

> Environmental Management Overview



Bankstown Airport
Airport Environment Strategy
2005



> Environmental Management Overview

3.1 Environmental Management System (EMS)

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 Environmental Management Manual. The AES documents the strategic, legal and reporting framework within which the EMS operates.

A commitment was made in the previous AES, for the period 2000 to 2005, to review the EMS and ensure that it was consistent with international standard *AS/NZS ISO14001 1996 Environmental Management Systems Specification with Guidance for Use*. The EMS currently contains many of the elements of ISO 14001. BAL will progressively update, and, amend the EMS documentation and processes to ensure they are consistent with ISO 14001.

The EMS will include detailed day-to-day environmental management procedures for BAL staff. Other components of the EMS are described in the following sections.

3.1.1 Environment Policy

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 CEO down, recognise that this commitment must include best practice EMS' 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.

3.1.2 Environmental Management Plans

EMPs will continue to be developed where required to address particular environmental issues or geographic parts of the Airport. The EMPs will detail environmental management actions to be implemented as part of the AES, the responsible organisation for implementation, specific monitoring requirements and the timing in which individual actions are to be completed.

As mentioned in Section 2.3, Tier 1 and 2 tenants are also required to prepare an EMP for the management of their activities. It is recognised that the tenants, many of whom have small operations, may have insufficient experience in the preparation of an EMP. Therefore, in order to obtain their cooperation, assistance will continue to be given in a number of areas. Specifically this will include:

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

Contractors undertaking major works at the Airport will also be required to prepare an EMP to show how impacts of their activities are to be mitigated.

> Environmental Management Overview

As a minimum, the EMPs shall include measures to minimise noise emissions, air pollution, water pollution, erosion and sedimentation. The requirement for the preparation of a construction EMP will be included as part of the technical specification of the construction works. Preparation and implementation of EMPs will also be a condition under building approvals as detailed in Section 2.5.3.

3.1.3 Training and Awareness

The training considered by BAL to be necessary for appropriate environmental management by a person employed by BAL or by other major employers is considered to be that sufficient to gain full membership to the Environment Institute of Australia and New Zealand (EIANZ), although actual membership is not necessary. Criteria for full membership comprise:

- a tertiary degree plus a minimum of two years professional experience in environmental practice; or,
- five or more years of experience in functional areas of environmental practice (ie. assessment, planning, documentation, operations and design, education, research, legislation).

BAL is committed to continue developing and implementing environmental training and awareness programs for all staff, tenants and contractors associated with the Airport. BAL's commitment will ensure that:

- education opportunities are provided on a regular basis;
- recruitment procedures are such that only competent and appropriately qualified staff are employed by BAL;
- contractors employed at the Airport are aware of their environmental obligations;
- tenants are made aware of environmental issues on a regular basis through day-to-day contacts, the monthly tenant newsletter and implementation of an environmental awareness program; and
- environmental awareness training records of employees are kept.

There are no formal training programs that the Airport is aware of that would meet the environmental training needs of persons employed at the Airport, excluding a range of tertiary degree courses which may be suitable for the Airport's environmental manager.

The environmental education programs for staff, tenants and contractors are, and will continue to be, provided by experienced BAL staff or trainers from private qualified companies.

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The environmental awareness program has largely involved promoting general environmental awareness and it is intended in the future to continue the program, targeting specific issues including:

- details of the AES;
- environmental legislation and penalties;
- best practice procedures and practices;
- protection of significant and sensitive sites;
- storage of dangerous goods and hazardous wastes; and
- environmental management plans.

Feedback will be obtained from participants on the effectiveness of the awareness program as input to the improvement of future programs.

3.1.4 Records and Document Control

The EMS details a recording and document control system that currently exists within the overall administrative records of BAL. BAL's Environment Manager is responsible for the maintenance of all environmental records associated with the Airport.

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;

> Environmental Management Overview

- 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.

3.1.5 Environmental Monitoring

Implementation of the AES will require various environmental monitoring data to be collected by BAL and in some cases by BAL's tenants.

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

All environmental testing, measuring and sampling will be carried out by methods approved by the DEH or the NSW Environment Protection Authority as appropriate.

Records of the monitoring undertaken will be kept by BAL and reported to the AEO and DoTaRS annually in the Annual Environment Report, unless otherwise agreed with the AEO and DoTaRS.

3.1.6 Auditing

To ensure that objectives and targets are being achieved and that these are effective in managing the environment at the Airport, a process of review and auditing is required.

Two types of audits are undertaken at the Airport:

- environmental audits (to assess compliance with legislative requirements of specific tenants, pollution control equipment, sensitive sites and contaminated sites); and
- EMS audits (to assess compliance with BAL's EMS).

BAL's current auditing protocols are based on checklists incorporating a range of issues.

Environmental Audits

Environmental audits are undertaken in accordance with the following schedule:

- Tier 1 tenants – annually by BAL's Environment Manager and the AEO;

- Tier 2 tenants – at least every two years by BAL's Environment Manager and the AEO; and
- Tier 3 tenants – every two years by BAL's Environment and/or Facility Manager.

The audits assess the following environmental issues:

- compliance with relevant environmental legislation;
- compliance with the AES;
- compliance with EMPs;
- potential for water pollution;
- potential for soil contamination;
- ground-based noise emissions;
- potential for air pollution;
- dangerous goods and hazardous substances (handling, storage, use and disposal);
- ozone-depleting substances;
- waste management (including wastewater);
- documentation and record keeping; and
- actions arising from previous audits.

A copy of the audit checklist is provided in Appendix C.

