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8. Operational Controls

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Summary:
An operational control exists to ensure an activity is completed in the correct/desired way. This procedure should assist Delivery Teams in identifying where operational controls are required and checking the adequacy of operational controls.

8.1. Summary

8.1.0.1.

An operational control represents a mitigating activity to support delivery of sound environmental performance.

Note: Operator perspective is required when considering operational controls in order to reflect practical and operational considerations.

8.2. Procedural Overview

8.2.0.1.

An operational control exists to ensure an activity is completed in the correct/desired way. An operational control represents a mitigating activity to support delivery of sound environmental performance. Opportunities to implement operationsal controls should be indicated in the EFM [1]. An operational control can be one or a combination of the following:

1. A written procedure/work instruction describing how, when and by whom an activity is to be performed (this would also include the use of signage);
2. A contract or agreement;
3. A physical measure, (e.g. computer or mechanical control);
4. Use of trained personnel.

8.2.0.2.

The Operational Control Decision Tree is designed to assist Delivery Teams to identify whether present controls, or proposals for controls, already exist and whether these are adequate from an environmental control perspective. The Operational Control Decision Tree will also identify where any controls need amendment, or if new controls are required.

8.2.0.3.

Where possible any environmental operational controls under this procedure should be combined with other operational controls associated with the operation of the equipment or service.

8.2.0.4.

Existing operational controls may include controls applied in operational situations by the Front Line Commands even though such operational controls would not be covered by POEMS

8.3. Procedure

8.3.1. Step 1 – Identify where Operational Controls may be required or appropriate

8.3.1.1.

To support the delivery of products, systems or services with sound environmental performance, appropriate controls are developed (for system testing and trialling, operation and disposal):

1. Where required to achieve objectives and targets;
2. Where required to achieve compliance obligations, such as standard and stakeholder requirements;
3. To control all priority environmental impacts;
4. To prevent or mitigate the potential for unintended (e.g., emergency, unplanned) events which could result in adverse environmental impact(s), by demonstrating that due diligence has been taken to procure, design and maintain the product, system or service that ensures:
    1. All reasonable precautions are taken to prevent such events; and
    2. All reasonable control and remediation measures can be taken by the operator after the event to limit harm to the environment.

8.3.1.2.

The Delivery Team may also have responsibility for completing the following checks during trials and testing of the equipment or service prior to its in-service date:

1. Check the use and adequacy of the operational controls; and
2. Physically test the adequacy of operational controls which exist to control unintended events, where this is practicable.

8.3.2. Step 2 – Index the Operational Controls

8.3.2.1.

Using Guidance (Operational Control Decision Tree) will identify:

1. Whether present or proposed controls already exist and whether these are adequate from an environmental control perspective or need amendment; or
2. No controls are present or proposed so new controls are required.

8.3.2.2.

The type of control must be sufficient to ensure that the activity is adequately complete to bring about the desired result.

8.3.2.3.

Separate operational controls may not be required to manage each Medium Priority and High Priority environmental impact, or those Low Priority impacts that can be easily mitigated, as one control could cover numerous environmental impacts.

8.3.2.4.

Similarly, environmental operational controls do not necessarily need to be separate to other controls in position, as often, environmental requirements can easily be integrated with other controls which are already set up or are due to be developed (e.g. in operational manuals for equipment systems). This is generally be considered to be the most efficient method of producing operational controls, for example environmental controls can be integrated within the following:

1. Standard Operating Procedures (SOPs);
2. Emergency Procedures;
3. Maintenance Procedures;
4. Disposal Procedures.

8.3.2.5.

Note: The above list is not exhaustive.

8.3.2.6.

It is essential for assurance and audit purposes to have a list or index of where the relevant Environmental Management System operational controls can be found and therefore Form EMP08/F/01 - Environmental Operational Control Index [2], should be completed.

8.3.3. Step 3 – Check use and adequacy of Operational Controls during trials and testing

8.3.3.1.

The Delivery Team may also have responsibility for completing the following checks during trials and testing of the equipment or service prior to In-Service:

1. Check the use and adequacy of the operational controls; and
2. Physically test the adequacy of operational controls which exist to control unintended events, where this is practicable.

8.4. Responsibilities

8.4.0.1.

The Senior Environmental Responsible (SER) individual, the Delivery Team Leader (or equivalent), is responsible for ensuring adequate resources are dedicated to environmental management activities within their area of responsibility, and for facilitating appropriate arrangements to successfully exercise and discharge their overarching responsibilities to ensure the product, system or service delivers sound environmental performance. The responsibility for ensuring the product, system or service delivers sound environmental performance, may be formally delegated in writing to a named, competent individual(s), identified as Environmental Responsible (ER), within the team.

8.4.0.2.

