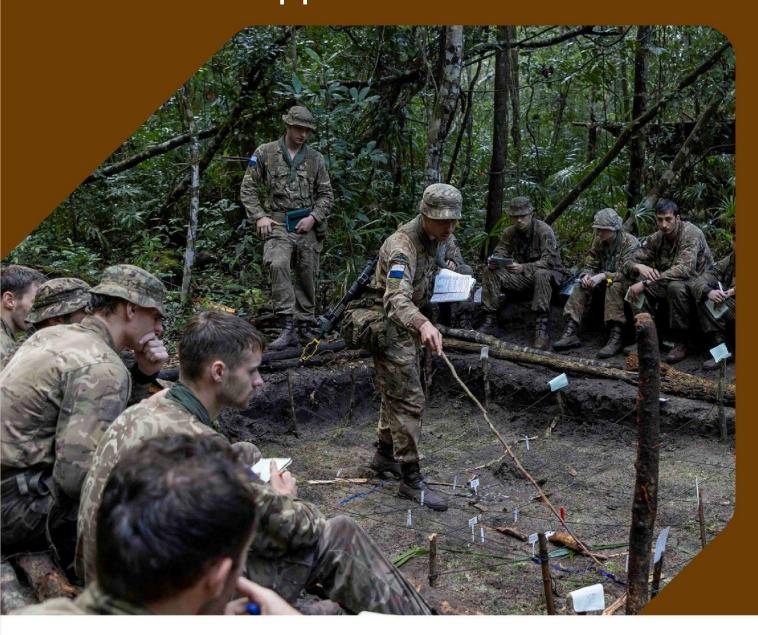


JSP 816 Element 4: Environmental Aspect Identification, Risk and Impact Assessment, Mitigation and Opportunities



Element 4: Environmental Aspect Identification, Risk and Impact Assessment, Mitigation and Opportunities

Contents

Title	Page
Amendment record	1
Terms and definitions	1
Scope	2
Introduction	2
Purpose and expectations	2
Environmental risk and opportunity management	3
EMS cycle review stages	4
Stage 1 - Setting Up	4
Stage 2 - Planning	5
Stage 3 - Implementation and operation 'doing'	10
Stage 4 - Checking	10
Stage 5 - Management Review	11
Element summary	11
Plan-Do-Check-Act (PDCA) Cycle	11
Element assurance framework	12
Expectations and performance statements	13

Amendment record

Version No	Date	Text Affected	Authority
1.0	Feb 22	BETA version for consultation	Dir CCE
2.0	Dec 23	Final version	CCE
2.1	Dec 24	Annual revision and combined element and	CCE
		assurance framework	

Terms and definitions

2. General environmental protection terms and definitions are provided in the Master Glossary of Environmental Terms and Definitions.

Must and should

- 3. Where this chapter says must, this means that the action is a compulsory requirement.
- 4. 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

5. 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

- 6. This element provides the guidance and best practice that should be followed and will assist users to comply with the expectations for risk assessments. The element covers:
 - a. environmental risk management; and
 - b. the application of environmental aspect identification, risk and impact assessment, mitigation and opportunities through the application of the EMS 'cycle' stages.

Purpose and expectations

- 7. This guidance supports Defence organisations with putting in place suitable and sufficient methods for identifying environmental aspects, their impacts, their risks and opportunities as a basis of effective Environmental management.
- **E4.1** The Defence Organisation has mechanisms in place to identify its environmental aspects, impacts and assess its risk profile.
- **E4.2** The Defence Organisation has mechanisms in place to manage its environmental impacts and risks, including provision of proportionate controls and mitigations.
- **E4.3** Where environmental risks and impacts are significant, these risks are escalated, and Leadership is actively involved in their management.
- **E4.4** The Defence Organisation has arrangements in place to ensure communication of environmental aspects, impacts, risks and opportunities to all stakeholders, outlining control measures needed to deliver effective environmental management.
- **E4.5** The Defence Organisation has mechanisms in place to continually improve risk management with the aim of protecting the environment from harm.
- **E4.6** The Defence Organisation tracks changes, such as those impacting equipment, operations, infrastructure, training, people, plans and procedures, and takes action to manage associated risk.
- **E4.7** An Environmental case is maintained throughout the acquisition lifecycle that identifies, evaluates and manages the risk from concept development through to disposal.

