

# EMR AUDIT CHECKLIST

Document audit

Date of Audit

Auditee

Location

ref EMS ATT E.5 AUDIT CHECKLIST

Environmental Performance : Design & Construct



Question	1. Communicate EMP Obligations	Observation/ Comments	Recommendation
<u>1A</u>	A competent person has been assigned to maintain the project EMP (Environmental Representative)		
<u>1B</u>	Identified key roles and responsibilities which can affect the environmental outcomes of the project have been assigned, documented and communicated to the workplace team.		
<u>1C</u>	The Project Manager has approved and is familiar with the EMP		
<u>1D</u>	The EMP is a controlled document		
<u>1E</u>	The scope of activities covered by the EMP is clearly defined		
<u>1F</u>	SMART Environmental Objectives and Targets consistent with BU and Group objectives and targets are documented for all project phases		
<u>1G</u>	All site personnel have undergone an induction and/or other training that includes reference to HSE incident reporting procedure, environmental policy and EMP, key obligations, risks and controls, consequences of departing from specified procedures.		
<u>1H</u>	Subcontractor agreements include reference to the Environmental Policy and EMP/Eps environmental obligations, risks and controls.		
<u>1I</u>	Environmental experience and qualifications of potential subcontractors is evaluated during tendering.		
<b>Other Comments</b>			

Question	2. Track Budget, Resources & Program	Observation/ Comments	Recommendation
<u>2A</u>	EnvR familiar with budget, program, resource and reporting requirements		
<u>2B</u>	Approval planning and application time and resources considered		
<u>2C</u>	Environmental budgets and programs updated for changes to project scope		
<u>2D</u>	Adequate environmental resources and equipment provided		
<b>Other Comments:</b>			

Question	3. Plan Approvals, Obligations & Controls	Observation/ Comments	Recommendation
<u>3A</u>	Have all obligations been identified and all approvals obtained as required		
<u>3B</u>	Programs to demonstrate compliance in place		
<u>3C</u>	Project/workplace registered on HSE Reporting System, core data appropriate, and all approvals/ licences/permits uploaded to HSE Licence Database		
<u>3D</u>	All approval documentation available and controlled		
<u>3E</u>	Changes to obligations being monitored and acted upon		
<u>3F</u>	EMP up-dated with changes to obligations or controls		
<b>Other Comments:</b>			

Question	4. Review Risks & Opportunities, Encourage Value & Sustainability	Observation/ Comments	Recommendation
4A	Environmental R&O acknowledged prior to commencement of activities		
4B	Controls assessed and reviews documented		
4C	EnvR familiar with environmental R&O		
4D	Environmental issues considered in procurement		
4E	Environmental issues considered in design		
<b>Other Comments:</b>			

Question	5. Implement and Maintain Controls	Observation/ Comments	Recommendation
5A	Control measures implemented and documented (refer EMP Checklist)		
<b>Other Comments:</b>			

Question	6. Manage Monitoring, Inspections & Audits	Observation/ Comments	Recommendation
6A	Monitoring and inspections implemented to schedule		
6B	Results reviewed to assess effectiveness of controls		
6C	Methods, equipment calibrated, maintained		
6D	Corrective and preventative actions closed out promptly		
<b>Other Comments</b>			

Question	7. Manage Incidents & Complaints	Observation/ Comments	Recommendation
7A	Incidents and complaints handled and reported as per TMS		
7B	Actions from non-conformances, incident investigations and previous audits appropriate and closed out promptly		
7C	Potential environmental emergencies prepared for		
7D	Emergency response procedures communicated to workforce		
7E	Environmental emergency responses practiced		
<b>Other Comments:</b>			

Question	8. Develop & Monitor Competencies	Observation/ Comments	Recommendation
8A	Environmental training needs determined		
8B	Environmental training program implemented		
<b>Other Comments</b>			

Findings:	9. Review & Report Performance & Lessons Learnt	Observation/ Comments	Recommendation
9A	Environmental reporting requirements known		
9B	EnvR regularly reviews environmental performance		
9C	Environmental performance regularly reported		
9D	Records and documents readily accessible		
9E	Review outcomes used to update environmental targets and objectives		
9F	Lessons learnt communicated to project, Business Unit and Group		
9G	Environmental targets and objectives achieved and on-track		
<b>Comments</b>			

## ATTACHMENT E – ENVIRONMENTAL AUDIT PROCEDURE

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## Procedure and information

Environmental audits are an independent examination of how processes are being or have been performed to ensure compliance with environmental requirements is being met. Audits also provide data which can be used to develop preventative or corrective actions for identified risks.

