Table of Contents

1. Environmental Management Plan

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Summary:
A fully resourced plan to manage potential impacts to the environment should be developed. It is likely that aspects will be known to the Delivery Team prior to commencement of the POEMS Process. This procedure should allow the Delivery Team to budget, resource tasks that may be required to assess the significance of the impacts from the project and to demonstrate that any significant impacts are minimised or reduced, as far as reasonably practicable.

1.1. Overview

1.1.0.1.

An Environmental Management Plan (EMP) defines the strategy for assessing environmental matters and outlines the Environmental Management System. The EMP better enables Delivery Teams to manage environmental performance and apply appropriate resource.

The EMP is applicable to both the Environmental Impact Screening and Scoping (EISS) approach (EMP01 to EMP04) and the more in depth Environmental Impact Management (EIM) approach (EMP06 to EMP08). The EMP shall be applied proportionally to the POEMS option taken. The decision point for the choice between EISS and EIM is at EMP04 [1].

1.1.0.2.

Effectively deploying the POEMS assessment will support and prompt better environmental management. This should enable a range of benefits including cost and compliance.

1.1.0.3.

The EMP should be detailed for the current stage of the Acquisition cycle but should also define a workable strategy for all the remaining stages, including Disposal. This strategy covers the MOD's environmental management activities and enables project Environmental Case development.

All projects submitted to the Investment Approvals Committee (IAC) must take sustainability and envioronmental impacts into consideration.

1.1.0.4.

Where relevant and proportional, a Sustainable Procurement Plan (SPP) shall be developed. The development of a SPP will be of most benefit during the Concept, Assessment and Design phases but can also be usefully employed through life at strategic points such as a refit. The Sustainable Procurement Guide [2] and Toolkit [3]; provide guidance and support tools. The Sustainable Procurement Plan is detailed at Step 1 of the Sustainable Procurement Toolkit.

1.2. Procedure

1.2.0.1.

The maturity of the project will dictate the level of information available during the production of the EMP. However, as the programme matures and progresses through the CADMID/T lifecycle, the EMP should be updated to accurately reflect the project and environmental activities to be undertaken (EMP09 Continuous Review). The EMP must document how, who, what and when activities will be undertaken in order to meet the requirements of ASEMS.

1.2.0.2.

The EMP shall be proportionate and relative to anticipated environmental impacts. For example, a relatively concise EMP is entirely acceptable where the product, system or service is environmentally benign or its impacts and risks are small when compared to domestic household activity. Conversely, a full, complete and well referenced EMP shall be appropriate where significant environmental impacts are anticipated. Delivery Teams shall approach the EMP in a proportionate and relative manner. The Delivery Team should make use of ASEMS Proportionality Guidance to assist with establishing scope, boundaries, depth and breadth for environmental management activities.

1.2.0.3.

The EMP is a 'live' document that shall be maintained, reviewed and updated in accordance with the Continual Review Procedure detailed in Environmental Management Procedure EMP 09 Continuous Review [4] (this will help to identify when, and if, the Plan needs to be reviewed). As a minimum, this should be at:

1. Planned intervals;
2. Key project milestones;
3. 'Trigger' events, such as:
    1. Changes in International or Defence Standards;

2. Any change in the Concept of Use;
3. Any change in the Concept of Operations;
4. Relevant change/s to the materiel state;
5. Following an environmental incident.

The EMP shall be revisited, updated and used throughout the POEMS process to better enable all POEMS outputs. In particular, development of an appropriately constructed EMP will better enable the EISS study and reports, the EIM study and report and the Environmental Case.

1.2.0.4.

The EMP shall include details of how the Delivery Team or equipment operators may respond/manage abnormal conditions and reasonably foreseeable emergency situations.

1.2.0.5.

A combined approach to safety and environmental planning offers process efficiency. The output of this commonly employed approach is called a Safety and Environmental Management Plan (SEMP).

1.2.1. General

1.2.1.1.

The Delivery Team shall consider the context of the organisation and project when producing the EMP. The Delivery Team should understand the needs and expectations of interested parties relevant to the project and which of these needs and expectations becomes its compliance obligations.

1.2.1.2.