E4.8 The Defence Organisation has mechanisms in place to identify and deliver environmental opportunities within its sphere of influence.

Environmental risk and opportunity management

- 8. Risk management in Defence must be carried out in accordance with JSP 418 and JSP 892. Defence organisations should be able to demonstrate that they have effectively integrated a risk management framework into their Environmental Management System (EMS). This will enable them to identify, assess, manage, mitigate, report and monitor environmental risks and opportunities in support of Defence's EP expectations. Opportunities in this context relate to environmental aspects which present Defence Organisations with an area of focus which may have positive environmental benefits (e.g. reducing waste or emissions or increasing awareness) rather than simply mitigating identified risks (e.g., preventing pollution). Risks and opportunities are frequently interrelated, and this should be reflected in the risk management process.
- 9. A risk management framework should clarify how environmental risks and opportunities are effectively managed, by ensuring:
 - a. suitable and sufficient environmental risk assessments are carried out and they are proportionate to the environmental risk.
 - b. appropriate management controls and procedures are in place including the provision of adequate training.
 - c. competency requirements are defined for specific roles.
 - d. there is an appropriate elevation process with ownership and acceptance of risk through the chain of command.
- 10. The EMS should be proportional to the risks associated with the site/organisation size and activities undertaken. For small or low risk sites/organisations it may be appropriate for them to be covered by a nearby establishment's EMS.
- 11. An EMS consists of the following interrelated functions (commonly known as the 'plan, do, check, review' cycle). The assessment and application of environmental aspects is relevant throughout the following stages.
 - a. **Plan**. Planning establishes the overall direction for environmental programmes. It provides the framework for establishing policy goals, as well as identifying the site's/organisation's environmental aspects and impact, along with 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.
 - 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. **Review**. Assessment of progress against defined objectives and targets. It is an opportunity to assess what change, if any, is required to sustain continual improvement in overall environmental performance.

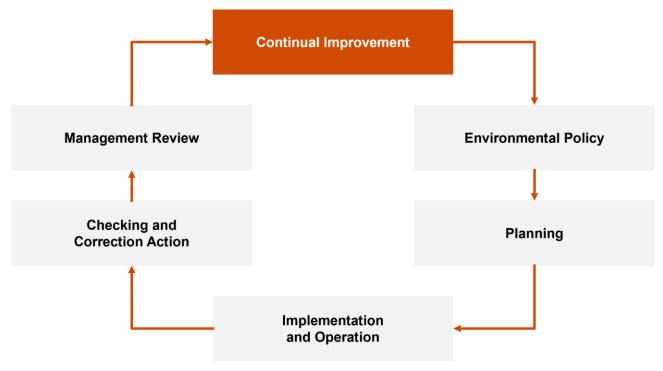


Figure 1: EMS function cycle

EMS cycle review stages

12. The Defence organisation should review and record its environmental aspects. A good way to do this is through a 'cycle' review (Figure 1), comprising the four steps outlined below:

STAGE 1 - SETTING UP

- 13. Organisations should review their current management practices as a preparatory stage for identifying environmental aspects and assessing impacts. This is likely to comprise of two elements:
 - a. documented commitment and Leadership to set out their vision of performance and accountability and the appointment of a 'management representative' to oversee the implementation of the EMS.
 - b. initial environmental review or a gap analysis to assess existing practices against an EMS based on ISO 14001.
- 14. An initial environmental review may be undertaken prior to the implementation or refreshing of an EMS. It should:
 - a. establish a baseline from which performance can be measured.
 - b. establish current environmental practice/policy.
 - c. identify key areas of environmental impact's significance.

- d. highlight priorities for improved performance.
- e. provide a mechanism to set out a project plan for implementation.

