Ministry of Defence

JSP 816
Defence Environmental Management System (EMS) Framework

Preface

Purpose

1. This document sets out the Environmental Management system (EMS) Framework. It details the goals and guidance to enable Defence organisations to develop and implement their own environmental protection management systems tailored to their business.

2. The EMS Framework described in this JSP is the overarching authority for environmental management across Defence. The information contained herein provides a means to assist Defence organisations to put in place good practices and drive continual improvement in environmental performance within their organisation.

3. It provides the direction that must be followed and the guidance and good practice that should be followed by all Defence organisations to assist them with the successful implementation of the requirements set out in the corresponding 12 Elements, which in turn provides expectations and performance statements that must be achieved to move Defence to a highly resilient and proactive organisation. The policy has been developed to align with ISO 14001 requirements.

Authority of this Defence EMS Framework

4. The document takes its authority from the Secretary of States's (SofS) Policy Statement for Health, Safety and Environmental Protection (HS&EP) in Defence. All Defence organisations should be aware of the Defence EMS Framework requirements and demonstrate their compliance with it.

Jurisdiction and legislation

5. Any reference within the EMS Framework to compliance with legislation generally refers to UK law. Where organisations conduct overseas activity or have an overseas presence, the SofS Policy Statement requires them to consider the latest Defence policy, guidance on applying UK standards and the host nation's relevant environmental expectations, particularly where these are not aligned.

Further advice and Feedback – Contacts

6. This document will be reviewed annually or more often if needed. The owner of this document is the Director of Climate Change and Environment (CCE). For further information or advice on any aspect of this publication or to provide feedback on the content, contact: the CCE (Environmental Protection) Team at SPOCCE-EP@mod.gov.uk. Where this document contains references to policies, publications and other JSPs which are published by other Functions, these Functions have been consulted in the formulation of the policy and guidance detailed in this publication.

Disclaimer

7. Nothing contained within this document removes the requirement on anyone to comply with applicable Statutory legislation, the SofS's Policy Statement, other JSPs or Defence Regulations.

Equality and Diversity Impact Assessing Statement

8. This policy has been equality and diversity impact assessed in accordance with Departmental policy. This resulted in a Part 1 screening only completed (no direct discrimination or adverse impact identified).

Contents

Amendment record

1. This document has been reviewed by the Directorate of Climate Change and Environment, together with relevant subject matter experts and key Environmental stakeholders. Any suggestions for amendments should be sent to SPOCCE-EP@mod.gov.uk

Version No	Date	Text Affected	Authority
1.0	Jan 23	Release of new Defence EMS Part 1	Dir CCE
1.1	Jun 23	Restructure to Defence EMS Volume 1	CCE
1.2	Dec 24	Annual revision and combined element and assurance framework	CCE

Terms and definitions

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

Note: Throughout this document, the term ‘Defence Organisation’ refers to Military Commands, Top Level Budgets (TLBs), the Defence Nuclear Organisation (DNO) and Enabling Organisations (EOs) collectively.

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. The Defence Environmental Management System (EMS) Framework is the guiding principles by which all Defence organisations should manage the interrelated parts of their business to conduct and manage activities and protect the environment. Each Defence organisation is expected to develop and maintain an organisational Environmental Management System (EMS). Each organisational EMS should relate back to this overarching policy framework document.

7. Responsibility for the management of health, safety, and environmental protection (HS&EP) is derived from the Secretary of State for Defence's (SofS) Policy Statement. The SofS Policy Statement sets out the commitment and role of the Defence organisations senior leaders to ensure that safety policies and regulations are applied throughout Defence and that their Defence activities are delivered in line with the Defence EMS Framework and their own Organisational EMS.

8. The amplification of the SofS Policy Statement is contained in Defence policy for Health Safety and Environmental Protection (HS&EP) which also sets out the general Organisation and Arrangements (O&A) for Defence to manage HS&EP. The minimum necessary management arrangements for safety policy are set out in JSP 815. The management arrangements for Environmental Protection policy are laid out in JSP 816.

Purpose

9. The Defence Environmental Management System (EMS) is the system by which all Defence organisations manage the interrelated parts of their business in order to conduct and manage their activities in such a way as to protect the Environment. Each Defence organisation is expected to develop and maintain an EMS which reflects their activities and supports the Defence vision for the Environment. Each organisational EMS should relate back to this overarching document. The scope of the EMS relates solely to Environmental Protection activities.

