Assessment of Contractor’s Environmental Management System (ISO 14001:2015 & G36)

Transport for NSW | February 2024 | Issue 6

**SUMMARY**

|  |  |
| --- | --- |
| Assessment report for: | *[Insert contractor’s name]* |
| ISO 14001 (1) Clause | Contractor’s Environmental Management System (CEMS) | Number of Nonconformities (2) |
| 5.2 | Environmental policy |  |
| 5.3 | Organisational roles, responsibilities and authority |  |
| 6 | Planning |  |
| 7.1 | Resources |  |
| 7.2 | Competence |  |
| 7.3 | Awareness |  |
| 7.4 | Communication |  |
| 7.5 | Documented information |  |
| 8.1 | Operational planning and control |  |
| 8.2 | Emergency preparedness and response |  |
| 9.1 | Monitoring, measurement, analysis and evaluation |  |
| 9.1.2 | Evaluation of compliance |  |
| 9.2 | Internal audit |  |
| 9.3 | Management review |  |
| 10.2 | Nonconformity and corrective action |  |
| 10.3 | Continual improvement |  |

| G36 Clause | Contractor’s Environmental Management Plan (CEMP) | Number of Nonconformities (2) |
| --- | --- | --- |
| 3.1 | Preparation and Submission of CEMP |  |
| 3.2 | Planning |  |
| 3.3 | Resources, Responsibilities and Authority |  |
| 3.4 | Selection and Management of Subcontractors |  |
| 3.5 | Competence, Training and Awareness |  |
| 3.6 | Working Hours |  |
| 3.7 | Communication |  |
| 3.8 | Emergency Planning |  |
| 3.9 | Contractor’s Monitoring, Inspection and Auditing |  |
| 3.10 | Environmental Nonconformities |  |
| 3.11 | Records of Environmental Activities |  |
| 3.12 | Management Review |  |
| 4 | Operational Control |  |

Notes:

(1) This can be either ISO 14001:2015 or AS/NZS ISO 14001:2016.

(2) Details of nonconformities are contained in the evaluation checklists.

|  |  |
| --- | --- |
| EMS Certification: |  |
| Is the EMS currently third party certified to ISO 14001:2015? | Yes / No |
| Conclusions: |  |
| Is Contractor’s environmental management system suitable for use on civil construction projects? | Yes / No |
| *[Insert comments]* |  |
| Assessor:  |  | Date:  |  |

