

# **Environmental Management Plan/System**

**Drapper Environmental Consultants Pty Ltd**

**Revision 8**



**DRAPPER  
ENVIRONMENTAL  
CONSULTANTS**

**Document control sheet**

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# 1 Environmental Management System requirements

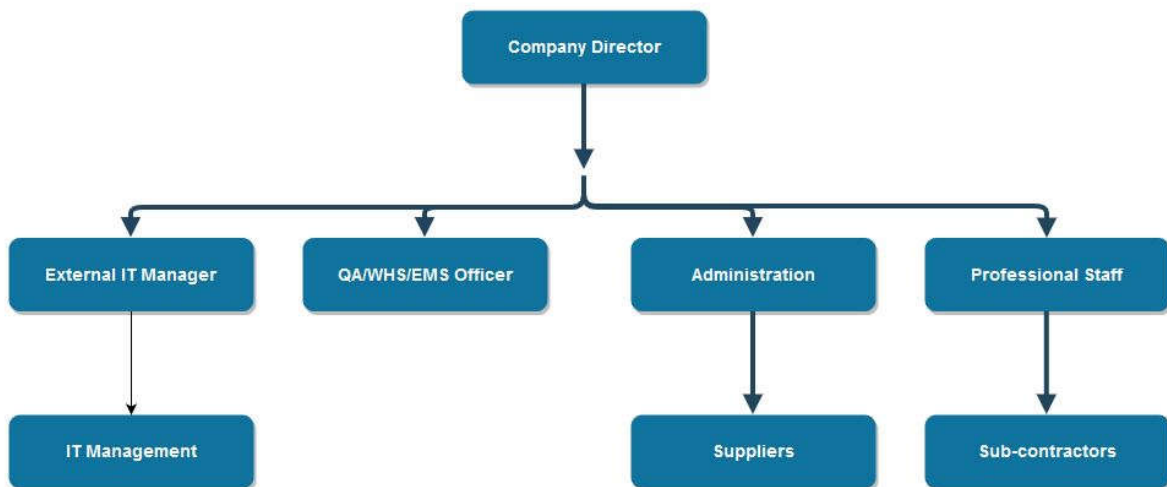
## 1.1 Purpose

This Manual defines the Environmental Management System (EMS) of Drapper Environmental Consultants activities and contains:

1. The Environmental Policy;
2. Statements of responsibility and authority;
3. An overview of the company’s environmental procedures and controls;
4. The identification of the resources and training allocated to Management, performance of work and verification activities including internal audit;
5. The appointment of the Environmental Management Representative (MANAGEMENT); and
6. The arrangement for periodic Management reviews.
7. The purpose of this Manual is to demonstrate that this EMS meets all ISO 14001:2015 requirements and provide guidance and direction for the implementation and operation of the EMS to all personnel including all relevant documents.

## 1.2 Organisational Structure

The following chart details the Organisation Structure within Drapper Environmental Consultants.



**Figure 1** Organisation structure.

## 2 Environmental Management Policy

Drapper Environmental Consultants is committed providing sustainable solutions and protection of the environment.

To minimise environmental impacts concerning our activities, products and services, we shall:-

- Comply with both the spirit and letter of the law for all matters which relate to its environmental aspects.
- Prevent pollution, reduce waste and minimise the consumption of resources.
- Educate, train and motivate employees to carry out tasks in an environmentally responsible manner.
- Encourage environmental protection among our clients, suppliers and subcontractors.
- Instil sustainability in anything and everything we do as a business.

The Company is committed to continual improvement of environmental performance. This Policy will be communicated to all staff, contractors and suppliers, and be available for the public.

## 3 Responsibilities

Drapper Environmental Consultants will set, and keep updated, an Environmental Management Policy and System for its employees.

Drapper Environmental Consultants is responsible for ensuring that complies with any duty or obligation under Environmental legislation and regulations. This is achieved by these officers exercising due diligence, which means they:

- acquire and keep an up to date knowledge of environmental matters;
- gain an understanding of Drapper Environmental Consultants's operations and the hazards and risks involved;
- ensure that appropriate resources and processes are provided to enable environmental impact to be identified and risks to be eliminated or minimised;
- ensure that information regarding environmental incidents and risks is received, considered and responded to in a timely way;
- ensure that the company has, and implements, processes for complying with its environmental duties and obligations;
- verify the provision and use of the resources and processes listed above.