Environmental policy

- 15. An organisation or site should set out its environmental aims and policies in a policy statement or a site organisation and arrangements (O&A) statement. Statements must be maintained; revised when circumstances change and, should be reviewed at least annually and/or as part of the Management Review. The O&A statement is the driver for the site's EMS. The O&A statement along with any other relevant documentation should be made available for viewing publicly on site and communicated with relevant stakeholders.
- 16. The O&A statement is a 'statement of the intentions and principles of action of the site regarding its environmental aspects'. It should refer to the Secretary of State's HS&EP Policy Statement and must include commitments to comply with all environmental legislation, with MOD and TLB policy, along with continual improvement in environmental performance. It must be signed and dated and identify the parts of the site covered.
- 17. The policy statement should include:
 - a. significant aspects and steps being taken to manage them.
 - b. personal commitments of the Commanding Officer / Head of Establishment.
 - c. a basis for setting realistically achievable environmental objectives, based on their significance.
 - d. a commitment to understanding the requirements of the relevant regulatory bodies.

STAGE 2 - PLANNING

- 18. Planning commences with an exercise to identify and establish the environmental aspects relevant to the organisation's activities and sites.
- 19. 'Environmental aspects' are the way the organisation interacts with the environment (both how the organisation impacts the environment and how the environment can impact the organisation). They are often split into direct aspects (those which can be controlled such as emissions to air, land or water) and indirect aspects (which can be influenced, but not directly controlled, such as contractor activities and the supply chain). Environmental aspects can have a negative impact (presenting an issue) or a positive impact (presenting an opportunity). A simplified example is below.

Function	Activity	Environmental Aspect	Direct Impact	Indirect Impact
Office activities	Production of briefings and reports	Energy use from IT Equipment	Climate Change	Resource Depletion
	Office lighting and heating	Production of Non-Hazardous Waste	Waste Burden	Climate Change and Resource Depletion

Figure 2: Identification of Aspects and Impacts

- 20. Organisations and sites should record their prioritised results in an environmental aspects and impacts register.
- 21. The register provides the basis for:
 - a. setting objectives and targets and establishing internal performance indicators (PIs) designed to measure and control environmental aspects.
 - b. establishing a management programme to support the EMS objectives.
 - c. reviewing and monitoring improvements.
 - d. revalidating the site's policy statement.
- 22. An environmental aspects and impacts register should be reviewed annually. More frequent review may be justified by any adverse audit results, evidence of uncontrolled aspects, new processes or new activities. Records of superseded or amended environmental aspects should be maintained.

Environmental risk and opportunity assessment

- 23. An Environmental risk and opportunity assessment describes how to identify and evaluate items or activities of environmental significance for each of the site's aspects. It is intended to determine the site's/organisation's compliance with environmental law, MOD policy and environmental management practices. The assessment should also take account of the local and global environmental impacts and typically has five steps:
 - a. identification of activities.
 - identification of aspects.
 - c. assessment of significance.
 - d. evaluation of priority.
 - e. documentation, management and review.

Step 1 - Identifying environmental activities

24. The site/organisation will identify all the activities that occur or arise within the scope of the EMS. On many sites (or programmes and projects) the initial environmental review will describe these. Each activity should be captured on the aspects and impacts register.

Step 2 - Identifying environmental aspects

- 25. For each activity the environmental aspects will be identified and entered on the register. Because the MOD EMS is based on ISO 14001, all aspects must be considered. The conditions under which MOD operates have to be taken into consideration, whether 'normal', 'abnormal' or 'emergency'.
- 26. Consideration must also be given in the analysis and documentation of environmental aspects to the following factors:
 - a. <u>Past aspects</u>. Consideration should be given to the consequences of all former activities. Examples might include the uncontrolled or undocumented disposal of

waste materials at a particular site, persistent spillage around tanks, fuel depots and chemical storage areas.

