0 SHOWING CONFORMANCE

0.1 Options

0.1.1 There are four options to demonstrate conformance when applying this system procedure:

a. Follow the defined system procedure using the recommended guidance and tools, including allowed variations and options.

b. Use an equivalent process and tool set generated elsewhere and document evidence of procedural equivalence.

c. Use an equivalent bespoke process and tool set for the project and document evidence of procedural equivalence.

d. Where the procedure is considered to be not relevant, document the basis for this decision.

1 INTRODUCTION

1.1.1 This procedure is intended to guide the Environmental Impact Assessment (EIA) process by producing an Environmental Impact Assessment Plan. This procedure is likely to be completed immediately after Procedure EMP03 – Impact Priority Evaluation.

1.1.2 Environmental Impact Assessment (EIA) is a process and management technique that can be applied to a project in order to identify all the environmental impacts produced by the project, their relative importance, and measures to eliminate or reduce any negative impacts identified. The EIA should be documented through the production of an EIA Report and summarised in an Environmental Impact Statement (EIS) (see Procedure EMP05 – Environmental Impact Assessment and Reporting).

2 PROCEDURE OBJECTIVES

2.1.1 To identify whether a full EIA and Report are necessary for the project.

2.1.2 If an EIA is required:

2.1.3 To determine the best strategy for applying the EIA process to the project;

2.1.4 To identify where in the CADMID cycle the EIA(s) should be carried out;

2.1.5 To assign responsibilities for carrying out the EIA(s).

3 RESPONSIBILITIES

3.1 Accountability

3.1.1 The IPTL is accountable for the completion of this procedure.

3.2 Procedure Management

3.2.1 IPTLs may delegate the management of this procedure to a member (IPT Environmental Focal Point) or members of the IPT.

3.3 Procedure Completion

3.3.1 IPTs will complete the procedure, in conjunction with advice and information from members of the Environmental Committee, especially those which may have related assessment responsibilities. An IPT may task advisors or contractors to assist with drawing up the assessment plan especially where the advisor has specialist knowledge on the assessments issues. It may also be possible to involve potential system suppliers/contractors in the EIA planning process as they may have existing studies available.

4 WHEN

4.1 Initial Application

4.1.1 For new projects, this procedure should be undertaken towards the end of the Concept Stage or the start of the Assessment Stage.

4.1.2 For legacy projects, this should be undertaken at the outset of the EIA to ensure that all relevant stakeholders and Subject Matter Experts are fully engaged and that the latest legislation and policies are being implemented.

4.2 Review

4.2.1 The outputs of this procedure will require periodic review and possible revision throughout the lifetime of the project. The appropriate timings for such reviews will be determined through following Procedure EMP08 - Continuous Review.

5 REQUIRED INPUTS

a. The ‘Common Documents’ (ie User Requirement Document (URD) and JSP 418 (Sustainable Development and Environment Manual)

b. Outputs of EMP01 - Stakeholders and Standards Identification, EMP02 – Screening and Scoping and EMP03 – Impact Priority Evaluation.

6 REQUIRED OUTPUTS

a. Completed **Form EMP04/F/01** – Environmental Impact Assessment Plan.

OR

Equivalent actions and documentation that ASEG is satisfied achieves the same objectives.

7 DESCRIPTION

7.1.1 For the majority of projects, the earlier the EIA process is applied, the greater the potential will be for reducing negative environmental impacts. The fact that detailed information may not be available at these early stages should not delay the EIA process, as this information can be incorporated in subsequent reviews of the EIS and EIA report. For more detail on what an EIA may require refer to Procedure EMP05 – Environmental Impact Assessment and Reporting. The EIA Plan will periodically require review and possible revision throughout the project's lifetime. Following Procedure EMP08 – Continuous Review, will help to identify when, and if, the EIA Plan needs to be reviewed.

7.2 Step 1: Decide whether a full EIA is necessary

7.2.1 This step requires reconsideration of the environmental impacts (EIs) identified in Step 2 of EMP02 – Screening and Scoping and EMP03 – Impact Priority Evaluation.

