

ENVIRONMENTAL MANAGEMENT PLANS POLICY AND GUIDELINES

1. Background

In managing and developing the airport, JAH complies with the *Commonwealth Airports Act 1996* and *Airports (Environment Protection) Regulations 1997*. In accordance with the Act, Jandakot Airport Holdings is required to have a Master Plan and an Environment Strategy reviewed and approved by the Minister of Infrastructure and Transport at least every 5 years.

In the approved Environment Strategy 2009, JAH have committed to ensuring that 70% of tenants have an Operational Environmental Management Plan (OEMP) in place by 2013, and all tenants have an OEMP in place by 2015. In addition, all construction/civil works with the potential for environmental impacts must develop and implement a Construction Environmental Management Plan (CEMP).

Whilst EMPs are developed by the tenant (or contractor in the case of CEMPs) for the tenant's specific operational activities, EMPs must meet the JAH guidelines to ensure that they are complementary and integrated with the overarching JAH Environmental Management System. As such, all EMPs must be reviewed and endorsed by JAH prior to being implemented.

2. What is an EMP?

All EMPs have the purpose of protecting the environment, and are based around the objectives of the *Commonwealth Airports Act 1996* and *Airports (Environment Protection) Regulations 1997* and other relevant legislation.

An EMP is a site-specific plan developed to ensure that all necessary measures are identified and implemented in order to protect the environment and comply with environmental legislation.

It should identify the environmental risks (and legal obligations) associated with day to day operations of a business/activity and specify the actions to mitigate and manage environmental risks.

3. Why is an EMP required?

Whilst JAH has an overall Environmental Management responsibility at Jandakot Airport, Airport tenants/contractors are responsible for managing their own operations in an environmentally responsible manner.

- OEMPs and CEMPs are a requirement under the Jandakot Airport Environment Strategy 2009. This requirement is also specified in commercial lease agreements (for OEMPs) and works/building permit approvals (for CEMPs).
- An EMP aligns tenant environmental management with the commitments set in JAH's Environment Policy and Environment Strategy.
- EMPs are a proven tool to improve management of environmental issues and improve performance of daily operations.
- EMPs assist both JAH and its tenants to meet the requirements of *Airports (Environment Protection) Regulations 1997* and other relevant environmental legislation.

4. What are the benefits of having an EMP?

As well as meeting an obligation of a lease or legal agreement, a well-developed EMP can provide business with many benefits. It can help:

- minimise environmental liabilities (including monetary fines for non-compliance);
- maximize the efficient use of resources;
- reduce waste;
- demonstrate a good corporate image;
- build awareness of environmental concern among employees;
- gain a better understanding of the environmental impacts of business activities; and
- increase profit, improving environmental performance, through more efficient operations.

You can also increase benefits through achieving environmental best practice. You can follow voluntary industry codes of conduct or the international environmental standard ISO 14000 series.

5. How do you develop an EMP?

Even though JAH requires you to address certain issues within an EMP (to ensure that overarching environmental management requirements are met at Jandakot Airport), the EMP is *your* document and should help *you* conduct your business. To develop an EMP, you may;

- Utilise guidelines provided by JAH and follow the format provided; or
- Commission an environmental consultant to develop an EMP for you to implement.

Alternatively, larger businesses with established Environmental Management Systems may wish to incorporate their Jandakot EMP requirements into their existing systems and documentation.

6. What should my EMP consist of?

The scope and content of an EMP will be a function of both the significance of a project's potential environmental impacts and also a project's size. Consequently, EMP templates are not always suitable.

The table below (Table 1) will assist you in ensuring that your EMP contains the necessary components. Further details are provided in Appendix A. Appendix B contains factors that can be used as a further checklist of an EMP's adequacy and usability. JAH will review OEMPs and CEMPs against this checklist.

Table 1. Does Your EMP Contain	Yes	No
Background		
Introduction		
Project Description (CEMP) or Business Operational Activities (OEMP)		
EMP Context		
EMP Objectives		
Environment Policy		
Environmental Management		
Environmental Management Structure and Responsibilities		
Approval and Licensing Requirements		
Reporting		
Environmental Training		
Emergency Contacts and Response		
Implementation		
Risk Assessment		
Environmental Management Activities and Controls		
Environmental Control Plans or Maps		
Environmental Schedules		
Monitoring and Review		
Environmental Monitoring		
Environmental Auditing		
Corrective Action		
EMP Review		

Note: This checklist highlights the main components of an EMP. It is not an EMP template.

7. Who should prepare, certify and approve an EMP?

Conditions of approval or consent generally require that a CEMP be approved before commencing construction. The preparation and implementation of a CEMP is generally the responsibility of the contractor.

