

| | | |
|---|-----------------------|--------------------|
| MOD | EMS Procedures | Procedure EMP01 |
| EMP01: Stakeholders and Standards Identification | | Page 1 |

0 SHOWING CONFORMANCE

0.1 Options

- 0.1.1 There are four options to demonstrate conformance when applying this system procedure:
- Follow the defined system procedure using the recommended guidance and tools, including allowed variations and options.
 - Use an equivalent process and tool set generated elsewhere and document evidence of procedural equivalence.
 - Use an equivalent bespoke process and tool set for the project and document evidence of procedural equivalence.
 - Where the procedure is considered to be not relevant, document the basis for this decision.

1 INTRODUCTION

- 1.1.1 This procedure is the first in the series and provides the foundation for the project level Environmental Management System. The information gathered at this stage should be as accurate and complete as possible and kept up to date.
- 1.1.2 To ensure that environmental impacts are identified and appropriately managed, information on relevant stakeholders, their needs and possible contribution to the project is also collated and documented. It is also important to identify any environmental standards that potentially apply to the project. (Note that 'standards' in this context also includes legislation, agreements, MOD policies and strategies).
- 1.1.3 To ensure that environmental issues are appropriately managed, project environmental responsibilities and communication requirements should be identified and documented.

2 PROCEDURE OBJECTIVES

- 2.1.1 The main objectives of this procedure are the identification, documentation and maintenance of:
- Applicable legal requirements (this relates to national and international environmental legislation and agreements);
 - Applicable MOD policy requirements (this relates to environmental policy commitment, strategy commitments and internal regulation);

| | | | |
|-----------------------------------|-------------------------|--------------|---------------|
| Issue | Authorised by CESO DE&S | ISSUE LEVEL: | Release V2.2e |
| Approval | Authorised by DG S&E | DATE: | November 2007 |
| DOCUMENT IS UNCONTROLLED IN PRINT | | | |

| | | |
|---|-----------------------|--------------------|
| MOD | EMS Procedures | Procedure EMP01 |
| EMP01: Stakeholders and Standards Identification | | Page 2 |

| | |
|--|---|
| <ul style="list-style-type: none"> c) Stakeholders and their requirements and contribution; d) Project environmental responsibilities; e) Communication requirements. | |
| 2.1.2 | A further objective is the assembly of the Environmental Committee. |
| 3 | RESPONSIBILITIES |
| 3.1 | Accountability |
| 3.1.1 | The IPTL is accountable for the completion of this procedure. |
| 3.2 | Procedure Management |
| 3.2.1 | IPTLs may delegate the management of this procedure to a member (IPT Environmental Focal Point) or members of the IPT. |
| 3.3 | Procedure Completion |
| 3.3.1 | IPTs will complete the procedure, in conjunction with advice and information from members of the Environmental Committee. In particularly large or complex projects the IPT may task advisors or contractors to complete all or part (eg legislation registers) of the procedure. |
| 4 | WHEN |
| 4.1 | Initial Application |
| 4.1.1 | For new projects this procedure should be undertaken as early as possible in the Concept Stage, prior to Initial Gate approval. |
| 4.2 | Review |
| 4.2.1 | The outputs of this procedure will require periodic review and possible revision throughout the lifetime of the project. The appropriate timings for such reviews will be determined through following Procedure EMP08 - Continuous Review. |
| 4.2.2 | For legacy projects this procedure 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. |
| 5 | REQUIRED INPUTS |
| 5.1.1 | The 'Common Documents': <ul style="list-style-type: none"> a) User Requirement Document (URD); and b) JSP 418 (Sustainable Development and Environment Manual). |

| | | |
|-----------------------------------|--------------|---------------|
| DOCUMENT IS UNCONTROLLED IN PRINT | ISSUE LEVEL: | Release V2.2e |
| | DATE: | November 2007 |

| | | |
|---|-----------------------|--------------------|
| MOD | EMS Procedures | Procedure EMP01 |
| EMP01: Stakeholders and Standards Identification | | Page 3 |

6 REQUIRED OUTPUTS

- a) Completed **Form EMP01/F/01** – Register of Stakeholder Requirements and Information;
- b) Completed **Form EMP01/F/02** – Register of Environmental Standards;
- c) Completed **Form EMP01/F/03** – Project Environmental Responsibilities;
- d) Environmental Committee assembled and Terms of Reference agreed;
- e) Communication Plan (also refer to SSP01 – Communication);

OR

Equivalent actions and documentation that ASEG is satisfied achieve the same objectives.