10. This policy document provides the Framework that the Defence organisations EMS should meet. Guidance on implementation and principles can be found in this JSP. The Defence EMS comprises of the JSP 816 Framework with guidance together with JSP 418 (Figure 1).

11. The Defence EMS Framework is structured around 12 Elements. The direction that must be followed and the guidance and good practice that should be followed, can be found in the JSP 816 Elements.

12. The Defence EMS Framework comprises of the JSP 816 Framework together, with the Defence Environmental Protection policy JSP 418 and regulation. The Defence policy and regulation framework can be seen below in Figure 1.

Figure 1: Defence EP policy and regulation framework

13. Where possible, the Defence EMS Framework seeks to avoid prescribing approaches or requirements, as these may not be generally applicable or relevant for all users but sets goals and provides direction on what good would look like.

Management System Approach

14. A management system comprises a range of interrelated practices, processes, documents, and information systems used to organise, direct and control Environmental Management within an organisation. These are complemented by attitudes and behaviours towards Environmental Management which must be demonstrated by staff at all levels of an organisation.

15. The Defence EMS Framework provides direction on the components needed for a cohesive and appropriate Environmental Management System. The framework encompasses the Environmental Management elements required to operate in an effective and consistent manner throughout the Department.

16. The Defence EMS Framework is based on the four-stage 'Plan-Do-Check-Act' approach (Figure 2) which helps to deliver and continually improve the Department's performance relating to the Environment.

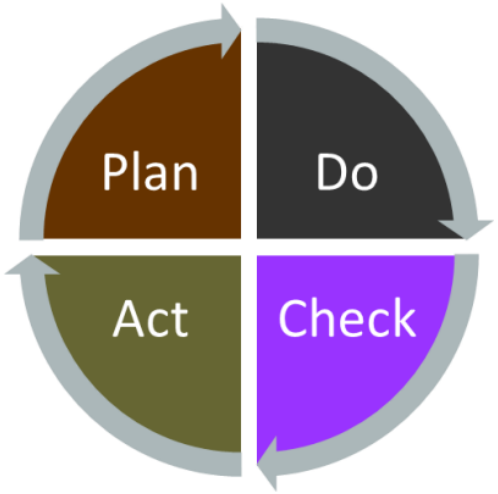

Figure 2: Plan-Do-Check-Act Cycle

17. Director CCE will oversee the process of implementing the Defence EMS.

18. The Defence EMS Framework:

a. is non-prescriptive and based on a devolved accountability model of Environmental Management, allowing each Defence organisation to manage environmental impacts consistent with Defence requirements, through their own specific Organisational governance and operational context.

b. outlines responsibilities and obligations each Defence organisation must take into account, when managing environmental risks and impacts. It includes a set of expectations and performance statements that all Defence organisations must conform to when establishing governance frameworks, developing Environmental Management strategies, processes and performance indicators to regularly monitor and improve their Environmental Management. It also outlines the leadership and culture that must be in place to support process implementation. It also sets out the need to establish systems to identify and address performance failures.

c. is aligned to ISO 14001:2015, the international standard for Environmental Management systems, but tailored to meet the specific needs of Defence.

Structure

19. The Defence EMS Framework is divided into 12 elements to cover Defence organisation activities. Together, the elements provide those conducting their own EMS with a holistic approach to consider how they will control, manage, and respond to relevant Environmental risks and impacts. The 12 elements which form the Defence EMS Framework are shown in Figure 3.

Figure 3: The 12 Elements of the Defence EMS Framework

20. Each element is supported by a series of expectations which describe the activities expected to be in place within each Defence organisation's Environmental Management systems. They outline typical processes, governance arrangements and other behaviours which are indicators of successful management systems.

21. Each expectation is further articulated by performance statements which set out how compliance with the 12 Elements of the Defence EMS Framework and continual improvement are demonstrated. Examples are given of performance across a maturity continuum, from those that would lead to no assurance, through limited and substantial to full assurance. The 12 elements and their supporting expectations are shown in Figure 4.