Preparation and implementation of an OEMP is the responsibility of the tenant. At Jandakot Airport, the requirement for tenants to prepare and implement an OEMP is included in all new leases and lease renewal agreements.

JAH retains the right to ultimately endorse all CEMPs and OEMPs prepared for implementation at Jandakot Airport. In addition, all EMPs are reviewed by the Airports Environment Officer (Commonwealth Department of Infrastructure and Transport) prior to endorsement. The time required to obtain approval often depends on the quality of the documentation provided.

The certification and approval requirements for an EMP should be recognised before the document is prepared, to ensure that sufficient time is allowed.

8. Reporting Requirements

JAH has a number of statutory environmental reporting requirements. In order for JAH to report comprehensively and accurately, JAH relies on the tenants submitting timely and accurate reports.

CEMP Reports

Reporting requirements may differ significantly, depending on the size of the project and the associated environmental risks that are being managed. Reporting requirements to JAH will generally be established during the initial development and/or draft review of the CEMP by agreement between the JAH Environment Manager and the proponent.

A Post-Construction Environment Report may be required to be submitted to JAH upon completion of the Project. This report is designed to summarise environmental management

of the project and ensure that all requirements have been completed. A template is shown in Appendix C, though the proponent may choose to submit the same information in a different format or edit the provided template to meet their specific reporting needs.

OEMP Reports

Reporting requirements may differ significantly, depending on the size of the operations and the associated environmental risks that are being managed. Reporting requirements to JAH will generally be established during the development of the OEMP, by agreement between the JAH Environment Manager and the tenant.

An Annual Environment Report is required, regardless of other agreed reporting requirements. This report is designed to summarise environmental management activities over the reporting (financial) year and act as a check-list to assist both the tenant and JAH. A template is shown in Appendix D, though the tenant may choose to submit the same information in a different format or edit the provided template to meet their specific reporting needs.

Appendix A

Components of an Environmental Management Plan	
Background	
Introduction	An introduction may be appropriate for large or publicly available EMPs. It can be used to provide a description of the project's/tenant's background.
Project Description (CEMP) or Business Operational Activities (OEMP)	<p>A project description should define the nature and scope of the project. It should include:</p> <ol style="list-style-type: none"> 1) Location: The site location should be described and a plan indicating the location of the activities provided. 2) A general description of the environment of the site would also be useful. 3) Construction Operation Activities. A description of construction/operation activities should be provided. This may include: <ul style="list-style-type: none"> • A brief description of the construction/operation process; • Working or operating hours, including details of any activities required to be taken outside of these hours; • Employment numbers and type; • The plant and equipment to be used; • The location of Site facilities and work compounds. 4) Timing and Scheduling. For CEMPs, include anticipated commencement and completion dates.
EMP Context	<p>Describe how the EMP fits into the overall planning process for the project. This will involve providing a list of the project's/operation's environmental studies and any approval or consent documentation.</p> <p>Stakeholder consultation that has occurred during the preparation of the EMP should be summarised.</p> <p>Some proponents may have existing environmental management documents, such as an EMS. The relationship of the EMP to such documents should be noted.</p>
EMP Objectives	List what the EMP is trying to achieve. Be project/site specific.
Environment Policy	Where relevant, a proponent's environmental policy should be provided or at least referred to. The JAH Environmental Policy and the JAH Environmental Strategy 2009 should also be referenced.
Environmental Management	
Environmental Management Structure and Responsibilities	<p>Provide a clear organisational structure for the project/operations including names and position of personnel responsible for environmental management. A description of the roles and responsibilities should also be included. Roles and responsibilities of subcontractors and other external stakeholders should be included where appropriate (e.g. may include reference to JAH personnel and Dept Infrastructure and Transport personnel).</p> <p>Identify whose responsibility it is to ensure that the EMP is implemented and maintained. This is usually a Project Manager for a CEMP. For an OEMP, the role will depend on the organisation's size and structure.</p>
Approval and Licensing Requirements	<p>Identify the project/operation's regulatory framework. Include:</p> <ul style="list-style-type: none"> • Any conditions of approval or consent (e.g. as contained in permits/approvals leases etc). • List the legislation relevant to the project/operations and any licenses, approvals or permits required under that legislation. • Identify the person/position responsible for obtaining relevant licenses, approvals and permits, and when they are