- b. <u>Current aspects</u>. Consideration should be given to ongoing aspects of MOD Activities.
- c. <u>Planned aspects</u>. Environmental aspects of any proposed or planned activities need to be considered.
- 27. Some aspects may not be obvious. Examples may relate to staff travel to work, policy and design work, visitor's behaviour, establishing a requirement for procurement, disposal of equipment at end of life and contractors' aspects when working on behalf of MOD. These 'indirect' aspects can be influenced by good management but are generally more difficult to control or quantify. Aspects may be remote and also unpredictable. It is not acceptable, however, to dismiss indirect aspects as being totally beyond the control of the site. Evaluation of indirect environmental aspects and their associated impacts must be considered as part of MOD policy and procurements EMSs.
- 28. It is likely that some environmental aspects recorded by MOD sites/projects will occur MOD-wide or across the whole TLB. Decisions on how to manage them should be taken at the appropriate level. Examples are:
 - a. environmental aspects attributable to joint public and private partnerships (commonly referred to as PFIs or PPPs) and other contractor and supplier actions.
 - b. office services and facilities management.
 - c. MOD-wide contracts for office-based machinery (e.g. furniture, photocopiers).
 - d. MOD-wide contracts for the services that distribution/logistics companies provide, for example, hire cars, modes of transport, fuel usage, vehicle maintenance.

Step 3 - Assessment of significance

- 29. Assessing the significance of environmental aspects will be a matter of judgement for those managing the site/organisation and with knowledge of the site/organisation and its activities. In general, if there is a breach in regulation or the environmental aspect is already a business concern to the site/organisation, then an assessment of the aspect's significance will be required.
- 30. Determining significant environmental aspects and associated environmental impacts is necessary in order to determine where control or improvement is needed and to set priorities for management action based primarily on environmental factors. The organisation's environmental policy, environmental objectives, training, communications, operational controls and monitoring processes should be developed primarily based on knowledge of its significant environmental aspects. The determination of significant environmental aspects should be an ongoing process.
- 31. Initially significance should be determined using the decision tree at Figure 3. Assessors should be aware that the identification of significant aspects can be subjective and be influenced by experience, local environmental sensitivity and management controls and procedures. Wherever insufficient information is available the aspect will be recorded as significant.

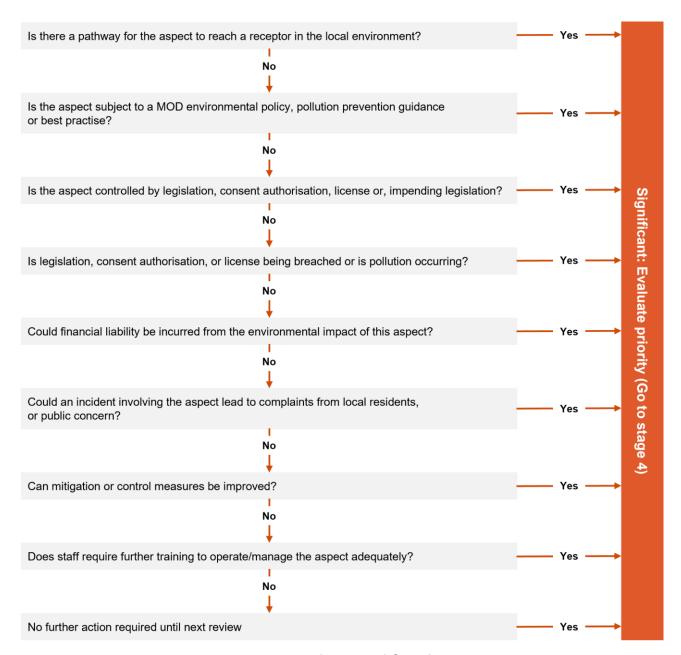


Figure 3: Identification of Significance

Step 4 - Evaluation of priority

32. The level of significance is a function of the likelihood of an aspect harming the environment (presenting an issue) or benefiting the environment (presenting an opportunity) and the scale of the consequences. It may be evaluated using the following:

Significance = Likelihood x Consequence

Likelihood is the probability of an environmental impact or benefit occurring.

Consequence is the magnitude of the impact or benefit on the environment.

