

DE&S SAFETY AND ENVIRONMENTAL PROTECTION LEAFLET 15/2019

SAFETY AND ENVIRONMENTAL MANAGEMENT PLAN REVIEWS

Sponsor: DES TECH-QSEP-Hd

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INTRODUCTION

1. The Acquisition Safety and Environmental Management System (ASEMS) requires all DE&S Projects to operate in compliance with an established Safety & Environmental Management System (SEMS), documented in the form of a suitable and sufficient through-life Safety & Environmental Management Plan (SEMP)¹. SEMP's are to be reviewed in accordance with pre-determined schedules.

2. This document formalises the requirement for all project SEMP's to be formally reviewed and re-baselined on change of the responsible personnel, on significant project changes, or at least annually. It also introduces a requirement for Principal Engineers to check that any multi-year commitments are on track (such as hazardous material elimination plans). Completed templates should be used for assurance purposes when reporting SEMP status updates.

PROCEDURE

3. Projects are required to ensure their SEMP's are subject to regular review. The maximum review periodicity is 12 months. SEMP's must also be reviewed when the Safety Responsible (SR) or Senior Safety Responsible (SSR) person responsible for them changes, or when there is significant project change.

4. Delivery teams must use the SEMP Commitment Review template at Annex A to record that the reviews required by this Leaflet have been carried out, and record key points arising from the review. These templates must be approved by the SR or SSR person for the project and retained on file with the SEMP. Further guidance on SEMP reviews is provided at Annex B.

¹ Or Safety Management Plan (SMP) and Environmental Management Plan (EMP), where these are separate documents. See Annex B for guidance.

5. Principal Engineers are accountable for providing assurance that SEMP reviews are carried out. In particular, where long-term (multi-year) work is required to control safety and environmental risk to appropriate levels, Principal Engineers must provide assurance that progress against plans is correctly reported. Declarations to this effect shall be made by countersigning the SEMP Commitment Review template. Principal Engineers should either personally endorse the completed templates or put in place appropriate delegations to enable them to provide this assurance.

6. Use of the templates in this leaflet will provide an audit trail to show that reviews have been carried out, even when they do not result in any changes to the SEMP. Any changes that are required must be recorded in the SEMP's revision history.

TRANSITIONAL ARRANGEMENTS

7. The procedure above should be used to record the status of the SEMP from the next scheduled review, or one year from issue of the current version of the SEMP, whichever is sooner. If more than one year has passed since the SEMP was reviewed, a review should be scheduled as soon as is practical.

Annexes:

A – SEMP Commitment Review Template

B – Further guidance on SEMP reviews

SEMP COMMITMENT REVIEW TEMPLATE

SEMP title:

SEMP version:

Review date:

Instructions:

1. This template must be completed at the time of any change of the Safety Responsible or Senior Safety Responsible person responsible for a SEMP, on significant project changes, or at least annually, to ensure that the responsible people are aware of the ongoing commitments required by the SEMP.
2. This template shall be used to record that the review has been carried out and highlight key findings. The questions below form a checklist to help ensure that the SEMP is appropriate for the project, and that the arrangements described in it continue to be effective.
3. Completed templates must be approved by the appropriate Safety Responsible or Senior Safety Responsible person. They must also be countersigned by the appropriate Principal Engineer or their delegated representative to signify their satisfaction.
4. Completed templates must be retained as records with the SEMP.

Serial	Review question	Yes / No
1.	This SEMP has been subject to a suitable and sufficient review to check that it is still accurate and appropriate for the current stage of the project.	
2.	Expiry dates for exemptions, licences or similar are established and documented, and plans are in place to renew where required.	
3.	Upcoming changes in legislation are noted, including REACH sunset dates, and plans are in place to address these where required.	
4.	Plans are in place and being met to gather information to support all relevant corporate reporting requirements, including on use of hazardous substances.	
5.	All necessary plans and actions are on track to maintain ALARP status, including management or elimination plans for any hazardous material, e.g. asbestos.	

6.	The project schedule includes the activities described in the Project SEMP.	
7.	Appropriate resources are in place to discharge the Project SEMP.	
8.	Mechanisms to obtain feedback from the Front-Line Command (FLC) are in place and effective.	

If the answer to any of the above questions is no, detail below the measures being taken to resolve the issue:

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Safety Responsible / Senior Safety Responsible Approval:

I am content that, to the best of my knowledge, the above statements are accurate.

Name	Appointment	Signature	Date

Principal Engineer Declaration:

I am satisfied that the above review has been carried out in accordance with SEP Leaflet 15/2019, and that extant multi-year plans and commitments required by this SEMP, hazardous material elimination plans or modification programmes, have been reviewed and updated to re-baseline the progress made since the last review and the remaining elements to be completed.

Name	Appointment	Signature	Date

FURTHER GUIDANCE ON SEMP REVIEWS

Background

This leaflet has been introduced to prevent loss of corporate knowledge on safety and environmental management arrangements. There is a risk that arrangements are planned but are not fully implemented, because they are not kept under an effective framework of review. This can be a particular issue where the work required is long-term, where there are changes in key personnel and management arrangements, and where safety and environmental plans are not fully integrated into the project's planning.

The template at Annex A is designed to maintain management control.

Safety Plans and Environmental Plans

Although referred to in this document as combined Safety and Environmental Management Plans (SEMPs), it may be appropriate for some projects to maintain a separate Safety Management Plan (SMP) and Environmental Management Plan (EMP). Although review of these plans may be triggered by different events, both POSMS ([SMP 03](#)) and POEMS ([EMP 09](#)) also require periodic review of outputs. POEMS guides that there is an opportunity to align reviews dealing with common issues at the same time, to ensure that changes revealed by the review process are assessed for both environmental and safety implications.

What is a “suitable and sufficient review”?

This is a matter of professional judgement, but will depend on the complexity of the project and the risks involved.

Expiry dates

Many safety and environmental cases are underpinned by permissioning or assurance arrangements that require periodic renewal. Examples of these include legislation exemption certificates, licenses to operate, inspection or calibration certificates, key hazard certificates and similar. Failure to do so may mean that equipment is operated unlawfully, or at increased risk due to unnoticed degradation.

The SEMP should make it clear when renewal is needed and where the responsibility lies for doing so, and ensure plans are in place to carry out any work required for renewal. Where these arrangements are complicated, it may be appropriate to document them in separately, e.g. in a certification plan.

Upcoming legislation

The ASEMS requires projects teams to establish and demonstrate compliance with relevant legislation ([Clause 4.4](#)). To avoid their equipment being operated unlawfully,

teams will need to be aware of upcoming changes to legislation and plan any changes necessary to allow compliance or put in place alternative arrangements.

Advice about relevant legislation changes may be available centrally from the DE&S Quality, Safety and Environmental Protection group (QSEP); from Operating Centre safety and environmental focal points, from industry forums, or from [legislation services](#) such as CEDREC. However, delivery teams must maintain their own records about the specific legislative requirements that apply to their equipment.

A particular concern is the Registration, Evaluation, Authorisation and Restriction of Chemicals regulations (REACH). Substances identified under these regulations may be banned or restricted now or in the future, meaning that equipment that uses them can only be used in specifically authorised applications unless an exemption is in place. This may make them impossible or very expensive to obtain in the future, driving equipment obsolescence. Teams will need to engage with their suppliers to determine suitable replacements.