Auditing is one of the requirements of the following standards:

- ~ ISO 14001:2004 clause 4.5.5.

This procedure includes internal audits and auditing by external parties.

## Procedure

### 1. Schedule the audit

#### 1.1 Systems and area implementation audits

Environmental audits of the Contractor are required for the following:

- ~ AquaSure Environmental Management System. (AquaSure audits of the EMS Manual will be managed in accordance with the AquaSure procedure “Internal and External Audits” AQS-SYS-PR002.)
- ~ D&C/O&M environmental management plans
- ~ Area D&C/O&M environmental management plans, including sub plans

#### Information

For specific requirements refer to Environmental audit types in Attachment E.1 in the EMS Manual

The environmental manager must:

- ~ Schedule audits to occur at an appropriate risk-based frequency based on discussion with relevant Government Agencies or as determined by specific project requirements
- ~ Coordinate audit schedules to minimise disruption to project operation
- ~ Record the relevant Audit Schedule in each respective EMP using the template provided in the EMS Manual.

#### Information

Environmental audit scheduling in Attachment M2 in EMS Manual.

Consult relevant Government Agencies and Project Environmental and Systems Managers when setting audit frequencies.

For example, consider having combined audits between H&S, Environmental and Management Systems.

#### 1.2 External audits including certification

AquaSure and its workplaces will be subject to Certification Audits.

#### Information

- ~ Certification audits are conducted by 3rd party auditors
- ~ Generally, environment and systems managers will schedule Certification audits in liaison with functional and project managers
- ~ Consultants, suppliers and subcontractors may be audited on a risk based frequency if their performance can affect the delivery and outcomes of a specific activity/area.

## Information

Not all subcontractors and suppliers need to be audited, eg a stationery supplier.

## 2. Plan the audit

The AquaSure Environmental Management Representative (EMR) must:

- ~ Establish and document the following:
  - Purpose and scope of audit
  - Area/Contractor to be audited
  - Contact names within that area/Contractor
- ~ Appoint and notify a suitably qualified lead auditor and/or audit members, if required. The EMR may appoint themselves as Lead Auditor.

## Information

Refer Auditor Competencies Attachment E.3 of the EMS Manual.

Environmental Auditors must be assessed and registered by the EMR. Submit assessment information using Environmental auditor registration application in Attachment E.4 in EMS Manual.

The Lead Auditor must:

- ~ Notify the relevant project/area/organisation before the planned audit date of the audit scope
- ~ Before an audit is carried out, check that Environmental Management Plans meet:
  - The specific operational requirements
  - Applicable legislation
  - Certification standards
  - AquaSure requirements.

## Information

- ~ Audit scoring methods must be discussed to ensure consistency
- ~ Certification Standards include:
  - ISO 14001:2004
- ~ Advise relevant managers if, after auditors conduct an initial desktop audit, management plans and sub-plans need updating.

## Information

Auditors should consider conducting a desktop audit as a preliminary step in advance of the audit:

- ~ With the audit team, make the necessary preparations to ensure the desired outcomes of the audit can be achieved.

## Information

- ~ Preparations must cover logistics such as transport, accommodation, tools and PPE required. For example, consider the following details for auditors:
  - Appropriate equipment to comply with site requirements, such as safety boots and long-sleeved shirts
  - Site-familiarisation tours, if necessary

- Permits or escorts to visit restricted areas on site, such as confined spaces
- ~ Ensure audits focus on the Environmental Management System, including:
  - AquaSure and State requirements are satisfied
  - Meeting ISO requirements
  - Being implemented and maintained effectively across operations
- ~ The EMR will audit against a defined set of criteria, e.g. a sub plan. The EMR may decide to maintain and use an environmental audit checklist.

#### Information

A sample environmental audit checklist is found in Attachment E.5 in the EMS Manual. An accompanying help Guide is attached as Attachment L.6.

### 3. Conduct the audit

The Audit Team must:

- ~ Take part in an entry audit meeting with relevant personnel to discuss the following:
  - Scope of audit
  - Proposed audit agenda
  - Project personnel to be contacted or interviewed
  - Audit objectives
  - A tentative time for the exit meeting.

