Official

Environmental Management System (EMS) Procedure

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1. Definitions

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| Term | Definition |
| ALARP | As Low As is Reasonably Practicable |
| CA | Competent Authority. Joint term for the Regulators (HSE, EA, SEPA). |
| CDOIF | Chemical and Downstream Oil Industries Forum. |
| CoGH | Cavern site known as Cape of Good Hope |
| Continual Improvement | Recurring process of enhancing the Environmental Management System in order to achieve improvement in overall environmental performance, consistent with the Environmental Policy. |
| Corrective Action | Action to eliminate the cause of a detected non-conformance or non-compliance finding. |
| CMS | Competency Management System. |
| COMAH | Control of Major Accident Hazards. |
| DIO | Defence Infrastructure Organisation |
| EA | Environment Agency |
| EIR | Environmental Information Request. |
| Environmental Management System (EMS) | Part of an organisation’s management system used to develop and implement its Environmental Policy and manage its environmental aspects. |
| Environmental Aspect | Environmental aspects are elements of activities, products and services that can interact with the environment. They include air emissions, water discharges, solid and liquid waste, energy consumption, and noise. |
| Environmental Impact | Any change to the environment, positive or negative, that wholly or partially results from the organisations activities, products or services. |
| Environmental Objective | An overall environmental goal, consistent with the Environmental Policy, that an organisation sets itself to achieve. |
| Environmental Performance | Measurable results of an organisation’s management of its environmental aspects. |
| Environmental Target | Detailed performance requirements, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives. |
| EMP | Environmental Management Programme. |
| ERA | Environmental Risk Assessments. |
| FBH | Fort Blockhouse (Gosport office) |
| FOI | Freedom of Information. |
| Hazard | The potential to cause harm, including ill health and injury, damage to property or the environment. |
| HSEQ | Health, Safety, Environment and Quality. |
| HSEQ-MS | This refers to OPA’s HSEQ Management System found on SharePoint. |
| Internal Audit | A systematic, independent, and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria set by the organisation are fulfilled including environmental management system. |
| Legal Requirement | A requirement promulgated by central or local authorities. |
| Major Accident | A major incident is defined as a significant event, which demands a response beyond the routine resulting from uncontrolled developments in the course of the operation of any establishment or transient work activity. |
| Non-compliance | The failure to act according to accepted standards, orders, or regulations. |
| Non-conformity | Non-fulfilment of a requirement. |
| MAPP | Major Accident Prevention Policy. |
| MATTE | Major Accident To The Environment. |
| OFD | Oil Fuel Depot(s). |
| OPA | Oil and Pipelines Agency. |
| Preventive Action | An action to eliminate the cause of a potential nonconformity or other undesirable potential situation. |
| Record | Document stating results achieved or providing evidence of activities performed. |
| Risk | The product of the chance that a specified undesired event will occur and the severity of the consequences of the event. |
| Risk Assessment | Process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable. |
| SEPA | Scottish Environmental Protection Agency |
| Significant Environmental Aspect | Relates to an environmental aspect that has or can have a significant environmental impact. Must be controlled through an operational or monitoring procedure, or as an objective and target. |
| SSoW | Safe System of Work |
| Stakeholder | An organisation or group of people with an interest in the business activity or impact i.e., customer, supplier, regulator etc. |

1. Introduction

The purpose of this document is to establish, document, implement, maintain and continually improve an Environmental Management System (EMS), in the spirit of the requirements of BS EN ISO 14001:2015 and describe how the Oil and Pipelines Agency (OPA) fulfils these requirements.

This manual and the EMS that it describes, is applicable to all activities related to the OPA’s primary aim of operating and maintaining the Cavern sites and managing the Navy Oil Fuel Depots in order to provide a fuel storage and pipeline delivery that is available to meet the requirements of both the Ministry of Defence and civil customers.

This management system applies to all activities conducted by the Oil and Pipelines Agency across the Naval Oil Fuel Depots and the cavern sites within England and Scotland. These activities include storage, receipt and delivery of light oil petroleum products.