This may include:

- having environmental management as a standing agenda item for each meeting;
- integrating environmental laws into everyday business through consultation with Managers and all workers;
- developing an environmental management system framework, which will be reviewed on a regular basis by the Director;

- ensuring that environmental management is incorporated into all business activities and that environmental management and control is an on-going process, including:
  - development and maintenance of EMS policies and procedures;
  - ensuring an effective EMS reporting procedure;
  - ensuring appropriate processes are in place for EMS issues relating to contractor/supplier management;
  - ensuring that the procurement of any equipment takes into account EMS matters;
  - ensuring that regular EMS inspections of the workplaces occur;
  - ensuring that EMS issues are part of all training provided for staff, including induction;
  - ensuring that contractors and visitors to are provided with appropriate and reasonable EMS information at site entry;
  - ensuring that the workplace is an environment-aware location.

### **Managers and Leaders**

Managers and leaders are responsible for providing a workplace that is, as far as reasonably practicable, environmentally-aware workplace for workers and visitors, in particular in the areas of their control. This includes:

- modelling good environmental stewardship;
- demonstrating a commitment to good environmental protection performance, by:
  - talking about environmental improvement at regular meetings;
  - ensuring environmentally-safe work procedures are followed;
  - reporting incidents, hazards and environmental concerns promptly;
  - assessing environmental risk and not allowing an activity to continue until it can be controlled adequately;
- fostering a strong environmental culture where worker input is valued;
- Promoting and implementing the Environmental Management Plan;
- actively support the identification of environmental hazards and the management of these;
- understand and monitor environmental performance objectives;
- proactively manage other duty holders (e.g. contractors, suppliers), when required.

### **Workers**

Workers must take reasonable care for their own activities while they are at work, and take reasonable care that their acts or omissions do not adversely affect the receiving environment. They must comply, so far as is reasonably practicable, with any reasonable instruction given by their manager or leader, as well as co-operating with any reasonable Drapper Environmental Consultants policy or procedure which relates to environmental management. On a day to day basis, this includes:

- to the extent of the worker's control or influence over working conditions and methods, take reasonable care to minimise or avoid environmental harm;
- making sure that the work area is clean and tidy when leaving it;

- make proper use of all appropriate safeguards, safety devices and protective equipment necessary to avoid environmental harm;
- follow agreed environmental protection practices and rules;
- report all known environmental hazards, accidents and incidents as soon as possible.

### **Contractors**

Contractors, sub-contractors and self-employed persons are defined as “workers” and are required to:

- comply with the requirements of all relevant environmental legislation;
- have in place any EMS policies and programs required under State or Territory environmental legislation; and
- consult with their manager about environmental matters and comply with policies.

If any staff member believes that a contractor may be engaging in an unsafe work practice, they are required to report this issue to their manager.

### **Visitors**

Visitors and other persons to also have responsibilities to abide by our environmental management rules and procedures. These responsibilities include to:

- take reasonable care for the environment whilst working or visiting our project sites;
- comply with, so far as they are reasonably able, all reasonable directions provided by staff;
- report all environmental-related incidents to staff;
- not wilfully or recklessly cause damage to the environment.

## **4 Planning**

DRAPPER ENVIRONMENTAL CONSULTANTS shall follow a “plan-do-check-act” process to facilitate continual environmental performance improvements. The planning process includes the identification and updating of DRAPPER ENVIRONMENTAL CONSULTANTS’s Register of Environmental Aspects, and the Register of Legal and Other Requirements. Together with DRAPPER ENVIRONMENTAL CONSULTANTS’s environmental policy, DRAPPER ENVIRONMENTAL CONSULTANTS’s objectives and targets are established, and appropriate programmes are formulated to achieve the objectives and targets.

## **5 Environmental Aspects**

The planning process commences with the identification and updating of environmental aspects. In order to evaluate the impacts of its activities to the environment, DRAPPER ENVIRONMENTAL CONSULTANTS shall establish, implement and maintain a procedure to identify the environmental aspects of its activities, products or services that it can control and those that it can influence taking into account planned or new developments, or new or modified activities, products and services.



These aspects, inclusive of those arising from works carried out by contractors, are registered in the "Register of Environmental Aspects".

DRAPPER ENVIRONMENTAL CONSULTANTS shall ensure that all environmental aspects that may pose significant impacts to the environment are under control and prioritised for improvements.

DRAPPER ENVIRONMENTAL CONSULTANTS shall keep this information up-to-date.

## **6 Legal and Other Requirements**

DRAPPER ENVIRONMENTAL CONSULTANTS shall establish, implement and maintain a procedure to identify and maintain access to legal requirements that are relevant to the company, as well as other requirements that the company subscribes to which relates to the company's environmental aspects.