The EMP shall contain (where relevant to lifecycle stage):

1. A Product, System or Service Description;
2. Concept of use, operation and operating environment;
3. A description of the Delivery Team and structure;
4. Relationship with other systems;
5. Summary of anticipated and/or actual legal compliance arguments, exemptions / derogations;
6. Reference to the Environmental Policy to be met;
7. Stakeholders;
8. Anticipated and/or actual significant environmental aspects;
9. Outline approach to anticipated aspects including objectives and targets and communications;
10. Environmental responsibilities;
11. Interface with other business systems/processes;
12. Considerations to be embedded within the procurement process (link to significant environmental aspects);
13. Key environmental management milestones;
14. Assurance regimes;
15. Resources required;
16. Competence and SQEP;
17. Other pertinent information.

1.2.1.3.

Each of the content headings above should be applied to each CADMID lifecycle stage where relevant. Refer to Process Maps [5]for further clarity.

1.2.2. Scope

1.2.2.1.

The Delivery Team shall determine the boundaries and applicability of ASEMS to their project in order to establish the scope. The Delivery Team shall refer to ASEMS Proportionality Guidance to assist in determining the scope of the EMP and the Delivery Team should also consider the requirements of EMP02 to EMP09.

1.2.3. Reporting and Business Requirements

1.2.3.1.

The EMP shall outline the approach to significant environmental aspects and highlight how any deltas in compliance (including any exemptions or derogations) will be addressed through life and how environmental management will interface with other business systems/process (e.g. Investment Appraisal, Sustainable Procurement, Supply Chain Resilience, POSMS, Business and Capability Risk). The Delivery Team shall consider how resulting actions from applying ASEMS may impact or interface with the environmental management objectives, technological options, financial, operational and business requirements and how these may be evaluated for effectiveness.

1.2.4. Competence and SQEP

1.2.4.1.

The EMP is required to consider appropriate competence and Suitably Qualified and Experienced Persons (SQEP) when considering what resources will be required to conduct environmental management activities. GMP00 [6], GMP03 [7],

EMP03 [8] and EMP08 [9] provide further guidance relating to competence and SQEP.

1.2.4.2.

Where sufficient competent resource is not available within the Delivery Team, the Delivery Team should establish how this may be addressed (such as training, mentoring, external support) and evaluate the effectiveness of any action. Documentary evidence of competence shall be retained as part of the Environmental Case.

1.2.5. Stakeholders and Communication (EMP02, GMP01 and GMP03)

1.2.5.1.

The EMP shall establish how stakeholders will be defined and communication will be achieved in accordance with EMP02 [10], GMP01 [11] and GMP03 [7]. The EMP shall outline:

1. What it will communicate;
2. When and who to communicate to;
3. How to communicate;
4. How external communications will be handled;
5. How communications will be responded to, documented and retained;
6. How pertinent information is disseminated in accordance with the scope of ASEMS.

1.2.6. Compliance (EMP03)

1.2.6.1.

The Environmental Management Plan shall establish how environmental standards information will be accessed and how demonstration of compliance will be achieved, in accordance with EMP03 [8].

1.2.7. Environmental Aspects (EMP04 & 08)

1.2.7.1.

The EMP shall identify how environmental aspects are to be identified and prioritised. The EMP should also establish how environmental aspects can be controlled or influenced to be reduced across the CAMID/T Lifecycle and consider how best to embed mitigations within the procurement process.

The Delivery Team should make use of ASEMS Proportionality Guidance to assist with establishing scope, boundaries, depth and breadth for environmental management activities.

1.2.8. Environmental Objectives (EMP06)

1.2.8.1.

Environmental objectives, in accordance with EMP06 [12], shall be set in line with any significant environmental aspect, standards, risk and/or opportunities.

1.2.8.2.

 The EMP shall outline how:

1. Objectives will be achieved;
2. What will be done and what resources are required;
3. Who will be responsible and accountable;
4. Time frames for key milestones and completion;
5. How progress will be monitored.

Acquisitions that pose no significant environmental impacts, standards or substantial further environmental risks and opportunities shall be recorded and limited to an Environmental Impact Screening and Scoping (EISS) study. The EISS will inform concise report outputs and be subject to continual review in line with EMP09 [4]. The more in depth Environmental Impact Management (EIM) approach will not be appropriate and the Environmental Case shall reflect this.

1.2.9. Reporting (EMP07)

1.2.9.1.

The EMP shall establish any stakeholder reporting requirements to Defence Regulators and other Business Units.

