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Environmental Management Overview

3 ENVIRONMENTAL MANAGEMENT OVERVIEW

3.1 ENVIRONMENTAL MANAGEMENT SYSTEM

The need for an EMS is part of the regulatory requirements outlined in *Regulation 3.06(c)* of the *Airports (Environment Protection) Regulations 1997*.

The AES forms part of BAL's EMS and is supplemented by other documentation and systems, including an EMS Manual. The AES documents the strategic, legal and reporting framework within which the EMS operates. The EMS Manual identifies the key environmental risks associated with the management and operation of the Airport and incorporates action plans and procedures that address those risks.

The EMS is progressively reviewed and updated as opportunities for improvement are identified and also to maintain its consistency with *AS/NZS ISO 14001:2004*.

The EMS will be audited within the course of this AES and action will be taken as required to ensure consistency with *AS/NZS ISO 14001:2004*.

The following sections describe the components of the EMS and how they have been implemented and maintained.

3.1.1 ENVIRONMENT POLICY

The Environment Policy, below, is the guiding reference for the management of environmental matters at Bankstown Airport. The policy, which was introduced in 2005, remains relevant today and is posted on the Bankstown Airport website.

"BAL's management and staff are committed to providing a centre of excellence for aviation, commercial and industrial facilities and services at Bankstown Airport. The staff, from the Chief Executive down, recognises that this commitment must include best practice environmental management systems that will ensure a continual improvement of the environmental health of the Airport by the reduction or mitigation of the environmental impacts from all Airport and Airport-based operations".

BAL is therefore committed to:

- promoting and implementing sound environmental management policies and practices in all Airport activities;

- promoting and encouraging principles of environmentally sustainable development in the future growth of the Airport;
- increasing the awareness of environmental responsibilities amongst staff and tenants;
- meeting the statutory obligations of relevant environmental legislation;
- promoting and applying the minimisation of waste and pollution, and operating effective waste management procedures;
- promoting purchasing policies within the Airport environment, which will give preference, as far as practicable, to those products and services which cause the least harm to the environment;
- continuing to promote consultation with the major stakeholders, including the community, to ensure that their views regarding environmental issues are considered;
- training staff and liaising with tenants on a continuing basis on environmental issues, and their responsibilities towards protecting the environment;
- providing sufficient resources to meet management's environmental objectives; and
- continually measuring, monitoring, reporting and improving upon environmental performance.

The Environment Policy will be reviewed and amended as required to ensure the implementation of the policies covered in the *2009 National Aviation Policy White Paper*, where relevant to Bankstown Airport.

3.1.2 ENVIRONMENTAL MANAGEMENT PLANS

Environmental Management Plans (EMPs) have been developed that address particular environmental issues or geographic parts of the Airport, such as the *Bankstown Airport Noise Management Plan* and the *Bankstown Airport Bushland Management Plan*. These EMPs:

- identify environmental management objectives;
- detail the actions required to achieve them;
- specify responsibility for actions; and
- nominate a time for their delivery.

EMPs will continue to be developed or updated as required.

Tier 1 and 2 tenants are required to prepare and implement an EMP for the management of environmental risks associated with their operations (refer to Section 2.3). As many of the tenants affected by this requirement have small operations and may be inexperienced in preparing an EMP, assistance has been provided in the following manner:

- issuing an EMP Guide;
- ensuring the AEO and BAL's Environment Manager are available to offer advice in the development of the EMP as well as on other environmental matters; and
- providing advice as part of the audit process.

Contractors undertaking major works at the Airport are also required to prepare an EMP to show how the environmental risks associated with their activities will be avoided or mitigated. As a minimum, these EMPs are required to include measures to avoid or minimise noise emissions, air pollution, water pollution, erosion and sedimentation.

Preparation and implementation of Construction EMPs are also a condition under building approvals as detailed in Section 2.5.3. A *Construction EMP Guide* has been prepared to assist with this requirement and is available on the Bankstown Airport website

EMPs will continue to be required for these activities and BAL will continue to provide reasonable assistance to ensure that the EMPs developed are relevant and are being implemented.

3.1.3 TRAINING AND AWARENESS

Promoting sound environmental management policies and practices and environmental sustainable development via awareness raising and training of staff, contractors and tenants are principles of the *Bankstown Airport Environment Policy*.

BAL achieves these commitments by:

- Recruiting appropriately qualified staff to oversee the management of environmental issues. (BAL considers that persons employed by it and other major employers on the Airport, to oversee the management of environmental issues, should have sufficient qualifications and / or experience to qualify as a "Certified Environmental Practitioner" (CEnvP) although actual certification is not necessary);

- Providing educational opportunities for professional environmental employees to keep abreast of best management practices and emerging issues and technologies in the field;
- Providing environmental awareness, induction and EMS training for all employees; and
- Raising tenant and contractor awareness of environmental issues (BAL does this via face to face meetings, site audits and inspections, articles in monthly newsletters, information sheets on specific topics and reference to relevant information that is publicly available on the internet).

