

**Submission
No 1**

**FOLLOW UP OF THE AUDITOR-GENERAL'S
PERFORMANCE AUDITS APRIL 2011 - SEPTEMBER
2011**

Organisation: NSW Environment Protection Authority (EPA)
Name: Mr Barry Buffier
Position: Chair and CEO
Date Received: 6/11/2012



ENVIRONMENT PROTECTION AUTHORITY

Our reference: D2012-00082
Contact: Craig Lamberton (02) 9995 5593

Jonathon O'Dea MP
Chair
Legislative Assembly Public Accounts Committee
Parliament of New South Wales
Macquarie Street
SYDNEY NSW 2000

Dear Mr O'Dea

I write in response to your letter of 28 September 2012 addressed to the Office of Environment and Heritage seeking details on the Department's response to the Auditor-General's Report on Transport of Dangerous Goods, tabled on 10 May 2011.

Please note that responsibility for implementation of the Auditor-General's recommendations now rests with the Environment Protection Authority (EPA).

I am pleased to advise that all recommendations have now been implemented within the timeframes set out in the Audit Report. Please find at Attachment A the completed template which summarises the EPA's response to the Auditor-General's Report. Attachment B provides a more detailed report describing the actions taken by the EPA to implement each recommendation. The EPA understands that WorkCover is also responding directly to the Legislative Assembly Public Accounts Committee in relation to the Auditor-General's Report.

Should you require any further information on this issue please contact Mr Craig Lamberton, EPA Director Hazardous Incidents and Environmental Health on (02) 9995 5593.

Yours sincerely

A handwritten signature in black ink, appearing to read 'B. Buffier', written over a white background.

01 NOV 2012

BARRY BUFFIER
Chair and CEO
Environment Protection Authority

Attachments

PO Box A290 Sydney South NSW 1232
59-61 Goulburn St Sydney NSW 2000
Tel: (02) 9995 5000 Fax: (02) 9995 5999
TTY (02) 9211 4723
ABN 43 692 285 758
www.environment.nsw.gov.au

Attachment A - Performance Audit -- Report on Transport of Dangerous Goods Implementation of Recommendations

Recommendation	Accepted or rejected	Actions to be taken	Due Date	STATUS (completed, on track, delayed) and COMMENT	RESPONSIBILITY (Section of agency responsible for implementation)
<p>1. EPA and WorkCover need to establish by June 2012 mechanisms for gathering and sharing meaningful and reliable information on the transport of dangerous goods with key agencies, and with the road and rail transport industry.</p>	<p>Accepted</p>	<p>An interagency working group including representatives from EPA, WorkCover, Independent Transport and Safety Regulator, NSW Health, NSW Fire and Rescue, NSW Police and Roads and Maritime NSW has been established. The group has reviewed data held by various agencies and other data sources. Mechanisms for sharing available data on an on-going basis and for reviewing and analysing compliance and incident data have been established – see attachment B for more details.</p>	<p>June 2012</p>	<p>Completed</p>	<p>Hazardous Materials Chemicals and Radiation (HMCR) (and WorkCover)</p>
<p>2. EPA and WorkCover by December 2011 need to strengthen the inspection and compliance program by working closely together, focusing on the most dangerous situations and the most dangerous operators and the places where their inspections can be done most expeditiously and effectively.</p>	<p>Accepted</p>	<p>EPA, WorkCover and other relevant agencies undertook joint inspection and compliance programs during 2011-12. Further joint campaigns are being rolled out in 2012-13. A risk assessment methodology has been used to identify the most dangerous situations (see Recommendation 4). A Poor Performers Program (see Attachment B) has been established to deal with the most dangerous operators.</p>	<p>Dec 2011</p>	<p>Completed</p>	<p>HMCR (and WorkCover)</p>

