

DE&S SAFETY AND ENVIRONMENTAL PROTECTION LEAFLET 18/2023

**DELIVERING SOUND ENVIRONMENTAL PERFORMANCE IN DE&S
ACQUISITION**

Sponsor: DES EngSfty- QSEP Hd

Version: 1.0

Date of Issue: August 2023

Author: DES EngSfty-QSEP-EPSSA-TL

Contact: desengsfty-qsepsep-envteam@mod.gov.uk

INTRODUCTION

1. The Environmental Responsibility Taxonomy defined in this Leaflet provides the formal structure of environmental responsibilities to be used in DE&S throughout the acquisition lifecycle of Products, Systems and Services (PSS). This structure is essential *“to ensure environmental performance is consistently and appropriately influenced across decision-making points”* ^[1] in DE&S.
2. To enable individuals to successfully exercise and discharge their environmental responsibilities, this leaflet also defines measures of success to ensure ‘PSS delivers sound environmental performance’.
3. Together these provides a consistent framework within which:
 - a. decision makers can make informed, balanced, and proactive decisions to improve the environmental performance of PSS; and
 - b. DE&S will report on the environmental performance of PSS through an enhanced and clearer environmental governance framework.

BACKGROUND

4. The UK Government published its Environmental Principles Policy Statement ^[2] which commits that *“we will be the first generation to leave the environment in a better state than that in which we found it”*. Consequently, as a government organisation, the MOD is required to place environmental considerations at the heart of policymaking.
5. The Defence wide environmental assurance framework, laid out in Joint Service Publication (JSP) 816 ^[3], outlines that the success of a Defence Organisation’s Environmental Management System (EMS) can be established by *“the extent to which a Defence organisation has a vision, clear aims and objective about what it can and wants to achieve in terms of the Environment”*.
6. This also reflects the ISO 14001 EMS ^[4] requirement for *“top management shall ensure that the responsibilities and authorities for relevant roles are assigned and communicated within the organization”*. This includes the responsibility for *“reporting on the performance of the environmental management system, including environmental performance, to top management”*.

7. In order to meet UK Government commitments, the requirements of JSP 816 and ISO 14001, DE&S will be updating¹ its corporate Environmental Protection Policy Statement to reflect three principal environmental commitments for DE&S across all activities, as shown in Figure 1.