The scope of this EMS also includes those activities, products and services which occur beyond the site boundaries and which the OPA can influence, including the actions of suppliers and contractors. Hence it also covers the activities undertaken, where applicable at the OPA Office locations.

1. Relationship Between HSEQ-MS and EMS

The integrated management system (HSEQ-MS) defines the occupational health, safety, and quality arrangements to enable the Oil and Pipelines Agency to control occupational health, safety, environmental and quality risks. The Environmental Management System (EMS) has been written and developed to sit alongside the existing HSEQ-MS.

There are strong links and overlaps between the systems and where these occur the EMS simply refers to the HSEQ-MS rather than repeating information. In contrast, there are elements of the EMS that do not have equivalent elements in the HSEQ-MS or require further clarification.

1. OPA Policy Statements

The OPA have a number of policy statements that define how the OPA meets its obligations to prevent major accidents, including MATTE’s and to limit the consequences for people and the environment.

The OPA HSEQ Policy Statements (including the Environmental Policy) sit within the organisation’s HSEQ-MS. The Policies are approved by the Chief Executive of the OPA and the Chair of the OPA Board.

* 1. Environmental Management System & Sustainability Policy

The Environmental Management System & Sustainability (EMSS) Policy has been developed to ensure that it reflects the OPA’s significant aspects and commitment to comply with legal and other requirements. The EMSS Policy shall be complied with at all times.

The Policy is communicated, implemented and understood throughout the Agency and is reviewed on a periodic basis. A copy of the Policy is made available to all new employees during their induction training and is displayed in each office.

* 1. Major Accident Prevention Policy

OPA has in place a Major Accident Prevention Policy (MAPP), which sets out the overall approach to health and safety, details the organisational arrangements and responsibilities, and sets out the arrangements including providing information and guidance on compliance with legal requirements through the use of policies and procedures. Further detail is contained within the HSEQ-MS.

The MAPP is available to the public via the Government website.

* 1. OPA Policy & Commitment Statement – Health Safety Environment & Quality Performance

The Agency requires all staff and contractors to work within this HSE and Quality Policy and Commitment and firmly believe that there is nothing more important than performing every job in a safe manner. The successful management of Health, Safety, Environment and Quality performance is fundamental to our success and our reputation. Further detail is contained within HSEQ-MS.

The Policy and Commitment Statement is available to the public via the Government website.

1. EMS Responsibilities

The following sections detail the roles and responsibilities within the OPA in relation to the EMS.

The Agency Board represents Top Management in the fulfilment of its obligations to define roles, allocate responsibilities and accountabilities and delegate authorities in order to ensure effective HSE and Quality management.

* 1. OPA Board Members
     + Provide resources for the establishment and maintenance of the OPA EMS.
  2. Chief Executive
     + Take appropriate action where standards or targets are not being met.
  3. Compliance & Risk Director
     + Ensure the efficient running, management, and continual improvement of the OPA EMS and compliance with relevant legislation at all times.
     + Ensure that the EMS documentation is established and maintained.
     + Generating and maintaining environmental policies, procedures, and programmes for implementation, to achieve compliance with legislation, permits, consents and good practice.
     + Investigating environmental incidents and develop action plans to correct deficiencies.
     + Lead the Management Review of the EMS by preparing and delivering reports covering the status of the EMS including environmental compliance, progress against Environmental Management Programme (EMP), internal audits and corrective action status.
  4. Operations Director
     + Ensure the implementation of environmental policies, procedures, and programmes within the OFD and Cavern sites.
  5. Process Safety Engineer
     + Act as the main link between the Depot Manager/Asset Manager, and Senior Management.
     + Advise and assist in the development and maintenance of registers of environmental aspects and impacts.
     + Support delivery of objectives and targets in the EMP.
     + Maintain the Containment Policy Scorecards.
  6. Depot Manager/ Plumley Asset Manager (or delegate)
     + Be the site focal-point for the EMS.
     + Maintain the register of environmental aspects and impacts.
     + Manage site non-conformity issues from audit reports and other sources.
     + Support delivery of objectives and targets against the EMP and Containment Policy Scorecard.
     + To co-ordinate communication on environment issues between site and the Assurance team.
     + Support and co-ordinate site logistics for internal audits.
  7. Competency Assurance Manager
     + Ensure environmental training is provided in accordance with the Competency Matrix and the appropriate training records are maintained.