	Accepted	<p>The EPA has undertaken a range of awareness raising activities including: contacting individual companies; updating the EPA website; awareness raising in high risk areas (e.g. clinical waste); targeted campaigns; and sponsoring the 2012 Hazmat conference -- see attachment B for more details.</p>	June 2012	Completed	HMCR (and WorkCover)
<p>3. EPA and WorkCover need to conduct by June 2012 awareness raising programs that target areas of high risk for the transport of dangerous goods. They need to talk to industry associations about how to most effectively accomplish this.</p>	Accepted	<p>The EPA and WorkCover have established risk assessment methodologies which are being applied to the dangerous goods regulatory program. The EPA assesses risk for dangerous goods transport against four criteria: substances, activities, individual or sector performance history or capability and environmental sensitivity.</p> <p>The 2011-12 risk assessment drew on analysis of earlier compliance campaigns, discussions between agencies and the findings of the audit report. Risk assessments for areas targeted for compliance activities in 2011-12 are summarised in attachment B.</p>	Dec 2011	Completed	HMCR (and WorkCover)
<p>4. EPA needs to clearly identify with WorkCover by December 2011 the areas of high risk and ensure that risk assessments used to more effectively guide its regulatory efforts in transport of dangerous goods.</p>	Accepted	<p>The EPA and WorkCover continue to be represented on the NSW Chemicals of Security Concern Advisory Group, which co-ordinates</p>	Ongoing	Completed	HMCR (and WorkCover)
<p>5. EPA and WorkCover need to continue to monitor developments in security risk</p>	Accepted				

<p>assessment, and incorporate this into their overall risk assessment.</p>		<p>the NSW contribution to the National Chemical Security Framework.</p> <p>Any measures relevant to dangerous goods transport are being assessed and implemented as they arise.</p>			
<p>6. EPA needs to improve by December 2011 the controls on its licensing and training processes to ensure the risk of fraud and corrupt conduct and remaining undetected is minimised.</p>	<p>Accepted</p>	<p>The EPA has improved its controls on dangerous goods licensing in NSW and has been collaborating with other states and territories and working with the Australian Skills Quality Authority (AQSA) to implement better dangerous goods training procedures. The EPA is currently negotiating an MoU with AQSA to formalise these arrangements. See attachment B for more detail.</p>	<p>Dec 2011</p>	<p>Completed</p>	<p>HMCR</p>
<p>7. EPA should also examine by September 2011 the feasibility of having Roads and Maritime Services issue dangerous goods licences on its behalf.</p>	<p>Accepted</p>	<p>The Auditor recommended EPA examine the possibility of RMS issuing dangerous goods driver licences on its behalf as such licence cards would include the security measures built into vehicle driver licences.</p> <p>The EPA and RMS have investigated the viability of RMS issuing dangerous goods driver licences and found it to be a feasible option.</p> <p>Specifications were prepared and a submission made to Treasury to obtain funding (\$1.6 million) for the proposal. The submission was not successful.</p>	<p>Sept 2011</p>	<p>Completed</p>	<p>HMCR</p>

<p>8. EPA and WorkCover need to establish by June 2012 safety goals and performance measures for the transport of dangerous goods regulatory program.</p>	<p>Accepted</p>	<p>An overall goal of the Government's regulatory and infrastructure programs is to enable the safe transport of dangerous goods. RMS and NSW Police provide the infrastructure and regulation of heavy vehicles aimed at minimising heavy vehicle accidents. WorkCover and EPA regulate dangerous goods with the aim of:</p> <ul style="list-style-type: none"> • minimising the leakage or chemical reaction of dangerous goods during transport including as a result of an accident; • enabling minor spills and fires to be dealt with; and • providing placarding and documentation to assist emergency services in the event of an incident. <p>The interagency working group established to implement the audit recommendations (see recommendation 1) has identified performance indicators for dangerous goods transport which cover the responsibilities of all agencies involved (see attachment B).</p>	<p>June 2011</p>	<p>Completed</p>	<p>HMCR (and WorkCover)</p>
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PERFORMANCE AUDIT OF DANGEROUS GOODS TRANSPORT: IMPLEMENTATION OF AUDIT OFFICE RECOMMENDATIONS

BACKGROUND

On 15 May 2012, the Auditor General tabled his report on a performance audit of the EPA's (then OEH) and WorkCover's regulation of the transport of dangerous goods. The EPA-WorkCover Senior Liaison Group established an interagency working group to co-ordinate implementation of the 8 recommendations contained within the audit report. The interagency working group included representatives from EPA, WorkCover, Independent Transport and Safety Regulator (ITSR), NSW Health, NSW Fire & Rescue, NSW Police and Transport NSW (Roads and Maritime Service (RMS)).