7.2.2 Proceed to prepare an EIA report if there is either:

- One or more adverse EIs in the matrix that may present a material risk to either the environment, stakeholders or legislative or policy requirements; or
- Insufficient information to decide whether the adverse EIs present a material risk to either the environment, stakeholders or legislative or policy requirements; or
- Insufficient information to decide whether an environmental impact is adverse.

7.2.3 It is important to note that this step has an element of subjectivity and is therefore open to interpretation. It is recommended therefore that the IPT seeks advice on this issue eg from a SME, Environmental Committee and also ASEG or DE&S particularly in cases where there is doubt as to whether or not the project's impacts warrant proceeding to a full EIA. The decisions made by following this procedure will need to be periodically reviewed and possibly revised throughout the life of the project. They are valid only at the time they are made on the assumption that all available information has been considered. The need for this review will be highlighted through following Procedure EMP08 – Continuous Review.

7.3 Step 2: Decide on an EIA plan

7.3.1 Different projects may require different strategies to be taken within the EIA process. The choice will depend on the nature of the project, the coverage and quality of available data and information, the predicted length of the product's life cycle and its interaction with other projects. Three example strategies are outlined below. However, IPTs should not be limited to these but should decide, in conjunction with relevant stakeholders where appropriate, the best strategy for their project. The three example strategies are:

a. To carry out an EIA that covers all the life cycle stages from Concept to Disposal. This approach will most suit straightforward projects where information on the whole life cycle is readily available at the Concept stage or where reasonable assumptions and estimates can be made. It is likely that some minor assumptions will be necessary for the later stages of the life cycle, but these can be confirmed or refuted as the project progresses and any necessary changes made to the EIA Report as a result of the Procedure EMP08 – Continuous Review.

C A D M I D	One EIA produced that fully covers all the life cycle stages.

b. Secondly, an EIA could be carried out which only fully addresses the early procurement stages, for example from Concept to Manufacture, but that contains minimal or no information on later stages. This approach would be suitable for projects where detailed information is available for the initial stages of the project but only skeleton or unreliable information for the later stages ie In-service and Disposal. This type of EIA would need to be reviewed at each CADMID stage to incorporate relevant information as it becomes available. For further information see Procedure EMP08 – Continuous Review.

C A D M I D review **C A D M I** D review **C A D M I D**	One EIA produced that fully covers the early life cycle stages and partially covers later stages, which is reviewed throughout the life cycle as more information becomes available to build into a complete EIA. Note that it is not mandatory to cover all of the CADMID stages with an EIA so long as there is good justification for not doing so.

c. The third approach would involve staged EIAs being produced throughout the lifetime of the project, aimed predominantly at the current stage but incorporating an assessment of any information, however limited, available relating to the later stages to ensure that impacts are given proper consideration early enough in the programme to influence their elimination or reduction. As the equipment develops, more detailed EIAs would be produced to fully address the later stages. This will be most suitable for large and complex projects that may interlink with several projects, for example projects involving platforms, or where a significant amount of trials and testing is required.

C A D	M	I	D	Several EIAs produced throughout the project's life cycle that cover one or more of the life cycle stages. Suitable for complex projects and projects that are closely integrated with other projects e.g. equipment platforms. Note that it is not mandatory to cover all of the CADMID stages with an EIA so long as there is good justification for not doing so.

7.3.2 When formulating the EIA Plan, the IPT is advised to contact ASEG, particularly if there is uncertainty in formulating an appropriate strategy or where there is significant deviation from the example strategies provided above. Irrespective of the strategy adopted the EIAPlan should ensure that a material inventory is established for the equipment.

7.3.3 Where other significant assessment activities are to be undertaken, such as any sustainability appraisals, it will also be helpful to show these and their relationship to the environmental impact assessments which are planned in the EIA plan.

7.3.4 As stated above, the EIA strategy formulated will need to be reviewed and possibly revised as the project progresses, for example where it has been identified that a life cycle stage does not require an EIA to be completed, changes to the project may warrant an EIA to be completed for that life cycle stage. The need for this review will be identified through following Procedure EMP08 – Continuous Review.