33. Likelihood and consequence can be determined using the scoring system (see Figures 4 and 5). Likelihood described by Figure 4 derives scores for the probability of an aspect occurring considered under normal, abnormal and emergency operating conditions. Control measures such as work instructions and training are taken into account, as these may significantly limit the likelihood of an aspect occurring. The presence and record of

control measures will also act as a permanent record of management action in the event of inquiry or audit or regulatory review. Figure 5 describes the scale of the consequence that could arise from an environmental aspect, scoring the most severe outcome as 4 and falling to 1. Scores should be determined by selecting the scenario that best describes each aspect.

Likelihood	Prompt	Score
Most Unlikely	Comprehensive control measures in place	1
Unlikely	Acceptable control measures in place	2
Likely	Minimal control measures in place	3
Most Likely	Ineffective control measures in place	4

Figure 4: Likelihood of an Environmental Aspect Occurring

Consequence	Prompt	Score
Negligible/	No noticeable environmental impact or benefit,	1
Trivial	contained within immediate area.	
	No nuisance to local inhabitants	
Minor/Slight	Minor impact or benefit on the environment.	2
_	Minor nuisance to local inhabitants.	
Serious	Noticeable impact or benefit on the environment.	3
	Creates public nuisance.	
Major	Major impact or benefit on the environment.	4
-	Media coverage, adverse public opinion.	

Figure 5: Scale of Environmental Consequence

- 34. Having assigned scores for both the likelihood and consequence associated with an environmental aspect, the level of significance is calculated by multiplying the two scores together. The rating will produce a range of values between 1 and 16 providing an indication of priorities for action. A table of four significance bands and suggested priorities for action is set out in Figure 6.
- 35. The priority for action will vary from site to site/organisation. Typically, a high priority requires immediate attention within the EMS. The chain-of-command and/or local line management should be appraised, and the existing procedures or controls may need to be reconsidered or the activity altered or suspended. Once priorities are identified, appropriate action should be undertaken to elevate significant environmental risks to an establishments or unit's relevant Senior Leadership.

Value	Priority
1 or 2	Negligible
3 or 4	Low
6 or 8	Medium
9, 12 or 16	High

Figure 6: Environmental Significance Priority Levels

Step 5 - Documenting, management and review

36. All aspects that are evaluated must be recorded in the environmental aspects register. It will demonstrate that the site/organisation is aware of and is managing their risks and opportunities and will assist in prioritising expenditure and workforce resource allocation, proportionate to the level of risk.

- 37. Introductory data should include an appropriate file reference and the date when the register was created or last updated. The following data elements should be included:
 - a. a reference or serial number to identify the environmental aspect which should be used in any cross reference within the EMS.
 - b. activity very brief description of the activity that gives rise to the environmental aspect.
 - c. a brief description of the environmental impact including positive environmental impacts (those that benefit the environment).
 - d. the value for the significant aspect evaluated during the risk assessment.
 - e. assessment date the aspect that has not been identified by an assessment provides a date for the source, for example the date of the LQA report.
 - f. review date the date when the assessment is due for annual review.
 - g. EP Action Plan reference.

STAGE 3 - IMPLEMENTATION AND OPERATION 'DOING'

- 38. The organisation or site should define the relevant roles and responsibilities of those implementing the system.
- 39. Organisation or site management should ensure that appropriate resources (financial, equipment, people) are made available, considering both the current and future needs of the site.
- 40. Sites/organisations are recommended to form an environmental committee or action group, likely to include the following representatives: Senior management, CO/HOE, EMS management representative, Environmental Adviser, Health and Safety Advisor, and other specialist roles as required (pollution control, conservation etc).

Communication

41. As part of the EMS, sites/organisations will be required to develop a procedure to report internally and externally on how its activities affect the environment. Further details on how organisations communicate their environmental matters are outlined in Element 11 of this JSP.

STAGE 4 - CHECKING

- 42. Sites/organisations should develop and maintain appropriate documentation to monitor and measure key activities for each environmental aspect identified.
- 43. They should establish, implement and maintain a procedure to periodically evaluate and record evidence of compliance with legal requirements. This will normally be done as part of the audit programme.