The audit report proposed staged implementation of the recommendations, with all recommendations be implemented by 30 June 2012. All recommendations have been implemented in accordance with the audit timetable. As all recommendations have been implemented, the interagency working group has been disbanded.

The following report summarises actions taken to implement the audit recommendations and on-going arrangements to ensure that the reforms introduced are sustained.

IMPLEMENTATION REPORT

Recommendation 1

EPA and WorkCover need to establish by June 2012 mechanisms for gathering and sharing meaningful and reliable information on the transport of dangerous goods with key agencies, and with the road and rail transport industry.

Data is essential to identify priority areas for regulatory action and to monitor the effectiveness of regulatory programs. Dangerous goods data requirements fall into 3 categories – compliance data, incident data and industry structure.

The interagency working group reviewed data held by various agencies and other data sources (e.g. ABS). The availability of data is patchy. Data on individual incidents is, for example, generally available, but aggregated data is limited as 'dangerous goods' is not always included in the data captured in incident databases.

The focus of activity to date has been on making best use of existing data systems, including implementing improved data collection where this can be done quickly. Consideration has been given to filling data gaps, while recognising the limited resources available to agencies whose primary responsibility is the delivery of front line services. On-going arrangements for data sharing are as indicated below.

Compliance data

The EPA has introduced a new workflow management system to track and record compliance and enforcement activities. The EPA uses the Government Licensing System to manage and record data pertaining to dangerous goods licences. The workflow management system was introduced during 2011-12 and so the first year's data is available for analysis. The EPA's Hazardous Materials, Chemicals & Radiation Section has ongoing responsibility for analysing this data and sharing it with other agencies as appropriate.

Incident data

National heavy vehicle data provides useful information on trends in heavy vehicle safety as a whole, but does not collect specific data on dangerous goods. EPA has collected data for a number of years on its after hours call outs but this data is limited to those incidents for which the fire brigade has sought EPA support. The introduction of amendments to the POEO Act in early 2012 requires all incidents to be reported. These reports, together with environment line reports will provide more robust incident data in the future. The transfer of environment line data to the new EPA workflow management system from August 2012 will strengthen future data analysis capability. The

Hazardous Incidents Review Group (HIRG), a subcommittee of the Environmental Services Functional Area, has ongoing responsibility for reviewing and sharing incident data.

Industry structure

At present there is little published industry information regarding dangerous goods transport. An Australian Bureau of Statistics report ('Freight Movements'), details the percentage of dangerous goods movement involved in general freight transport. This report is the first of its kind to be released. Industry itself holds data on market size and distribution networks. EPA is approaching industry to determine the extent to which industry would make such data available to the EPA and other agencies, given the commercially sensitive nature of much of the data.

Recommendation 2

EPA and WorkCover by December 2011 need to strengthen the inspection and compliance program by working closely together, focusing on the most dangerous situations and the most dangerous operators and the places where their inspections can be done most expeditiously and effectively.

EPA, WorkCover and other relevant agencies have undertaken joint inspection and compliance programs during 2011-12. A risk assessment methodology has been used to identify the most dangerous situations (see Recommendation 4). The Poor Performers Program (see below) has been established to deal with the most dangerous operators.

The following table summarises the 2011-12 dangerous goods compliance program.

