at risk' or 'probably at risk'.</li> <li>rod and line fishing in a prohibited area, e.g. near weirs where migratory salmonids congregate and become easily targeted in catchments where the status for either species is 'at risk' or 'probably at risk'.</li> <li>rod and line capture, intentional killing and/or taking of any adult migratory salmonid during a time where there is mandatory catch and release for that species in a catchment that is considered 'at risk' or 'probably at risk' for salmon.</li> <li>fishing for migratory salmonids with rod and line equipment capable of taking them without a valid licence.</li> <li>rod and line byelaw offences e.g. minimum size limits, baits and lures, out of season fishing where the target species is salmon or migratory trout.</li> <li>significant contravention of migratory salmonid net licence condition or relevant byelaw, e.g. mesh size too small, failure to tag fish, fishing outside of the designated area.</li> </ul> <p><b>Eels/elvers</b></p> <ul style="list-style-type: none"> <li>unlicensed fishing for elvers</li> <li>illegal fishing for eels (deliberate targeting of) e.g. illegal fyke netting.</li> <li>illegal taking of eels using rod and line.</li> </ul> <p><b>Coarse fish, non-migratory trout, lamprey or smelt</b></p> <ul style="list-style-type: none"> <li>illegal netting of coarse fish or trout in enclosed waters or online stocked waterbodies (e.g. canals) where there is likely to be a large fish mortality.</li> </ul> <p><b>Cockling</b></p> <ul style="list-style-type: none"> <li>unlicensed fishing for cockles in a regulated fishery</li> <li>illegal fishing for cockles in closed beds</li> <li>introduction of cockles into an estuary system</li> </ul>

	<ul style="list-style-type: none"> <li>significant contravention of licence condition. For example use of unauthorised instrument to gather cockles (e.g. net or rake head &gt;30cm) or gathering above the daily quota.</li> </ul> <p>Illegal fish introductions</p> <ul style="list-style-type: none"> <li>the unpermitted introduction of non-native species or introduction of fish to a protected area.</li> </ul> <p>Crayfish</p> <ul style="list-style-type: none"> <li>the illegal trapping of any non-native crayfish where native crayfish are present.</li> </ul>
Low – minor impact	<p>Migratory salmonids</p> <ul style="list-style-type: none"> <li>unlicensed fishing in an area where migratory salmonids are likely to be present.</li> <li>breach of byelaws pertaining to bait used</li> </ul> <p>Coarse fish, non-migratory trout, lamprey or smelt</p> <ul style="list-style-type: none"> <li>unlicensed fishing for non-migratory salmonids or coarse fish</li> <li>rod and line byelaw offences e.g. minimum size limits, baits and lures, out of season fishing where the target fish species is non-migratory trout, coarse fish, eels etc.</li> </ul> <p>Crayfish</p> <ul style="list-style-type: none"> <li>the illegal trapping of any non-native crayfish where native crayfish are not present.</li> </ul> <p>Illegal fish introductions</p> <ul style="list-style-type: none"> <li>the unpermitted introduction of native species.</li> <li>the unpermitted keeping of species where a permit is required.</li> </ul> <p>Theft of fish</p> <ul style="list-style-type: none"> <li>unconsented fish removal from a privately owned water or from a river where fishing rights exist.</li> </ul>

### A1.13 Impact on water resources

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<ul style="list-style-type: none"> <li>major or significant or complete loss of river, stream or canal flow or level, where known not to be a natural occurrence.</li> <li>major or significant or complete loss of groundwater resource.</li> </ul>
Low – minor impact	<ul style="list-style-type: none"> <li>minor loss of river, stream or canal flow or level for a short period.</li> <li>minor disruption or loss of minor groundwater resource where known not to be a natural occurrence.</li> </ul>

## A1.14 Impact on Water, potable abstractions

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<p>Major effect on a potable abstraction point:</p> <ul style="list-style-type: none"> <li>necessary closure of a strategically important potable surface or groundwater abstraction, to prevent contamination or further contamination of that source, due to an actual deterioration in water quality.</li> <li>for strategic groundwater sources the impact is likely to be less immediate but closure of the abstraction may still be justified if the incident occurs within a Source Protection Zone.</li> </ul> <p>Significant effect on a potable abstraction point:</p> <ul style="list-style-type: none"> <li>closure of a strategically important potable surface or groundwater abstraction to prevent contamination of that source.</li> <li>apply High to the precautionary closure of a strategic groundwater abstraction where the incident did not fall within its nature conservation source protection zone.</li> <li>necessary closure of a minor unlicensed potable surface or groundwater abstraction (such as serving one or two households) due to an actual deterioration in water quality.</li> <li>significant action or treatment required by the operator to address a deterioration in water quality, such as blending with uncontaminated water.</li> </ul>
Low – minor impact	<p>Minor effect on a potable abstraction point:</p> <ul style="list-style-type: none"> <li>precautionary closure of an unlicensed potable groundwater or surface water abstraction.</li> <li>minor action or treatment required by the operator to address a deterioration in water quality.</li> </ul>

## A1.15 Impact on Navigation

Covers any incident that occurs in the Dee Conservancy where we are the competent authority for navigation (Dee estuary only), and has the potential to or is impacting people, property or the environment. All incidents must be reported to the Harbour Master.