STAGE 5 - MANAGEMENT REVIEW

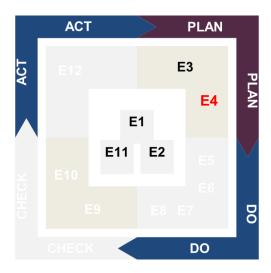
- 44. Sites should regularly review their EMS and evaluate it for continuing suitability, adequacy and effectiveness. Reviews should address business change and the potential impact of forthcoming regulations and other requirements.
- 45. The Review should seek to verify that:
 - a. audit and other recommendations have been implemented.
 - b. new or growing areas of concern have been considered, along with legislative developments.
 - c. ultimately the EMS remains relevant, effective and meets the site's needs.

Element summary

- 46. The Defence Organisation should ensure that:
 - a. it has mechanisms in place to assess its risk profile and identify its Environmental aspects.
 - b. it has mechanisms in place to manage its environmental risks and impacts, including provision of proportionate controls.
 - c. where environmental risks and impacts are significant these risks are escalated, and Leadership is actively involved in their management.
 - d. it has arrangements in place to ensure communication of Environmental aspects, risks, impacts and opportunities to all stakeholders, outlining control measures needed to deliver effective Environmental Management.
 - e. it has mechanisms in place to continually improve risk management with the aim of protecting the environment from harm.

Plan-Do-Check-Act (PDCA) Cycle

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



Element assurance framework

- 47. The focus of this element requires that the organisation/site has put in place effective methods for identifying Environmental aspects, their impacts, their risks, and opportunities on the natural environment, environmental opportunities for example include pollution prevention or reduction, waste minimisation, energy efficiency by using energy from renewable sources as a basis of effective Environmental Management.
- 48. The expectations and performance statements for this element are set out in the following pages.

Expectations and performance statements

Element 4: Environmental Aspect Identification, Risk and impact assessment, mitigation, and opportunities

The expectations in this element are

- **E4.1** The Defence Organisation has mechanisms in place to assess its risk profile and identify its Environmental aspects
- **E4.2** The Defence Organisation has mechanisms in place to manage its environmental risks and impacts, including provision of proportionate controls.
- **E4.3** Where Environmental risks and impacts are significant these risks are escalated, and Leadership is actively involved in their management.
- **E4.4** The Defence Organisation has arrangements in place to ensure communication of Environmental aspects, risks, impacts and opportunities to all stakeholders, outlining control measures needed to deliver effective Environmental Management.
- **E4.5** The Defence Organisation has mechanisms in place to continually improve risk management with the aim of protecting the environment from harm.
- **E4.6** The Defence Organisation tracks changes, such as those impacting equipment, operations, infrastructure, training, people, plans and procedures, and takes action to manage associated risk.
- **E4.7** An Environmental case is maintained throughout the acquisition lifecycle that identifies, evaluates and manages the risk from concept development through to disposal.
- **E4.8** The Defence Organisation has mechanisms in place to identify and deliver environmental opportunities within its sphere of influence.

Documents often associated with this element:

- 1LOD assurance reports
- Agenda and minutes of the HS&EP committee meetings (Strategic, Tactical and Working)
- Industry engagement (networking, conference, industry days)
- Change management process and plan
- Change risk register and examples of use
- · Communications plan,
- Corporate risk register
- Continual Improvement (CI) log and process
- Defence Organisation EMS
- Duty holding construct and letters of delegation and acceptance
- Emergency arrangements and escalation process
- Environmental Aspects Register
- Industry engagement (networking, conference, industry days)
- Incident reporting log
- Knowledge sharing forums
- Learning from Experience (LfE) communications
- Quarterly Performance and Risk Review (QP&RR)
- Risk management plan including escalation process
- SLT risk review meeting minutes and actions
- Environment case policy application and risk assessments
- Environment case reports and reviews
- Top eight risks
- Environmental Impact Assessments

Expectation 4.1 The Defence Organisation has mechanisms in place to assess its risk profile and identify its Environmental aspects.

