

Environmental Management Plans Guidelines

1 Foreword

This Perth Airport document is for use by Perth Airport Pty Ltd (PAPL, Perth Airport) Tenants, Contractors and Sub-contractors (the Organisation) when preparing operational or project specific Environmental Management Plans (EMPs). This document describes the content and format required in each EMP to meet the requirements of the *Airports Act 1996* (Cth) and the *Airports (Environment Protection) Regulations 1997* (Cth). Under this Act, the EMP becomes legally binding on Tenants, Contractors and Sub-Contractors undertaking works within the Perth Airport Estate.

The Organisation's EMP shall be audited by PAPL or its appointed auditors annually or at such other frequency as determined by the level of environmental risk posed by the project or operations. The EMP prepared by the Organisation, shall be submitted to PAPL with sufficient lead time to allow PAPL to undertake a thorough review of the document prior the project or operations commencing.

For the purposes of this document, the following verbal forms are used: "Shall" or "Must" indicates a minimum requirement that the EMP must meet to be compliant with PAPL's requirements. "Should" indicates a recommendation, that PAPL considers to be good practice, "May" indicates a permission and "Can" indicates a possibility or a capability.

Where this Guideline refers to environmental aspects, risks, issues or management practices, this also includes material sustainability matters, whether explicitly stated or not; and these matters shall be included in Organisation's management and reporting requirements under this Guideline.

2 Disclaimer:

The Organisation acknowledges that this document is general information only and does not constitute specific advice regarding the Organisation's legal obligations, including under any contract between PAPL and the Organisation or arising under the Airports Act 1996 (Cth) and the Airports (Environment Protection) Regulations 1997 (Cth). The Organisation must make its own independent assessment of its legal obligations and will rely solely on its own investigations and analysis.

Subject to any law to the contrary, and to the maximum extent permitted by law, PAPL disclaims all liability for any loss suffered by any person using or acting on this document or any other environmental information supplied by PAPL, whether the loss arises in relation to, in connection with or as a result of any negligence, default or lack of care on the part of PAPL, or from any misrepresentation or any other cause.

3 Title Page/ Front Cover

The title page or front cover should be in the following format, including the company name, date and version and shall be followed by a Table of Contents:

<p style="text-align: center;">[<i>INSERT FACILITY NAME</i>] PERTH AIRPORT</p> <p style="text-align: center;">ENVIRONMENTAL MANAGEMENT PLAN</p> <p style="text-align: center;">Date</p> <p style="text-align: center;">Revision No.</p>
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The following document sections are all required to be addressed by the Organisation within their EMP:

4 Environment Policy

The Organisation's Environment Policy shall define the overall intentions and direction of the Organisation in relation to its environmental and sustainability performance. The policy:

- Shall reflect the nature and scale of the Organisation, its activities, products and services.
- Shall include a commitment to the prevention of pollution.
- Shall include a commitment to comply with all applicable legal and other requirements to which the Organisation subscribes.
- Shall be documented and authorised by the Organisation's most senior management.
- Shall be communicated to all employees working for, or on behalf of the Organisation.
- Should comply with the requirements outlined in ISO 14001:2015 or shall be of equivalent standard.

5 Introduction

The introduction shall summarise how the Organisation's EMP will address Perth Airport's requirements with respect to environmental management and sustainability. All new Tenants are required to prepare an EMP in accordance with the Perth Airport Environment Strategy (as amended from time to time) as part of their lease agreements.

For existing Tenants, an Environmental Risk Profile has been developed by PAPL and depending on the level of environment risk proposed by the project or operation, PAPL may request an Environmental Management Plan be prepared in accordance with the Perth Airport Environment Strategy (and any amendments to the Strategy).

Note - It is a requirement of the *Airports (Environment Protection) Regulations 1997 (Cth)* (Part 6, division 1, Section 6.05) that sub-lessees operating within an airport give all reasonable assistance to the airport-lessee company with their environmental management and reporting obligations, (note – Perth Airport's environmental management activities now also include Sustainability aspects, in keeping with enabling its Corporate Strategy). Therefore, for Perth Airport and its associated Tenants, Contractors and Sub-contractors, this includes the Organisation providing an EMP and Annual Environmental Report (AER) when requested and as required, with consideration of Sustainability as appropriate.