BAL is committed to continuing developing and developing environmental training and awareness programs for all staff, tenants and contractors.

3.1.4 RECORDS AND DOCUMENT CONTROL

BAL has developed and implemented an environmental filing system to ensure that records and documents are controlled and stored in a secure and logical manner. This allows records to be readily accessed and provided to relevant Government authorities upon request. An important component of the environmental filing system is the *Environmental Site Register*. This register is a written record of the environmental management of the Airport and includes:

- correspondence with the AEO;
- results of environmental monitoring and investigations undertaken at the Airport;
- environmental reports, including environmental assessments, remedial plans and validation reports;
- details of incidents that resulted or had the potential to result in adverse environmental impacts (date, place and nature of the occurrence); and
- corrective and preventative actions implemented as a result of accidents and incidents.

BAL's Environment Manager who is responsible for the maintenance of the Environment Site Register and environmental records associated with the Airport will continue to ensure these are maintained in a secure and logical manner.

3.1.5 ENVIRONMENTAL MONITORING

Various environmental monitoring data is collected by BAL and in some cases by BAL's tenants in the course of implementing the AES.

All environmental monitoring and data collection is undertaken by suitably qualified professionals, whose qualifications include relevant tertiary certificates or degrees, membership of appropriate professional bodies or who have recognition by long practice in the industry sector. All analyses are undertaken by laboratories that are registered with the National Association of Testing Authorities (NATA) for the specific test method.

Records of the monitoring undertaken are kept by BAL and reported to the AEO and DITRDLG annually in the *Annual Environment Report*, unless otherwise agreed with the AEO and DITRDLG.

BAL will continue to maintain records of monitoring undertaken in the course of implementing the AES and will ensure that such monitoring is undertaken by suitably qualified professionals.

3.1.6 AUDITING

The frequency and type of environmental audit required is based on the environmental risk associated with an operation.

Tier 1 tenants are required to be audited at least annually. This audit can be conducted by an internal staff member who has received appropriate training for the task, but every second year these tenants are required to engage an independent certified environmental auditor to carry out an environmental audit of their activities.

Tier 2 tenants are required to be audited at least annually. This audit can be conducted by an internal staff member who is considered appropriate for the task. Every third year these tenants are required to engage an independent third party with appropriate environmental qualifications and environmental auditor experience to carry out an environmental audit of their activities.

The audits must assess:

- Compliance with the AES and regulatory requirements;
- Compliance with EMP requirements;
- Potential for water pollution, soil contamination, ground-based noise and air pollution;
- Management of dangerous goods and hazardous substances, including ozone depleting substances;
- Waste management including liquid and solid wastes;
- Documentation and record keeping; and
- Actions arising from previous audits.

The results of each audit including all recommendations for improvement and a timeframe for their implementation must be provided to BAL annually by a mutually agreed date, no later than 30 June.

Compliance with recommendations made in an audit report and the effectiveness of the actions taken will be followed up by BAL and the AEO.

An environment audit checklist and guidance notes have been prepared (see Appendix C). These documents, which may be improved from time to time, are available on the Bankstown Airport website.

BAL and the AEO will institute training and assist tenants as required to develop the necessary skills to conduct self audits.

Tier 3 will not be audited, but will instead be subject to environmental inspections by BAL staff from time to time and at least every three years.

Tier 1 and 2 tenants may also be subject to environment inspections by BAL staff from time to time.

In the event an audit, an inspection or an incident identifies serious environmental risks or numerous environmental issues (i.e. examples of poor practice) the relevant tenant may be required to submit an audit by an appropriately qualified external party on an annual basis until it is evident environmental practices are improved.

ENVIRONMENTAL MANAGEMENT SYSTEM AUDIT

In addition to informal reviews of elements of the EMS an internal audit of BAL's EMS will be conducted with the assistance of the AEO. Consideration will be given to having external consultants audit the EMS. The scope of the EMS audit includes:

- checking EMS consistency with *ISO 14001*;
- checking compliance with objectives of the AES;
- confirming that the EMS has been implemented and operates as described;
- checking compliance with randomly selected environmental procedures;
- check the *Environmental Site Register* for accuracy and currency;
- identifying non-conformances and determining whether corrective action is being taken, and
- documenting opportunities for improving any components of the EMS.

EMS audit results will be issued to the CEO for consideration and action. The EMS will be reviewed as appropriate based on the recommendations provided in the EMS Audit report. Compliance with the audit recommendations will be assessed in the course of informal reviews and during the following EMS Audit.

BAL will continue to update, amend and re-write sections of the EMS and progressively revise the EMS documentation and processes to ensure consistency with *AS/NZS ISO 14001:2004*.

The EMS will be audited and action will be taken, as required, to ensure consistency with *AS/NZS ISO 14001:2004* within the course of this AES.



3.1.7 NON-CONFORMANCE, CORRECTIVE AND PREVENTIVE ACTION

Non-conformances identified in the course of environmental audits, routine inspections and incidents are managed through BAL's corrective and preventive action process.

