Ministry of Defence

Element 2: Organisation and Dependencies

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Contents

Amendment record

1. This chapter has been reviewed by the Directorate of Levelling Up, Climate Change and Sustainability together with relevant subject matter experts and key Environmental stakeholders. Any suggestions for amendments should be sent to: SPO-LUCCS@mod.gov.uk

Version No	Date	Text Affected	Authority

Use of must and should

2. Where this chapter says must, this means that the action is a compulsory requirement.

3. Where this chapter says should, this means that the action is not a compulsory requirement but is considered best practice to comply with the policy.

Scope

4. This policy applies to all those employed by Defence (military or civilian) as well as those working on behalf of Defence (for example, contractors). It applies to all Defence activities carried out in any location (UK or overseas).

Introduction

5. This element provides the guidance and best practice to assist users in understanding the broader organisational context for the MOD's Environmental Policy and

approach to its Environmental Management System (EMS). This element also provides guidance on contextual considerations that will assist in identifying dependencies. The detail and guidance provided should help users to understand the policy direction that is provided in Element 2 of Volume 1 to JSP 816 (this JSP).

6. Leadership for environmental management should be demonstrated at all levels in Defence, with specific, formalised roles and responsibilities for key individuals and grades.

Purpose and expectations

E2.1 Defence organisations develop and maintain an EMS specific to their area of responsibility. This sets out how the Defence EMS and underpinning policy and regulations will be delivered in a way specific to the Defence organisation.

E2.2 The organisation defines its Environmental Management roles, responsibilities and accountabilities in its EMS.

E2.3 There is a system in place to determine and allocate appropriate resources (i.e. budget and people).

E2.4 The Defence organisation has arrangements in place to share information about environmental risks and issues, supporting effective risk management and continual improvement.

E2.5 The organisation checks that standards of Environmental management, including policies and procedures, of its contractors and suppliers are working to an equal, or better standard than Defence standards.

E2.6 The organisation has mechanisms for joint working with external and internal Environmental Regulators (such as a positive working relationship with local EA officers)

E2.7 Changes to an organisational structure or changes in personnel with specific knowledge or experience are evaluated, risk assessed, approved and documented.

E2.8 Mechanisms are in place to identify functional and organisational dependencies and interfaces and how environmental risks, issues and opportunities are managed between these.

The Defence Operating Model and delivery of Environmental Policy

7. How Defence Works explains how defence is structured and governed, how key decisions are taken, and how core activities (policy, strategy, planning, governance, generate, enable, and operate) are carried out by organisations and key business functions, working together to deliver defence outputs (defence policy, military capability, and military operations).

8. It is through this operating model that Defence is required to discharge its responsibilities for environmental management.

9. MOD recognises the importance of protecting the environment and that good environmental performance has to be delivered. This is because:

a. legislation requires it.

b. MOD policy requires it.

c. it preserves our licence to operate both domestically and internationally.

d. good EM is a capability enabler.

e. local and global ecosystem services are preserved by it.

10. **Departmental Leadership**. The Secretary of State (SofS) for Defence is accountable to Parliament for HS&EP in Defence. The Secretary of State's HS&EP Policy Statement sets out Defence's legal obligations and what the SofS for Defence requires from commanders, line managers and individuals. Defence's most senior official for HS&EP matters is the Permanent Secretary (PuS) who is responsible for ensuring that effective management arrangements are in place to comply with the SofS's HS&EP Policy Statement.

11. The Defence Safety and Environment Committee (DSEC) is the principle forum responsible for HS&EP and climate change and sustainability (CC&S) governance, and acts as the Functional Accountability Body (FAB), as required by the Defence Operating Model Board (DOMB), to oversee the strategic direction of HS&EP.

12. Senior leaders of Defence organisations (Service Chiefs, Director General Nuclear and Chief Executives of enabling organisations) lead on HS&EP through the responsibilities set out in their Letters of Delegation issued by the PuS (or any equivalent delegated authority). They make sure their Defence activities are delivered in line with the MOD's Environmental Policy.

