

Guideline

Environmental Management

Activity management plans

This guideline is designed to explain the benefits and potential content of management plans describing procedures necessary to prevent / minimise environmental harm.

Preamble

Section 319 of the *Environmental Protection Act 1994* (EP Act) sets a general environmental duty that requires persons to take all reasonable and practicable measures to prevent or minimise environmental harm from any activity that they carry out.

Under s. 493 of the EP Act, if a corporation commits an offence against the Act, corporate officers (i.e. management of the company) are potentially liable for the breach. The exceptions to this are where the corporate officer can establish that he or she has personally exercised due diligence to ensure the corporation complied, or was not in a position to influence the conduct of the corporation.

One way that management of an organisation conducting an activity with potential to cause environmental harm or a prescribed environmentally relevant activity (ERA) can demonstrate general environmental duty is by preparing and implementing an effective plan describing how the activity will be managed to prevent/minimise environmental harm.

Purpose

The purpose of a management plan is to demonstrate that persons carrying out activities that may cause environmental harm have in place a structured program that:

- sets the environmental objectives or standards to be achieved;
- identifies the potential environmental harm which may occur from routine operations and establishes and documents measures to avoid this harm as far as practicable;
- identifies extraordinary factors (i.e. abnormal operation, emergencies) that may cause environmental harm and establishes and documents contingency plans to deal with these;
- ensures all persons carrying out the activity are aware of the environmental risks, and are trained in the measures and contingency plans to deal with them;
- implements monitoring of environmental performance to ensure the effectiveness of the measures and contingency plans;
- assists the communication of environmental information throughout the organisation and to the administering authority; and
- provides for continual improvement.



The development and implementation of a management plan is not intended to be onerous, but to be a proactive approach, tailored to the needs of the ERA and the site, that prevents environmental problems occurring.

A management plan does not need to be approved by Department of Environment, Science and Innovation (the department). However, it may be assessed for its adequacy in managing environmental impacts during, for example, an investigation into any environmental incident or complaint of environmental nuisance, or during an inspection initiated by the department (if a condition of an environmental authority requires development of a management plan or written procedures identifying environmental risks and associated management strategies). Please see the document titled common conditions for prescribed environmentally relevant activities on the department's website at www.des.qld.gov.au (search ESR/2015/1828) for an example of a condition requiring the activity to be conducted in accordance with written procedures.

Benefits

Benefits to companies and businesses that have developed and implemented a management plan include:

- demonstrate general environmental duty;
- identification of recycling opportunities;
- reduction of energy consumption;
- facilitated implementation of cleaner production;
- safer workplaces;
- less prescriptive conditioning;
- fewer complaints made by the public;
- enhanced public image;
- ability to address environmental issues in own timeframe;
- more favourable terms from financiers due to reduced risk;
- increased compliance and reduced risk of penalties; and
- facilitation of approvals during expansion or alteration of the activity.

For these reasons ERA operators are encouraged to develop and implement management plans.

Format

The department recognises that different people choose to manage their responsibilities in different ways. The format of a management plan will therefore vary from site to site and industry to industry.

A management plan may consist of or contain reference to a set of detailed manuals, plans and procedures, or could equally be a specific stand-alone document.

Whatever form it takes, the elements detailed below should be considered, at a level consistent with the scale of the activity, the sensitivity of the location, and the environmental risk. It is important to note though that any management plans developed in response to a condition of an environmental authority should address the requirements of the condition.

Elements

1. Environmental commitments - a commitment by senior management to achieve environmental goals

All persons who carry out the activities must be aware of commitments to environmental management. For small operations, this may be as simple as the statement “compliance with all relevant environmental laws”. For more complex operations, a detailed environmental policy and specific performance targets would be more appropriate.

2. Identification of environmental issues and potential impacts

It is essential that all sources of potential and actual environmental harm, including actual and potential releases of all contaminants, are identified. These include issues relevant to routine operations and non-routine factors such as fire and flooding. Generally this requires identification of environmental values threatened by the activity and relate how they will be affected. For low risk activities it may be adequate to list likely environmental risks such as “potential dust nuisance”.

For more complex sites, the first step in identifying potential issues involves describing the activities performed, developing site plans showing where the activities will take place, and identifying surrounding features of the environment, for example, nearby streams, residential areas, and other environmentally sensitive sites.