DRAPPER ENVIRONMENTAL CONSULTANTS shall identify all relevant regulations, codes of practice and guidelines that are applicable to the environmental aspects of its activities, products and services, and record this information in the Register of Legal and Other Requirements.

DRAPPER ENVIRONMENTAL CONSULTANTS shall keep this information up-to-date.

## **7 Objectives, Targets and Programme(s)**

Based on the environmental policy and significant environmental aspects, environmental objectives and targets shall be established, implemented and maintained at each function and level within DRAPPER ENVIRONMENTAL CONSULTANTS. Programmes are established, implemented and maintained for achieving its objectives and targets.

When establishing and reviewing its objectives, DRAPPER ENVIRONMENTAL CONSULTANTS shall take into consideration the legal and other requirements, significant environmental aspects, technological options, financial/operational/business requirements, and the views of interested parties, and ensure that the objectives and targets are consistent with the environmental policy, including commitment to pollution prevention, to compliance with applicable legal requirements and other requirements, and to continual improvement.

The programmes designate the responsibility for achieving objectives and targets at each function and level of the company, together with the means and time frame by which they are to be achieved.

Management shall approve the objectives, targets and programmes proposed by the EMS Committee before implementation. MANAGEMENT shall ensure that the objectives and targets are measurable if possible, and that the progress towards achieving the objectives and targets is continually monitored and reviewed.

The achievement of objectives, targets and programmes shall be reviewed by the EMS Committee. The MANAGEMENT shall lead the EMS Committee in revising the objectives, targets and programmes as necessary.

DRAPPER ENVIRONMENTAL CONSULTANTS shall ensure that the programmes are amended as appropriate for new projects and new or modified activities, products or services in order to ensure that environmental Management applies to such projects and activities.

In the event that objectives and targets in the programmes are not met, MANAGEMENT shall revise the programme as necessary and maintain documented evidence / records for the actions taken to mitigate the problems.

MANAGEMENT shall also maintain obsolete objectives, targets and programmes as an EMS record for three years.

## **8 Implementation and Operation**

The implementation of the EMS requires DRAPPER ENVIRONMENTAL CONSULTANTS to clearly define roles, responsibilities and authorities of key personnel, commit to staff training, maintain effective communication channels, adopt effective document and operational controls, and maintain sufficient awareness on emergency preparedness among the staff.

## **9 Resources, Roles, Responsibility and Authority**

Management of DRAPPER ENVIRONMENTAL CONSULTANTS shall commit to provide resources (including human resources and specialized skills, organizational infrastructure, technological and financial resources) essential to the implementation and control of the EMS. The roles, responsibilities and authorities of key personnel shall be defined, documented, and communicated in order to facilitate effective environmental Management.

## **10 Competence, Training and Awareness**

DRAPPER ENVIRONMENTAL CONSULTANTS shall ensure all persons performing tasks for it or on its behalf, whose work may have a significant impact on the environment, are competent on the basis of appropriate education, training and/or experience, and shall retain associated records.

DRAPPER ENVIRONMENTAL CONSULTANTS will need to ensure that all people performing tasks for or on behalf of the organization, which includes contractors, sub-contractors, temporary staff and remote workers, have had an appropriate assessment for their potential to cause a significant environmental impact and the associated competence required.

DRAPPER ENVIRONMENTAL CONSULTANTS shall establish, implement and maintain procedures to identify the training needs associated with its environmental aspects and its EMS, and develop programmes to ensure awareness and competence, at each relevant function and level, by addressing:

- the roles and responsibilities in achieving conformity with the environmental Management system;
- the importance of conformity with the environmental policy, the procedures and the requirements of the structured EMS;

- the significant environmental aspects and related actual or potential impacts associated from their work activities and the environmental benefits of improved personal performance;
- the potential consequences of departure from specified operating procedures;

## **11 Communication**

For internal communication, the MANAGEMENT shall ensure information regarding the EMS (such as the policy, objectives, targets and programmes) and environmental performance is readily available to employees on notice board, or is published on the intranet or newsletters.

Employees with enquiries / complaints regarding to the EMS and/or environmental issues of DRAPPER ENVIRONMENTAL CONSULTANTS shall inform their Function / Departmental Manager. The designated member of EMS Committee representing each division shall maintain a log for the relevant enquiries / complaints. Depending on the nature and scope of the enquiry / complaint, the MANAGEMENT shall determine the corresponding action and maintain relevant records to demonstrate the response / corrective actions taken.

For external communication, the environmental policy is available at the office. All internal and external enquiries / complaints / communications shall be discussed and reviewed during the EMS Committee meeting and the decision shall be recorded on meeting minutes.