Campaign	Agencies	Location	Date	Vehicles inspected*	Outcome
Bulk distribution points	EPA-WorkCover	Orica, Kooragang	Aug 2011	15	Compliance levels high – no enforcement action taken
		Port Botany	Oct 2011	4	Compliance levels high – no enforcement action taken
		Erskine Park	Oct 2011	4	Compliance levels high – no enforcement action taken
		Arndell Park	Nov 2011	1	Compliance levels high – no enforcement action taken
Prohibited routes (tunnels)	EPA-RMS	Sydney Harbour, Eastern Distributor, Airport and M5 East tunnels	Nov 2011	15	Enforcement action taken for breaches identified on 7 vehicles, including 2 vehicles for transport of dangerous goods (1 lead acid batteries, 1 gas cylinders) through a tunnel and 5 for general dangerous goods breaches. A total of 9 penalty notices and 9 official cautions issued.
Bulk tankers (mostly petroleum products)	EPA-RMS	Port Botany	Mar 2012	46	Enforcement action taken for breaches identified on 5 vehicles. A total of 6 official cautions issued. 6 investigations continuing.
Western region roadside campaigns	EPA-RMS-Police	Lithgow	Nov 2011	22	Enforcement action taken for breaches identified on 6 vehicles. A total of 15 penalty notices and 8 official cautions issued. 2 investigations continuing.
	EPA-ITSR-WorkCover	Port Botany	Jan, Mar 2012	n/a	One placarding non-compliance identified, ITSR issued a warning.

Reports of alleged breaches	EPA	various	various	13	4 official cautions issued.
Driver training and licensing	EPA	See Recommendation 6 for details			
Poor Performers Program	EPA	Program established to focus on "the most dangerous operators". At this stage, the program's purpose is to provide a focus for EPA regulatory activities, it is not a "name and shame" program. Based on the 2010-11 compliance program, 4 major transport companies were found to have systemic non-compliance problems. EPA met with company managers who undertook to introduce measures to improve compliance. Two of these companies have continued to have compliance problems and have been included in the Poor Performers Program. Regulatory interventions are being designed to deal with these compliance problems. Another company has been added to the program as a result of the bulk tanker campaign and other businesses will be added where warranted.			
High Risk Industries Program	EPA	Program established to focus on industries with identified compliance problems. The clinical waste industry was found to have a poor understanding of its responsibilities under dangerous goods legislation. See Recommendation 3 for action taken in relation to this industry. Other industries will be added to the program if warranted.			

* One vehicle inspection can result in up to 4 investigations, depending on whether breaches identified were the responsibility of the driver, owner, prime contractor and/or consignor.

Future joint compliance work will be co-ordinated through HIRG meetings and/or on a bilateral basis.

Recommendation 3

EPA and WorkCover need to conduct by June 2012 awareness raising programs that target areas of high risk for the transport of dangerous goods. They need to talk to industry associations about how to most effectively accomplish this.

Awareness raising activities completed by June 2012:

Companies Contacted Individually

Meetings have been held with major transport companies identified in the 2010-11 compliance program as having systemic compliance problems. Management of these companies has undertaken to implement measures to improve compliance. Feedback from these companies on problems they encounter in trying to achieve compliance, such as consignors not properly identifying their goods, are being considered in developing future compliance programs. Achieving high levels of compliance by major transport companies is critical to raising the overall levels of compliance across the industry.

Updated EPA Website

The dangerous goods pages on the EPA website were updated in October 2011 to provide clearer guidance on dangerous goods issues and requirements. These updates have included FAQ style pages outlining regulatory responsibilities of parties involved in dangerous goods transport (i.e. consignors, drivers etc) and updated application forms along with more streamlined procedures. The EPA consulted with other states to ensure the provision of consistent information.

Awareness Raising in High Risk Areas

The transportation of clinical waste was identified as a high risk area through poor compliance rates observed during two separate roadside campaigns. Subsequent follow up meetings with transporters indicated a general lack of understanding within this industry regarding regulatory obligations. In May 2012, the EPA delivered a presentation to the '2012 Clinical Waste Workshop' on dangerous goods and POEO requirements for transporting clinical waste in NSW. Feedback from the presentation again highlighted the fact that most were not aware of the concept of clinical waste being classified as dangerous goods. Follow up action is planned, such as ongoing discussions with industry and the potential development of educational material.