7 DESCRIPTION

7.1.1 The initial identification of the following information will assist you to complete this procedure:

- a. Domain of operation of the project (air, land, water);
- b. The country (or countries) in which the equipment or service is likely to be deployed;
- c. The potential environmental issues associated with the project (eg air pollution, use of non-renewable resources);
- d. The life cycle stages the project is likely to pass through (eg CADMID);
- e. Other projects or platforms with which the project may be closely associated.

7.1.2 The information gathered for point ‘c’ (potential environmental issues) need not be detailed at this stage. The IPT Environmental Focal Point should be able to produce a preliminary list which may use simple terms such as: air emissions, emissions to water, emissions to land or resource use.

| | | |
|-----------------------------------|--------------|---------------|
| DOCUMENT IS UNCONTROLLED IN PRINT | ISSUE LEVEL: | Release V2.2e |
| | DATE: | November 2007 |

| | | |
|---|-----------------------|--------------------|
| MOD | EMS Procedures | Procedure EMP01 |
| EMP01: Stakeholders and Standards Identification | | Page 4 |

7.2 Step 1: Identify Stakeholders, their Requirements and Information Available

7.2.1 Stakeholders include individuals/groups that:

- a. include Customer 1, Customer 2;
- b. may be given responsibility for the project in later stages of CADMID (eg other IPTs);
- c. have a regulatory role or function in relation to the deployment and use of the capability being acquired;
- d. have environmental requirements from the project (eg Defence Estates may need information to complete site specific environmental assessments);
- e. hold relevant environmental information to the project or related systems or platforms (eg other IPTs, Armed Services, DE);
- f. have environmental concerns regarding the project (eg other Government Departments, pressure groups, the general public);
- g. are part of MOD and have an assurance role for equipment and capability acquisition projects.

7.2.2 When identifying stakeholders, consideration should be given to stakeholders relevant to each life cycle stage of the project.

7.2.3 **Form EMP01/F/01** - Register of Stakeholder Requirements and Information, includes a list of mandatory consultees as a starting point for identifying relevant stakeholders. This form should be completed by recording stakeholders' environmental concerns, requirements and/or any relevant environmental information they may hold. Where available, contact details for stakeholders should also be recorded in **Form EMP01/F/01**. Please complete one sheet per stakeholder.

7.2.4 **Note that for projects** where the system is likely to receive considerable interest from the general public or external organisations (eg regarding noise issues), that it may not be possible at this stage to accurately establish either the degree of concern, the number of people concerned, the requirements for information or relevant contact details. However, this should not prevent the IPT from recording them as a stakeholder as this information can be gathered later in the project where necessary. Recording such external groups at this stage does not mean that they will be contacted or actively engaged with at any stage, merely that their concerns should be accounted for.

| | | |
|-----------------------------------|--------------|---------------|
| DOCUMENT IS UNCONTROLLED IN PRINT | ISSUE LEVEL: | Release V2.2e |
| | DATE: | November 2007 |

| | | |
|---|-----------------------|--------------------|
| MOD | EMS Procedures | Procedure EMP01 |
| EMP01: Stakeholders and Standards Identification | | Page 5 |

7.3 Step 2: Produce Communications Plan

- 7.3.1 For the majority of projects a Communication Plan should be formulated which identifies the need, timing, purpose and appropriate method(s) for Stakeholder consultation. **Form EMP01/F/01** could be expanded to meet this requirement or a separate document could be produced. The Communication Plan should include contact details, information requirements, lines of communication, frequency and media of communication, responsibilities and any relevant security considerations. If an IPT decides that a Communication Plan is not appropriate for the project it should record the justification for this decision.
- 7.3.2 Initially, stakeholders identified for consultation at this stage will be restricted to the MOD. However, any relevant external stakeholders identified (eg other Government Departments, regulatory bodies etc) should be logged and included in the Communication Plan even if no communications are currently planned.
- 7.3.3 It should be noted that it is not a requirement of the POEMS to contact every stakeholder. For example, where the project may provoke considerable public interest the risk this may cause to the project may be sufficiently managed by producing relevant objectives and targets (see Procedure EMP06 – Environmental Management Plan (Setting Objectives and Targets)) without engaging in consultation. However, it is the responsibility of the IPT to decide the best way to manage stakeholder concerns taking into account the likely impact of the Freedom of Information Act and the Environmental Information Regulations and the MOD presumption of openness.

