

JANDAKOT AIRPORT ENVIRONMENTAL MANAGEMENT PLANS POLICY AND GUIDELINES

In managing and developing the airport, Jandakot Airport Holdings complies with the *Airports Act 1996* and *Airports (Environment Protection) Regulations 1997*. In accordance with the Act, Jandakot Airport is required to prepare a Master Plan, incorporating the Environment Strategy, every 8 years (previously every 5 years). The current Master Plan includes a commitment for construction/civil works and tenant operations to be managed under either Construction or Operational Environmental Management Plans.

Construction Environmental Management Plans (CEMPs)

All construction/civil works (including demolition) with the potential for environmental impacts require a CEMP, which must be reviewed and endorsed by the JAH Environment Department prior to works commencing. The requirement for CEMPs is typically included as a condition of the building/works/demolition permit.

Operational Environmental Management Plans (OEMPs)

The requirement for a tenant OEMP is directly linked to a tenant's environmental risk profile. In accordance with the Jandakot Airport Tenant Environmental Risk Allocation and Auditing Frequency Criteria, tenants assessed as having a 'Low' environmental risk profile may be provided with an OEMP Exemption following site inspection by the JAH Environment Department. All other tenants must prepare an OEMP and have it endorsed by JAH.

JAH has developed templates to assist tenants in the development of CEMPs and OEMPs. However, proponents / developers / tenants may wish to use their own preferred style of documentation that complies with internal or other requirements, instead of the JAH templates. All EMPs must meet the JAH guidelines to ensure they are complementary and integrated in to the overarching JAH Environmental Management System; therefore, all EMPs, whether they have utilised the JAH templates or otherwise, must be reviewed and approved by JAH prior to being implemented.

The guidance material on the following pages provides further information and advice on preparing EMPs.

1. What is an EMP?

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

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

EMPs must identify the environmental risks (and legal obligations) associated with day to day operations of a site and specify the actions to mitigate and manage those environmental risks.

2. Why is an EMP required?

Whilst JAH has responsibility for overall environmental management at Jandakot Airport, under the *Airports (Environment Protection) Regulations 1997*, airport tenants and contractors as “operators of undertakings” are responsible for managing their own operations in an environmentally responsible manner.

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

3. What are the benefits of having an EMP?

As well as meeting legal, commercial or permit obligations, a well-developed EMP can provide an organisation with many benefits. It can help:

- minimise environmental liabilities (including monetary fines for non-compliance)
- maximise 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
- increase profit, improving environmental performance, through more efficient operations.

Site specific EMPs can also assist an organisation in their compliance to the ISO 14001 Environmental Management Systems Standard.

4. How is an EMP developed and approved?

Conditions applied to Building/Works Permits, issued by the Department of Infrastructure, Transport, Regional Development and Communications (DITRDC) and JAH, generally require that a CEMP be developed and approved before commencing construction. The preparation and implementation of a CEMP is usually the responsibility of the contractor, however in some cases the developer may be better suited to preparing the document.

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.

To develop an EMP, an organisation may:

- Utilise the templates provided by JAH and follow the format provided, or engage an environmental consultant to do so; or
- Prepare an EMP in line with their own established systems and documentation, using the information provided in this document to ensure compliance with JAH requirements.

JAH ultimately approves all CEMPs and OEMPs prepared for implementation at Jandakot Airport. In addition, EMPs may be reviewed by the DITRDC Airport Environment Officer prior to approval. The time required to obtain approval often depends on the quality of the documentation provided. JAH aims to review submitted OEMP within seven days, however additional reviews may be necessary if the submitted OEMP is incomplete or contains insufficient information.

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

5. Contents of an EMP

The scope and content of an EMP will be a function of the significance of an organisations' / projects' potential environmental impacts.

CEMP and OEMP templates have been developed by JAH to assist organisations in the preparation of their documents. The templates describe the minimum information required to properly assess the organisation's management of their site, including the most commonly encountered environmental impacts and controls on both standard construction sites and tenant operations at Jandakot Airport. Additional information specific to the organisation's activities (e.g. referenced procedures), may be required in order to capture all potential environmental impacts before the EMP is approved by JAH.

Current EMP templates can only be obtained by contacting the JAH Environment Manager on 9417 0900.

Organisations may wish to use their own preferred style of documentation that complies with internal or other requirements, instead of the JAH EMP templates. However, the content must meet the minimum expectations of JAH in order to be approved.