7.4 Step 3: Decide EIA Responsibilities

7.4.1 This step requires an understanding of the size and nature of the project and the interaction it will have with other projects/platforms, in order to identify the best party to carry out the EIA. If it has the necessary knowledge, experience and resource (ie time) available then the IPT may be the best party to perform the EIA. On the other hand the EIA may be best performed by a third party such as an advisor, contractor or supplier, in the following situations:

a. Complex projects;

b. Projects involving environmental aspects that may give rise to public relations difficulties;

c. Limited knowledge or experience within the IPT on the environmental issues relevant to the project;

d. Limited time availability within IPT;

e. The completion of an EIA by an independent body would be of benefit.

7.4.2 It will also be helpful to record both in the EIA Plan and EMP01 the responsible party for undertaking other related assessments and appraisals.

7.5 Step 4: Record decisions

7.5.1 Any decisions relating to the EIA process should be clearly documented. This is to demonstrate that adequate consideration has been given to the issue. This is particularly relevant where several IPTs will be involved. Relevant stakeholders should also be informed of these decisions. Form EMP04/F/01 – Environmental Impact Assessment Plan can be used to document and communicate these decisions.

8 RECORDS AND PROJECT DOCUMENTATION

8.1.1 Where relevant, the outputs from this procedure should feed into the following:

a. SRD (System Requirement Document) – for any specific environmental performance requirements;

b. CSA (Customer Supplier Agreement) – to document agreements on environmental studies to be delivered by the IPT;

c. TLMP (Through Life Management Plan);

d. Input report for Initial Gate.

8.1.2 A copy of the information produced from following this procedure should be stored in the project's Environmental Case.

9 RECOMMENDED TOOLS AND FORMS

a. **Form EMP04/F/01** – Environmental Impact Assessment Plan.

10 GUIDANCE

10.1 General

10.1.1 The ISO14040 Series, and particularly ISO14042, provides good general guidance on when to carry out product related environmental impact assessments.

10.2 Aligning safety and environment

10.2.1 The key alignment opportunity in EMP04 is to establish whether any planned assessment studies can produce data to meet both safety and environmental evaluation requirements.

10.3 Guidance for Different Acquisition Strategies

10.3.1 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 can be demonstrated for all projects. Some elements of this procedure may be best completed by contractors and suppliers for some strategies such COTs and MOTs where, in effect, major design issues are already fixed.

10.4 Legacy systems

10.4.1 Note that for legacy systems there may be no benefit to applying the EIA methodology to CADMID stages that have already passed and so any EIA that may be necessary should only address the life cycle stage that the project is currently in (unless this is almost concluded) and any future stages.

10.4.2 When applying this procedure to a legacy system it is important that the following questions are asked:

a. What is the remaining length of time of the equipment's or service's projected service life?

b. Has the legislation and other standards review identified a need for mitigation that has not already been put in place?

c. Are there future plans for major modifications and capability enhancements, and if so when?

d. Is there historic evidence of actual environmental incidents and impacts, if so when, where and what?

e. Have there been any legal compliance problems to date or issues with regulators?

f. Has there been any stakeholder (particularly external to MOD) interest to date (for example Parliamentary Questions or enquiries regarding the equipment's environmental performance)?

10.4.3 Considering these questions should ensure that the outputs from this procedure for legacy systems do not include provision for unnecessary EIAs. For many legacy systems, with limited life, it will be appropriate to concentrate on disposal arrangements and impacts especially where there is no evidence of environmental incidents or accidents associated with the system. Therefore, for a legacy system it may be wholly appropriate that the EIA Plan identifies that only an EIA on the disposal phase is required. However, if there is evidence of environmental incidents and accidents it is likely to be necessary to carry out an EIA of the in-service phase to help to identify any mitigation or control measures which should be applied.

10.5 Warnings and Potential Project Risks

10.5.1 If the IPT fails to plan and co-ordinate the EIAs and any other studies (that maybe carried out elsewhere in MOD) it is possible that the IPT will engage in unnecessary or overly complex environmental assessment activities, involving unnecessary cost and potential delays. Any short comings in the completion of this procedure could compromise Initial Gate procedures and approvals. Omissions may also cause delays in approvals later in the CADMID cycle, such as at Main Gate or ISD. Incomplete or otherwise inadequate EIAs may also compromise (or at least delay) granting of permission and approvals.