1.2.10. General Management Procedures

1.2.10.1.

The EMP shall establish how the Delivery Team environmental information will interface and meet the requirements of GMP00 to 04 [13] and ASEMS Part 3 [14]. Specifically the EMP shall establish:

Assurance Regimes:

1. Use and number of Independent Environmental Advisor(s)/Auditor(s) (IEA);
2. Constitution and number of Committee Meetings and/or Working Group/s;
3. Internal and External Audits;

Suitably Qualified and Experienced Persons for the purposes of conducting/verifying identification and assessment activity;

Reporting:

1. Business performance reporting requirements (eg. ASSERT submissions);
2. Style and format of reporting outputs from the application of ASEMS (e.g. Environmental Management Plan or Environmental Case Report);
3. Risk Referral;

Training and Awareness:

1. Training required to meet Terms of Reference;
2. Awareness training as a means of communicating pertinent elements of the EMP and fostering a sound environmental culture;

Documentation:

1. Where documentation is located;
2. Version Control.

Note: The use of an Independent Environmental Auditor (IEA) is a matter of choice for its Environmental Committee unless mandated by Regulation. Electing to use an IEA is often driven by a high environmental risk profile and the associated need to manage environmental liabilities, often including the probability of significant reputational damage.

1.2.11. Plan

1.2.11.1.

As a key part of the EMP the Delivery Team shall establish a Project Plan which articulates key environmental management milestones and how these interface with key project milestones to meet the requirements of ASEMS.

1.2.11.2.

The EMP shall present:

1. Effort (number of staff and time allocated – Full Time Equivalents);
2. Competence of persons;
3. Approving Authorities;
4. Named resource (post or individual) for the purposes of Assurance.

1.2.12. Updates

1.2.12.1.

As the project matures the EMP shall be updated to reflect how the Delivery Team will implement findings and integrate information into the environmental case, e.g. how controls and mitigations will be implemented/managed or the setting of new objectives.

1.3. Responsibilities

1.3.0.1.

The Delivery Team Leader is responsible for ensuring adequate resources are dedicated to the management of safety and environmental protection within their area of responsibility, and for facilitating appropriate arrangements to discharge responsibilities relating to this procedure in an efficient and effective manner.

1.3.0.2.

Responsibility for ensuring those arrangements are implemented, and achieve outputs which fully satisfy legislative and departmental requirements for safety and environmental protection (including compliance with this procedure), shall be formally delegated in writing to a named, competent individual within the team.

1.4. When

1.4.1. Initial Application

1.4.1.1.

For new projects this procedure should be undertaken as early as possible in the Concept Stage, prior to Outline Business Case approval.

1.4.1.2.

For legacy projects this should be undertaken at the outset to ensure that all relevant stakeholders and Subject Matter Experts are fully engaged and that the latest legislation and policies are being implemented.

1.4.2. Review

1.4.2.1.

The outputs of this procedure will require periodic review and likely revision throughout the lifetime of the project. The appropriate timings for such reviews will be determined via Procedure [EMP09](#) [4] – Continuous Review.

1.5. Required Inputs

1.5.0.1.

For established projects with existing environmental information inputs may include:

1. Environmental Impact Statement;
2. Environmental Impact Screening and Scoping Study;
3. Environmental Impact Management Report (formerly Environmental Impact Assessment);
4. Environmental Case Report;
5. Environmental risk, impact, evaluation or prioritisation register/s;
6. Standards Register;
7. Compliance Information;
8. Domain Specific Guidance/Requirements (eg. JSP 454).

1.6. Required Outputs

1.6.0.1.

Conformance should be demonstrated by completing one of the following outputs:

1. A standalone EMP;
2. A combined Safety and Environmental Management Plan;
3. A Sustainability Management Plan;
4. Incorporation of EMP01 requirements into a strategic project plan.

1.6.1. Records and Project Documentation

1.6.1.1.

A copy of the EMP produced shall be documented, controlled and retained as part of the project's Environmental Case.

1.6.2. The Environmental Case

1.6.2.1.

The Environmental Case is a structured argument and body of evidence that supports a project's environmental claims.

1.6.2.2.