It is important that both immediate and potential future impacts associated with any new actions on site are identified. Potential issues may be identified from a number of sources, including but not limited to:

- relevant departmental information sheets;
- relevant planning policies or environmental studies into the environmental values, sensitivity or amenity of the area;
- complaints that have been registered by the department;
- information requests or an environmental impact statement (EIS); and
- current industry best practice guidelines.

3. Control measures for routine operations to minimise likelihood of environmental harm

Control measures to avoid potential environmental impacts must be developed and documented in a way appropriate to the activity and risks. For small activities or minimal environmental risks, they may take simple forms such as checklists and setting aside areas for particular activities on site plans (e.g. for filling tankers, refuelling operations). For larger-scale activities or more significant environmental risks, more detailed documented procedures and plans would be appropriate.

Waste prevention, treatment and disposal procedures focussing on avoidance, minimisation, recycling and appropriate disposal are also integral to this element.

4. Contingency plans and emergency procedures for non-routine situations

Foreseeable risks and hazards must be identified and corrective responses developed beforehand to prevent environmental harm as far as possible. This must include any site rehabilitation and cleanup. These should be documented as contingency plans.

5. Organisational structure and responsibility

The organisational structure and responsibility for specific actions must be defined to ensure that roles, responsibilities and authorities allow effective management of environmental issues. This becomes increasingly important as staff numbers increase. Some options may include all staff having environmental responsibility, operational managers having environmental responsibility for their sections, employment of specialist environmental staff, and contracting outside professional help.

A common way of documenting this is to allocate responsible positions for each environmental measure in a table format.

6. Effective communication

Effective communication must take place to ensure two-way communication on environmental matters between operational staff and management.

For simpler situations, a statement showing positions that staff report to may be sufficient.

For more complex situations, staff reporting hierarchies are commonly used with descriptions of the types of events that trigger notification to higher management levels. Regular reports to higher management summarising environmental performance are another feature of larger scale operations.

In all cases, issues or incidents that require notification to the administering authority should be listed.

7. Monitoring contaminant releases

For activities that involve material releases of contaminants into the environment, periodic monitoring must be implemented, recording and reporting of data to management and in some cases to the administering authority. Procedures must detail the circumstances when monitoring will occur, the parameters monitored, procedures and methods used, record keeping and interpretation and notification of results to management and the administering authority.

Many smaller scale operations are operated in a way that they are not likely to release contaminants. For emissions that may cause a nuisance (such as noise) to surrounding people, it is common, in small to medium scale activities, to only monitor in the event of a complaint.

8. Conducting environmental impact assessments

For smaller scale activities that have no designed releases to the environment, appropriate measures may include, for example, tracking the number of spillages or the number of complaints about noise or dust from the site.

For larger scale activities with significant potential to cause harm, monitoring programs are required to confirm that the predictions about the expected environmental impacts, made at the time of approval, are accurate.

Such studies must be appropriately designed to measure those environmental indicators relevant to the activity undertaken, and be performed in sufficient locations and at times to be able to determine changes to the activity. When statistics are used to make comparisons, the tests used should have at least an 80 percent chance of detecting an environmental impact if one is occurring.

9. Staff training

All staff engaged in the activity must be made aware of the environmental issues caused by carrying out the activities and the practices and procedures to deal with them, including the monitoring and reporting obligations. This must also include any part time and contract staff.

For smaller operations, this may take the form of on the job training, with larger operations often having formal staff training. Where specific skills are necessary to operate plant or equipment on which the environmental performance depends, for example a wastewater treatment plant, appropriately trained and experienced operators are essential.

10. Record keeping

Records must be kept of the key environmental performance indicators, monitoring results, wastes accepted, environmental incidents and complaints, reports to management and any records required by law such as regulated waste tracking.

11. Periodic review of environmental performance and continual improvement

Periodic reviews of environmental performance and procedures are required to ensure the system used is still effective, and identify opportunities for improvement.

For smaller scale activities, periodic meetings with operational staff to discuss and record improvement opportunities, keeping up-to-date with industry guidelines and consulting with neighbours or attending community consultation meetings may be involved.

In more complex situations, the addition of internal or external audits of the environmental performance and adequacy of the system may be appropriate.

Disclaimer:

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Version	Date	Description of changes
1	06 June 2012	Document first published
2	28 February 2017	Changed focus of the document from a site based management plan to activity management plan.
2.01	11 June 2018	Document rebranded to align with machinery of government changes
2.02	10 March 2022	Minor typo corrections and document search details updated
2.03	21 February 2024	Document rebranded to align with machinery of government changes