5.1 Operation Description

The Operation Description section of the Organisation's EMP shall include sufficient detail to enable an assessment of the potential environmental risks that may result from the activity undertaken on the premises by the Organisation. The information required shall include, but is not limited to:

- A description of the key function of the business.
- A description of the main activities, goods and/or services undertaken by the Organisation.
- The hours of operation.
- The size / area of the facility.
- A site plan, that includes the location of key items at the site that require environmental management. For example, wash down bays, fuel storage, spray booths.

- A description of any goods that maybe classified as hazardous or dangerous under State or Commonwealth legislation and the expected volumes of such goods either stored at the facility or being handled by the facility.
- A description of any aspects of Sustainability that may be significant to the operation, such as water or energy efficiency, use of sustainable transport, procurement or materials, climate change or greenhouse gas emissions.

5.2 Purpose and Scope

This section shall define the purpose and scope of the Organisation's EMP.

Key considerations shall include:

- why the plan has been prepared,
- what the plan covers,
- whose activities it is to manage, and
- what the plan contains.

The Organisation shall ensure that the EMP is consistent with relevant Perth Airport environmental management and sustainability commitments detailed in the current Perth Airport Environment Strategy, as the commitments of the Perth Airport Environment Strategy are binding on Sub-lessees (i.e. Tenants, Contractors and Sub-Contractors) as well as to Perth Airport itself.

Perth Airport may be required to amend its Environment Strategy from time to time, to ensure compliance with its own legal and other obligations. Where required, the Organisation may be required to update the Organisation's EMP to reflect the amended Environment Strategy and its associated commitments and objectives.

The Perth Airport Environment Strategy can be accessed online via the Perth Airport website (<http://www.perthairport.com.au>). Alternatively, hard copies may be viewed at, or purchased from, the Airport Management Office, Level 2, 2 George Wiencke Drive, Perth Airport.

5.3 Legal and Other Requirements

This section shall provide details of all legal and other requirements applicable to the Organisation, i.e. legal, statutory and regulatory compliance requirements and shall include any specific Perth Airport lease requirements or conditions and include reference to the Perth Airport Environment Strategy located in the publicly available Perth Airport Master Plan (current version) and subsequent revisions.

The section shall detail, or provide reference to, process(es) for the identification, access and maintenance of legal and other requirements to which the Organisation subscribes. This section shall reference a register of legal and other requirements to be included in an Appendix.

Key considerations shall include:

- What legislation, standards or other requirements are applicable to the Organisation?
- How legislation is identified and accessed; and how currency is maintained.
- What other obligations does the Organisation have in terms of non-legislative requirements, e.g. agreements, contractual commitments?
- How does the Organisation ensure compliance with its obligations?

6 Management Framework

6.1 Roles and Responsibilities

The Organisation shall provide details of:

- Key personnel and their environmental and/or sustainability management responsibilities.
- Environment accountabilities and responsibilities for key positions, including overall environmental management, risk management, incident reporting and internal audit.
- The management structure of the Organisation (Organisational Chart).

6.2 Induction, Training, Awareness and Competency

This section shall detail processes that demonstrate personnel at the Organisation's Perth Airport facility are appropriately trained and competent to undertake tasks that may potentially impact on the environment. The section shall provide details of the process by which environmental or sustainability training needs are identified and briefly describe what environmental, sustainability or HSE training is provided. This should include environmental induction and any relevant specialised environmental or sustainability management training. Detail should also be provided of how training is planned and implemented and what records of training are maintained.

Where an established training and awareness process is documented in an existing management system procedure, a summary of the process and reference to the procedure is acceptable.

7 Environmental Setting

Provide a brief introduction detailing the location and layout of the Organisation's facility within the Perth Airport Estate. This shall include a figure depicting the site location and surrounding land use.

7.1 Physical and Ecological Environment

Provide detail of the surrounding physical environment, especially areas of high conservation value, wetlands and surface drains. Key considerations should include:

- Quality and type of surrounding vegetation/ flora.
- Terrestrial habitat and fauna.
- Site hydrology and drainage (surface water and groundwater).
- Wetlands/ riparian habitat.