| ISO 14001 Clause | Requirement | Guide (1) | Finding(2) |
| --- | --- | --- | --- |
| 5 | LEADERSHIP |  |  |
| 5.2 | Environmental policy |  |  |
|  | Is there an environmental policy? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Is the environmental policy relevant to civil construction projects? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
|  | Does the environmental policy include a commitment to the protection of the environment, prevention of pollution, fulfilling compliance obligations and continual improvement? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| 5.3 | Organisational roles, responsibility and authorities |  |  |
|  | Is there a nominated Environmental Management Representative and are the person’s responsibilities defined? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Are suitable personnel be assigned for implementing the CEMP? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
|  | Is the relationship between corporate support and on-site personnel responsible for environmental protection clearly defined? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 6 | PLANNING |  |  |
|  | Are effective planning guidelines established to: |  |  |
| a) | identify environmental impacts for construction activities? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| b) | identify relevant statutory requirements and conditions and the associated actions for conducting construction activities? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| c) | prepare a CEMP that identifies appropriate environmental objectives for the relevant works, details how they will be achieved and the roles/persons who will be responsible, and incorporates the client’s environmental requirements? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| d) | ensure that statutory requirements and compliance limits are kept up to date? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| 7 | SUPPORT |  |  |
| 7.1 | Resources |  |  |
|  | Is there a process to ensure that sufficient resources are allocated to implement the CEMP? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 7.2 | Competence |  |  |
|  | Are there processes to self-assess the competency of workers (including those of subcontractors) performing the work, identify the training needs, and provide the necessary training, to ensure that workers can effectively carry out their activities in accordance with environmental requirements?  |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| 7.3 | Awareness |  |  |
|  | Are there processes to ensure that workers are aware of environmental impacts related to their work, and the associated compliance obligations? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| 7.4 | Communication |  |  |
|  | Are the internal and external communication process which are relevant to the CEMS defined for implementation and improvement, and do these processes allow compliance obligations to be met and enable workers to contribute to continual improvement? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| 7.5 | Documented information |  |  |
|  | Does the CEMS include processes to develop, control, review and update core documentation for the effective implementation of the CEMS and ensure compliance with environmental obligations? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| 8 | OPERATION |  |  |
| 8.1 | Operational planning and control |  |  |
|  | Are there established, implemented and maintained documented procedures for operational control (where absence of such procedures could adversely affect environmental performance), for the following areas: |  |  |
| a) | provision of goods and services from suppliers or subcontractors? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| b) | site facilities and compounds? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| c) | construction activities? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| d) | management of subcontractors? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| e) | handling and storage of materials? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| f) | legal disposal of wastes? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| g) | maintenance of operational controls, plant and facilities? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| h) | incident management? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Does the purchasing procedure require the subcontract documents to identify the environmental protection requirements which the subcontractor will be responsible for (where applicable)? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Are subcontractors evaluated and selected on the basis of their ability to meet specified requirements (including environmental protection)? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Does the purchasing procedure provide a suitable mechanism to plan and implement monitoring and measurement of the subcontractor’s operations to verify environmental protection compliance? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
|  | Is responsibility defined for implementing and monitoring operational controls and rectifying any deficiencies? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 8.2 | Emergency preparedness and response |  |  |
|  | Does the CEMS incorporate an emergency plan or procedure detailing how the organisation will: |  |  |
| a) | plan to mitigate potential environmental impacts arising from an emergency situation? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| b) | respond to actual emergency situations? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| c) | test, review and improve processes for emergency response? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| d) | provide relevant training to workers including subcontractors? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 9.1 | Monitoring, measurement, analysis and evaluation |  |  |
|  | Are there documented processes to determine: |  |  |
| a) | what should be monitored? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| b) | appropriate methods for monitoring, analysis and evaluation? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| c) | frequency of monitoring and review? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| d) | appropriate performance criteria? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| e) | overall environmental performance and performance of the CEMS? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Is there a suitable system (in-house and/or subcontract) for controlling, calibrating and maintaining environmental monitoring equipment? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Are there processes to ensure that relevant documentation is captured as evidence to demonstrate monitoring, measurement, analysis and evaluation? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
|  | Are there processes to ensure that the relevant performance information is communicated internally and externally? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 9.1.2 | Evaluation of compliance |  |  |
|  | Is there a documented procedure for periodically evaluating compliance with legal requirements, taking action where needed, and keeping records of the evaluations? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| 9.2 | Internal audit |  |  |
|  | Does the organisation implement an internal audit program to assess all aspects of the CEMS, including CEMP? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Does the program establish: |  |  |
| a) | frequency (that reflects the importance of each management, operational and monitoring activity? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| b) | methods? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| c) | responsibilities? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| d) | planning and reporting requirements (including process to ensure that management are aware of the results)? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Are audit schedules prepared, covering: |  |  |
| a) | CEMS procedures? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| b) | CEMP operational controls? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| c) | CEMP monitoring program? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| d) | audits of subcontractors? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 9.3 | Management review |  |  |
|  | Are corporate management reviews of the CEMS conducted at least annually (with documentation) to evaluate: |  |  |
| a) | the effectiveness and continuing suitability of the CEMS? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| b) | environmental risks and opportunities? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| c) | compliance obligations? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| d) | changes to potential environmental impacts from operations? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 10 | IMPROVEMENT |  |  |
| 10.2 | Nonconformity and corrective action |  |  |
|  | Are procedures established for: |  |  |
| a) | identification and notification of environmental nonconformities? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| b) | implementing actions to immediately mitigate environmental impacts and rectify controls? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| c) | investigating the nonconformity to determine causes, whether similar nonconformities exist or could potentially occur, and changed management practices or environmental mitigation measures that need to be put in place? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| d) | identifying and implementing corrective actions that are commensurate to the significance of the nonconformity encountered, and reviewing them? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
|  | maintaining records which trace the resolution of the nonconformity? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 10.3 | Continual improvement |  |  |
|  | Does the CEMS generally provide for continual improvement to the suitability, adequacy and effectiveness of the CEMS? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |