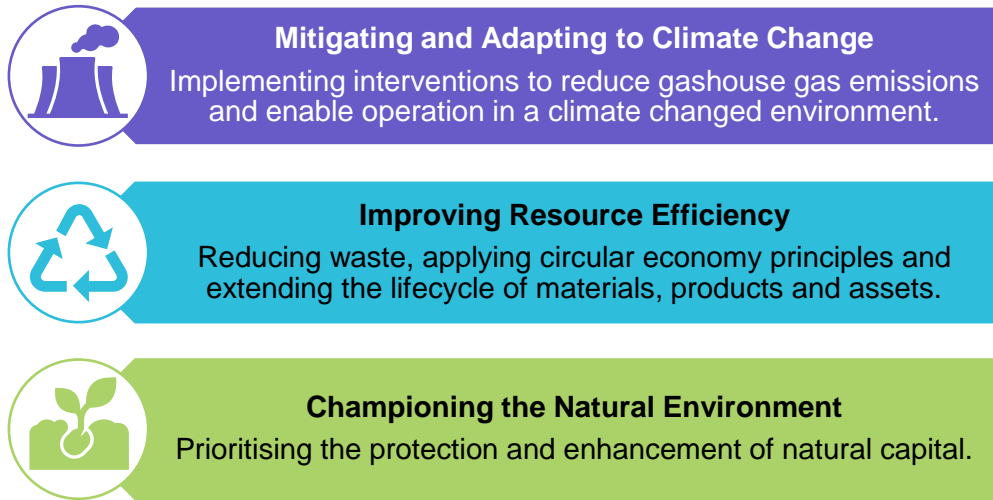


Figure 1: DE&S Principal Environmental Commitments

8. DE&S must therefore champion these three principal environmental commitments in the context of its acquisition activities. To enable robust performance against these commitments it is necessary to improve the defined purpose, responsibilities and governance of the DE&S acquisition EMS. This will be achieved through a set of defined environmental outcomes for PSS, which promotes informed decision-making across all functions involved in acquisition activities (e.g., commercial, engineering, finance, operational delivery, and project delivery). This will ensure that environmental outcomes are suitably considered and prioritised at decision-making points by individuals who are using robust information and evidence which is presented in a consistent way.
9. By robustly viewing DE&S acquisition activities through an environmental lens, an environmental culture can be engendered which sees DE&S delivering solutions that are more environmentally sustainable. Therefore, it is imperative that DE&S evolve the way in which it considers environmental protection² and environmental sustainability³ in acquisition (e.g., requirements definition, procurement, through-life support, and end of life management). **‘Sound environmental performance’ should be utilised as an enabler for resilient capability.**

¹ Update due early 2024.

² **Environmental Protection** is about maintaining, and recovering where necessary, a healthy natural environment through preventing the emission of pollutants or reducing the presence of polluting substances ^[1].

³ **Environmental Sustainability** is about acting in a way that ensures future generations have the natural resources available to live an equal, if not better, way of life as current generations. It looks to address the environmental elements of sustainable development ^[1].

ACQUISITION ENVIRONMENTAL TAXONOMY AND ASSOCIATED RESPONSIBILITIES

10. The DE&S CEO, as **Senior Accountable Person**, shall cascade environmental responsibilities within DE&S. This cascade is summarised in Figure 2 and described in the subsequent paragraphs.