Table 1 below can assist an organisation in ensuring that self-developed EMPs contain the necessary components. JAH reviews OEMPs and CEMPs against this checklist. Further detail on the specific information to be included in an EMP is provided in Appendix A.

Table 1. EMP Contents Checklist

Content Included in EMP	Yes	No
Background		
Introduction		
EMP objectives and context		
Project or tenant site location, description and site-specific conditions, including a detailed Site Plan (typically referenced as an appendix)		
Environmental Management		
Organisation's Environment Policy (or commitment to comply with JAH's Environmental Policy)		
Environmental management structure and responsibilities (corporate and onsite)		
Commitment to compliance with JAH EMS, policies and procedures, and other legislative requirements		
Approvals, permits and licensing requirements		
Environmental induction and training of staff/sub-contractors		
Emergency contacts and response procedures		
Implementation/Environmental Risk Management		
Site specific risk assessment		
Environmental impacts and controls		
Reporting, Monitoring & Review		
Environmental incident reporting – internally and to JAH		
Post Construction Report to JAH (CEMPs only)		
Annual Environment Report to JAH (OEMPs only)		
Environmental monitoring (checklists, inspections, audits etc.) and commitment to allow JAH and DITRDC inspections / audits		
EMP review frequency		
Environmental schedules (e.g. copies of incident report form, inspection checklists, induction register etc.)		
End of Lease Requirements (OEMPs only)		

Appendix A

Components of an Environmental Management Plan	
Background	
Introduction	An introduction should be used to provide a description of the project's/tenant's background.
Objectives and Context	List what the EMP is trying to achieve. Be project/site specific. The primary objective of all EMPs is typically to provide a management manual for use by management and staff to ensure that all necessary measures are identified and implemented in order to protect the environment and comply with environmental legislation.
Project or tenant site location, description and site-specific conditions, including a detailed Site Plan	<p>This section should define the nature and scope of the project or site. It should include:</p> <ol style="list-style-type: none"> 1) Location (Site number and street address). 2) A general description of the environment of the site (e.g. vegetated, cleared, fully developed etc.). 3) Identify neighbouring properties (these are potential sensitive receptors that may be impacted by your activities/operations). 4) A Site Plan should be provided (usually as an Appendix) that at a minimum includes, where applicable: <ul style="list-style-type: none"> • Building layout • On-site (and adjacent) environmentally sensitive areas • Wash bays, waterways, key drains • Works areas; parking; fuel and chemical stores, waste storage areas • Monitoring locations (such as groundwater bores) • Aerobic Treatment Unit/Septic system • Emergency Response equipment such as spill kits • Erosion and sediment control measures • Vegetation or significant areas requiring protection • Restrictions on traffic movement.
Facilities and Activities	<p>Detail the infrastructure that exists (or is being constructed) at the facility and the activities undertaken at the facility.</p> <p>Include working hours and personnel number.</p> <p>For CEMPs, include anticipated commencement and completion dates.</p>
Environmental Management	
Environment Policy and Systems	<p>Where relevant, the organisation's environment policy should be provided or referenced.</p> <p>The organisation should provide details about their Environmental Management System (EMS) (if applicable) and their own commitment to environmental management.</p>

Components of an Environmental Management Plan	
Environmental Management Structure and Responsibilities	Provide a clear organisational structure for the project / operations including names, position and contact details 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 DITRDC personnel). Identify who's 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.
JAH EMS, policies and procedures, and other legislative requirements	Environmental regulatory requirements should be clearly defined, including applicable: <ul style="list-style-type: none"> • Commonwealth Legislation • Western Australian Legislation • Australian Standards, Guidelines and Other Regulatory Requirements • JAH Requirements (including the Master Plan, Leasing and Development Guidelines etc).
Approvals, Permits and Licensing Requirements	Include: <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 (e.g. Dangerous Goods License, Refrigerant Handling License). • Identify the person / position responsible for obtaining relevant licenses, approvals and permits, and when they are to be obtained / renewed. • Other applicable requirements (e.g. voluntary agreements).
Environmental induction and training of staff/contractors	All employees (including contractors) should undergo a site induction that includes relevant environmental issues as detailed in the EMP. This should typically include: <ul style="list-style-type: none"> • Chemical and fuel storage and handling • Spill control and clean up • Dust and/or litter management • Fuel drain disposal • Washing of aircraft/vehicles/equipment • Painting • Environmental incident reporting. Additional training requirements relevant to the EMP should also be identified. Responsibilities for inductions and training (including maintaining records) should be identified.