Campaign Work

The EPA and WorkCover have used the first point of loading / distribution centre compliance campaigns to raise industry awareness of its obligations. Awareness raising has been incorporated.

into all other compliance campaigns through the use of information hand outs, follow up information/ letters and also by providing information and guidance to other agencies, e.g. to RMS vehicle inspectors to enable them to check dangerous goods requirements at their own heavy vehicle stops and to involve EPA officers where necessary.

Registered Training Organisations (delivering dangerous goods driver training)

Awareness raising within the training industry is being facilitated through direct engagement with training organisations and the national training regulator to enable industry to have a better understanding of processes and obligations (see recommendation 6 for further details on improvements to the training system).

2012 HazMat Conference

The EPA sponsored the 2012 Hazmat Conference, held in May. EPA Staff attended to liaise with industry and provide information and answer any questions regarding regulation in NSW and relevant dangerous goods work being undertaken.

Recommendation 4

EPA needs to clearly identify with WorkCover by December 2011 the areas of high risk and ensure that risk assessments are consistently used to more effectively guide its regulatory efforts in transport of dangerous goods.

The EPA and WorkCover have established risk assessment methodologies which are being applied to the dangerous goods regulatory program. The EPA assesses risk against four criteria - substances, activities, individual or sector performance history or capability and environmental sensitivity.

The 2011-12 risk assessment drew on analysis of earlier compliance campaigns, discussions between agencies and the findings of the audit report. Risk assessments for areas targeted for compliance activities in 2011-12 are summarised in the following table.

	Substance	Activity	Performance history or capability	Environment
Bulk distribution point	Wide range of dangerous goods including the most hazardous (<u>high risk</u>)	High volumes of dangerous goods. Poor packaging, loading, placarding or documentation here causes problems throughout the distribution chain (<u>high risk</u>)	Limited information prior to this campaign (assessed as <u>medium</u> risk in the absence of comprehensive information)	Point of loading is mostly in industrial areas of varying environmental sensitivity, but problems at loading can affect the whole distribution chain, which includes sensitive environments (<u>medium risk</u>)
Prohibited routes (tunnels)	Wide range of dangerous goods including the most hazardous (<u>high risk</u>)	Transport of dangerous goods through tunnels is prohibited because of the risks involved (<u>high risk</u>)	No substantiated evidence of widespread use of tunnels by dangerous goods vehicles but claims surface from time to time within the industry (<u>medium risk</u>)	Enclosed space heightens risks associated with fires, spills or gas emissions (<u>high risk</u>)
Bulk tankers (mostly petroleum products)	Petroleum products are highly flammable (<u>high risk</u>)	Petroleum accounts for 75% of dangerous goods transport in NSW. The flammability of petroleum products poses a high risk of combustion or explosion where a spill or accident occurs (<u>high risk</u>)	The cost of tankers and insurance means that major companies place considerable emphasis on safety and compliance. There is, however, the risk of failure of individual employees or rogue operators entering the industry (<u>medium risk</u>)	Petroleum products are transported throughout NSW. They present a particular risk in built up areas (<u>high risk</u>)

Western region roadside campaigns	Wide range of dangerous goods including the most hazardous (<u>high risk</u>)	Steep, winding roads in the area, heaving traffic and a past history of accidents (<u>high risk</u>)	Previous roadside campaigns (latest at Mt Boyce near Blackheath in August 2010) have identified the need for improved compliance (<u>medium risk</u>)	Campaign was held near Lithgow, targeting vehicles travelling through the World Heritage listed Blue Mountains (<u>high risk</u>)
Driver training and licensing	While driver training itself doesn't involve substances, the effectiveness of training determines the capability of drivers to identify and deal appropriately with high risk substances (<u>medium risk</u>)	The Audit report identified driver training as at risk of fraud or corrupt conduct (<u>high risk</u>)	No substantiated evidence of fraud or corrupt conduct in driver training but claims surface from time to time within the industry (<u>medium risk</u>)	While driver training doesn't pose a direct risk as such to the environment, the effectiveness of driver training impacts on the on-road performance of drivers, including in environmentally sensitive areas (<u>medium risk</u>)

The EPA introduced a new workflow management system in 2011-12. The system includes a prioritisation module that enables the risks associated with cases subject to both reactive and proactive compliance programs to be assessed. All 2011-12 dangerous goods compliance campaigns and investigations were managed using the workflow management system.