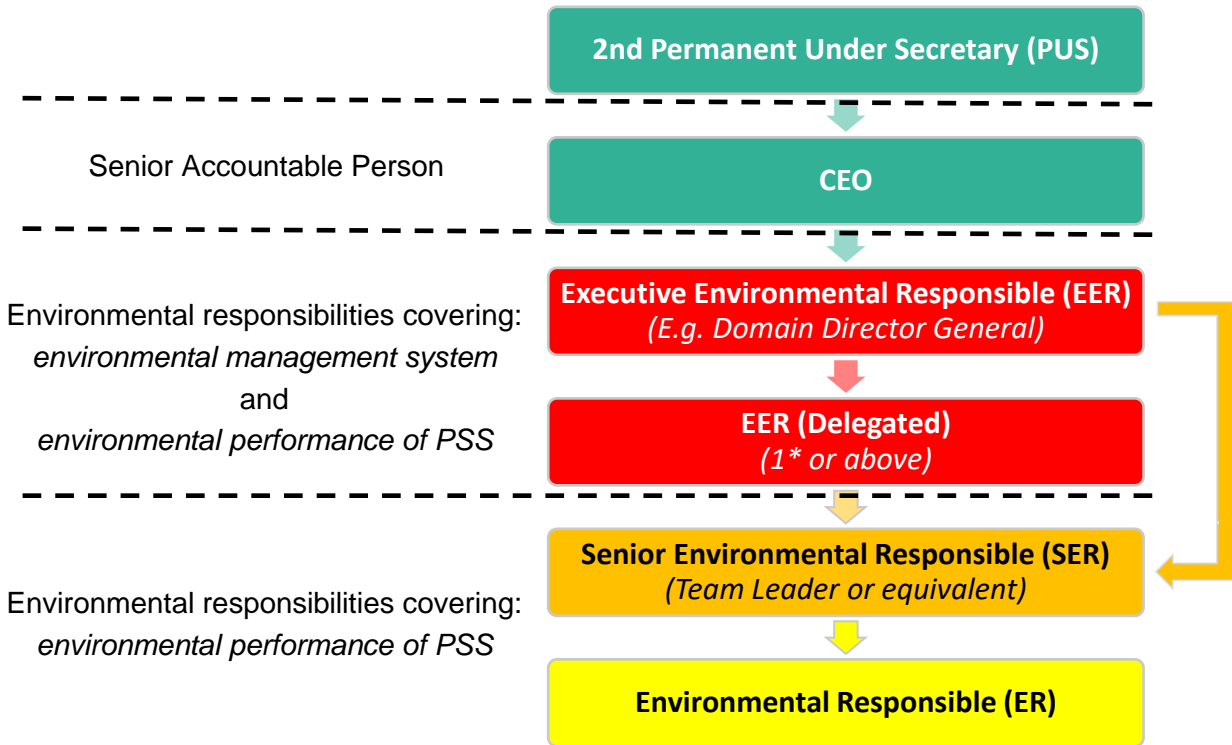


Figure 2: Overarching Environmental Responsibilities Cascade

11. The ‘**Executive Environmental Responsible**’ (EER) is responsible for:

- a. ensuring their Domain⁴ is operating within robust environmental management arrangements consistent with the DE&S acquisition EMS outlined in ASEMS^[5];
- b. authorising supplementary or alternative environmental management arrangements, or approaches, to those outlined in the DE&S acquisition EMS outlined in ASEMS^[5], but only where these:
 - i. are Domain specific;
 - ii. are justifiable with respect to efficiency or effectiveness for the Domain; and
 - iii. do not conflict with the top-level goal of delivering PSS with sound environmental performance.
- c. empowering individuals within their Domain to feedback and support improvements in the DE&S acquisition EMS; and
- d. ensuring the PSS within their area(s) of responsibility delivers sound environmental performance.

12. The EER may delegate some, or all, of the EER responsibilities listed above to one or more appropriately competent individuals who are 1* or above; these individuals will be known as ‘**Executive Environmental Responsible (Delegated)**’ or EER(D). EER responsibilities relating to the EMS (points 11.a to 11.c) may not be delegated below 1* level.

⁴ It is noted that this terminology (Domain) may change as a result of the ongoing work around the DE&S Operating Model. For brevity Domain is used through the leaflet, but it should be read as ‘Domain (or equivalent)’ and take into account future updates to the DE&S organisational structure.

13. An EER, or EER(D), may further delegate some, or all, elements of their responsibility relating to sound environmental performance (point 11.d) to one or more appropriately competent individuals as the **'Senior Environmental Responsible' (SER)** for nominated PSS.
14. The SER, the Delivery Team Leader (or equivalent), may formally delegate some elements of their responsibilities for ensuring their nominated PSS deliver sound environmental performance, as laid out in paragraph 16, to appropriately competent individuals as an **'Environmental Responsible' (ER)**.
15. Delegated responsibilities from SER to ER for 'ensuring the PSS within their area(s) of responsibility delivers sound environmental performance' (11.d above) may include the responsibility to approve environmental artefacts associated with PSS, such as those defined in ASEMS ^[5].

SOUND ENVIRONMENTAL PERFORMANCE

16. To enable individuals to successfully exercise and discharge their environmental responsibilities to ensure the **'PSS delivers Sound Environmental Performance'**; the measure of success has been defined as the following four environmental outcomes:

1 - Compliance Obligations

- a. **[The PSS] fulfils environmental compliance obligations** from:
 - i. Legal requirements (to ensure PSS are legal to procure, legal to operate, legal to support, and legal to dispose of);
 - ii. Defence specific requirements, such as Defence Regulations, MOD Policy, and Commercial Policy;
 - iii. DE&S requirements, such as DE&S organisational commitments or policy; and
 - iv. User and wider stakeholder requirements.
- b. Specific operational constraints and limitations are communicated to, and agreed with, the Senior Responsible Owner (SRO) or Front-Line Command (FLC) client.

2 - Unintended Events

- c. **[The PSS] prevents or mitigates the potential for unintended** (e.g., emergency, unplanned) **events which could result in adverse environmental impact(s)**, by demonstrating that DE&S has undertaken due diligence to procure, design and maintain PSS that ensures:
 - i. All reasonable precautions are taken to prevent such events; and
 - ii. All reasonable control and remediation measures have been taken by the operator after the event to limit harm to the environment.
- d. Precautions and mitigations identified outside DE&S' area of responsibility are communicated to the SRO or FLC client.