7.2 Social Environment

This section shall provide information the details of the surrounding social environment. Key considerations should include:

- Zoning
- Surrounding land uses.
- Heritage/ cultural significance of environment (Aboriginal and European).

8 Environmental Assessment

The purpose of this section is to clearly identify:

- All risks of environmental harm arising from the specific activities being undertaken by the Organisation on the Perth Airport Estate site, and any material sustainability issues pertinent to the Organisation.
- For each risk or material sustainability issue, specific management measures directed at minimising those risks, addressing the issues or preventing them from eventuating.

8.1 Environmental Risk and Opportunities Assessment

The section shall provide detail on the Organisation’s environmental risk and opportunities assessment process, the outcomes of the risk and opportunities assessment, control measures proposed appropriate to the level of risk and detail of when and how environmental risks and opportunities (and material sustainability issues) are reviewed.

An environmental risk and opportunities assessment effectively identifies potential or actual environmental impacts associated with the Organisation’s activities, goods or services over which the Organisation may have influence or control, as well as any opportunities related to its activities and in achieving continual improvement. Once identified, risks and opportunities shall be ranked, prioritised and where required, controls established to reduce the level of risk to an acceptable level. The resulting environmental risk and opportunities register (including any material sustainability issues) must be provided in the Organisation’s EMP as an Appendix. AS/NZS 31000:2009 provides further guidance on the risk assessment process and can be obtained from SAI Global.

The risk assessment process consists of three key stages:

- Risk and opportunity identification - Identify and document environmental risks, opportunities and impacts (both positive and negative) and material sustainability issues associated with the Organisation’s activities, goods and services.
- Qualitative assessment of potential environmental impacts to establish relative significance, using the Perth Airport or the Organisation’s risk matrix, that has been provided and referenced in the Organisation’s EMP.
- Establishment and documentation of control measures to mitigate potentially significant environmental impacts.

Risk assessment is generally undertaken by assigning likelihood and consequence levels to each identified activity or issue and determining risk levels using a risk matrix (Table 1). Management measures are then implemented and residual risk is determined. For guidance, the Perth Airport likelihood (

Table 2) and consequence criteria (Table 3) and levels of control (Table 4) are presented below with an example provided in Table 5.

Table 1: Perth Airport Qualitative Risk Rating Matrix.

LIKELIHOOD		CONSEQUENCE				
		Level 1	Level 2	Level 3	Level 4	Level 5
	5	Moderate	Moderate	High	Very High	Very High
	4	Low	Moderate	High	Very High	Very High
	3	Low	Low	Moderate	High	Very High
	2	Very Low	Low	Moderate	High	High
	1	Very Low	Very Low	Low	Moderate	High

Table 2: Perth Airport Risk Likelihood Classification.

DESCRIPTION		FREQUENCY		PROBABILITY		LIKELIHOOD RATING		
The event is a common or frequent occurrence. Has occurred many times at Perth Airport and/or circumstances are such that it will almost certainly happen.	OR	More than once per year	OR	>95%	=	Almost Certain	LIKELIHOOD	5
The event is expected to occur. Has occurred often at Perth Airport and/or frequently in other similar organisations.		Once per 1 year		75-95%		Likely		4
The event should occur at some time/will probably occur, in some circumstances. Has occurred more than once at Perth Airport and/or has occurred several times in similar organisations.		At least once in 2-3 years		25-75%		Possible		3
The event could occur at some time. Has occurred very infrequently at Perth Airport and/or is known to occur occasionally in other similar organisations.		At least once in 10 years		5-25%		Unlikely		2
The event may occur only in exceptional circumstances. Has not occurred at Perth Airport however has occurred infrequently in other similar organisations.		Less than once in 10 years		<5%		Rare		1

Table 3: Perth Airport Risk Consequence Classification.