Recommendation 5

EPA and WorkCover need to continue to monitor developments in security risk assessment, and incorporate this into their overall risk assessment.

The EPA continues to be represented on the NSW Chemicals of Security Concern Advisory Group, which co-ordinates the NSW contribution to the National Chemical Security Framework.

Any measures relevant to dangerous goods transport will be assessed and implemented as they arise.

Recommendation 6

EPA needs to improve by December 2011 the controls on its licensing and training processes to ensure the risk of fraud and corrupt conduct occurring and remaining undetected is minimised.

Licensing

Applicants for dangerous goods driver licences are required to submit documentation (proof of successful completion of training, medical certificate and RMS driving record) when applying for or renewing a licence. Proof of training has been identified as the highest risk for fraud or corrupt activity. See 'Training' below for details on how this risk is being addressed. The lower risk associated with forged medical certificates or RMS driving records is being addressed by authenticity checks of selected applications.

While the focus of the audit was on risks associated with driver licensing, EPA has also reviewed measures in place to detect any fraud or corrupt activity associated with dangerous goods vehicle licensing. The current requirement to provide photographic evidence of a tank compliance plate when applying for a licence and the industry-run safe load pass scheme for petrol tankers is considered adequate. In 2011, EPA strengthened its tanker design approval process by requiring third party certification of compliance with the relevant standard. EPA is reviewing the implementation of this reform and may further strengthen control measures as an outcome of the review.

Training

Reforms are currently underway at a national level to strengthen and harmonise dangerous goods driver training, including the implementation of a new nationally recognised Unit of Competency for driver training. The EPA has been collaborating with other states and working with the Australian

Skills Quality Authority (ASQA) to implement better procedures, including more robust compliance programs and reduced red tape, to coincide with the introduction of the new Unit of Competency.

In 2011-12, the EPA undertook a desktop audit of Registered Training Organisations (RTOs) providing dangerous goods driver training in NSW. The audit found driver training was being undertaken in accordance with regulatory requirements and no evidence of fraud or corrupt activity was identified.

EPA has been negotiating with ASQA to streamline the process for approving RTOs delivering dangerous goods driver training and to improve measures to address the risk of fraud and corrupt activity occurring. A Memorandum of Understanding (MoU) between the EPA and ASQA is expected to be finalised in October 2012. The MoU will facilitate joint site audits and enable better communication and notification systems between parties to identify poor performance of training providers.

Recommendation 7

EPA should also examine by September 2011 the feasibility of having Roads and Maritime Services issue dangerous goods licences on its behalf.

While no actual occurrences of fraud have been identified, the Auditor considered that the existing EPA procedure of issuing laminated dangerous goods driver licences was at risk of fraud or corrupt conduct. The Auditor recommended EPA examine the possibility of Road and Maritime Services (RMS) issuing dangerous goods driver licences on its behalf as such licence cards would include the security measures built into vehicle driver licences.

The EPA and RMS have investigated the viability of RMS issuing dangerous goods driver licences and found it to be a feasible option. The current firearms licensing model (i.e. where RMS issues firearms licences on behalf of NSW Police), appeared to be suitable for dangerous goods driver licensing. RMS issuing the licences on EPA's behalf could also reduce red tape for drivers by aligning the validity period of vehicle and dangerous goods driver licences so that a single transaction leading to one card covering both licences could be introduced.

Specifications were prepared and a submission made to Treasury to obtain funding (\$1.6 million) for the proposal. The submission was not successful.

EPA has commenced reviewing its GLS licensing functions in the lead up to the introduction of radiation management licences and the possible transfer of urban pest control and fumigator licences from WorkCover to EPA. As part of that review, the procedure used to issue certain WorkCover licences, which includes a photo licence card with inbuilt security features, is being investigated as an alternative approach to meeting the Auditor's objective for dangerous goods driver licences.