1. References
   * Control of Major Accident Hazards Regulations 2015, as amended.
   * Containment of Bulk Hazardous Liquids at COMAH Establishments Containment Policy.
   * CDOIF (Chemical and Downstream Oil Industries Forum) Guidelines on Environmental Risk Tolerability for COMAH Establishments.
2. Planning – Objectives, Targets & Programmes
   1. Environmental Aspects and Impacts

The process for identifying, evaluating the significance of and reviewing the OPA’s environmental aspects and impacts is described in the Environmental Aspects Procedure.

The Environmental Aspects Procedure is supported by a suite of Environmental Aspects and Impacts Registers (one for each COMAH site).

The significant environmental aspects arising from this process will be taken into account when establishing, implementing and maintaining the EMS, particularly when developing and updating the policy and objectives and operational controls.

* 1. Environmental Risk Assessments (ERA)

Each COMAH site has an Environmental Risk Assessment (ERA) which has been developed in accordance with the CDOIF (Chemical and Downstream Oil Industries Forum) Guidelines on Environmental Risk Tolerability for COMAH Establishments.The ERA details the source, pathway and receptors associated with environmental risk and calculates the unmitigated and mitigated risk. This gives an overview of the establishment risk. The risk to each receptor by each pathway is assessed to determine whether a MATTE is possible. The outcome is plotted on a risk matrix to establish whether the risk is ‘Broadly Acceptable’, ‘Tolerable if ALARP, (TifALARP) or ‘Intolerable’. The establishment environmental risk is considered when implementing changes to the COMAH site.

* 1. Legal and Other Requirements

The OPA maintains a Legal Register which is organised into the legal provisions applicable to specific operations for the OPA as a whole. The OPA Legal Register is hosted by Legislation Update Service (LUS), in order that it remains up to date.

The OPA Legal Register is used in the areas of environment and health and safety (EHS) as well as information security and quality. Further information can be found within the OPA Legal Register Procedure available via SharePoint.

* 1. Containment Policy Scorecards

The OPA has to manage containment in accordance with the CA’s Containment Policy which covers secondary and tertiary containment of Bulk Hazardous Liquids at COMAH Establishments. Each Depot has a Containment Policy Scorecard which is reviewed on a regular basis. The Containment Policy Scorecard is the process utilised by the OPA for identifying, setting and meeting environmental objectives, targets and programmes. Whilst some of the improvement programmes are at a corporate level, others can be based on identified significant environmental aspects and can be site specific if appropriate.

The cavern sites (Plumley/CoGH) do not qualify for a Containment Policy Scorecard due to the nature of the infrastructure i.e., no tanks or bunds.

* 1. Environmental Management Programme

Each individual COMAH site has developed an Environmental Management Programme which details the identified objectives and targets for the site and links these to the EMSS Policy and all identified significant environmental aspects.

Each Depot has developed an Aspects Register in accordance with the EMS Environmental Aspects Procedure. It identifies and evaluates the environmental aspects and impacts relevant to its operations. These activities include storage, receipt and delivery of light oil petroleum products. It also includes those applicable to the activities, products and services over which the organisation has control and can exert an influence.

* 1. Flood Risk assessments

Each site has determined the flood risk in accordance with COMAH 2015 Regulations, and in accordance with CDOIF Preparing for a Flood: Guidance and Best Practice.

This assessment identifies flooding where:

* + - The flooding could directly initiate a major accident at the establishment; or
    - Where the wider impacts of flooding also need to be considered due to the potential impact on managing a major accident and challenges to the layers of protection on site, for example the ability of emergency responders to attend a major accident.
  1. Land Quality Assessments

To benchmark the environmental status of the sites, under the direction of Defence Infrastructure Organisation (DIO), Land Quality Assessments (LQAs) have been generated by external consultants for each site. The assessments are not required under civilian legislation and are part of the DIOs requirement to understand the environmental risk that the land quality may present for continued military and commercial use. The purpose is to assess the potential and possible location of any contamination arising from activities both past and present.