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<ul style="list-style-type: none"> <li>sinking, collision or grounding of vessels; structure failure or an obstruction in the Conservancy jurisdiction resulting in blockage or hazard to navigation.</li> <li>maritime incident within the Dee estuary resulting in loss of life, release of polluting material, deployment of rescue services or significant damage to a vessel or structure.</li> <li>request to utilise the Conservancy as a place of refuge by vessels in distress. Sinking, collision or grounding of vessels; structure failure or an obstruction in the Conservancy jurisdiction resulting in blockage of the navigation channel.</li> <li>damage to, or loss of, a Dee Conservancy owned aid to navigation.</li> <li>floating debris posing a significant risk to vessels navigating within the Dee Conservancy jurisdiction.</li> </ul>

Low – minor impact	<ul style="list-style-type: none"> <li>• sinking, collision or grounding of a vessel, failure of a structure or an obstruction in the Conservancy jurisdiction that does not result in a hazard to navigation.</li> <li>• failure of a Dee Conservancy aid to navigation.</li> <li>• failure of third party aid to navigation.</li> <li>• floating debris posing a minor risk to vessels navigating within the Dee Conservancy jurisdiction.</li> </ul>
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### A1.16 Impact on potential flooding

We continually forecast and monitor for potential flooding from rivers and coastal sources of flood risk and works with the Flood Forecasting Centre to produce a daily Flood Guidance Statement (FGS) summarising flood risk at a unitary authority scale for 5 days ahead for all sources of flooding. Local forecast information combined with the FGS provides an indication of potential flooding. Depending on the flood risk, this triggers us, government and professional partner response prior to actual flooding taking place.

We provide a flood warning service to professional partners and the general public to warn them of flooding from river or coastal sources. This is underpinned by powers under the Water Resources Act 1992 (S166) and a 1996 Ministerial Direction. Flood Alerts, Flood Warnings and Severe Flood Warnings are issued based on forecast or observed conditions but in the case of Severe Flood Warnings this is done in conjunction with professional partners and locally specific information on the risk to life.

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<ul style="list-style-type: none"> <li>• Amber or Red flood risk on the FGS for any Welsh unitary authority (any source of flooding);</li> <li>• National Flood Advisory Service (NFAS) telecon with FFC and Welsh Government to discuss potential flooding risk and likely response;</li> <li>• One or more local Flood Advisory Service (FAS) telecons with LRF professional partners to discuss potential flooding risk and likely response;</li> <li>• issue of one or more Flood Warnings or Severe Flood Warnings;</li> <li>• significant media interest in potential flood risk and associated media releases/interviews;</li> <li>• NRW operational attendance at primary response sites, defences or other assets due to the risk of potential flooding and where there is no asset damage – see A1.2 Impact on or from NRW assets</li> </ul>
Low – minor impact	<ul style="list-style-type: none"> <li>• Yellow flood risk on the FGS for any Welsh unitary authority in the Flood Guidance Statement (any source of flooding);</li> <li>• issue of one or more Flood Alerts.</li> </ul>

### A1.17 Impact on actual flooding

During periods of flooding we will:

- operate defences, pumping stations and other assets to ensure they operate as they should to reduce the risk to communities from flooding from main rivers and coastal and estuarine waters;
- record and report property flooding that is notified to us;
- liaise with professional partners in the multi-agency response to flooding;
- monitor water levels where required;

- where safe to do so, deal with blockages that may exacerbate flooding from main watercourses.

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<ul style="list-style-type: none"> <li>• major flooding from a main river, or coastal or estuarine waters;</li> <li>• one or more properties (occupied dwellings, caravans, campsites, residential, commercial or industrial) flooded above floor level in the same distinct area. A property is considered to be flooded once flood water has inundated through the lowest point of entry (such as an air brick), or internal damage has been caused to the property by external flooding (such as water has entered bricks above the damp proof course). The property will be considered as flooded if the garage is flooded and is attached to the property.</li> <li>• flooding of or disruption to key sites identified in flood plans e.g. public and emergency buildings (such as hospitals, schools, police and fire stations) and other strategically important buildings which subsequently stop functioning;</li> <li>• damage to or collapse of buildings/structures is possible;</li> <li>• damage to infrastructure;</li> <li>• possible danger to life due to fast flowing or deep water, or wave overtopping or inundation;</li> <li>• evacuation of properties may be required;</li> <li>• emergency response by Police, fire, ambulance service and local authorities is significantly impaired due to flooding affecting access or equipment;</li> <li>• flooding and closure of motorways and/or major trunk roads and or busy A and B roads which cuts off roads and/or restricts vehicles travelling between communities, resulting in the extension of journey times by more than 30 minutes and affecting the emergency response;</li> <li>• flooding and closure of the rail network;</li> <li>• utility supplies unavailable or intermittently affected (such as water, electricity, gas and telecommunications) at significant number (community) of residential properties or one major commercial property, i.e. major industrial plant, chemical works.</li> <li>• any predicted or actual report of flooding from a reservoir, including damage to dam infrastructure;</li> <li>• NRW operational attendance at primary response sites, defenses or other assets as a result of actual flooding being reported and where no asset damage is evident – see A1.2 for asset damage.</li> </ul>
Low – minor impact	<ul style="list-style-type: none"> <li>• flooding to below floor level of homes and businesses (flooding below floor level means flooding of those basements and cellars not classified as living spaces and flooding below suspended floors);</li> <li>• flooding of unoccupied dwellings, detached garages and garden sheds, caravan sites or camp sites;</li> <li>• individual properties in coastal locations affected by spray or wave overtopping;</li> <li>• localised flooding of minor roads, including A (non-trunk roads), B, C and unclassified roads;</li> <li>• flooding of farmland (arable and pasture).</li> </ul>