CONSEQUENCE RATING					
CONSEQUENCE CATEGORY	Level 1	Level 2	Level 3	Level 4	Level 5
Health, Safety & Wellbeing	Requires first aid treatment OR assessment by medical practitioner OR psychological impact that could be treated at site.	Physical OR psychological injury requiring short to medium term treatment by medical practitioner.	Physical injury requiring admission to hospital as inpatient OR permanent physical impairment not significantly affecting quality of life OR psychological injury requiring long term treatment by medical practitioner.	Single fatality OR physical injury resulting in permanent disability to one person OR psychological injury requiring extensive remedial intervention, unable to function in society OR more than one person with Level 3 impact.	Multiple fatalities OR multiple persons with Level 4 physical or psychological injury.
Total Financial Impact (Direct Financial Loss or Capitalised Opportunity Loss)	<\$100,000 direct or opportunity loss.	\$0.1m – \$3.0m direct or opportunity loss.	\$3m – \$30m direct or opportunity loss.	\$30m – \$100m direct or opportunity loss.	>\$100m direct or opportunity loss.
Environment & Heritage	Low level environmental impact OR negligible impact on heritage asset. Immediately rectifiable.	Minor environmental impact (< 3 months to remediate / recover) OR heritage asset damage fully rectifiable.	Moderate environmental impact (< 1 year to remediate / recover) OR heritage asset damage only partially rectifiable.	Major impact (> 1 year to remediate or recover) on ecosystem or threatened species OR severe or large-scale damage to heritage asset beyond recovery.	Permanent loss of ecosystem or threatened species OR severe or large-scale damage to highly valued heritage asset beyond recovery.
Public Reputation, Community or Stakeholder relationship	Short term media concerns (single day) and/or community complaints. Minimal flow on effect for external stakeholders or short-term damage to single stakeholder relationship. Nil impact on brand.	Adverse media coverage (up to 1 week) OR large number of community complaints. Short term flow on effect for external stakeholders. Short term damage to significant number of stakeholder relationships. Short term impact on brand.	Adverse and sustained media attention / campaign (weeks) and/or local political scrutiny (State). Large scale community campaign(s). Significant flow on effect for external stakeholders and/or significant damage to majority of stakeholder relationships or a critical stakeholder relationship. Significant impact on 'brand'.	Repeated adverse national or international media attention and/or political scrutiny (national). Loss of credibility with the majority of stakeholders or breakdown of critical stakeholder relationship requiring significant Board intervention. Sustained negative impact on 'brand'.	Sustained, intense adverse national or international media attention and/or political scrutiny. Governmental Inquiry. Sustained major flow on effect on stakeholders. Total loss of credibility with all stakeholders. Loss of licence to operate. Permanent negative impact on 'brand'.

The Organisation’s environmental risks can then be prioritised once the appropriate level of risk has been determined. From the criteria above, the Organisation shall determine and document which risks are considered significant, and control strategies shall be established and implemented for all significant risks.

When determining risk control strategies, the level of controls (effectiveness of the control) used in managing risks, as summarised below, must be considered:

Table 4: Risk Control Rating Used by Perth Airport.

EXISTING CONTROL RATING	
LEVEL	DESCRIPTION
Level 1	Controls are robust and fully effective and provide reasonable assurance that both the legislative & regulatory obligations & business efficiency/effectiveness objectives should be met.
Level 2	Existing controls are adequate, appropriate & effective to provide reasonable assurance that both the legislative & regulatory obligations & business efficiency/ effectiveness objectives should be met however further controls could be applied. Certain controls may require improvement to ensure that the overall environment will continue to operate effectively.
Level 3	The overall control environment is not adequate or effective & fails to provide reasonable assurance that risks are being managed & control objectives are being met. There is an immediate need to improve the control environment to achieve a satisfactory level of risk mitigation.

Outcomes of the risk identification and assessment process shall form the basis of the environmental management measures detailed in Section 5.3. This process will assist with the identification and planning of training requirements, development of emergency procedures and setting environmental objectives.

An Environmental Risk Register format with a completed example risk is presented in Table 5.

Where an established risk assessment process is documented in an existing management system procedure, a summary of the process and reference to the procedure is acceptable for this section.

Table 5: Example Environmental Risk Register Format.