	<p>to be obtained/renewed.</p> <ul style="list-style-type: none"> • Other applicable requirements (e.g. voluntary agreements).
Reporting	<p>A list of the reporting requirements for the Project/Operations. Include:</p> <ul style="list-style-type: none"> • A list of reports required (e.g. monitoring, incidents and complaints, auditing etc); • personnel responsible for preparing the report and when they are to be completed; • Communication protocols; and • Document control procedures.
Environmental Training	<p>All employees (including contractors) should undergo general environmental awareness training and training about their responsibilities under the EMP. The training should ensure that all employees understand their obligations to exercise due diligence for environmental matters. Environmental training should include:</p> <ul style="list-style-type: none"> • A site Induction; • Familiarisation with the requirements of the EMP; • Environmental emergency response training; • Familiarisation with site environmental controls; and • Targeted environmental training for specific personnel (e.g. plant operators may require specific training in dust minimisation). <p>The need for additional or revised training should be identified and implemented from the outputs of monitoring and reviewing the EMP.</p> <p>Records of all training should be maintained and include:</p> <ul style="list-style-type: none"> • Who was trained; • When the person was trained; • The name of the trainer; • General description of the training (e.g. Oil Spill Response Course).
Emergency Contacts and Response	<p>The EMP should nominate a contact person(s) for emergencies and how this information is to be promulgated amongst personnel on site (and visitors). The EMP should also document the procedures to be followed in the event of an environmental emergency (i.e. an event that causes or has the potential to cause environmental harm). These procedures need to include:</p> <ul style="list-style-type: none"> • The names and contact details (including all-hours telephone numbers) for emergency response personnel; • Response personnel responsibilities; • Contact details for emergency services (e.g. ambulance, fire brigade); • The location of on-site information on hazardous materials, including MSDSs and spill containment materials; • Steps to follow to minimise damage and control an environmental emergency; and • Instructions and contact details to notify relevant government agencies (including JAH).
Implementation	
Risk Assessment	<p>The type and level of risk assessment will vary depending on the project and/or operations involved. This section of the EMP should generally follow the following steps;</p> <ol style="list-style-type: none"> 1. Provide a list of all the activities to be carried out;

	<ol style="list-style-type: none"> 2. Identify the actual and potential impacts associated with each activity; 3. Identify which environmental impacts are significant. Methods for risk assessment should be selected that are appropriate to the project/operations. 4. Use this information to design environmental management activities, controls and monitoring to prevent or minimise impacts appropriately; 5. State how often, and when, this risk assessment will be carried out.
Environmental Management Activities and Controls	<p>Specify all the environmental management activities, mitigation and control measures that will be used to prevent or minimise environmental impacts. It should include detailed mitigation measures identified from the risk assessment. THIS IS USUALLY THE LARGEST SECTION OF AN EMP.</p> <p>This section should assign responsibility for control measures to specific personnel and provide time frames for their implementation. It may also specify the monitoring requirements associated with the control measures. Where monitoring requirements are identified, the EMP should state the minimum performance level or criterion to be achieved.</p>
Environmental Control Plans or Maps	<p>Environmental control plans or maps are a particularly useful on-site reference tool and should be included in the EMP. These may indicate the following:</p> <ul style="list-style-type: none"> • On-site (and adjacent) environmentally sensitive areas; • Waterways and drains; • Erosion and sediment control measures; • Works areas; parking; fuel and chemical stores etc; • Vegetation requiring protection; • Restrictions on traffic movement; • Monitoring locations.
Environmental Schedules	<p>Environmental Management Schedules are copies of forms, reports and registers used during a project's (or operation's) day-to-day environmental management. Examples include:</p> <ul style="list-style-type: none"> • Site Inspection Checklists; • Non-compliance and corrective action reports; • Environmental Incidents and Complaints Reports; • Environmental Training Register; • Waste Management Register; monitoring checklist. <p>Relevant schedules must be included in the EMP.</p>
Monitoring and Review	
Environmental Monitoring	<p>This section of the EMP should explain how environmental management activities and controls will be monitored. A monitoring checklist should be developed specifying when the environmental control activities need to be carried out, who is responsible and what methods will be used to measure effectiveness. It should include space to sign-off to verify that the control action was undertaken and is working effectively. The checklist should also specify if (and when) follow-up action is required and who is responsible.</p> <p>Details about how monitoring records will be collated, distributed and stored should also be provided.</p>