13. The MOD's Environmental Policy is operationalised for senior leaders of Defence organisations through the use of an Environmental Management System. The EMS is a formal, structured approach to managing the aspects of a site's activities, outputs or services that have, or could have an impact upon the environment. ISO14004 details that an EMS should be viewed as an organising framework that should be continually monitored and periodically reviewed to provide effective direction for an organisation's response to changing external and internal issues. A commonly used model for a management system is referred to as the **Plan-Do-Check-Act** (PDCA) approach.

14. MOD EMS Policy requires that all MOD sites are covered by an EMS based on the ISO 140001 standard. Utilisation of an EMS at a specific MOD site should be proportional to the risks associated with the size of the site and the types of activities undertaken.

15. Where establishments are located in close proximity it may be appropriate for a site to be covered by a nearby site's EMS or at a higher-level (i.e. via the TLB). Commanding Officers/Heads of Establishment must ensure that their site is covered by an EMS based on the ISO 140001 standard.

16. An EMS consists of interrelated functions, with the end result being the development and implementation of a system of continuous improvement.

a. **Plan**. Planning establishes the overall direction for environmental programmes. It provides the framework for establishing policy goals, for setting objectives and targets, as well as identifying the site's environmental aspects and impacts and their legal responsibilities.

b. **Do**. Establishing and recording the structure, roles and responsibilities for managing environmental aspects. This provides the operational framework, procedures and documentation required by an EMS. It requires strong communication, awareness and training components.

c. **Check**. The framework for measuring results, acknowledging performance and diagnosing problems through audits and inspections. Checking and corrective action keeps the site on track to meet its environmental goals, objectives and targets.

d. **Act**. The Management review assesses progress against defined objectives and targets. Using the outputs from the Check phase, it is an opportunity to assess what change, if any, is required to sustain continual improvement in overall environmental performance.

Organisational Roles and Responsibilities

17. TLB CESOs or equivalents are responsible for advising on EMS policy in their respective TLBs and providing assurance on compliance in line with the MOD process ownership model. The Commanding Officer (CO), Head of Establishment (HoE) and Senior Managers are required to ensure that:

a. the site they are responsible for is operating an EMS in line with MOD policy.

b. the EMS is personally endorsed and periodically reviewed to ensure continual improvement by them.

18. Site Environmental Protection Officers (EPO) / SHEF advisors are responsible for:

a. advising on application of EMS at the site in line with MOD policy.

b. the day-to-day management of the EMS.

19. Line Managers must ensure that personnel responsible for implementing and managing EMSs are appropriately trained and competent. The Training Catalogue for HS&EP in Defence lists a comprehensive suite of training and qualifications in Environmental Protection (and Health and Safety) and contains details on a full suite of EP-related training and qualifications.

20. The Duty-Holder construct as employed by the MOD for operational safety is not replicated in its approach to environmental management. However, Commanding Officers (CO), Heads of Establishment (HoE), and Senior Managers should be clear regarding who is responsible for what in relation to environmental management and ensure that this chain-of-responsibility is clearly articulated in its EMS management plans and policies.

21. Each establishment or unit is likely to have an EP organisational structure that is specific to their particular location and the environmental opportunities and risks being managed. It is important that any changes to this organisational structure, or changes in personnel with specific knowledge or experience are evaluated, risk assessed, approved and documented. The following documents and systems should be consulted prior to and during any organisational change process involving EP-related roles: JPA, MyHR, Organisation and Design documentation and relevant TNA (Training Needs Analysis) documentation (see Element 6),

Dependencies for delivery of an EMS at unit or establishment level

22. For an EMS to be successfully planned, delivered, managed and improved requires responsible individuals at an establishment or unit to understand the relevant dependencies. This section considers a number of factors that are detailed in ISO14004 that should be considered during implementation of an EMS.

23. Understanding context is essential for teams and individuals implementing an EMS in order that it is relevant and enables the user to effectively manage associated opportunities and risks. This requirement is effectively summarised in ISO14004:

'In order for an organisation to establish, implement, maintain and continually improve an environmental management system, it should determine the context within which it operates. The context includes the external and internal issues, including environmental conditions, relevant to its purpose and that affect its ability to achieve the intended outcomes of the environmental management system.'

