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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 As projects evolve and change, and as new information comes to light, it is necessary to review and modify the outputs produced from these procedures:

EMP01 – Stakeholders and Standards Identification;

EMP02 – Screening and Scoping;

EMP03 – Impact Priority Evaluation;

EMP04 – Environmental Impact Assessment Plan;

EMP05 - Environmental Impact Assessment and Reporting;

EMP06 – Environmental Management Plan (Setting Objectives and Targets);

EMP07 – Operational Controls.

- 1.1.2 This will ensure that the outputs are kept up to date with overall project and other developments. Reviews can be triggered by a number of factors for example, changes to equipment design or service, a change in a relevant standard, or a change in the customer requirements. A review could also be part of a planned process of the revision of outputs as the project progresses in order to incorporate improved or amended information, or as the result of audit findings.

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2 PROCEDURE OBJECTIVES

2.1.1 The main objectives of this procedure are:

- a) To initiate the review and possible revision of procedure outputs when changes occur that affect the project or information available;
- b) To initiate the review and possible revision of procedure outputs at set intervals;
- c) To record the results of the above reviews.

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 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 revisions produced as part of this procedure should be agreed with the IPT and endorsed by the Environmental Committee.

4 WHEN

4.1 Initial Application

4.1.1 This procedure will apply throughout the life of a project.

5 REQUIRED INPUTS

- a) The 'Common Documents' (ie User Requirement Document (URD) and JSP 418 (UK legislation and MOD policy)
- b) Outputs from Procedures EMP01 – EMP07 inclusive.
- c) When available, outputs from Procedures:
 - AAP01 – System Audit;
 - AAP02 – Management Review;
 - AAP03 – Non-Conformance and Corrective Action.
 - AAP04 – Monitoring and Measurement.

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6 REQUIRED OUTPUTS

- a. Completed **Form EMP08/F/01** – Continuous Review Record – (plus amended outputs as required).

OR

Equivalent actions and documentation that meets the same objectives and has been approved by ASEG.

7 DESCRIPTION

- 7.1.1 Most of the outputs from the procedures will require periodic review and possibly modification as the project progresses. When an output (for instance a completed form or report) is produced from following Procedures EMP01 –EMP07, its details should be entered into Form EMP08/F/01 – Continuous Review Record. At this point a date or stage for review of the output should also be entered into Form EMP08/F/01.
- 7.1.2 Wherever possible periodic reviews of outputs should be organised to coincide with the major stages and hold points of the CADMID cycle. This will increase the likelihood that the most complete and up to date information is available for decisions at the hold points.
- 7.1.3 Reviews should also be undertaken before major information deliverables are released to stakeholders.
- 7.1.4 The following list summarises some of the potential triggers for ad hoc reviews of procedure outputs, which could occur at any time in the project's life:
- Change to relevant project stakeholders;
 - Change to project stakeholders' requirements or concerns;
 - Change to the information available from project stakeholders;
 - Change to planned project activities (in any stage of the project life cycle);
 - Change to relevant environmental standards;
 - Change to equipment or service specification;
 - Change to operation geography or use;
 - Change in project responsibilities;
 - Change in information available on the environmental impacts associated with the project, ie type, frequency or severity of impact;
 - Change in the environmental assessment plan;
 - Change in impact priority evaluation methodology;
 - The occurrence of an environmental incident;

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<p>m) Non-achievement of objective and/or target;</p> <p>n) The identification of a non-conformance.</p> <p>o) Note that any of the above ‘triggers’ may also cause another trigger to apply, for example a change in equipment use or operational domain could cause a change in relevant stakeholders.</p>	
7.1.5	Most ad-hoc triggers are unlikely to require an immediate and complete review of the EMS and outputs. Therefore, in many cases it will be possible to schedule an ad-hoc review to coincide with one of the planned periodic reviews.
7.1.6	However, there will be a small number of strategic changes and triggers which will cause the IPT to instigate an immediate and thorough review irrespective of the overall review plan. In such cases it is probably wise to bring the planned periodic review forward as opposed to duplicating review effort.
7.1.7	Any significant changes to EMS outputs will require the amendment and reissuing of the relevant output. For instance, if new or improved information becomes available on certain impacts it may be necessary to carry out a new Environmental Impact Assessment, or at least prepare an addendum to the EIA Report produced under Procedure EMP05 - Environmental Impact Assessment and Reporting. Keeping EMP01 forms up to date in respect of stakeholder contact details and a communication plan will help and greatly simplify the reissuing process.
7.1.8	As part of any review the implications of changes have to be followed through the whole EMS. So for instance, a change to the Environmental Feature Matrix is likely to necessitate changes to the Environmental Objective and Target Register which will likely cause changes to the EM Plan.
7.1.9	If a change is identified as required to a procedure output which is also a controlled document then this should be completed and recorded by following SSP03 – Document and Record Control.
8	RECORDS AND PROJECT DOCUMENTATION
8.1.1	This procedure could cause any of the outputs produced from Procedures EMP01-EMP07 to be reviewed and amended:
8.1.2	A copy of the information produced from following this procedure should be stored in the project’s Environmental Case.
9	RECOMMENDED FORMS
a)	Form EMP08/F/01 – Continuous Review Record.

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10 GUIDANCE

10.1 General

- 10.1.1 ISO 14001 and the ISO 14000 series of standards generally, are helpful in understanding how to manage continuous environmental improvement through an Environmental Management System. This concept also underlies all quality management system and approaches as well as systematic management approaches to health and safety risks. Therefore general guidance on continuous improvement may also be found in standards dealing with any management system approaches.

10.2 Aligning Safety and Environment

- 10.2.1 The key alignment opportunity in EMP08 is to undertake reviews of safety and environmental records dealing with common issues at the same time, and to ensure that changes introduced by the review process are assessed for both environmental and safety implications.

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 reviews are likely to be required as the system moves towards disposal phase, or if there are other major changes such as modifications, changes to the operating geography or new legal and policy requirements.

10.5 Warnings and Potential Project Risks

- 10.5.1 If this procedure is not completed in a timely manner there will be an increase in risk that the Environmental Case will not evolve and develop in keeping with equipment or service developments and decisions. If the Environmental Case lags too far behind the development of the equipment or service then there are increased risks of the IPT not being suitably prepared for approvals and permissions within the CADMID approach. It is also possible that any new or changed environmental liabilities brought about by changes in other project work streams may go unrecognised and therefore be uncontrolled. The consequences of this could be increased cost, however it might also include limitations to operational envelopes and delays for bringing the equipment system or capability into service.

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