Environmental Auditing	<p>The EMP should describe the program and procedures for periodic auditing of the EMP's implementation and effectiveness. The audits should determine whether or not the EMP was properly implemented and maintained and provide information for the EMP review.</p> <p>The audit program and procedures should cover both internal and external auditing as appropriate, including scope, frequency and methods, as well as the responsibilities and requirements for conducting audits and reporting results. The frequency of audits should reflect the level of significance of environmental impacts and the results of any previous audits.</p>
Corrective Action	<p>The EMP should define procedures for dealing with non-compliance with environmental management controls, environmental incidents and emergencies. The procedures should also define who is responsible and has the authority for handling and investigating non-compliance, taking action and completing corrective and preventative action.</p> <p>Schedules should be developed for recording environmental incidents, non-compliance and corrective and preventative action.</p>
EMP Review	<p>Describe how the EMP will be reviewed, including looking at the environmental controls and procedures to make sure they are still applicable to the activities being carried out. It should include;</p> <ul style="list-style-type: none"> • When/how often this will be done; • Who is responsible for reviewing the EMP, recording decisions and the reasons for them, and making subsequent changes; and • When the reviewed EMP should be submitted for approval/distributed etc.

Appendix B. Key Success Factors of an EMP.

The below factors can be used as a further checklist of an EMP's adequacy and usability. Note that, depending on the size and impacts of the activity/operation, not all of these factors may be applicable. JAH will review OEMPs and CEMPs against this checklist.

EMP Success Factors			
Indicator	Yes	No	N/A
EMP Structure			
A management tool showing how environmental impacts will be controlled?			
Well defined, clear document structure?			
Clearly and concisely written?			
Prescriptive?			
Realistic?			
Written for its users (i.e. construction and operational personnel)?			
Site specific?			
Easy to update?			
A dynamic assessment tool?			
Auditable?			
Prepared in parallel with detailed project design?			
EMP Content			
Only relevant detail?			
Environmental objectives and/or performance criteria?			
Allocation of responsibility?			
Clear identification of environmental controls, including responsibility and timing?			
Definition of parameters that trigger review?			
Environmental training requirements?			
Environmental Policy?			
Checklists?			
Reporting and auditing requirements?			
Explanation of relationship of EMP to other environmental management documents?			
Project specific (or operationally-specific) approvals and licensing requirements?			
Links to relevant approval and consent conditions?			
EMP as a Management Tool			
Reflect level of available information?			
Draws on commitments from the Environmental Impact Assessment process?			
Contains and Environmental Risk Assessment?			
Uses plans to illustrate requirements – e.g. sensitive sites and location of controls?			
Define the relationship between the EMP and EMS (including the Jandakot Airport EMS/Policy/Strategy)?			
Identify areas of uncertainty and contain contingency plans to cover uncertainty?			

Appendix C.

Jandakot Airport Post Construction Environmental Report

To be completed by the Proponent and Submitted to JAH Environment Manager within 2 weeks of project completion unless otherwise agreed in writing by JAH.

Proponent/Company Name		File Reference	
Contact name for any queries relating to this report	Phone number	Email address	
Project Name/Description		Project Location (address, site or lot number etc)	
Project Start Date		Project Completion Date	
Incidents & Complaints		Non Compliance & Corrective Action	
Were there any Environmental Incidents or Complaints? <input type="checkbox"/> No <input type="checkbox"/> Yes If you answered yes, reports/details: <input type="checkbox"/> Are attached <input type="checkbox"/> Have already been submitted to JAH <input type="checkbox"/> Other (provide details)		Were there any non-compliances requiring corrective action? <input type="checkbox"/> No <input type="checkbox"/> Yes If you answered yes, reports/details: <input type="checkbox"/> Are attached <input type="checkbox"/> Have already been submitted to JAH <input type="checkbox"/> Other (provide details)	
Audits		Monitoring	
Were any audits (internal or external, formal or informal) conducted? <input type="checkbox"/> No <input type="checkbox"/> Yes If you answered yes, reports/details: <input type="checkbox"/> Are attached <input type="checkbox"/> Have already been submitted to JAH <input type="checkbox"/> Other (provide details)		Was any monitoring (e.g. soil, groundwater, ASS, dieback) required under construction approval conditions? <input type="checkbox"/> No <input type="checkbox"/> Yes If you answered yes, reports/details: <input type="checkbox"/> Are attached <input type="checkbox"/> Have already been submitted to JAH <input type="checkbox"/> Other (provide details)	
Insert (or attach) additional information relating to environmental management during construction.			
Submit Report (tick method of submission): <input type="checkbox"/> Email to environmental@jandakotairport.com.au <input type="checkbox"/> Fax to (08) 9417 3777 <input type="checkbox"/> Mail/Deliver to: Environment Manager, Jandakot Airport Holdings, 16 Eagle Drive, JANDAKOT WA 6164.			
To be signed on behalf of the proponent.			
Signature	Printed Name	Position	Date