#### Information

- ~ Invite senior team members to the entry and exit meeting
- ~ Audit activities must focus on verifying the Environmental Management Plan implementation as well as compliance to standards. These are performed by:
  - Interviewing appropriate personnel
  - Examining systems documents and records for evidence of compliance (including forms, photographs, etc)
  - Observing activities
- ~ Carry out a site familiarisation tour before commencing the audit if deemed necessary
- ~ Carry out the audit, formally recording:
  - Specific details of compliance or non-compliance with checklist items
  - Objective evidence and any observed non-compliance(s) or discrepancies with system procedures or planned arrangements
  - Comments and feedback from personnel being interviewed.

#### Information

- ~ Record details as notes for inclusion in the audit report or directly onto the audit checklist or formatted proforma, as applicable
- ~ During the audit, any urgent issues must be immediately reported to the Contractor, in accordance with with the AquaSure procedure “Non Compliance, Corrective and Preventive Action” AQS-SYS-PR003. Where an

auditor identifies a non-conformance or hazardous situation on site, this shall be promptly notified to the Contractor in accordance with this procedure.

#### Information

Urgent issues can include, but are not limited to:

- ~ A potential/actual major environmental catastrophe
- ~ Major actual/potential legal issue
- ~ Assess the most appropriate method to address any audit findings and non-compliance
- ~ Take part in an exit audit meeting with relevant personnel, where all issues raised during the audit will be specifically addressed and acknowledged by the responsible personnel.

#### Information

At the exit meeting:

- ~ All findings are summarised and addressed
- ~ The pro-forma Audit result including draft of any Non Compliance (NC), Stop Work Order (SWO) or Area for Improvement (AI), Observation (O) or Comment (C) may be handed over to the Contractor during the exit meeting

## **4. Develop audit report and action plan**

### **4.1 Prepare and distribute draft audit report**

The Audit Team must:

- ~ Prepare a report based on the objective evidence collected during the audit.

#### Information

Corrective actions must focus on long-term solutions that will prevent recurrence.

Capture best practice by including positive reinforcement of good practices in the report:

- ~ Within 2 days of completing the audit, forward the audit report to the Contractor

### **4.2 Distribute final audit report**

Distribute the final audit report to:

- ~ Auditor
- ~ Contractor
- ~ Other relevant personnel
- ~ Independent Reviewer & Environmental Auditor
- ~ The State.

#### Information

Other relevant personnel may include:

- ~ Chief Operations Officer
- ~ Quality Manager
- ~ Community and Public Relations Manager.

Ensure a copy of the audit report is filed in the AquaSure records.

## **5. Audit follow-up**

The EMR will follow up close out of any NC, SWO or AFI by the Contractor. This may be done separately or at the next relevant audit, depending on the significance of the finding.

## ATTACHMENT E.1 – ENVIRONMENTAL AUDIT TYPES

AquaSure recognises four generic types of environmental audits which can be employed within its operations:

### 1. EMS review

It is envisaged that the Environmental Management Representative (EMR) will conduct EMS reviews to review AquaSure's Environmental Management System (EMS) processes based on a rotating six monthly basis at most. This schedule is finalised through discussion with the relevant Government Agencies. The schedule is maintained by the AquaSure EMR.

These Reviews provide assurance, support and direction for AquaSure to ensure EMS obligations are being achieved and certification to ISO14001 is continued.

### 2. Project/Area EMP implementation audits

It is envisaged that the Environmental Manager will organise these audits with each work area in liaison with project teams on a risk-based frequency. This schedule is finalised through discussion with the relevant Government Agencies.

An approved Lead Auditor conducts Project/Area System Audits, with the assistance of other auditors if necessary. The auditor must be independent of the area being audited.

This type of audit includes a review of all, or a selection of, EMS requirements, including compliance with legal and other obligations.

An environmental audit checklist (for internal audit) has been developed to measure audit performance – refer to Attachment E.5 of the AquaSure EMS Manual.

### 3. Project/workplace compliance audits

The Environment Manager can organise these audits with each work area in liaison with project teams on a risk-based frequency. This schedule is finalised through discussion with the relevant Government Agencies.