3 - Opportunities

- e. **Opportunities** available to DE&S (through requirements setting, procurement decisions, design changes, and maintenance regimes) **are used to:**
 - i. **Enhance environmental performance⁵ of [the PSS];** and
 - ii. **Support sustainable procurement.**
- f. Opportunities identified outside DE&S' area of responsibility are recommended to the SRO or FLC client.

⁵ Annex B outlines eight objectives devised for PSS. These objectives should be used as a key point of reference for decision-making when exploiting opportunities to enhance environmental performance.

4 - Adaptation and Resilience

- g. Ensure changing environmental conditions resulting from, for example, climate change and environmental degradation are recognised, and due diligence is applied when procuring, designing, and supporting PSS to ensure **[the PSS] is resilient to changing environmental conditions and can therefore maintain operational capability**.
 - h. Potential constraints and limitations are communicated to the SRO and FLC client, as well as opportunities for mid-life upgrades and adaptations to enable resilience.
17. Going forwards, these outcomes will be embedded within the guidance provided in the acquisition EMS ^[5] by the DE&S Quality, Safety and Environmental Protection (QSEP) Team. Delivery Teams, or equivalent, shall:
- a. use this structure for all new projects and programmes to assess whether the ‘PSS delivers sound environmental performance’; and
 - b. migrate existing environmental cases to this structure where opportunities are presented e.g., when an environmental case report is re-issued.
18. To support Operating Centres and Delivery Teams (or equivalent), a recommended structure is provided in Annex A to translate these outcomes into the supporting claims and arguments of an environmental case.

GOVERNANCE

19. Operating Centres and Delivery Teams shall embed the responsibilities and measures of success for sound environmental performance, as defined within this leaflet, into existing environmental management activities and wider delivery arrangements. This will:
- a. maximise opportunities to improve the environmental performance of PSS;
 - b. allow a basis for decision-making to make informed, balanced and proactive choices to improve the environmental performance of our PSS throughout the acquisition lifecycle;
 - c. act as a framework to challenge existing environmental performance and promote improvements within Project Environmental Committees (or equivalent).

20. From April 2024, the goal that ‘PSS delivers Sound Environmental Performance’, and the supporting outcomes outlined in paragraph 16, will be used as the basis for reporting through the DE&S Governance arrangements ^[6] summarised in Figure 3. Noting that some areas may operate a combined safety and environmental committee, the specific name of the committees may differ to that shown in Figure 3. Reporting through this governance structure will also cover environmental assurance activities (the following section provides further detail on the assurance Lines of Defence (LoD)).



Figure 3: DE&S Environmental Governance Structure (Acquisition)

21. Ensuring that DE&S ‘PSS delivers Sound Environmental Performance’ shall be the aim of acquisition environmental governance and therefore the **Executive Committee** will ensure that:
- a. The DE&S principal environmental commitments are reflected in the strategic direction of the organisation and are filtered into working practices; and
 - b. Appropriate resource is available to operate a robust EMS.
22. The **DE&S Safety, Health, and Environmental Committee (SHEC)** shall provide oversight and strategic direction on the DE&S EMS and the environmental performance of PSS. The SHEC shall advise the **CEO, as the Senior Accountable Person**, on actions required to improve the DE&S EMS, the environmental performance of PSS and any information that requires escalation to the DE&S Executive Committee. A Non-Executive Director member of the DE&S Board will maintain oversight as a standing member of the SHEC, and in turn provides challenge to the Executive. This is in line with the existing arrangements ^[7].
23. The **3* Leads of the Domain Environmental Committees**, which feed into the SHEC, are the de facto ‘**Executive Environmental Responsible**’ (**EER**) for their Domain.
24. The **2* Lead of the Acquisition Environmental Steering Group (AESG)** is responsible for:
- a. Ensuring the DE&S acquisition EMS outlined in ASEMS ^[5] is:
 - i. fit for purpose for DE&S and its acquisition activities; and
 - ii. in line with the 12-element model of environmental assurance framework outlined in JSP 816 ^[3] and the requirements of ISO 14001 ^[4].