E1 Leadership, Governance and Culture	E1.1 Tone from the top E1.2 Continual improvement E1.3 Accountabilities and responsibilities E1.4 Leadership visibility E1.5 Strategic objectives E1.6 Culture and behavior	Element 1
E2 Organisation and Dependencies	E2.1 Environmental Management System E2.2 Roles, responsibilities, and accountabilities E2.3 Allocation of resources E2.4 Sharing information E2.5 Standards of Environmental Management E2.6 Consultation with external and internal regulators E2.7 Changes to structure and personnel E2.8 Dependencies and interfaces	Element 2
E3 Legislation, Policy, Regulations and Guidance	E3.1 Compliance obligations E3.2 Compliance with policy and regulations E3.3 Local policy and guidance E3.4 Communicating compliance requirements E3.5 Review of policies and guidance E3.6 Exemptions, disapplication's, derogations	Element 3
E4 Environmental Aspect Identification, Risk and Impact assessment, Mitigation, and Opportunities	E4.1 Environmetnal Aspects E4.2 Managing risks and impacts E4.3 Escalation of risk and impacts E4.4 Communicating aspects, risks, impacts and controls E4.5 Continual improvement E4.6 Changes affecting the Defence organisation E4.7 Environmental case through acquisition lifecycle E4.8 Environmental opportunities	Element 4
E5 Supervision, Contracting and Control Activities	E5.1 Delegation of authority E5.2 Competence of delegated authority E5.3 Risk and impact elevation E5.4 Documentation of delegation E5.5 Mitigation of risks using BPEO E5.6 Ceasing activities E5.7 Environmental protections	Element 5
E6 Personnel Competence, Resources and Training	E6.1 Resources E6.2 Responsibilities, accountabilities, and delegation E6.3 People development E6.4 Training programmes E6.5 Competency assessment	Element 6
E7 Equipment Design, Manufacture and Maintenance	E7.1 Equipment lifecycle risks and impacts E7.2 Risk and impact mitigation E7.3 Compliance with statute and Defence Regulation E7.4 Equipment maintenance and operation E7.5 Physical Equipment changes E7.6 Supply chain risks and dependencies E7.7 Lessons learned E7.8 Equipment and systems integration risk	Element 7
E8 Infrastructure Design, Build and Maintenance	E8.1 Infrastructure lifecycle risks and impacts E8.2 Risk and impact mitigation E8.3 Compliance with statute and Defence regulation E8.4 Infrastructure maintenance and operation E8.5 Physical infrastructure changes E8.6 Supply chain risks and dependencies E8.7 Lessons learned	Element 8