7.4 Step 3: Identify Environmental Standards and their Requirements

- 7.4.1 This stage identifies all the environmental standards, and their requirements, that will apply to the project over its entire life cycle. This will therefore include:
- National and international environmental legislation and agreements;
 - MOD Environmental Policy commitment, strategy commitments and internal regulation.
- 7.4.2 **Form EMP01/F/02** - Register of Environmental Standards, can be used to list and document these standards for each of the life cycle stages. A separate sheet should be used for each standard identified. Useful information sources for identifying relevant environmental standards include:
- JSP 418 for UK operations;
 - Stakeholders, in particular in regards to non-UK environmental legislation and agreements;
 - Environmental Committee.

| | | |
|-----------------------------------|--------------|---------------|
| DOCUMENT IS UNCONTROLLED IN PRINT | ISSUE LEVEL: | Release V2.2e |
| | DATE: | November 2007 |

| | | |
|---|-----------------------|--------------------|
| MOD | EMS Procedures | Procedure EMP01 |
| EMP01: Stakeholders and Standards Identification | | Page 6 |

7.4.3 It is expected that in the majority of cases these sources for identifying relevant legislation will be adequate. However, gaps and omissions may occur and in particularly sensitive cases the IPTL may wish to have assurance that any listing is comprehensive.

7.5 Step 4: Define and Agree Project Environmental Responsibilities

7.5.1 It is important at this stage to ensure that any environmental responsibilities in relation to the project are clearly defined and agreed with the relevant internal and external stakeholders. This includes the designation of a member of the IPT who will be responsible for environmental issues related to the project throughout its whole life cycle (the IPT Environmental Focal Point).

7.5.2 Other environmental responsibilities should be assigned and documented if possible at this stage, including the responsibility for carrying out any downstream studies. Downstream studies include sustainability appraisal for projects to be utilised on Defence Estates property, or for providing information to stakeholders eg MOD POEMS documentation may be required for systems to be used on the Army Training Estate.

7.5.3 Responsibility for the maintenance of documents produced as part of the EMS, and applying for permits and authorisations, should also be assigned and documented. **Form EMP01/F/03 - Project Environmental Responsibilities**, should be used for recording these responsibilities. In deciding on roles and responsibilities, consideration should be given to any opportunities for the project to be grouped with other similar projects. In these cases it may be more efficient to undertake an EIA for the whole group rather than individual projects.

7.5.4 Responsibility should be assigned for maintaining the records produced from following this procedure to ensure they are kept up to date and communicated as required.

7.6 Step 5: Assemble Environmental Committee

7.6.1 The Environmental Committee should be assembled for the project.

7.6.2 The members of the Committee should include representatives of the main MOD stakeholders and those having particular expertise relevant to the equipment or service being acquired, eg SMEs (Subject Matter Experts). Members of the Committee external to MOD may comprise industry or scientific experts, consultants or academics who can provide advice to the IPT on environmental issues related to the project.

7.6.3 The members and Terms of Reference of the Environmental Committee should be documented. All individual responsibilities of members of the Environmental Committee should still be recorded in **Form EMP01/F/03**.

| | | |
|-----------------------------------|--------------|---------------|
| DOCUMENT IS UNCONTROLLED IN PRINT | ISSUE LEVEL: | Release V2.2e |
| | DATE: | November 2007 |

| | | |
|---|-----------------------|--------------------|
| MOD | EMS Procedures | Procedure EMP01 |
| EMP01: Stakeholders and Standards Identification | | Page 7 |

7.7 Step 6: Set up Environmental Case

7.7.1 An Environmental Case should be set up for the project. This is a body of evidence that provides a convincing and valid argument that the equipment or service is adequate in terms of environmental issues. The Environmental Case would therefore contain all outputs (and any other relevant information) produced from following these EMS procedures.

8 RECORDS AND PROJECT DOCUMENTATION

8.1.1 Where relevant, the outputs from this procedure should feed into the following:

- SRD (System Requirement Document) – for any specific environmental performance requirements;
- CSA (Customer Supplier Agreement) – to document agreements on environmental studies to be delivered by the IPT;
- TLMP (Through Life Management Plan);
- Input submission for Initial Gate.

8.1.2 A copy of the information produced by following this procedure should be stored in the project's Environmental Case.