- b. Identifying and enabling cross domain workstreams aimed to improve PSS environmental performance (via the Acquisition Environmental Working Group (AEWG));
- c. Directing 2LOD environmental assurance activities.

ASSURANCE

25. The DE&S governance model requires Engineering and Safety Assurance, which encompasses environmental assurance, to be undertaken at a number of levels (commonly referred to as 1st, 2nd and 3rd Line of Defence). This assurance arrangement is shown in Figure 4.

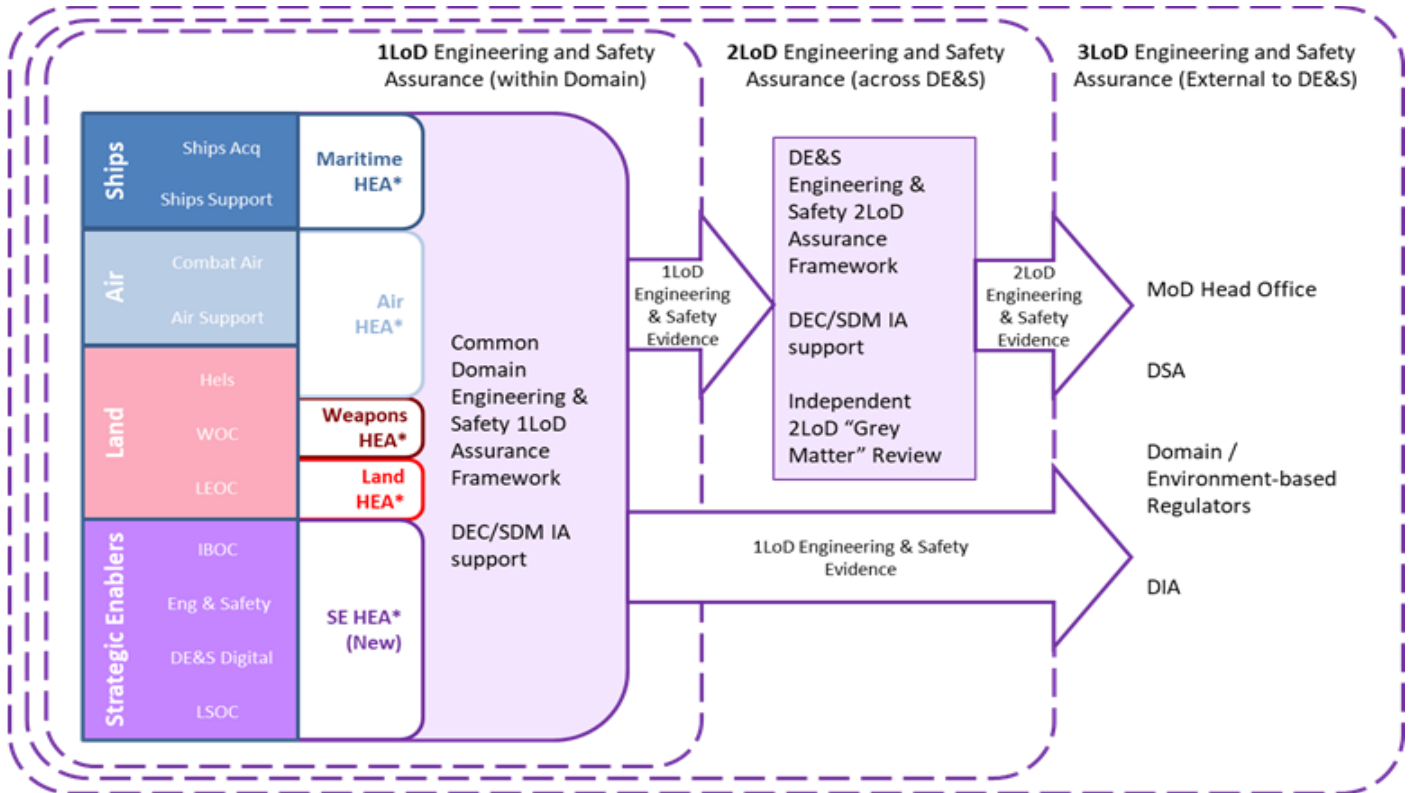


Figure 4: Lines of Defence Construct

26. This leaflet does not change the Engineering and Safety Assurance model, and environmental assurance activities shall be undertaken with due diligence paid to the goal of sound environmental performance outlined in paragraph 16, the effectiveness of the DE&S EMS, and the environmental assurance framework outlined in JSP 816 [3].

ANNEX

Annex A – Top Level Environmental Claim and Support Claim Structure

Annex B – Objectives to Enhanced Environmental Performance

REFERENCES

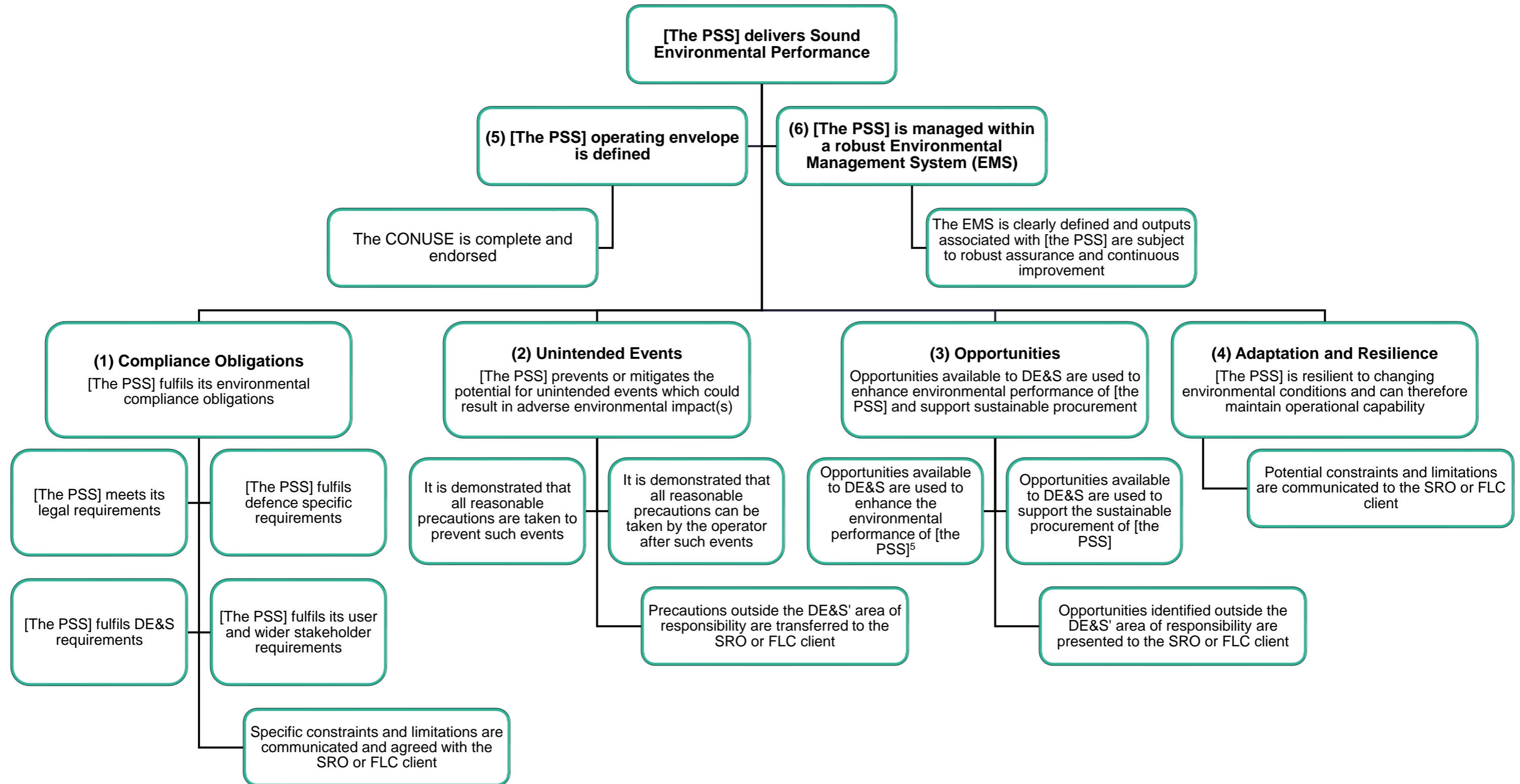
- [1] Defence Equipment and Support, “DE&S Environmental Strategy (DE&S 2025),” November 2021. [Online]. Available: <https://des.mod.uk/our-new-environmental-strategy/>.
- [2] DEFRA, “Environmental Principles Policy Statement,” UK Government Policy Paper, 31 January 2023. [Online]. Available: <https://www.gov.uk/government/publications/environmental-principles-policy-statement/environmental-principles-policy-statement>.
- [3] Ministry of Defence, “JSP 816: Defence Environmental Management System Framework Part 1,” February 2023. [Online]. Available: <https://www.gov.uk/government/publications/defence-environmental-management-system-framework-jsp-816>.
- [4] ISO, “14001:2015 Environmental Management Systems”.
- [5] DE&S, “Acquisition Safety and Environmental Management System (ASEMS),” [Online]. Available: <https://www.asems.mod.uk/>.
- [6] DE&S, “Safety and Environmental Management System, General Arrangements for the Management of Health, Safety and Environmental Protection (Revision 1),” July 2021.
- [7] DE&S, “Organisation and Arrangement Statement for of Health, Safety and Environmental Protection,” 2023.