The SER individual, the Delivery Team Leader (or equivalent), is also responsible for facilitating appropriate arrangements to discharge responsibilities relating to this procedure in an efficient and effective manner. Responsibility for ensuring those arrangements are implemented, and achieve outputs which fully satisfy legislative and departmental requirements for environmental management (including compliance with this procedure), may be formally delegated in writing to a named, competent individual(s), identified as ER, within the team.

8.5. Procedure Completion

8.5.0.1.

The Delivery Team is responsible for ensuring that the procedure is completed. The implementation and/or testing of an operational control may be carried out or fulfilled by a third-party contractor; in this situation suitable evidence of the activities or actions taken should be requested, and subsequently documented as evidence within the Environmental Case. Any suggested operational controls identified or produced as part of this procedure should be agreed with the Delivery Team and agreed by the Environmental Committee.

8.6. When

8.6.1. Initial Application

8.6.1.1.

The initial application of this procedure is likely to be in the Assessment or Demonstration Stages.

8.6.1.2.

If the Concept, Assessment and Design stages have already passed, any arrangements already in place must be reviewed to ensure

that environmental risks are still adequately covered. Depending on the nature of the project, operational controls could be required during any stage or phase of the systems operation but may also be required during system testing and trialing and disposal.

8.6.2. Review

8.6.2.1.

The outputs of this procedure (operational controls), will require periodic review and revision throughout the lifetime of the project. This is relevant where operational controls have been set early within the project for later life cycle stages. The appropriate timings for such reviews will be determined through following Procedure EMP09 - Continuous Review [3]. The timings of these reviews should be recorded in the Environmental Management Plan.

8.7. Required Inputs

8.7.0.1.

1. System Requirement Document.
2. The outputs from all preceding Procedures:

8.8. Required Outputs

8.8.0.1.

1. Form EMP08/F/01 – Environmental Operational Control Index [2].

8.8.1. Records and Project Documentation

8.8.1.1.

A copy of the information produced by following this procedure shall be stored in the Project's Environmental Case.

8.9. Further Guidance

8.9.0.1.

General advice on operational control procedures will be found in JSP418 [4], and also ISO 14001 [4].

8.9.1. Aligning Safety and Environment

8.9.1.1.

The key alignment opportunity in [5]should be to ensure wherever possible that Operational Controls for the equipment or service control both safety and environmental impacts.

8.9.2. Guidance for Different Acquisition Strategies

8.9.2.1.

The objectives for this procedure apply to all acquisition strategies. It is MOD policy that the same standards are met, and that assurance that these standards have been met shall be demonstrated for all projects.

8.9.3. Legacy Systems

8.9.3.1.

Legacy systems must identify or create operational control procedures where objectives and targets have been identified under Procedure EMP01 - Environmental Management Plan [6]and EMP06 - Objectives and Targets [7]. However, if, because of the legacy nature of the system, any objectives and targets are limited then the associated operational controls are also likely to be limited.

8.9.4. Warnings and Potential Project Risks

8.9.4.1.

Failures to set operational controls may introduce or increase risks. These risks are likely to relate to unmanaged environmental liabilities and un-discharged legal obligations. It is possible that the consequences of this could be increased cost resulting from delays for bringing the equipment or capability into service, or having to suspend the use of existing equipment. However, consequences might also include limitations to the operational envelopes for equipment and increased cost of remediation or clean-ups.

8.10. Version Control

8.10.1. Version 2.3 to 3.0 uplift

8.10.1.1.

Major uplift from the Acquisition System Guidance (ASG) to online version. POEMS has undergone major revision. Refer to the POEMS Transition Document [8] for details.

8.10.2. Version 3.1

8.10.2.1.

Refer to the POEMS Transition Document [8] for details.

8.10.3. Version 3.1 to 3.2 uplift

8.10.3.1.

Additional environment content added to para 8.1 & 8.3 as part of SP Tool release. See POEMS Transition Document [8]for further details.

8.10.4. Version 3.2 to 3.3 Uplift

8.10.4.1.

Minor text changes to align with ASP taxonomy.

8.10.5. Version 3.3 to 3.4 Uplift

8.10.5.1.

Text change replacing Project Team with Delivery Team.

8.10.6. Version 3.4 to 3.5 Uplift

8.10.6.1.

Amended wording to align with S&EP Leaflet 18/2023.

Source URL: https://www.asems.mod.uk/guidance/poems/emp08

Links
[1] https://www.asems.mod.uk/sites/default/files/documents/EMP/EMP04_Environmental%20Feature%20Matrix%20(V3)%20(1).xlsx#overlay-context=
[2] https://www.asems.mod.uk/sites/default/files/documents/EMP/EMP08_F_01%20-%20Environmental%20Operation%20Control%20Index.xlsx
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