Risk Identification				Inherent Risk Rating			Control Strategy	Residual Risk Rating			Further Actions Required	Rating Comments
#	Activity/ Issue (Source or Event)	Potential Causes	Impacts	Likelihood	Consequence	Risk Rating		Likelihood	Consequence	Risk Rating		
1	Hydrocarbon leak from bulk fuel storage.	Tank failure. Seal failure.	Soil/ groundwater contamination	Likely	High	Very High	<ul style="list-style-type: none"> AS1940 compliant bunding. Spill kit located at tank. Emergency response training. Routine inspection. 	Unlikely	Medium	Moderate	none	
2												

8.2 Potentially Significant Environmental Risks

This section shall summarise the Organisation's activities, goods or services that have been identified as potentially significant inherent risks using the environmental risk assessment process, and as defined by the Organisation. The Organisation shall also summarise potential emergency situations for which emergency response planning is required. Bulleted lists are sufficient.

8.3 Environmental and Sustainability Management Measures

A section detailing the environmental management measures that are implemented by the Organisation to control environmental impacts or address material sustainability issues shall be prepared for each environmental aspect (or other material sustainability issues). Management measures shall be consistent with Perth Airport's Environmental Strategy (located with Perth Airport's Master Plan, and as amended from time to time).

Potential environmental management options and material sustainability issues will be specific to the Organisation and dependent on the activities, goods and services undertaken by the Organisation. The following list provides guidance as to the types of environmental management practices or sustainability issues that may be considered:

- Vegetation and habitat protection.
- Fauna management, including any wildlife interactions that occur on site and how they are managed (referencing the Airport Operating Standards available on the Perth Airport corporate website www.perthairport.com.au).
- Soil management, including contamination.
- PFAS.
- Fire management, including relevant Perth Airport measures.
- Water management (surface, ground and supply) including procedures for activities near environmentally significant areas and management of contamination.
- Water quality, erosion and sedimentation control.
- Stormwater and fire suppression water management.
- Aboriginal and European heritage protection.
- Dust management.
- Noise and vibration management.
- Stockpile management.
- Hazardous material and waste management, including measures addressing:
 - Movement and storage of hydrocarbons;
 - Storage and handling procedures for all hazardous chemicals;
 - Registers of waste materials/contamination, monitoring and audit sheets;
 - Hazardous spill contingency actions;
 - Contamination contingency actions; and
- Waste management including the external storage of waste and contractor waste handling.

- Maintenance activities, including those of contractors.
- Resource use including energy, water and construction materials.
- Carbon emissions and greenhouse gas accounting or carbon footprint management.
- Energy efficiency measures and/or water efficiency measures.
- Recycling and diversion from landfill.

Documents that are important to the Organisation's risk management measures should be referenced in this section.

8.4 Environmental and Sustainability Monitoring

The *Airports (Environment Protection) Regulations 1997 (Cth)* requires tenants to establish and maintain appropriate monitoring systems to assess the environmental consequences of their activities and to report monitoring results to Perth Airport. These consequences may also be due to material sustainability issues, such as carbon emissions and climate change.

Where an Organisation undertakes activities or services that may result in impacts to water quality, ground or surface water levels, air quality, surrounding facilities or residential areas (noise, dust etc.) or soils/ sediments, it is likely that environmental monitoring will be required by Perth Airport. Where an Organisation is unclear as to whether environmental monitoring is, or is likely to be required, advice should be sought from Perth Airport's Environment Department personnel.

Where environmental monitoring is required by PAPL, an environmental monitoring plan shall be prepared to ensure all internal or external requirements are met. The plan shall include:

- Monitoring objectives.
- Location and description of sample locations with map.
- Sampling techniques.
- Competencies for sample collection.
- Sampling and reporting frequency.
- Environmental monitoring records management.
- The frequency and process for reviewing the monitoring program following changes to the facility, process modifications or work practices and also in the absence of change and by whom.

Where the Organisation has an established environmental monitoring process that is documented in an existing management system procedure, a summary of the process and reference to the procedure is acceptable. However, it is essential that the Organisation's environmental monitoring required by Perth Airport is captured by this process and documented using existing schedules and forms.