Unsatisfactory	Limited	Moderate	Substantial
 Environmental aspects and associated risk profile are not clearly defined or documented across the Defence Organisation. A mechanism may be in place to identify environmental aspects, but this is not adequately defined or consistently implemented. 	 Environmental aspects are identified but there is a limited risk profile. Mechanisms are defined for identifying environmental aspects and these are implemented but there is limited evidence of connectivity with Environmental Management. A risk management framework is implemented within the Defence Organisation, but it is not routinely 	 Environmental aspects are identified and there is a complete risk profile. Environmental aspects are consistently and systematically identified with a clear linkage to Environmental Management. A risk management framework is applied across the Defence Organisation and regularly reviewed by Leadership. Risk assessments are adequately 	 Environmental aspects are identified, and the risk profile is regularly reviewed. The identification of environmental aspects involves a range of stakeholders and clearly encompasses life-cycle issues. A risk management framework is developed and used across the Defence Organisation, it is owned by Leadership and used to drive continual improvement in
	reviewed by Leadership. Risk assessments are appropriate for their intended use but are not regularly updated by Leadership.	designed to capture risk mitigation activities. They are regularly reviewed by Leadership.	 environmental performance. Risk assessments are well designed to capture risk mitigation activities. They are regularly reviewed by Leadership.

Expectation 4.2 The Defence Organisation has mechanisms in place to manage its environmental risks and impacts, including provision of proportionate controls.

Unsatisfactory	Limited	Moderate	Substantial
Risk assessments are not used to develop proportionate controls to mitigate the environmental risks associated with the Defence Organisation's operations.	 Risk assessments are used to develop controls to mitigate environmental risks. However, this process is not always applied effectively. Risk assessments contain insufficient environmental information and do not help the Defence Organisation implement and maintain proportionate controls. The sound environmental management is not properly taken into account when defining controls. 	 Risk assessments containing relevant environmental information relating to identified environmental aspects resulting in mostly effective and relevant controls. The sound environmental management is consistently taken into account when defining controls. 	 Risk assessments consider the Environmental impacts of wider risks and are frequently reviewed by Leadership. Proportionate controls are in place to mitigate risks and are developed in conjunction with relevant stakeholders through continual improvement. The sound environmental management is regularly reviewed in consultation with stakeholders and relevant internal or external experts to maintain current knowledge.

Expectation 4.3 Where environmental risks and impacts are significant these risks are escalated, and Leadership is actively involved in their management.

Unsatisfactory	Limited	Moderate	Substantial
 Significant environmental risks and impacts are not escalated. Leadership is not aware of environmental risks nor involved in their management. 	significant weaknesses in the process,	are escalated, and Leadership is made aware.Leadership is involved in the	 All significant environmental risks and impacts are escalated. There is clear evidence that Leadership is actively aware of and involved in the management of all significant environmental risks.

Expectation 4.4 The Defence Organisation has arrangements in place to ensure communication of Environmental aspects, risks, impacts and opportunities to all stakeholders, outlining control measures needed to deliver effective Environmental Management.

Unsatisfactory	Limited	Moderate	Substantial
 There are no arrangements in place for the communication of the Environmental aspects, risks, impacts and opportunities faced by the Defence Organisation. Control measures to address risks and impacts are not made available to those who need them. 	 Some arrangements exist for the communication of Environmental aspects, risks, impacts and opportunities faced by the Defence Organisation on an ad-hoc basis. The arrangements are not systematically defined or implemented, and information is not frequently updated. Control measures to address risks and impacts are only made available on request. 	 Arrangements exist for the communication of Environmental aspects, risks, impacts and opportunities faced by the Defence Organisation. However, weaknesses remain in the breadth of issues communicated and stakeholders engaged with. Control measures to address risks and impacts are made available to all stakeholders. 	 Comprehensive arrangements exist for the communication of Environmental aspects, risks, impacts and opportunities faced by the Defence Organisation. Control measures are clearly stated and structured in such a way as to deliver effective Environmental Management for the Defence Organisation and proactively communicated to all stakeholders.