ACRONYMS / ABBREVIATIONS

AESG	Acquisition Environmental Steering Group
AEWG	Acquisition Environmental Working Group
ASEMS	Acquisition Safety and Environmental Management System
DE&S	Defence Equipment and Support
EER	Executive Environmental Responsible
EMS	Environmental Management System
ER	Environmental Responsible
FLC	Front-Line Command
GEAR	Guide to Engineering Activities and Review
GGC	Greening Government Commitments
ISO	International Standards Organization
JSP	Joint Service Publication
LoD	Line of Defence
PSS	Products, Systems and Services
QSEP	Quality, Safety and Environmental Protection
SER	Senior Environmental Responsible
SHEC	Safety, Health, and Environmental Committee
SRO	Senior Responsible Owner

Annex A – Top Level Environmental Claim and Sub-Claim Structure

27. The descriptions used within the ‘(1) Compliance Obligations’, ‘(2) Unintended Events’, ‘(3) Opportunities’ and ‘(4) Adaption and Resilience’ sub-claims are an abridged version of paragraph 16; paragraph 16 should be used as main referenced to provide full context.



⁵ Annex B outlines eight objectives devised for PSS. These objectives should be used as a key point of reference for decision-making when exploiting opportunities to enhance environmental performance.

Annex B – Objectives to Enhanced Environmental Performance of PSS

28. The following set of high-level objectives have been devised to enhance the environmental performance of PSS beyond a baseline compliant position. These are categorised into three themes; the DE&S’ principal environmental commitments (see Figure 1). They reflect the significant, common, environmental aspects of DE&S’ PSS and should be used as a key point of reference when exploiting opportunities to enhance the environmental performance of PSS.



Date of Issue: August 2023	Uncontrolled Document when printed	Version: 1.0
----------------------------	------------------------------------	--------------