The responsible party is required to address the recommended corrective and preventative actions and BAL Environment Manager will check the implementation and effectiveness of the actions taken. The AEO decides whether regulatory action is required in relation to non-compliance with the *Airports Act 1996*, the *Airports (Environment Protection) Regulations 1997* and the AES.

Where a non-conformance with the *Airports Act 1996*, the *Airports (Environment Protection) Regulations 1997*, other relevant legislation and the AES is identified, BAL will notify the responsible party and follow up to confirm corrective action is taken and ensure that the action taken addresses the matter.

3.1.8 RISK MANAGEMENT

The following potential incidents that could occur at the Airport:

- loss of electrical power;
- burst water main;
- fuel/oil/chemical spill;
- sewer blockage;
- pump failures;
- flood;
- stormwater blockage;
- fire (building or bush/grass); and
- vehicle or aircraft accident.

Of these fuel / oil / chemical spills are considered to have a relatively high likelihood of occurrence and would pose a high potential environmental risk if they were to occur.

It is BAL's objective to manage environmental risks associated with all foreseeable incidents, accidents and emergencies. BAL has protocols in place to manage responses to fires, spillages and other incidents.

The EMPs prepared by Tier 1 tenants are likewise required to include an emergency response procedure for significant environmental risks associated with their operations.

Details of incidents, including the date, place and nature of the incident, that resulted or had the potential to result in adverse environmental impacts are recorded in the *Environmental Site Register* and reported in the Annual Environmental Report.

BAL will continue to ensure that all foreseeable incidents and accidents in relation to its operations are regularly assessed and that appropriate measures are developed and implemented to manage potential environmental risks. BAL will require its tenants to do likewise via their EMPs.

3.1.9 TENANT COOPERATION

BAL works in a cooperative fashion with tenants to achieve compliance with the objectives and actions described in the AES. This is carried out in various ways including, face to face meeting, environmental forums, audits of tenant operations and facilities, reviewing tenant monitoring programs and results, undertaking regular site visits, providing information sheets on relevant environmental issues and forwarding correspondence, where necessary.

BAL will continue to work in a cooperative fashion with tenants to achieve compliance with the objectives and actions established in this AES.

3.1.10 ENVIRONMENTAL REPORTING

BAL undertakes a range of environmental reporting.

ANNUAL ENVIRONMENT REPORT

In accordance with the *Airports (Environment Protection) Regulations 1997*, BAL prepares an *Annual Environment Report* for submission to the Secretary of DITRDLG. The contents of the *Annual Environment Report* are specified by *Regulation 6.03*. The *Annual Environment Reports* are reviewed and verified by the AEO before submission to the DITRDLG.

BAL will continue to prepare an *Annual Environment Report* in accordance with its obligations under the *Airports Act 1996*.

PUBLIC ENVIRONMENT REPORTING

In the 2005 AES, BAL undertook to produce an *Annual Public Environment Report* each year. A number of such reports have been prepared and issued, however the interest in them has been limited.

In place of an *Annual Public Environment Report*, BAL will issue a minimum of 3 (three) *Environment Fact Sheets* per annum to be posted and maintained on the Bankstown Airport website.

The *Environment Fact Sheets* will describe aspects of the Airport environment and the actions being taken by BAL to monitor, maintain and improve those aspects as well as a summary of the outcomes of any monitoring, environmental surveys and projects.

The *Fact Sheets* will be updated on a regular basis to incorporate the results of monitoring and the outcomes of environmental surveys and projects.

LIAISON MEETINGS

The AEO and BAL meet monthly to discuss progress on the AES, development applications and other current environmental issues on the site. The AEO is kept informed of the results of routine monitoring performed by BAL and its tenants during the regular BAL/AEO liaison meetings.

BAL and the AEO will continue monthly liaison meetings with a view to bimonthly meetings in the future.

INTERNAL REPORTS

Reporting of the performance of BAL with respect to environmental issues is undertaken by the Environment Manager on a regular basis (typically monthly) at management meetings chaired by the CEO.

BAL's Environment Manager also prepares updates on progress in managing environmental matters including the implementation of the AES in BAL's Board reports.

Internal reporting of progress in managing environmental matters to the CEO and the Board will continue.

3.2 CONTINUOUS ENVIRONMENTAL IMPROVEMENT

BAL worked closely with the DITRDLG and its representative, the AEO, throughout the period of the 2005 AES to achieve improved environmental outcomes on Bankstown Airport by;

- implementing the management actions and outcomes of the AES;
- working with the community and Government Agencies;
- reviewing and updating the EMS, and continuing to identify and update environmental standards;
- undertaking monitoring and following up the outcome of any non-conformances with specified objectives and targets;
- implementing and reviewing the EMS; and
- conducting regular reviews to identify opportunities for continuous improvement.

BAL will continue to work closely with the DITRDLG and the AEO throughout the period of this AES to achieve continued improvement in environmental outcomes at Bankstown Airport via similar means.

In particular BAL will work to achieve the sustainability objectives outlined for airport operations in the *2009 National Aviation Policy White Paper*.