The EMS Committee may discuss and decide whether to communicate externally about its significant environmental aspects, the decision shall be documented in the meeting minutes. If the decision is to communicate, the EMS Committee shall establish and implement a method(s) for this external communication, e.g. publish environmental report.

## **12 Documentation**

The Environmental Management System documentation encompasses four levels as described below:

The first level is the Environmental Management System Manual (this document) which includes DRAPPER ENVIRONMENTAL CONSULTANTS's environmental policy (specifying the principal objectives and environmental commitments of DRAPPER ENVIRONMENTAL CONSULTANTS), and a broad description of how DRAPPER ENVIRONMENTAL CONSULTANTS addresses the ISO 14001 requirements. The EMS Manual serves as an interface to interpret the relationship between DRAPPER ENVIRONMENTAL CONSULTANTS's EMS and the ISO 14001 Standard. An individual document of Objectives, Targets and Programmes is developed based on the company's environmental policy. It demonstrates the company's environmental commitment on continual improvement in environmental performance.

The second level is the Environmental Procedures (EPs), which include all procedures that DRAPPER ENVIRONMENTAL CONSULTANTS shall follow as specified in the ISO 14001 Standard. These procedures provide a detailed description of the EMS elements and define who should do what, how and when. Appendix A shows the relationship between various environmental procedures and the ISO 14001 Standard clauses. Register of Environmental Aspects, and Register of Legal and Other

Requirements are derived from the procedures and act as the foundation of the EMS which the company subscribed to.

The third level is the Environmental Instructions (EIs), which are operational control procedures or instructions, with defined responsibilities, to control the identified significant environmental aspects associated with DRAPPER ENVIRONMENTAL CONSULTANTS's operations and activities.

The fourth level is Environmental Records, which arise from the implementation of the Environmental Management System Manual, Environmental Procedures and Environmental Instructions. Environmental Records include various checklists, reports and meeting records, etc, as defined in each Environmental Procedure and Environmental Instruction.

### **13 Control of Documents**

The essences of EMS documentation controls are:

- they shall be reviewed, revised as necessary and approved for adequacy by authorized personnel;
- that current version of relevant documents shall be available at all locations where operations essential to the effective functioning of the environmental Management system are performed;
- that documents of external origin determined by the organization to be necessary for the planning and operation of the EMS are identified and their distribution controlled;
- obsolete documents shall be promptly removed from all points of issue and use, or are otherwise assured against unintended use; and
- any obsolete documents retained for legal and / or knowledge preservation purposes shall be suitably identified.

DRAPPER ENVIRONMENTAL CONSULTANTS shall ensure that documentation is legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner, and retained for a specified period. DRAPPER ENVIRONMENTAL CONSULTANTS shall establish, implement and maintain a procedure for the creation and modification of the various types of documents and the respective responsibilities for such creation and modifications.

### **14 Operational Control**

DRAPPER ENVIRONMENTAL CONSULTANTS shall establish, implement and maintain operation control procedures to manage its significant environmental aspects.

DRAPPER ENVIRONMENTAL CONSULTANTS shall ensure that all operations and activities, carried out by DRAPPER ENVIRONMENTAL CONSULTANTS's employees or contractors, that are associated with the significant aspects are properly controlled, and that appropriate operational control procedures, in terms of Environmental Procedures (EPs) and Environmental Instructions (EIs), are communicated to personnel whose tasks may result in significant environmental aspects. DRAPPER ENVIRONMENTAL

CONSULTANTS shall influence its staff and contractors by communicating its environmental policy and other relevant EPs and/or EIs to them.

## **15 Emergency Preparedness and Response**

DRAPPER ENVIRONMENTAL CONSULTANTS shall establish, implement and maintain a procedure to identify potential emergency situations and responses to such situations in order to prevent and/or mitigate environmental impacts that may associate with them.

DRAPPER ENVIRONMENTAL CONSULTANTS shall review and revise its emergency preparedness and response procedures, in particular after the occurrence of accidents or emergency situations.

DRAPPER ENVIRONMENTAL CONSULTANTS shall also periodically test the procedure and the preparedness where practicable.

## **16 Checking**

While implementing the EMS, DRAPPER ENVIRONMENTAL CONSULTANTS shall monitor and measure the key characteristics of its operations and activities on a regular basis. These results shall be recorded together with nonconformity and the corrective action and preventive action. As part of the checking process, a periodic audit on the EMS shall provide a basis for Management review.