* 1. Climate Impacts Risk Assessment (CIRAM)

The Climate Impacts Risk Assessment Methodology (CIRAM), is a risk assessment tool developed by Defence Infrastructure Organisation (DIO), identifies the risks to defence outputs from current and future climate or extreme weather events, and identifies actions required to maintain and optimise operational capability. CIRAM helps MOD & OPA establish an understanding of the estate’s ability to anticipate, absorb, accommodate and recover from the effects of climate driven challenges, and implement resilience and adaptation actions where necessary.

CIRAMs are undertaken for sites where significant investment is being undertaken, and as such OPA in collaboration with MOD have generated CIRAM reports for the two southern sites (Gosport and Thanckes).

1. Implementation & Operation

The successful implementation of an EMS requires the commitment of all employees and contractors. All OPA personnel and contractors are responsible for adhering to the requirements of the EMS; however, there are duties assigned to specific personnel within the organisation. These roles and responsibilities are described in detail in the OPA HSEQ-MS.

* 1. Resources, Roles, Responsibility & Authority

Overall responsibility for ensuring the effective implementation and continual improvement of the EMS lies with the Chief Executive, who assumes the role of EMS Management Representative for the purposes of the Management System.

Regular monthly reports on environmental performance are given to the Board and quarterly reports are given to the HSEQ committee by the Compliance & Risk Director.

Further detail on roles and responsibilities are given within the HSEQ-MS.

Each operational OPA site has responsibility for administering the system at a local level (e.g. identifying environmental aspects and impacts and setting local objectives and targets) and overall responsibility lies with the Depot Manager.

The cavern sites (Plumley/CoGH) are currently dormant i.e., non-operational.

The OPA Organisational Structure is available via SharePoint.

* 1. Competence, Training and Awareness

The OPA Competency Management Policy sets out systems and arrangements to ensure that OPA staff competencies are addressed as part of the Competency Management System (CMS) under the direction of the Competency Assurance Manager.

The OPA HSEQ-MS describes further the arrangements for ensuring staff competence and training needs assessment. However, in summary, staff competence, training and awareness are assured through a series of measures including inductions, refresher training and reviews.

1. Communication

Effective communication, both internal and external, is fundamental to the functioning of the EMS. Within the OPA there are a number of systems and functions in place for communicating environmental and EMS information and the OPA HSEQ-MS describes these arrangements, in addition to the more general communications.

* 1. Internal Communication

Internal environmental communications take place in a number of ways across the OPA, including:

* + - Notice boards.
    - Specific job function environmental training.
    - Email.
    - Management reviews and meeting minutes.
    - Regular department meetings,
    - The weekly communications meetings.
    - Internal SharePoint.
  1. External Communication

The External communication process from stakeholders (e.g., Board, NC) and the Competent Authority (e.g. EA, SEPA) is detailed within the OPA HSEQ-MS.

All communication with the CA is channelled via the Compliance & Risk Director.

* 1. Freedom of Information (FOI) Requests

The OPA Secretariat responds to Freedom of Information requests in accordance with FOI procedures set out in the Freedom of Information Act 2000 or the Freedom of Information (Scotland) Act 2002.

Similarly, if environmental information is requested the OPA Secretariat responds to EIRs in accordance with the Environmental Information Regulations 2004.

1. Documentation

The OPA SharePoint site is used to maintain key documentation such as Standards, Policies and Procedures including those policies and procedures forming part of the EMS.

The detail of the OPA’s documentation framework is given in the HSEQ-MS.

Where applicable to contractors who do not have access to the OPA SharePoint site, EMS documentation will be communicated in compliance with the OPA Health and Safety Regulations for Contractor procedure or the Control of Works Procedure (whichever is most applicable).