Expectation 4.5 The Defence Organisation has mechanisms in place to continually improve risk management with the aim of protecting the environment from harm.

Unsatisfactory	Limited	Moderate	Substantial
The Defence Oganisation has no evidence of mechanisms for continually improving control of environmental risks.	 The Defence Organisation has mechanisms in place to continually improve environmental risk management, but there are significant weaknesses in design or application. The mechanisms are not aligned to reducing harm, enhancing capability and minimising environmental impacts. 	 The Defence Organisation has mechanisms in place to continually improve environmental risk management, with only minor weaknesses in design or application. The mechanisms are largely aligned to reducing harm, enhancing capability and minimising environmental impacts. 	The Defence Organisation has effective mechanisms in place to continually improve environmental risk management, and the mechanisms are aligned to reducing harm, enhancing capability and minimising environmental impacts.

Expectation 4.6 The Defence Organisation tracks changes which have an environmental impact, such as those impacting equipment, operations, infrastructure, training, people, plans and procedures, and takes action to manage associated environmental risk.

Unsatisfactory	Limited	Moderate	Substantial
There is no process or system for tracking or risk assessing changes to equipment, operations, infrastructure, training, people, plans and procedures.	• The Defence Organisation has a formal procedure for tracking and risk assessing changes to equipment, operations, infrastructure, training, people, plans and procedures but these are either not consistently implemented, reviewed by Leadership and actions are not always tracked to completion.	reviewed by Leadership, but actions	 The Defence Organisation has a formal procedure for tracking and risk assessing changes to equipment, operations, infrastructure, training, people, plans and procedures that are reviewed by Leadership and actions are tracked to completion. Relevant management and stakeholders are involved in the change management and risk assessment process.

Expectation 4.7 An Environmental case is maintained throughout the acquisition lifecycle that identifies, evaluates, and manages the risk from concept development through to disposal.

Unsatisfactory	Limited	Moderate	Substantial
The Defence Organisation does not consider environmental cases across the acquisition lifecycle of its activities.	 The Defence Organisation creates environmental cases for the acquisition lifecycle for some activities and equipment but does not do so consistently or adequately. Environmental cases have significant gaps in depth and breadth. Environmental cases are not updated frequently and are not accessible. 	 The Defence Organisation creates environmental cases for the acquisition lifecycle for those activities and equipment requiring them. Environmental cases are assured but with minor weaknesses. Environmental cases have minor weaknesses in depth and breadth. Environmental cases are not always kept updated throughout the lifecycle and / or not easily accessible. 	 The Defence Organisation creates and maintains environmental cases for the acquisition lifecycle for all activities and equipment requiring them. Environmental cases are independently assured. Environmental cases are of appropriate depth and breadth of environmental risks. Environmental cases are regularly updated throughout the lifecycle and are easily accessible.

Expectation 4.8 The Defence Organisation has mechanisms in place to identify and deliver environmental opportunities within its sphere of influence.

Unsatisfactory	Limited	Moderate	Substantial
The Defence Organisation does not consider environmental opportunities in relation to its environmental impact, business decisions, supply chain, or financial and operational benefits.	The Defence Organisation considers environmental opportunities in relation to its environmental impact, business decisions, supply chain, or financial and operational benefits on an adhoc or infrequent basis.	 The Defence Organisation regularly considers environmental opportunities in relation to its environmental impact, business decisions, supply chain and financial activities. The Defence Organisation considers environmental opportunities from multiple perspectives and communicates environmental information to relevant stakeholders. 	 Environmental opportunities are reviewed on a regular basis and Leadership is consistently seeking opportunities in relation to its environmental impact, business decisions, supply chain, or financial and operational benefits. The Defence Organisation communicates its environmental opportunities and performance and any potential benefits to stakeholders across the organisation and wider Defence community. Where identified, environmental opportunities are consistently incorporated into the EMS.