The Environmental Case will consist of the Environmental Impact Screening and Scoping report and associated Environmental Impact Statement or the Environmental Impact Management report along with its associated Environmental Impact Statement, the Environmental Management Plan, the Environmental Feature Matrix, appropriate records of Environmental Committee meetings and other pertinent information generated outside of POEMS that might include a range of reports and documents such as a design for the environment study or a disposal plan.

1.6.3. The Environmental Case Report

1.6.3.1.

The Environmental Case Report provides a summary of the arguments made and presents relevant supporting evidence. The Environmental Case Report presents a snapshot in time relevant to when it is produced. Further information and about the Environmental Case and Environmental Case Report is located here: https://www.asems.mod.uk/guidance/manual/safety-cases-assessments [15]

1.7. Sustainability and Sustainable Procurement

1.7.0.1.

The POEMS performs a crucial role in ensuring that the MOD meets the environmental considerations of sustainable development and sustainable procurement. Equally, sustainable development and sustainable procurement activity will enhance the POEMS activities. For example, the outputs of a POEMS assessment undertaken during the "Concept" lifecycle stage can inform sustainable procurement activity and consequently eliminate or reduce anticipated environmental impacts within the procurement cycle (targeted contract management and enhanced design options etc.).

1.7.1. Aligning Safety and Environment

1.7.1.1.

Environmental objectives and targets in EMP06 [12] could be aligned to related safety objectives and targets, where beneficial.

1.7.1.2.

The setting of appropriate environmental objectives and targets should be carried out irrespective of the acquisition strategy. However, under some strategies it may be necessary, or appropriate, to negotiate objectives and targets rather than impose them, especially where the acquisition is one of international collaboration.

1.8. Version Control

1.8.1. Version 2.3 to 3.0 uplift

1.8.1.1.

Major uplift from the Acquisition System Guidance (ASG) to online version. POEMS has undergone major revision. Refer to the POEMS Transition Document [16] for details.

1.8.2. Version 3.0 to 3.2 uplift

1.8.2.1.

The following changes have been introduced as part of the Sustainable Procurement Tool release:

- Addition of new content to reflect the introduction of the Sustainable Procurement Tool; see paragraph 1.1.0.4 ;
- Following T45 trials new content introdcued at para 1.6.2 bringing clarity to the role of the environmental case and report.

Refer to the POEMS Transition Document [16] for additional details.

References to GMPs have been updated to reflect the new GMP structure.

1.8.3. Version 3.2 to 3.3 Uplift

1.8.3.1.

Minor text changes to align with ASP taxonomy.

1.8.4. Version 3.3 to 3.4 Uplift

1.8.4.1.

Text change replacing Project Team with Delivery Team.

Text changes to align with EMP04 update.

1.8.5. Version 3.4 to 3.5 Uplift

1.8.5.1.

Minor amendment to replace reference to Initial Gate and Main Gate and change these to Strategic Outline case, Outline Business Case and Full Business Case. This change brings terminology in line with JSP 655.

1.9. TEST

1.9.1. SUBTEST

1.9.1.1.

This is a test

Source URL: https://test.asems.mod.uk/guidance/poems/emp01

Links
[1] https://www.asems.mod.uk/guidance/poems/emp04 [2] https://www.asems.mod.uk/sites/default/files/documents/EMP/Sustainable%20Procurement%20V2%20Intro%20Guide.pdf?_t=1537867947 [3] https://www.asems.mod.uk/toolkit/sustainable-procurement-tool [4] https://www.asems.mod.uk/guidance/poems/emp09 [5] https://test.asems.mod.uk/process-maps [6] http://www.asems.mod.uk/guidance/safety-and-environmental-protection-leaflets [7] http://www.asems.mod.uk/guidance/gmp/gmp07 [8] https://www.asems.mod.uk/guidance/poems/emp03 [9] https://www.asems.mod.uk/guidance/poems/emp08 [10] https://www.asems.mod.uk/guidance/poems/emp02 [11] https://www.asems.mod.uk/guidance/gmp/gmp05 [12] https://www.asems.mod.uk/guidance/poems/emp06 [13] http://www.asems.mod.uk/guidance/gmp [14] https://test.asems.mod.uk/assurance [15] https://www.asems.mod.uk/guidance/manual/safety-cases-assessments [16]

http://www.asems.mod.uk/sites/default/files/documents/POEMS%20Transition%20Document%20for%20ASEMS%20Web.docx