The Organisation is required to maintain monitoring equipment within their lease/ project activity area to the appropriate scientific standard at their own expense.

8.5 Environmental Performance Objectives

This section shall detail the key environmental performance objectives for the Organisation. Objectives may be in the form of management objectives, targets, KPIs, monitoring program(s) or a combination of the above. These

environmental performance objectives shall ensure specified levels of environmental performance and/or improvement in environmental performance are achieved.

The Organisation shall clearly identify the environmental and sustainability standards and objectives that must be met when carrying out their activities. In the event of a non-conformance or trigger-level being met or exceeded, the Organisation shall also describe the consequences and actions required to redress the situation.

A summary table of the Organisation's environmental commitments as part of the lease agreement or contract shall be included as an Appendix to the OEMP. This table shall reference the relevant section within the OEMP that demonstrates action towards meeting each commitment.

9 Document and Records Management

The processes used by the Organisation for the retention of environmental (or HSE) documents and records, and all other documents which affect the environmental management practices of the Organisation shall be described in this section of the Organisation's EMP.

10 Reporting to Perth Airport Pty Ltd

10.1 7.1 Incident Reporting by the Organisation

The Organisation shall detail the environmental incident reporting and complaint management processes implemented by the Organisation and either include, or reference any procedures, forms and registers utilised to report and manage environmental incidents.

This section of the Organisation's EMP shall include:

- The types of incidents/ complaints that are reported.
- How incidents/complaints are categorised, and severity determined.
- How incidents/complaints are investigated.
- The process for informing Perth Airport of incidents and the person responsible for notification of the following:
 - When the Organisation has not met the relevant objectives and standards in Section 5.3 (one of which might be general – e.g. if there is any harm to the environment, it must be reported to Perth Airport).
 - When the Organisation receives complaints from the community or a regulator.
 - When Organisation's activities on the premises change or the environmental risk profile of those activities change.

Where any results of environmental monitoring, as outlined in Section 5.4, indicate that pollution is occurring or an environmental trigger level has been reached, the Organisation must inform the Perth Airport Environment Manager in writing as soon as practicable and in all cases within 24 hours of this information becoming known.

In the event of an environmental incident, the Organisation is to report to Perth Airport:

- All Airside Incidents (that are not classified as an emergency (see Section 10 for Emergency Response)) as soon as reasonably practicable to the Airport Control Centre on (08) 9478 8572.
- All significant environmental incidents or complaints, notifiable environmental incidents or any other environmental incidents which have the potential to cause environmental impacts external to the facility boundary, or which may result in pollution as described in the *Airport (Environment Protection)*

Regulations 1997 (Cth). These types are to be reported to the PAPL Environment Manager as soon as reasonably practicable, and in all cases within 24 hours in writing.

- A significant incident is defined as an occurrence that has the potential to cause significant harm or does cause actual harm. This can be:
 - An exceedance against the PFAS National Environmental Management Plan (NEMP) or the Airports (Environment Protection) Regulations 1997 in monitoring results.
 - A loss of containment to air, water or land (such as an uncontrolled discharge of a hazardous material or wastewater that has entered drains of the natural environment, or unplanned release to air).
 - A spill or release of a hazardous material (of a large quantity of 100 litres or more) that has the potential to cause significant harm.
 - Unapproved impact to any native vegetation.
 - Injury or death to listed fauna species – Carnaby's, Baudin's or Forest Red tailed black cockatoos.

Note - this obligation is in addition to the notification requirements within the Sub-lease where the Organisation is a Tenant of Perth Airport.

10.2 7.2 Annual Reporting by the Organisation

Results of all environmental monitoring and sustainability management activities undertaken for or on behalf of the Organisation, as outlined Section 5.4, shall be reported to Perth Airport as part of the Organisation's Annual Environmental Report (AER). This report must be submitted by 31 July immediately following each financial year. Guidance on the requirements of the AER is located on Perth Airport's corporate website (perthairport.com.au).

The Organisation must:

- By 31 July immediately following each financial year, provide to Perth Airport, as part of the Organisation's Annual Environmental Report (see Annual Environmental Report Guideline - Section 12), a summary of all environmental incidents and complaints incurred by the Organisation. This summary shall include the nature of the incident/ complaint, the extent of the impact and the status of any corrective actions arising from investigation.