BAL will prepare an Audit Report and, if necessary, issue non-conformance notices, as a result of the audits. The Audit Reports and non-conformance notices will be issued to the AEO and the tenant management. A summary of the audit findings will also be included in the Annual Environment Report issued by BAL to DoTaRS and the Annual Public Environment Report which is made available to the public. Compliance with the report recommendations and the effectiveness of the actions implemented are assessed during the next Environmental Audit.

In addition, BAL's Environment Manager will also conduct informal inspections of tenants' facilities on a regular basis.

Environmental Management System Audit

An internal audit of BAL's EMS will be conducted every two years. BAL may consider in the future engaging qualified and experienced external consultants to undertake an audit. The scope of each audit is as follows:

- check EMS consistency with ISO 14001;
- check compliance with objectives of the AES;

> Environmental Management Overview

- confirm that the EMS has been implemented and operates as described;
 - check compliance with randomly selected environmental procedures;
 - check the Environmental Site Register for accuracy and currency;
 - identify any non-conformance, and prepare a brief report;
 - inspect the Corrective Action Request register and determine whether corrective action is being followed-up and implemented; and
 - document recommendations for improving any components of the EMS.
- sewer blockage;
 - pump failures;
 - flood;
 - failure of single control structures;
 - stormwater blockage;
 - building fire;
 - bushfire/grass fire;
 - vehicle accident; and
 - aircraft accident.

EMS audit results will be issued to BAL's CEO and the AEO by the Environment Manager for consideration and action. BAL will then amend the EMS or review implementation as appropriate based on the recommendations provided in the EMS Audit report. Compliance with the audit recommendations will be assessed during the following EMS Audit.

The risks that have a relatively high likelihood of occurring and would pose a high risk to the environment if they were to occur are primarily considered to relate to spillage of fuel and hazardous chemicals.

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

3.1.7 Non-Conformance, Corrective and Preventive Action

Non-conformances identified through environmental audits, routine inspections and incidents will be managed through BAL's non-conformance, corrective and preventive action processes.

The responsible party will be required to consider and implement as appropriate the recommendations provided in the non-conformance reports. BAL's Environment Manager will make regular progress checks on the implementation of the recommendations by BAL staff and tenants.

The AEO will decide whether regulatory action is required in relation to non-compliances with the AES.

Tier 1 tenants are required to prepare an EMP that includes an emergency response procedure. The requirements for spills reporting are included in the EMS. For a significant spill likely to result in off-Airport impacts, the NSW EPA and Bankstown City Council would be notified in addition to the AEO.

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 Environment Report.

3.1.8 Incident Management and Reporting of Hazardous Chemicals and Fuels

Potential incidents that could occur at the Airport include:

- loss of electrical power;
- burst water main;
- fuel/oil/chemical spill;

3.1.9 Tenant Cooperation

BAL intends to ensure tenant compliance with actions and management procedures outlined in the AES by working with the tenants, completing environmental audits, reviewing tenant monitoring results and programs, undertaking regular site visits, providing information sheets on relevant environmental issues and forwarding correspondence, where necessary.

Tenants will also be represented on the BACCF.

3.1.10 Environmental Reporting

BAL undertakes various levels of environmental reporting as summarised below.

> Environmental Management Overview

Annual Environment Report

In accordance with the Airports (Environment Protection) Regulations 1997, BAL will prepare an Annual Environment Report for submission to the Secretary of DoTaRS. The contents of the Annual Environment Report are specified by Regulation 6.03. The format will be agreed with the AEO to ensure compliance with the AES. The Annual Environment Reports are reviewed and verified by the AEO and submitted to DoTaRS.

Annual Public Environment Report

As part of its commitment to community consultation, BAL has voluntarily undertaken to produce Annual Public Environment Reports. These reports record the current status of the environment at the Airport and include:

- progress on implementing the AES;
- a summary of investigations into environmental incidents or breaches over the reporting year, and an analysis of trends;
- a summary of the results of environmental monitoring programs and a review of trends;
- a summary of results of environment audits;
- an overview of other relevant environmental projects or studies undertaken during the reporting period; and
- a report on the activities of the BACCF.

The Annual Public Environment Reports will be available to the public via the Internet.

Liaison Meetings

The AEO and BAL will continue to meet monthly (with a view to bimonthly or quarterly meetings in the future) 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.

Internal Reports

BAL's Environment Manager will be responsible for the preparation of quarterly environmental reports with respect to the AES, the EMS and the relevant legislation for consideration by BAL's CEO as well as environmental updates in BAL's Board reports.

Reporting of the performance of BAL with respect to environmental issues will continue to be undertaken by the Environment Manager on a regular basis (typically weekly) at senior management meetings for review and comment by the CEO and other senior management of BAL.

3.1.11 EMS Implementation Plan

The timetable for implementation and audit of the EMS shall be determined as part of an AES implementation plan to be developed in cooperation with the AEO during early 2005. On this basis the first EMS audit will be undertaken during 2005. BAL will ensure that the EMS is consistent with the requirements of ISO14001 within two years of the first audit, to be verified by the next audit.

3.2 Continuous Environmental Improvement

Over the five year period of this AES, BAL will continue to manage environmental improvement through the following initiatives:

- implementing the management actions and outcomes of the AES;
- working with the community and Government Agencies;
- reviewing the current EMS, and continue to identify and update environmental standards;
- undertaking monitoring and following up the outcome of any non-conformances with BAL's targets;
- implementing and auditing the EMS (including the AES); and
- conducting annual reviews by the BAL Environment Manager in consultation with the AEO to identify opportunities for continuous improvement.