9 RECOMMENDED TOOLS AND FORMS

- **Form EMP01/F/01** – Register of Stakeholder Requirements and Information.
- **Form EMP01/F/02** – Register of Environmental Standards.
- **Form EMP01/F/03** – Project Environmental Responsibilities.

| | | |
|-----------------------------------|--------------|---------------|
| DOCUMENT IS UNCONTROLLED IN PRINT | ISSUE LEVEL: | Release V2.2e |
| | DATE: | November 2007 |

| | | |
|---|-----------------------|--------------------|
| MOD | EMS Procedures | Procedure EMP01 |
| EMP01: Stakeholders and Standards Identification | | Page 8 |

10 GUIDANCE

10.1 General

10.1.1 General guidance on applicable standards, including legislation will be found in JSP 418 which is sponsored by DS&C. As a consequence, IPTs should remember that specialist knowledge may yet be helpful to ensure that all major requirements have been identified. (NB in the event that a significant omission in JSP418 is identified, DS&C should be advised). However, assistance is available from ASEG and additionally a number of other JSPs include general advice on some environmental matters (JSPs 454, 520, 442, 518, 430, and 553).

10.1.2 It may also be possible to obtain standards information from suppliers and manufacturers operating in the same areas.

10.2 Committees, Cases and Case Reports

10.2.1 The advice in the POSMS procedures SMP02 (Safety Committee), SMP03 (Safety Planning) and SMP12 (Safety Case and Safety Case Report) may also be helpful in understanding the roles and relationships of Committees and Cases and when it is possible to operate joint Safety and Environment structures, and when it may be advisable to separate the functions.

10.3 Aligning Safety and Environment

10.3.1 The key alignment opportunity in EMP01 is to establish combined Safety and Environmental Committees and Cases.

10.4 Guidance for Different Acquisition Strategies

10.4.1 The objectives for this procedure apply to all acquisition strategies. It is MOD policy that the same standards are met, and that assurance that these standards have been met can be demonstrated for all projects. Some elements of this procedure may be best completed by contractors and suppliers for some strategies such as COTs and MOTs.

10.5 Legacy Systems

10.5.1 Stakeholders and Standards identification for legacy systems should be neither over-engineered nor incomplete. In all cases it will be important to ensure that all applicable legislative requirements have been identified to confirm that all appropriate mitigation measures have been identified and shared with the stakeholders or are now agreed and actioned. Opportunities should be sought in Assisted Maintenance Periods (AMPs), mid-life updates or similar for the introduction of programmes to eliminate or reduce impacts. Thus it will be seen that for many legacy systems, with limited life, it will be appropriate to concentrate on disposal arrangements and impacts especially where there is no evidence of environmental incidents or accidents associated with the system.

| | | |
|-----------------------------------|--------------|---------------|
| DOCUMENT IS UNCONTROLLED IN PRINT | ISSUE LEVEL: | Release V2.2e |
| | DATE: | November 2007 |

| | | |
|---|-----------------------|--------------------|
| MOD | EMS Procedures | Procedure EMP01 |
| EMP01: Stakeholders and Standards Identification | | Page 9 |

10.6 Warnings and Potential Project Risks

- 10.6.1 If this procedure is not completed, and reviewed (see Procedure EMP08 – Continuous Review), in a timely manner there may be delays in engaging stakeholders, recognising legislative and other requirements, or creating the environmental management arrangements for the project. It is also possible that legislative requirements could go unrecognised, with attendant unrecognised liabilities and ultimately, the possibility of prosecution.
- 10.6.2 If the project fails to co-ordinate the treatment of stakeholders and legislative requirements between the safety and environmental management systems, there is a risk that there will be inconsistent communication to stakeholders and duplication or omission of requirements (eg falling between the two).
- 10.6.3 The legislative and other requirements register should not be read across from one project to another, even if they are similar in scope, without a detailed review. The earlier register may have missed requirements and there may have been legal and policy developments since the earlier register had been created. (NB in the event that a significant omission is identified DS&C should be advised).
- 10.6.4 It is essential that there is clear and documented agreement between the IPT and other MOD stakeholders on the responsibilities and budget allocation for studies (such as sustainability appraisals, where the project does not include the provision of facilities) which may be the responsibility of other parts of the MOD.

| | | |
|-----------------------------------|--------------|---------------|
| DOCUMENT IS UNCONTROLLED IN PRINT | ISSUE LEVEL: | Release V2.2e |
| | DATE: | November 2007 |