24. ISO14004 recommends consideration of context be undertaken through three specific areas of focus, all of which have the potential to impact an organisation's EMS:

a. **External Issues**. ISO14004 identifies a number of external factors which those at unit/establishment level responsible for EMS could consider including political, financial, supply-chain management, technological, policy and legislation.

b. **Internal Issues**. Internal issues can include organisational structure; governance and culture; internal policies; capacity and capability; contracts and suppliers; compliance, legal and regulatory requirements.

c. **Environmental conditions**. Units or establishments may be susceptible to specific meteorological, geological, hydrological and ecological impacts. Data sources including weather reporting, historical records, previous risk assessments and current environmental permits and licences collectively will help to inform how environmental conditions could impact a unit or establishment's EMS.

25. In the process of planning and implementing an EMS, an establishment or unit should seek to determine interested parties that may be dependent on the effective implementation of an EMS or are impacted by it, in a direct or indirect manner. As ISO14004 suggests, an establishment or unit should determine which of the relevant interested parties' needs and expectations it has to comply with, and then which of the remaining needs and expectations it chooses to adopt.

26. An establishment or unit should seek to understand where the success of its EMS is dependent on successfully meeting statutory or regulatory environmental requirements. These compliance requirements should be mapped out and will help to form the basis for an establishment or unit's EMS.

27. Successful planning and implementation of an EMS at establishment or unit level will also be dependent on both physical and conceptual resources. Resources will include infrastructure; externally provided resources; information systems; competence; technology; financial, human and other resources specific to its activities. A review of these resources and dependencies identified should be undertaken on an ongoing basis during the planning, implementation and review of an establishment's or unit's EMS.

28. The Defence organisation should have arrangements in place to share information about environmental risks and issues in order to support the effective risk management and continual improvement (further guidance is provided in Element 11).

29. It is likely a Defence organisation will be dependent, to some extent, on a variety of third parties who will be contracted to undertake specific work in support of the establishment or unit either as contractors, suppliers or as an outsourced process. In such cases, the Defence organisation should ensure that the standards of environmental management, including policies and procedures, of its contractors and suppliers are working to an equal, or better standard than Defence standards.

30. This can be achieved through a variety of approaches, which should be selected depending on the significance and complexity of environmental risk and level of control required. Examples of relevant approaches include:

a. the inclusion of environmentally related pre-qualification criteria, during the selection/contracting phase (e.g. requiring that a third party has an environmental policy or certification to ISO 140001).

b. the inclusion of, and periodic review of compliance with, specific environmental performance criteria within contracts (e.g. the avoidance of environmental incidents).

c. the documentation and communication of environmental operational controls to third parties (e.g. waste management procedures or the provision of specific environmental training requirements).

d. periodic auditing and assurance of the environmental performance of third parties (e.g. site inspections and post-contract review meetings).

Element summary

31. Those with environmental leadership responsibilities at every level of Defence should:

a. ensure that internal key stakeholders understand Defence's approach to Environmental Management.

b. ensure that the broader population at an establishment/unit understand their roles and responsibilities for Environmental Management and agree a communication plan to cascade and publicise this information at local level,.

c. analyse the latest requirements of ISO140001 and how these should be integrated into an EMS.

d. understand the roles and responsibilities of EP personnel at establishment/unit level and how these personnel interact with TLB EP personnel.

e. undertake an analysis of an establishment/unit approach to EP that integrates internal issues (incl. stakeholders), external issues (incl. stakeholders) and local environmental conditions, opportunities and risks. Institute a governance process to ensure that this analysis is updated on a periodic basis and is integrated into the EMS.

f. understand, and where required, implement strategies and plans to ensure compliance with environmental protection requirements (policy and statute).

g. review current and future EP resource requirements to ensure that an establishment/unit EMS can be successfully delivered.

Plan- Do- Check- Act- (PDCA) Cycle

32. This diagram is designed to illustrate where this, and all the elements of JSP 816, fit into the PDCA cycle.