Components of an Environmental Management Plan	
Emergency Contacts and Response	<p>The EMP should nominate a contact person(s) for emergencies and describe how this information is to be promulgated amongst personnel on site (and visitors). The EMP should also document or refer to the organisation's 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, such as a large uncontrolled spill). 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 external emergency services; • The location of on-site information on hazardous materials, including SDSs 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). <p>Alternatively, the EMP may reference a site-specific Emergency Response Plan that contains the above requirements.</p>
Implementation/Environmental Risk Management	
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> <ul style="list-style-type: none"> • Provide a list of all the activities to be carried out; • Identify the actual and potential impacts associated with each activity; • Identify which environmental impacts are significant. Methods for risk assessment should be selected that are appropriate to the project/operations. • Use this information to design environmental management activities, controls and monitoring to prevent or minimise impacts appropriately; • State how often, and when, this risk assessment will be carried out. <p>Refer to the CEMP and OEMP Templates for supplied guidance material on conducting risk assessments.</p>
Environmental Impacts and Controls	<p>Specify all the 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 (or as guided by the JAH templates). THIS IS USUALLY THE LARGEST SECTION OF AN EMP.</p> <p>This section should assign responsibility for control measures to specific personnel. 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> <p>Potential environmental impacts typically identified on project and operational sites at Jandakot Airport include:</p> <ul style="list-style-type: none"> • Hazardous Materials/Substances and Dangerous Goods • Hazardous Materials/Substances and Dangerous Goods Storage • Safety Data Sheets

Components of an Environmental Management Plan	
	<ul style="list-style-type: none"> • Spill Management & Containment • Waste Management (including hazardous/controlled wastes) • Fuel Drains (for Aviation activities) • Wash Bays & Aircraft/Plant/Equipment Washing • Domestic Waste Water • Firefighting Foams and PFAS • Surface Water and Stormwater Management • Air Emissions (including Dust Management) • Noise Emissions /Vibration • Water and Energy Efficiency <p>CEMPs may also need to address:</p> <ul style="list-style-type: none"> • Refuelling of Plant & Equipment • Vegetation Clearing and Flora Management • Weed Management • Fauna Management • Landscaping • Dieback Management • Heritage • Acid Sulfate Soils • Contamination • Roads and Public Transport <p>This list is not exhaustive and may not encompass all activities undertaken by the organisation, which should be identified via the risk assessment process.</p> <p>JAH has a number of resources available to assist tenants and contractors in understanding environmental management requirements at Jandakot Airport, including the Tenant Environmental Handbook and a number of Policies that cover key areas of environmental impact (http://www.jandakotairport.com.au/environment/tenant-resources.html).</p>
Reporting, Monitoring and Review	
Environmental Incident Reporting	<p>The EMP shall define procedures for dealing with environmental incidents, emergencies, and non-compliance with environmental management controls. 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>An internal report form should be developed for recording environmental incidents, non-compliance and corrective and preventative action. The JAH Incident Report Form (Appendix B and</p>

Components of an Environmental Management Plan	
	<p>http://www.jandakotairport.com.au/environment/tenant-resources.html) can be used internally as well as for external reporting to JAH.</p> <p>The EMP must note that all environmental incidents (including near misses) and complaints will be reported to the JAH Environment Department. Emergency environmental incidents (e.g. significant uncontained spills) will be reported immediately via telephone to JAH with an incident report from submitted within 24 hours. The procedures must document that reporting environmental incidents to regulatory agencies (including the DITRDC) will be the responsibility of JAH unless otherwise advised.</p>
Environmental Reporting	<p>JAH has a number of statutory environmental reporting requirements. In order for JAH to report comprehensively and accurately, JAH relies on tenants / developers / contractors submitting timely and accurate reports. The organisation shall make a commitment to this reporting within the EMP.</p> <p>CEMP Reports</p> <p>A Post Construction Environment Report shall 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. The template is shown in Appendix C.</p> <p>OEMP Reports</p> <p>An Annual Environment Report is required of all tenants with an OEMP. 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. The template is shown in Appendix D and is available at http://www.jandakotairport.com.au/environment/tenant-resources.html.</p> <p>Additional reporting may be required, depending on the size of the project/operations and the associated environmental impacts (e.g. groundwater monitoring reports). Reporting requirements to JAH will generally be established during the development and/or draft review of the EMP by agreement between the JAH Environment Department and the organisation.</p>
Environmental Monitoring	<p>This section of the EMP should explain how environmental activities and controls will be monitored. Internal monitoring / inspection checklists should be included as an appendix to the EMP. The CEMP and OEMP templates include example inspection checklist for use by tenants or contractors. Details about how monitoring records will be collated, distributed and stored should also be provided.</p>
Environmental Auditing	<p>Detail internal auditing commitments. The EMP must also include a commitment to support and participate in environmental audits and inspections undertaken by JAH and DITRDC.</p>
EMP Review Frequency	<p>Describe how often 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. This section should also document who is responsible for reviewing the EMP and making subsequent changes. New versions of the EMP shall be submitted to JAH for review.</p>