11 Environmental Inspection and Audit

11.1 Internal Audits and Inspections by the Organisation

The processes used by the Organisation for the planning, implementation and documentation of internal and third party environmental audits shall be detailed in this section. Where formal workplace inspections act as risk mitigation measures, these shall also be planned and documented.

Responsibilities and authorities within the Organisation for audit and inspection shall be included and hazards or non-conformances identified during internal or external audits or inspections shall be assessed and controlled in accordance with risk management and corrective action procedures.

An audit schedule which includes the examination of conformance of the Organisation with the management measures and processes detailed in the Organisation's EMP shall be prepared and referenced. The schedule shall also include any other processes that require audit as part of risk treatment.

The annual audit plan, completed audit checklists and any non-conformance reports (NCRs) resulting from internal or third party environmental audits shall be made available to Perth Airport if requested and a statement to this effect shall be included in the EMP. Inspection checklists shall be referenced and included in appendices.

Where the Organisation has established inspection and audit processes documented in existing management system procedures, a summary of the processes and references to the procedures are acceptable.

11.2 Audits and Inspections by Perth Airport

In addition to defining processes for internal audits and inspections, this section must also include a statement of the Organisation's willingness to provide PAPL and its employees or agents access to the facility or project area for the purposes of conducting inspections or environmental audits.

Appropriate action plans to address any non-conformance raised during a PAPL audit or inspection shall be managed in accordance with the audit and inspection processes defined above and shall include reporting of actions and outcomes to PAPL.

The Organisation's EMP shall also include provision for the amendment of the EMP by the Organisation following the outcome and recommendations of the audit. The Organisation will amend the EMP to the reasonable satisfaction of PAPL.

12 Maintenance Management System

Maintenance and inspection activities are often utilised in conjunction with physical and/or additional operational controls as preventive risk mitigation measures. To ensure optimum performance of the Organisation's critical equipment in mitigating the environmental impacts of activities or processes; routine and periodic maintenance activities and inspections should be planned and implemented. To demonstrate this, a maintenance schedule shall be prepared by the Organisation for equipment whose failure may potentially result in adverse environmental impacts.

Where the Organisation has an established maintenance management process documented in an existing management system procedure, a summary of the process and reference to the procedure is acceptable.

13 Emergency Response

The Organisation shall, through the risk assessment process, and based on previous incidents or experience, identify potential emergency situations which may arise. This section shall include information on how emergency situations are identified by the Organisation and the management practices to be applied in the case of their realisation.

It shall also specify requirements for emergency response planning, training and emergency exercises by the Organisation. PAPL recommends site emergency response plans which encompass environmental emergencies are developed and referenced in the Organisation's EMP.

Emergency response documentation shall include key contacts within the Organisation and detail how Perth Airport personnel are to be integrated into emergency response.

Where the Organisation has an established emergency response process documented in an existing management system procedure, a summary of the process and reference to the procedure is acceptable. It is however essential that potential emergency scenarios associated with the activities undertaken at the Organisation's premises are appropriately addressed in any emergency response documentation (e.g. plans or manuals).

This section should be consistent with any 'Emergency Response Plan' as required by the Sub-lease where the Organisation is a Tenant of Perth Airport.

Note: in the event of an emergency, it is recommended that an Organisation contacts emergency services by dialling '000'. Following this the Airport Control Centre is to be notified by calling (08) 9472 8500.

14 Corrective and Preventative Action

This section shall detail how actions arising from complaints, incidents (including near misses), audits, inspections or other events which may potentially result in an environmental impact, or adversely affect the environmental performance of the Organisation are managed and closed-out.

Sufficient detail shall be provided within the Organisation's EMP clearly explaining the methodologies and requirements for:

- The identification of corrective actions.
- The assignment of timeframes and responsibilities for their implementation and the relevant authorities for review and sign-off.
- Documented tracking and reporting on the status of corrective actions.

This section of the Organisation's EMP shall state that the environmental impact be corrected to the reasonable satisfaction of the Perth Airport Environment Manager.