| G36 Clause | Requirement | Guide (1) | Finding(2) |
| --- | --- | --- | --- |
| 3 | CONTRACTOR’S ENVIRONMENTAL MANAGEMENT PLAN (CEMP) |  |  |
| 3.1 | Preparation and Submission of CEMP |  |  |
|  | Does the CEMP identify a person with authority for issuing and revising the CEMP? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
|  | Does the CEMP describe the scope and staging of works? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
|  | Does the CEMP include appropriate environmental objectives? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 3.2 | Planning |  |  |
|  | Does the CEMP identify the obligations under relevant environmental legislation? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Does the CEMP include provision to identify approvals/licences/permits to be obtained by the Contractor? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Does the CEMP include provisions to adequately address the terms and conditions of each approval/licence/permit? (Note: actual approvals/licences/permits are not required to be addressed for prequalification/registration assessment) |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Does the CEMP outline processes for ongoing identification and management of environmental risks for the Works?  |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| 3.3 | Resources, Responsibilities and Authority |  |  |
|  | Does the CEMP define responsibility and authority for personnel who: |  |  |
| a) | plan, approve, implement and maintain environmental controls? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| b) | monitor and assess effectiveness of environmental controls? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| c) | rectify any environmental deficiencies? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| d) | control further construction activity until the environmental deficiency is corrected? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
|  | Does the CEMP nominate a full-time Environmental Site Representative (ESR) (or equivalent, if the sample CEMP is not for a TfNSW contract) for communication with the Principal and EPA on all environmental matters, and are the ESR’s responsibilities and authority defined? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
|  | Where the Environmental Management Representative will be based mainly off-site, does the CEMP detail the relationship between the Environmental Management Representative and the ESR? (Note: this is only applicable if the sample CEMP shows this management structure.) |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 3.4 | Selection and Management of Subcontractors |  |  |
|  | Does the CEMP commit to including environmental management requirements in the planning, selection and management of subcontractors? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Does the CEMP include: |  |  |
| a) | duties of each subcontractor? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| b) | duties that Contractor will retain? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| c) | interaction with adjacent work areas? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| d) | Contractor’s surveillance program to monitor effectiveness of subcontractor’s environmental protection measures? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| 3.5 | Competence, Training and Awareness |  |  |
|  | Does the CEMP include an environmental induction and training program or plan to ensure competence and awareness of site personnel, including subcontractors? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Does the induction training cover the purpose and objectives of the CEMP, conditions of environmental licences, permits and approvals, environmental emergency plans, reporting and notification requirements for pollution and other environmental incidents, high-risk activities and associated environmental safeguards and working in or near environmentally sensitive areas? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Does the CEMP provide for maintaining a register of environmental training carried out? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| 3.6 | Working Hours |  |  |
|  | Does the CEMP state the standard working hours and, if relevant to the CEMP reviewed, state the approvals required and the associated approval processes for conducting out of hours work? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 3.7 | Communication |  |  |
|  | Does the CEMP describe the processes for external and internal communication in relation to the environmental aspects of the Contract? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
|  | Does the CEMP include a list of current contacts, including 24 hour emergency contacts? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
|  | Does the CEMP provide details of how changes to the environmental management documentation and data are identified and communicated to relevant project personnel? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| 3.8 | Emergency Planning |  |  |
|  | Does the CEMP include: |  |  |
| a) | Contractor’s emergency response personnel, their responsibilities and contact details? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| b) | details of emergency services? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| c) | response procedures for identified potential environmental emergencies? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| d) | frequency of tests of emergency response procedures? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 3.9 | Contractor’s Monitoring, Inspection and Auditing |  |  |
|  | Does the CEMP include procedure(s) to monitor and measure regularly the Contractor’s environmental management performance and to evaluate compliance with contract requirements (where these apply to the CEMP)? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Does the CEMP define responsibility for undertaking site environmental inspections to assess the adequacy and effectiveness of the Contractor’s environmental controls, including high risk activities and processes, work in environmentally sensitive areas and site preparedness for adverse weather conditions? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
|  | Does the CEMP include provision for a risk-based environmental auditing program in accordance with ISO 19011? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| 3.10 | Environmental Nonconformities |  |  |
|  | Does the CEMP detail how corrective and preventive actions for nonconformity will be implemented and closed out? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| 3.11 | Records of Environmental Activities |  |  |
|  | Does the CEMP define responsibility for keeping environmental records (as part of project records)? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| 3.12 | Management Review |  |  |
|  | Does the CEMP outline a process for periodic management review of the effectiveness and implementation of the CEMP? |  |  |
| Applicant |  |  |  |
| Assessor |  | F | [ ] |
| 4 | OPERATIONAL CONTROL |  |  |
|  | Does the CEMP or established sub-plans describe potential environmental impacts, mitigation measures and procedures relevant before, during and after construction (as applicable) for: |  |  |
| 4.1 | soil and water management? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.2 | contaminated land, including known contamination, unexpected contamination and contamination that occurs as a result of the works? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.3 | spill prevention and response? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.4 | effective control of dust and vehicle emissions? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.5 | fire safety and burning off? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.6 | minimising the impact of construction noise on sensitive receivers and the general community? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.7 | minimising the impact of vibration and air blast on sensitive receivers and the general community? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.8 | protection of native flora and fauna? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.8 | minimising spread of weeds, diseases and pests? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.9 | protection of known Aboriginal heritage objects, places and culturally significant areas, and management of unexpected potential Aboriginal heritage items? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.10 | protection of known non-aboriginal heritage and management of unexpected potential non-aboriginal heritage items? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.11 | storage, transport and disposal of waste generated during the Contract? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.11 | waste avoidance and minimisation strategies? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.12 | use of pesticides? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.13 | work in environmentally sensitive areas? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.15 | establishing, operating and decommissioning site facilities? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |
| 4.16 | restoration of site to make good areas disturbed by construction? |  |  |
| Applicant |  |  |  |
| Assessor |  | H | [ ] |