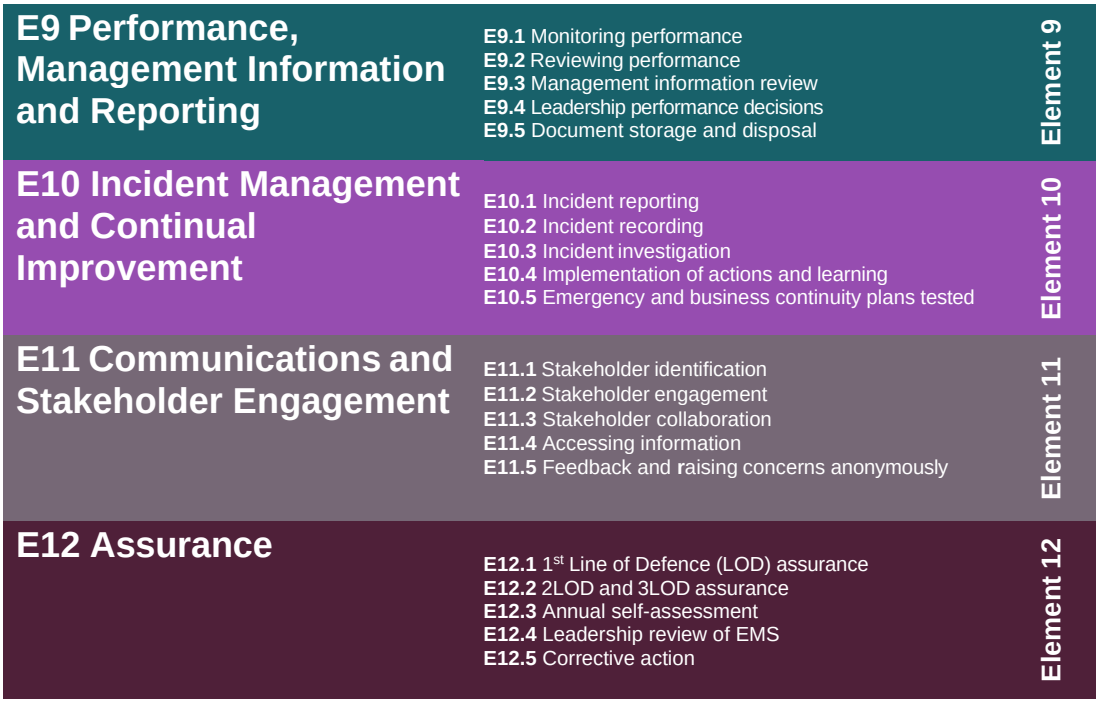

Figure 4: The 12 Elements of the Defence EMS Framework and supporting Expectations

Using the EMS Framework

22. It is the responsibility of each Defence organisation to develop and implement an EMS that meets the 12 elements, and accompanying expectations, for their organisation.

23. Defence organisations should adopt an evidence-based approach to their own EMS. Several data sources, information and knowledge are likely to be used to measure an organisation's current Environmental performance.

24. The documentation listed within each element, provide Defence organisations and assessors with an initial starting point to assess an EMS; the evidence to support performance assessment against each expectation and to determine overall performance against each element.

Relationship to the Defence Safety Management System (EMS)

25. It is recognised that within Defence, Safety and Environmental Management are often, but not exclusively managed through the same organisational structures, governance arrangements, and documentation. The twinned development of JSP 816 and JSP 815 aims to support this method whilst allowing sufficient flexibility to deliver the safety and environmental outcomes that Defence requires.

26. JSP 815 contains the Defence Safety Management System framework. It contains the same 12 element titles supported by expectations and performance statements aligned to the EMS but with the content amended to reflect health and safety management and policy requirements. In so far as is practical, both JSP 815 and JSP 816 will look to be ‘digital twins’, aligned in their format and presentation.

27. JSP 816 should be read in conjunction with other MOD internal policy documents such as but not limited to JSP 375, JSP 418, JSP 426, JSP 392 and JSP 850.

Assurance stages

28. Performance statements are provided on a maturity continuum aligned with the MOD's assurance stages. These stages are sequential and build on all previous stages, i.e. an Organisation can only achieve 'substantial assurance' once the expectations and requirements of 'moderate assurance' have been achieved and so on.

29. Figure 5 sets out some of the typical characteristics of processes and controls for each level and aligned with the assessment criteria of the Government Internal Audit Agency (GIAA).

Assessment and criteria to determine the level of assurance of Defence Function/TLB/HLB/EO key controls and compliance requirements	
Assessment (GIAA aligned)	**Criteria**
Substantial	You have robust evidence to demonstrate that prescribed policies, processes and key controls that **should** be operating in your area **are fully embedded**. You have robust evidence to demonstrate that policies, processes and key controls **actually** help you manage your key risks. You have robust evidence to demonstrate that the policies, processes and key controls are **actually** operating as intended and no weaknesses have been identified.
Moderate	You have evidence to demonstrate that prescribed policies, processes and key controls that **should** be operating in your area are fully embedded **but these could be improved.** You have evidence to demonstrate that these policies, processes and key controls **actually** help you manage your key risks **but these could be improved.** You have evidence to demonstrate that the policies, processes and key controls are **actually** operating as intended, but have identified some **minor areas of noncompliance** with the defined policies, processes and key controls.
Limited	You have **some, but not enough** evidence that prescribed policies, processes and key controls are operating and are embedded. You **do not have confidence** that the policies, processes and key controls are designed to **actually** help you manage your key risks. You have evidence to demonstrate that the policies, processes and key controls are **not actually operating as intended** or not operating in **numerous instances**.
Unsatisfactory	You have evidence that the prescribed policies, processes and key controls are **lacking or not well defined** or **not actually embedded**. You have evidence that the policies, processes and key controls are defined, but as designed, **do not** help you manage your key risks. You have evidence that the policies, processes and key controls **are not measured** to be able to assess **compliance or** are **not being adhered** to.

Figure 5: Assurance Levels