Where the Organisation has an established corrective and preventive action process documented in an existing management system procedure, a summary of the process and reference to the procedure is acceptable.

This section should be consistent with any 'Emergency Response Plan' as required by the Sub-lease where the Organisation is a Tenant of Perth Airport.

15 Annual Environmental Report

The Organisation shall provide an Annual Environment Report (AER) to PAPL by 31 July immediately following each financial year in keeping with the requirements of the *Airports (Environment Protection) Regulations 1997* (Cth) and any Sub-Lease the Organisation may hold with PAPL.

The Organisation's AER shall include the information required by the Sub-lease as well as the following information:

- A summary of environmental complaints and incidents incurred by Organisation for the financial year.
- The results of the Organisation's environmental monitoring, including but not limited to:
 - Licensed discharge to natural ground including laboratory certificates of analysis;
 - Licensed discharge to water including laboratory certificates of analysis; and
 - Licensed discharge to atmosphere including laboratory certificates of analysis.
- An annual summary of any contamination investigations undertaken for or on behalf of Organisation, including references to all documents that may have been previously provided to Perth Airport.
- An annual summary of the environmental audits and inspections undertaken by the Organisation and the status of their actions.
- A summary of environmental improvements and sustainability initiatives undertaken by the Organisation.
- Copies of fuel and hazardous storage integrity reports.
- Performance reports on all pollution control equipment (such as oily water separators, grease traps, air emission control equipment etc).

- Any other environmental issue or material sustainability issues which may affect the environmental or sustainability performance of the Organisation or PAPL; and
- The information required by the Annual Environmental Report Guidelines. This section shall also detail the processes established by the Organisation to ensure the above reporting requirements are met and include responsibilities for environmental and sustainability reporting.

16 Amendments to the EMP

This section shall state that once accepted by PAPL, the EMP will only be amended with approval from PAPL.

In addition, Perth Airport may be required to amend its own Environment Strategy from time to time, to ensure compliance with its own legal and other obligations. Where required by Perth Airport, the Organisation may be required to update the Organisation's EMP to reflect the amended Environment Strategy. The amended EMP shall be submitted to PAPL for approval.

17 References

This section of the Organisation's EMP shall provide references to documents of external or internal origin specified in the text of the EMP. Where the EMP is based on an existing management system, only documents outside that system specified in the text shall be included here, and a listing of management system procedures should be included as an Appendix.

18 Appendices

The following list of appendices shall be included with the Organisation's EMP. Each Appendix shall be sequentially numbered/ lettered and prefaced by an appropriate title page.

Appendix A – Register of Legal and Other Requirements

Insert a copy of register here.

Appendix B – Environmental Risk and Opportunities Register & Material Sustainability Issues

Insert a copy of the environmental risks register for all environmental risks associated with the project or activity(s) being undertaken by the Organisation on the Perth Airport Estate, including any material sustainability issues.

Appendix C – Listing of Management System Documentation which relates to Environmental Management

Where the Organisation has an established management system which forms the basis of the management actions detailed in this EMP, a listing of the management system documentation (including procedures and references) should be included in tabular form.

Appendix D – Environmental Inspection Checklist(s)

Insert copies of the internal checklist(s) and inspections undertaken by the Organisation to ensure good environmental management onsite.

Appendix E – Environmental Commitments (Contract or Lease Agreement).

Insert table here that details the lease or contract environment commitments of the Organisation that includes reference to the relevant section(s) in the OEMP that demonstrates commitments are being met.

Authority Table

Authorised by:	Environment Manager
Document Owner:	Environment Advisor

Revision Index

Version number	Date	Revised or reviewed by (Position title)	Revisions approved by (Position title)	Reasons and details of changes	Next review date
a	2016			Initial Draft	
0	06/03/2018	Environment & Sustainability Coordinator	Environment & Sustainability Manager	Update to reflect new EMS documentation.	Mar 2019
1	03/07/2020	Environment & Sustainability Coordinator	Environment & Sustainability Manager	Now includes Sustainability.	June 2021
2	25/11/2021	Environment Advisor	Environment Manager	Updated to reflect new EMS processes	Nov 2022