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## **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 An operational control exists to ensure an activity is completed in the correct/desired way. An operational control could therefore be one or a combination of the following:
- a written procedure/work instruction describing how, when and by whom an activity is to be performed (this would also include the use of signage);
  - a contract or agreement;
  - a physical measure, (e.g. computer or mechanical control);
  - use of trained personnel.
- 1.1.2 **Guidance Sheet EMP07/G/01** – Operational Control Decision Tree, is designed to assist IPTs to identify whether present controls, or proposals for controls, already exist and whether these are adequate from an environmental control perspective. **EMP07/G/01** should also identify where any controls need amendment, or if new controls are required.
- 1.1.3 Where possible any environmental operational controls under this procedure should be combined with other operational controls associated with the operation of the equipment or service. In most situations separate environmental operational controls will not be required to the controls which would normally be developed.
- 1.1.4 Existing operational controls may include controls applied in operational situations by the Armed Forces even though such operational controls would not be covered by the POEMS.

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## **2 PROCEDURE OBJECTIVES**

- 2.1.1 To ensure appropriate controls are developed (for system testing and trialing, operation and disposal):
- a) Where required to achieve objectives and targets;
  - b) Where required to achieve standard and stakeholder requirements;
  - c) To control all priority environmental impacts;
  - d) To control the environmental impacts which could give rise to a environmental emergency situation;
  - e) To deal with an emergency situation if it was to occur.
- 2.1.2 The IPT may also have responsibility for completing the following checks during trials and testing of the equipment or service prior to its in-service date:
- a) Check the use and adequacy of the operational controls; and
  - b) Physically test the adequacy of operational controls which exist to control environmental emergency situations, where this is practicable.

## **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(s) of the IPT (e.g. IPT Environmental Focal Point).

### **3.3 Procedure Completion**

- 3.3.1 The IPT is responsible for ensuring that the procedure is completed. However, completion will most likely be carried out by the project supplier or contractor, or possibly by an advisor. Any suggested operational controls identified or produced as part of this procedure should be agreed with the IPT and agreed by the Environmental Committee.
- 3.3.2 The procedure will normally be completed by the contractor for the Assessment or Demonstration Stages (if one is appointed) or the equipment supplier or service contractor as project documentation including operating procedures and disposal plans or related information is developed.

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## **4 WHEN**

### **4.1 Initial Application**

4.1.1 The initial application of this procedure is likely to be in the Assessment or Demonstration Stages. If these stages have already passed, any arrangements already in place must be reviewed to ensure that environmental risks are still adequately covered. Depending on the nature of the project, operational controls could be required during any stage or phase of the systems operation but may also be required during system testing and trialing and disposal.

### **4.2 Review**

4.2.1 The outputs of this procedure, and operational controls, will require periodic review and revision throughout the lifetime of the project. This is relevant where operational controls have been set early within the project for later life cycle stages. The appropriate timings for such reviews will be determined through following Procedure EMP08 - Continuous Review. Where the EIA Plan proposes interlinked or incremental EIAs then Procedure EMP08 - Continuous Review, should be used to plan the review and revision to operational control(s).

## **5 REQUIRED INPUTS**

- a) System Requirement Document (SRD).
- b) Environmental Case including outputs from Procedures EM01 – Stakeholders and Standards Identification, EMP02 – Screening and Scoping, EMP03 – Impact Priority Evaluation, EMP05 - Environmental Impact Assessment and Reporting and EMP06 - Environmental Management Plan (Setting Objectives and Targets).

## **6 REQUIRED OUTPUTS**

- a) **Form EMP07/F/01** – Environmental Operational Control Index.

### **OR**

Equivalent actions and documentation that ASEG is satisfied achieves the same objective.

## **7 DESCRIPTION**

### **7.1 Step 1 – Identify where Operational Controls are required**

7.1.1 List where operational controls are required, see section 2 of this procedure.

### **7.2 Step 2 – Index the Operational Controls**

7.2.1 Using Guidance Sheet EMP07/G/01 (Operational Control Decision Tree) identify:

- a) Whether present or proposed controls already exist and whether these are

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	adequate from an environmental control perspective or need amendment; or
	b) No controls are present or proposed so new controls are required.
7.2.2	An operational control could be one or a combination of the following:
	a) A written procedure/work instruction describing how, when and by whom an activity is to be performed, (this would also include the use of signage);
	b) A contract or agreement;
	c) A physical measure, (e.g. computer or mechanical control);
	d) Use of trained personnel.
7.2.3	The type of control must be sufficient to ensure that the activity is adequately completed to bring about the desired result.
7.2.4	Separate operational controls may not be required to manage each Medium Priority and High Priority environmental impact, or those Low Priority impacts that can be easily mitigated, as one control could cover numerous environmental impacts. Similarly, environmental operational controls do not necessarily need to be separate to other controls in position as often, environmental requirements can easily be integrated with other controls which are already set up or are due to be developed (e.g. in operational manuals for equipment systems). This is generally considered to be the most efficient method of producing operational controls, for example environmental controls will most likely be integrated within the following:
	a) Standard Operating Procedures (SOPs);
	b) Emergency Procedures;
	c) Maintenance Procedures;
	d) Disposal Procedures.
	Note: The above list is not exhaustive.
7.2.5	It is essential for assurance and audit purposes to have a list or index of where the relevant EMS operational controls can be found and therefore <b>Form EMP07/F/01 - Environmental Operational Control Index</b> , should be completed.
<b>7.3</b>	<b>Step 3 – Check use and adequacy of Operational Controls during trials and testing</b>
7.3.1	The IPT may also have responsibility for completing the following checks during trials and testing of the equipment or service prior to in-service:
	a) Check the use and adequacy of the operational controls, and
	b) Physically test the adequacy of operational controls which exist to control environmental emergency situations, where this is practicable.

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## **8 RECORDS AND PROJECT DOCUMENTATION**

- 8.1.1 A copy of the information produced by following this procedure should be stored in the Project's Environmental Case. If it would be impractical to store all environmental operational controls in the Environmental Case as well as in the Through Life Management Plan a cross reference document to the relevant controls should be included within the Environmental Case, this being **Form EMP07/F/01** - Environmental Operational Control Index.

## **9 RECOMMENDED TOOLS AND FORMS**

- a) **Form EMP07/G/01** – Operational Procedures Decision Tree.
- b) **Form EMP07/F/01** – Environmental Operational Control Index.

## **10 GUIDANCE**

### **10.1 General**

- 10.1.1 General advice on operational control procedures will be found in the EMS annex to JSP418 and also ISO 14001.

### **10.2 Aligning Safety and Environment**

- 10.2.1 The key alignment opportunity in EMP07 is to ensure wherever possible that Operational Controls for the equipment or service control both safety and environmental impacts.

### **10.3 Guidance for Different Acquisition Strategies**

- 10.3.1 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.

### **10.4 Legacy Systems**

- 10.4.1 For legacy systems it will be necessary to identify or create operational control procedures where objectives and targets have been identified under Procedure EMP06 - Environmental Management Plan (Setting Objectives and Targets). However, if, because of the legacy nature of the system, any objectives and targets are limited then the associated operational controls are also likely to be limited.

### **10.5 Warnings and Potential Project Risks**

- 10.5.1 Failures to set operational controls may introduce or increase risks. These risks are likely to relate to unmanaged environmental liabilities and un-discharged legal obligations. It is possible that the consequences of this could be increased cost resulting from delays for bringing the equipment or capability into service, or having to suspend the use of existing equipment. However, consequences might also include limitations to the operational envelopes for equipment and increased cost of remediation or clean-ups.

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