Other documents such as the Environmental Aspects Registers and Environmental Management Programmes are also retained on the OPA SharePoint site but are the responsibility of Depot Manager.

1. Control of Documents

Documentation is managed by the OPA Document Controller and is available via the OPA SharePoint site.

All policies and procedures are appropriately documented, formatted, maintained, and approved in accordance with the OPA Document Management Procedure.

1. Operational Control

Operational controls at the OPA have primarily been designed and implemented to minimise the environmental impacts from significant aspects (including those which are directly controlled by legislation).

These controls take a mixture of forms including formal written procedures / work instructions, signs / labelling, physical control measures (e.g., interceptors) and planned preventive maintenance systems.

Operational controls are summarised within the individual site Aspects and Impacts Registers. Site specific and OPA-wide operational procedures consist mainly of existing maintenance and control manuals / procedures which have been amended where necessary to meet the needs of the EMS.

* 1. Control of Contractors

Given the nature of the OPA’s activities, significant amounts of work are conducted by contractors, and this therefore forms a vital part of the OPA’s control measures.

A separate Control of Works procedure is in place to describe the systems employed by OPA to control work undertaken by both staff and contractors.

1. Emergency Preparedness & Response

The OPA shall take all reasonable precautions to prevent/minimise all accidents that may have detrimental environmental consequences. Potential environmental emergency conditions have been identified within the ERA’s and the COMAH Safety Reports for each site.

The OPA Crisis Management Plan is designed to assist OPA response teams in understanding what is required to prepare for and respond appropriately to emergency events/incidents. The Crisis Management Plan covers both Emergency Preparedness and Business Continuity within a single framework plan; this is detailed within the HSEQ-MS.

In summary each Depot maintains an oil spill response plan as part of the Emergency Response Plans and procedures, which includes a COMAH Internal Emergency Plan for Upper Tier COMAH Sites. The local authority is responsible for the COMAH External Plan which has been developed for all the OFD Upper Tier COMAH Sites.

Note; although Plumley and CoGH (cavern sites) are Upper Tier COMAH sites, the local authority has not developed an External Plan as no MAH/MATTE scenarios were identified within the COMAH Safety Report.

Exercises schedules are in place in accordance with the 2015 COMAH Regulations.

1. Performance Monitoring & Measurement

The OPA plans and implements the monitoring, measurement, analysis and improvement processes to support its business activities. These processes are described in detail in the OPA HSEQ-MS and includes environmental performance.

* 1. COMAH Compliance

The OPA are committed to achieving assured regulatory compliance in 10 key areas, known as the   
10 Strategic Pillars of Compliance. The COMAH Compliance records the scores given at each CA intervention or OPA 10 pillars audit. Where the score is below what is considered “broadly compliant” an improvement plan is put in place.

* 1. Audits & Inspections

The OPA HSEQ-MS describes the arrangements for audits and inspections and the subsequent evaluation.

The Occupational EHS audits include sampling of work practices; verification of compliance with applicable legislation for activities carried out on site. This is further detailed within the OPA Audit procedure.

The OPA is subject to external audits, such as Marine audits conducted by Dept. for Transport and those conducted by Maritime Coast guard Agency auditing the oil pollution preparedness response & co-operation (OPRC) regulations. The inspection and audit plan includes those inspections and audits are required to satisfy the MoD, external regulatory and legal bodies.

* 1. Non-Conformances and Action Tracking

The OPA HSEQ-MS describes the arrangements for recording and tracking non-conformances and actions arising from incident investigation, CA interventions and audits.

* 1. KPI’s/PSPI’s

There are a number of key performance indicators (KPI’s) and process safety performance indicators (PSPI’s) that have been developed, including those relating to environmental performance. These are reported monthly to the Board.

1. Management Review

The purpose of the Management Review is for top management to review the suitability and effectiveness of the OPA EMS to deliver continual improvement in environmental performance.

The Management Reviews consist of:

* + Monthly management review by OPA leadership team;
  + monthly review by OPA Board and;
  + the quarterly OPA HSEQ Committee review.

This is further described within the OPA HSEQ-MS.