Recommendation 8

EPA and WorkCover need to establish by June 2012 safety goals and performance measures for the transport of dangerous goods regulatory program.

An overall goal of the Government's regulatory and infrastructure programs is to enable the safe transport of dangerous goods. RMS and NSW Police provide the infrastructure and regulation of heavy vehicles aimed at minimising heavy vehicle accidents. WorkCover and EPA regulate dangerous goods with the aim of:

- minimising the leakage or chemical reaction of dangerous goods during transport including as a result of an accident;
- enabling minor spills and fires to be dealt with; and
- providing placarding and documentation to assist emergency services in the event of an incident.

Emergency services agencies have responsibility for managing incidents.

It is not sensible to isolate EPA and WorkCover responsibilities from those of other agencies when setting safety goals and performance measures for the transport of dangerous goods regulatory

programs. Also, the performance measures established have taken into account the availability or potential availability of data.

Proposed performance indicators have been developed by the implementation working group (see Table below). The HIRG will be responsible for co-ordinating reporting against multi-agency indicators.

GOAL/ PERFORMANCE INDICATOR	AUDIT REPORT SUGGESTED INDICATORS	PROPOSED INDICATORS	ISSUES/ FEASIBILITY	AGENCY RESPONSIBLE
1. Improve the compliance of operators with regulatory requirements	<ul style="list-style-type: none"> • Proportion of operators found to be fully compliant on first inspection. • Number of persistent offenders. 	<p>Campaign effectiveness</p> <p>Comparison of compliance levels before and after a campaign (or set of campaigns).</p> <p>Compliance rates of poor performers/ high risk areas</p> <p>Comparison of compliance levels over time before and after a targeted campaign. (e.g. for an industry identified as high risk, such as clinical waste transport – look at compliance levels of clinical waste transporters from earlier compliance work, carry out awareness raising campaigns and then compare compliance rates of future campaigns).</p>	<p>Comparison of compliance rates for a particular industry or sections of the transport chain (i.e. consignors etc) is feasible using results from roadside and other regulatory campaigns. However this may initially need to be a qualitative until measurement methods can be established.</p> <p>Steps will need to be taken to minimise variations in approach between campaigns for any statistical analysis to be meaningful. In particular, consistency in assessing breaches and actions taken is needed to ensure consistent regulatory outcomes and valid data.</p>	EPA
2. Reduce the risk of harm to people due to dangerous goods transport	<ul style="list-style-type: none"> • The number of dangerous goods incidents involving death or injury. • The number of high consequence events. 	The number of dangerous goods incidents where the dangerous goods have directly caused death or injury.	<p>Incidents involving dangerous goods, which also involve death or injury can be reviewed and monitored on a regular basis through the HIRG meetings.</p> <p>There needs to be a clear definition of injury, for example the WorkCover 'lost time' model.</p>	Police NSW Fire & Rescue EPA
3. Reduce the risk of harm to the environment due to dangerous goods transport	<ul style="list-style-type: none"> • The number of releases of dangerous goods substances into environmentally sensitive areas. • The amount spilled. • The number of high consequence events. 	The number of breaches of containment of dangerous goods during transport.	<p>It is possible to keep track of incidents involving dangerous goods spills which also involve potential or actual harm to the environment through the HIRG.</p> <p>External factors such as bad weather may lead to an increase in the number of accidents, hence the potential for spillage to occur may be influenced. This would need to be taken into consideration in the analysis of results.</p>	NSW Fire & Rescue EPA
4. Maintain the dangerous goods transport systems	<ul style="list-style-type: none"> • Capacity lost due to incidents. • The number of high consequence events. • Time to return the system to normal after an incident. 	Incident response times.	Response times are highly variable and external factors such as location of the incident, access, weather etc.	NSW Fire & Rescue EPA

5. Maintaining a credible and efficient licensing system.	n/a	95% of properly completed licence applications processed within 5 days. % of deficiencies identified during audits of the processing of licence applications	This is a measurable indicator. The aim is 0% deficiencies. The first audit will confirm or otherwise how close we are to achieving this aim.	EPA
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