## **17 Monitoring and Measurement**

DRAPPER ENVIRONMENTAL CONSULTANTS shall establish, implement and maintain procedures to monitor and measure, on a regular basis, the key characteristics of its operations and activities that have significant impacts on the environment. This shall include procedures for tracking of performance, applicable operational controls and conformity with the company's objectives and targets, as well as the calibration and maintenance of monitoring equipment. The information of environmental monitoring shall be documenting.

## **18 Evaluation of Compliance**

To meet the company's commitment to compliance, DRAPPER ENVIRONMENTAL CONSULTANTS shall regularly monitor and evaluate the compliance status of the applicable environmental legal requirements (section 4.5.2.1) and other requirements (section 4.5.2.2) that the company subscribes to. The records of the results of the periodic evaluations shall be retained.

## **19 Nonconformity, Corrective Action and Preventive Action**

Continual improvement of the EMS can be achieved by identifying nonconformity, correcting nonconformity, and preventing nonconformity from occurring again. Regarding nonconformity and

its subsequent corrective / preventive action, DRAPPER ENVIRONMENTAL CONSULTANTS shall establish, implement and maintain a procedure which defines the responsibilities and authorities to:

- handle and investigate nonconformity;
- take action to mitigate the impacts caused;
- initiate and complete corrective and preventive actions;
- ensure that the corrective or preventive actions taken to eliminate the causes of actual and potential nonconformity are appropriate to the magnitude of problems and commensurate with the environmental impacts encountered;
- record the results of corrective and prevention actions taken;
- review the effectiveness of corrective action and preventive action taken;
- implement and record any changes in the documented procedures resulting from corrective and preventive action; and
- DRAPPER ENVIRONMENTAL CONSULTANTS shall also ensure that any necessary changes are made to environmental Management documentation.

## **20 Control of Records**

Records shall be maintained to keep track of DRAPPER ENVIRONMENTAL CONSULTANTS's environmental performance, to demonstrate conformity to the requirements of the EMS, legal compliance, and to maintain audit trails in accordance with the requirements of ISO 14001 Standard, and the results achieved.

DRAPPER ENVIRONMENTAL CONSULTANTS shall establish, implement and maintain a procedure to denote the identification, storage, protection, retrieval, retention and disposition of environmental records, to ensure that such records are legible, identifiable, and traceable to the activity, product or service involved, and that they are stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss. The retention period of each type of environmental records shall be specified.

## **21 Internal Audit**

DRAPPER ENVIRONMENTAL CONSULTANTS shall plan, establish, implement and maintain a programme and procedures to carry out periodic environmental Management system audits to:

- a) determine whether or not the environmental Management system:
  - conforms to planned arrangements for environmental Management including the requirements of ISO 14001; and
  - has been properly implemented and maintained;
- b) Provide audit results and information for Management review for environmental improvement.

The audit programme, including the schedule, shall be based on the environmental importance of the activities concerned and results from previous audits. The audit procedures cover the audit criteria, scope, frequency and methods, as well as responsibilities and requirements for conducting audits and reporting results and retaining associated records.

## 22 Management Review

The “plan-do-check-act” cycle shall require the Management of DRAPPER ENVIRONMENTAL CONSULTANTS to act and review the environmental Management system periodically to ensure its suitability, adequacy and effectiveness.

Before the Review, Management shall schedule for the Management review and inform all the participants, and gather all relevant records/requirements (such as change in legal requirements) and prepare a summary report (if necessary) for discussion.

The Management and Staff shall take part in the annual Management review. They shall assess the work done in the past year in environmental Management and evaluate the existing EMS with respect to changes in legislation, concerns of interested parties, business activities, technology and product requirements, and lessons gained from previous experience, etc.

Topics to be discussed in the Management review shall include but not be limited to:

- review of the environmental policy, objectives, targets, and programmes;
- review of legal compliance and compliance with other requirements (including contractor compliance on DRAPPER ENVIRONMENTAL CONSULTANTS’s activities);
- environmental aspects of activities and their disclosure to public;
- findings of the internal audits;
- review of nonconformities and the status of corrective/preventive actions;
- communications from external interested parties, including complaints;
- areas for improvement with respect to environmental performance;
- adequacy of emergency preparedness and response;
- changing circumstances, including developments in legal and other requirements related to its environmental aspects,
- identify the need for modification of the existing EMS in light of the above items, and
- follow-up action from previous Management reviews.

The review shall initiate a new “plan-do-check-act” cycle with improvements in DRAPPER ENVIRONMENTAL CONSULTANTS’s environmental performance and further enhancement of the EMS.

Findings from the Management review shall be recorded in the meeting minutes and the MANAGEMENT shall retain it as an EMS record.