## A1.18 Impact on radioactivity

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<ul style="list-style-type: none"> <li>• significant and extensive radioactive contamination requiring major countermeasures including environmental monitoring and sampling;</li> <li>• localised dispersion of radioactive materials and contamination requiring limited countermeasures;</li> <li>• public receive a dose of radiation;</li> <li>• emergency at a civil nuclear site within the UK, and its potential or actual impact on Wales;</li> <li>• emergency involving a defence nuclear site, a nuclear submarine in port or nuclear weapons in transit;</li> <li>• hostile use of radioactive materials from an NRW regulated source;</li> <li>• loss of control and a significant breach of an authorisation;</li> <li>• fire involving radioactive materials of significant activity;</li> <li>• loss of a radiography source of significant activity.</li> </ul>
Low – minor impact	<ul style="list-style-type: none"> <li>• no intervention or very limited intervention needed;</li> <li>• loss of a low dose rate sealed source;</li> <li>• minor breach of authorisation;</li> <li>• radioactive source found at non-permitted site.</li> </ul>

## A1.19 Impact on economic or amenity value

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<ul style="list-style-type: none"> <li>• cancellation or significant effect on an important recreation activity or public event prohibiting the normal range of activities;</li> <li>• serious contamination or damage of property requiring specialised remediation, decontamination or destruction of property from an NRW regulated or operated activity or flooding incident. This includes damage caused to car paintwork and windows from the fall out of material and resulting in compensation claims for repair (Not Cleaning) from the responsible party;</li> <li>• major or significant damage to agricultural activity such as the extensive contamination of crops or soil rendering them unfit for use, and/or death or slaughter of livestock, and or the contamination of crops which need extra treatment to restore to useable condition or distress to livestock and the need for veterinary treatment due to pollution of water or pollution to air from an NRW activity or regulated source;</li> <li>• major or significant disruption to commercial interests such as closure of an industrial site serious interruption of production (damage to commercial activity) due to pollution from air or water;</li> <li>• major or significant disruption to transport infrastructure, e.g. major road or rail closure due to pollution incident, or major waste fire.</li> </ul>
Low – minor impact	<ul style="list-style-type: none"> <li>• minor transitory effect on the public local to the site. May be considered to be a minor nuisance, with minor effects on the normal range of activities. Minor effect on property;</li> <li>• this includes visible fallout of inert dust or particulate, onto car paintwork or buildings, or litter, but which causes no damage and is easily removed;</li> </ul>

	<ul style="list-style-type: none"> <li>• minor damage to agriculture or commerce, such as inert dust or particulate fallout but which has no deleterious effect on crops, livestock or commercial activity. Would be easily washed off by rain or water.</li> </ul>
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### A1.20 Need for multi-agency co-ordination

Any incident that requires our involvement in a multi-agency incident response. This may include multi-agency response plans and the activation of a multi-agency co-ordination group or groups.

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<p>Major disruption:</p> <ul style="list-style-type: none"> <li>• disruption to normal business through the deployment of liaison resources to a multi-agency group (examples include Emergency Co-ordination Centre (Welsh Government), Strategic or Tactical Command Group, Port Authority, National Contingency Plan, Flood, COMAH, Environment Group).</li> <li>• multi agency incident on our land such as fire or wild fires requiring coordinated response.</li> </ul>
Low – minor impact	<ul style="list-style-type: none"> <li>• Not applicable.</li> </ul>

### A1.21 Media interest/risk to NRW reputation

Any Incident that has the potential to generate significant media interest or has the potential to have a significant negative effect upon NRW's reputation.

Category	Guidance
High - major, serious, persistent, extensive or significant impact	<p>Examples Include;</p> <ul style="list-style-type: none"> <li>• disruption to normal business with media and government request for contentious site information requiring dedicated resources;</li> <li>• high level of political interest which gives rise to concern by Welsh or UK government, ministers or elected members;</li> <li>• major plant disease;</li> <li>• criminal or public interest incident on our land;</li> <li>• high impact enforcement cases /major illegal activity taking place (activities we regulate as defined under our enforcement prosecution policy);</li> <li>• incidents involving NRW or our subcontractors.</li> </ul>
Low - minor impact	Not applicable.