Components of an Environmental Management Plan	
Environmental Schedules	<p>Environmental 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. <p>Relevant schedules should be referenced in the EMP and may be included as appendices.</p>
End of Lease Requirements.	<p>For OEMPs, detail end of lease environmental obligations consistent with <i>Airports (Environment Protection) Regulations 1997</i> (Reg 6.07).</p>

Appendix B JAH Incident Report Form

JAH Environmental Incident Report Form			
1. Tenant Details			
Tenant/Company Name:		Location (address, or site number etc)	
Reported By (person completing this form):	Phone number:	Email address:	
2. Incident Type			
Incident Type (Check one)			
<input type="checkbox"/> Incident – Spill	<input type="checkbox"/> Monitoring Result		
<input type="checkbox"/> Incident - Other	<input type="checkbox"/> Internal Audit		
<input type="checkbox"/> Internal Complaint	<input type="checkbox"/> External Audit		
<input type="checkbox"/> External Complaint	<input type="checkbox"/> Near Miss/Potential Incident		
3. Incident/Non-Conformance Details (describe the incident in as much detail as possible).			
Location of Incident:			
Date of Incident:			
Time of Incident:			
Person Initially Reporting Incident:			
Incident Details: (Note – for spills, please provide details of the product/chemical name, volume spilled etc).			
4. Immediate Actions Taken (describe any immediate actions taken).			
5. Investigation Details and Cause of Incident/Non-Conformance.			
6. Corrective Actions/Improvements (to avoid a repeat incident/non-conformance).			
Proposed Action:	Person Responsible	Date to be Completed.	
Action 1.			
Action 2.			
<i>Insert more rows if required for additional actions</i>			
7. Approval and Submission (To be signed by Tenant)			
Signature	Printed Name	Position	Date
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.			
JAH Internal Use Only		SMS Report # (if applicable):	

PRIVACY STATEMENT: The personal information provided on this form will be managed in accordance with the Privacy Act 1988 and the Jandakot Airport Holdings Pty Ltd (JAH) Privacy Policy as published on the Jandakot Airport website at <http://www.jandakotairport.com.au/corporate/privacy-policy.html>. By completing this form, you consent to JAH collecting, using and disclosing personal information as set out in the published Privacy Policy.

Appendix D OEMP Annual Environment Report

Annual Report Template Jandakot Airport OEMP Annual Environment Report

To be completed and submitted to JAH Environment Manager by September 1 each year covering environmental management activities over the previous financial year.

Tenant/Company Name	Reporting Year (e.g. 14/15 FY)	Location/s (address, Site or Lot number etc)	
Contact name for any queries relating to this report	Phone number	Email address	
OEMP. Is your OEMP current and submitted to JAH? <input type="checkbox"/> No <input type="checkbox"/> Yes		When was your OEMP last reviewed and updated? dd/mm/yyyy.	
Incidents & Complaints		Non Compliance & Corrective Action	
Were there any Environmental Incidents or Complaints relating to your activities in the past Financial Year? <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 in the past Financial Year? <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/external, formal/ informal), environmental inspections, checklists etc 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, Aerobic Treatment Unit, UST integrity test) undertaken in the past Financial Year? <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 the implementation of your OEMP during the past financial year. This should include positive achievements.			
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.			
<i>To be signed on behalf of the Tenant:</i>			
Signature	Printed Name	Position	Date

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