Environmental Incident & Near-Miss Reporting Policy

Incident prevention, timely escalation, investigation and corrective action

Document number	Revision	Issue date	Review date
MOG-POL-ENV-INC-001	0	18 October 2026	18 October 2027

1. Purpose and scope

Mogas Design Ltd requires prompt reporting and proportionate investigation of actual or potential environmental harm connected to its business. This policy applies to the two directors and all independent contractors engaged by Mogas while working remotely, travelling on company business or visiting gas installations, pipelines, AGIs, PRSs and related sites. Mogas is normally a design and technical assurance consultancy, not a gas-network operator or construction contractor. Site operators, principal contractors and competent responders retain their respective operational and legal duties.

2. What must be reported

Report any actual or suspected environmental incident, near miss, unsafe environmental condition or complaint, including: oil/fuel/chemical spills; contaminated runoff, drains or watercourses; gas leakage or suspected methane release; inappropriate venting; uncontrolled waste, fly-tipping or improper disposal; damage or threatened damage to protected habitats, wildlife, trees or watercourses; dust/noise or soil contamination; permit/consent non-compliance; and a design error or omitted environmental constraint that could create a significant environmental risk. Record near misses even if no pollution occurred.

3. Immediate action and safe response

Prioritise human safety: stop affected work, move to safety, warn others and alert site control/emergency services as appropriate. Do not touch valves, isolate live gas equipment, operate spill equipment, enter confined spaces, approach releases or attempt remediation unless trained, authorised, safe and expressly within the relevant site rules/RAMS. For suspected gas release follow the site emergency plan and immediately notify the site operator/control room; call the National Gas Emergency Service on 0800 111 999 where applicable. For immediate danger to life call 999. Keep clear of ignition sources. Follow client instructions and evacuation routes. Preserve the scene/evidence only when safe.

4. Reporting timescales and routes

Notify the site supervisor/operator immediately for an event on a client-controlled site; also notify a Mogas director as soon as practicable and preferably the same day. For serious, continuing or potentially reportable pollution, escalate immediately rather than waiting for a completed form. Complete an Environmental Incident / Near-Miss Report Form within 24 hours where reasonably practicable, and record any reason for delay. Reporting must be factual and must not imply blame.

5. Regulatory notifications and dutyholder coordination

The site operator, permit holder or other legally responsible person may be responsible for statutory/regulator notification; Mogas must not assume another party has reported. The director must verify who has the duty, what notification is required, and whether it was made. If there is ongoing serious pollution or danger to the environment in England, the Environment Agency 24-hour incident hotline is 0800 80 70 60. For Wales, Scotland or Northern Ireland use the corresponding national regulator and site arrangements. Notifications to the regulator, client, landowner, insurers or other authorities must follow applicable legal/contract duties, with time, person, reference number and supporting evidence recorded. Report unsafe gas situations in line with site emergency procedures; environmental incident reporting does not replace RIDDOR or other safety reporting where applicable.

6. Investigation, root causes and actions

A director appoints a suitable reviewer independent of the event where practicable. Identify the sequence, immediate impacts, potential impacts, relevant RAMS/site induction/permit, photographs, witnesses and environmental receptors. Determine causes without presuming fault: design information, communications, competence, site conditions, controls and third-party interfaces. Apply immediate containment only via authorised responders, then assign corrective/preventive actions with owner, deadline, evidence and verification of effectiveness. Significant design risks are transferred to project design-risk registers and communicated to the client.

7. RAMS, site visits and contractor responsibilities

Site-specific RAMS are required before every Mogas gas-site visit, including environmental hazards, spill/escape protocols, access/egress, ecological constraints and escalation contacts. All attendees must be briefed on the applicable RAMS and client induction. Changes to conditions require stop-work and RAMS review. Contractors must report incidents promptly to both their site contact and Mogas, cooperate with investigation and comply with the site operator's rules. Remote-office incidents such as improper disposal of e-waste are also in scope.

8. Records, monitoring and protection

Use the companion Environmental Incident / Near-Miss Report Form and central incident register. Record unique reference, date, location, actual/potential impacts, notifications, investigation, actions and closure. Store records securely in the controlled company cloud drive with access limited as necessary, handling personal information proportionately. Follow applicable client retention and data protection requirements. Director reviews open incidents quarterly, trends annually, and immediately after a serious event. No fabricated zero-incident claims are permitted: a nil return must reflect an actual review.

9. Related documents and review

Linked procedures: Environmental Policy; Environmental Action Plan; Environmental Aspects Register; Environmental Legislation Register; Ecology, Sustainability & Climate Change in Design Policy; Accident and Near-Miss Reporting Policy; Gas Site Visiting Safety & Conduct Policy; project-specific RAMS and client emergency procedures. Review annually, or sooner after serious incidents, changes in activities or applicable legal/client requirements. Director approval makes this policy operative; it does not represent third-party certification.

Director approval

Approving director	**Mohammed Fasiuddin**
Role	Director
Issue / approval date	18 October 2026
Next review	18 October 2027

Director signature:

Signed copy held on file – available on request.

Regulatory guidance (England): https://www.gov.uk/report-environmental-problem ; https://www.gov.uk/report-water-pollution ; https://www.hse.gov.uk/gas/domestic/faqs.htm