These audits demonstrate project/area compliance with all, or a selection of, legal obligations, ie conditions of licenses, permits, approvals and legislation. The auditor must be independent of the area being audited.

The scope of compliance audits may be expanded to include contractual or other parent company obligations.

The environmental audit checklist referred to above (for internal audit) can be used to record and report results of the audit – refer to Attachment E.5 of the AquaSure EMS Manual.

### 4. Audits by external parties

Management processes may be queried, inspected, or audited from time-to-time by:

- ~ Standard certification bodies
- ~ Regulatory authorities such as DSE following an incident
- ~ Finance providers and insurers or parent company partners.

The Environmental Manager should be notified or involved in all other types of environmental audits by external parties.

### 5. Audit reports and non-conformance

A copy of the audit report will be provided to the auditee. The audit report will include any relevant non-conformances. The auditor may provide a draft audit report before providing the final report.

Audits will be reported and any non-conformances will be managed in accordance with Section 9.5 (Audits) and Section 9.3 (Non-conformity, corrective and preventative actions) of the EMS Manual.

The auditor, or nominee, will follow up the close-out of any non-conformances.

## ATTACHMENT E.2 – ENVIRONMENTAL AUDIT SCHEDULING

The required environmental audit frequency for a workplace will be determined, prior to project start up, in discussion with relevant government agencies. However the following schedule will be proposed:

All workplaces are to be audited at key points in the project cycle, as shown in Table 1 below:

**Table 1 – EMS audit schedule guideline**

<b>Audit type</b>	<b>Scope of audit</b>	<b>Frequency</b>	<b>Responsibility</b>
Establishment audit (system and compliance)	EMS performance and certification (including EMPs) and Environmental approval compliance	Within 3 months of construction commencement.	Environment and Approvals manager
Compliance audit	To assess performance in relation to operation of EMS; implementation of EMS and each other environmental requirement in accordance with the Project Deed	Monthly - During D&C Phase Quarterly – During O&M Phase  An audit will be conducted within 10 days of receipt of the Certificate confirming activities have been undertaken in accordance with the EMP and environmental requirements. This Certificate must be submitted on the first business day of each calendar month. The audit is to be conducted within 10 business days of that receipt.  See Clause 13.9 of the Project Deed	Independent Reviewer & Environmental Auditor
Compliance audit	To assess performance in relation to operation of EMS; implementation of EMS and each other environmental requirement in accordance with the Project Deed	If requested by the project team in additional to monitoring listed above	Independent Reviewer & Environmental Auditor
Internal (system compliance)	EMS performance (including EMPs) and Environmental approval compliance	3 monthly, and 4-12 weeks prior to completion	Environment and Approvals manager
ISO 140001 external audit (system and compliance)	EMS performance and ISO 140001 certification (including EMPs) and Environmental approval	Initial audit within 6 months of start up and as required to achieve and maintain certification	External representative ie SAI global
Compliance	DSE EMS compliance	As required/requested	DSE representative
Inspection checklists	Current activities	Daily	Area Environment Managers

The audit frequency is to be based on:

- ~ Contractual requirements
- ~ Through discussion with relevant government agencies
- ~ The likelihood of project operations causing harm to the environment or public health
- ~ The severity of harm to the environment or public health
- ~ Environmental sensitivity, where certain site characteristics may make a location more susceptible to wide-spread environmental damage. Examples include groundwater resources, poor soils, prevailing wind direction, close proximity of bodies of water, presence of sensitive flora and fauna, sensitive community issues
- ~ Historical environmental performance of the project.

### Decision matrix

Use the following decision matrix to determine audit frequency:

#### Likelihood

(1 = low, 5 = high)

1. Rare – practically impossible
2. Unlikely – not likely to occur
3. Moderate – could occur, or 'I've heard of it happening'
4. Likely – known to occur, or 'it has happened'
5. Almost certain – common or repeating occurrence.

Note: Project past performance should be considered when determining likelihood.

#### Consequence

(1 = low, 5 = high)

Also refer Incident Classification in Incident Classification Matrix TAU-H&S-PR-015.5.

1. No environmental effects
2. Minimal effects to environment or people
3. Short term minor effects to the environment or people
4. Significant effects to the environment or people, possible persistent in the long term
5. Significant and persistent long-term effects to the environment or people.

#### Environmental sensitivity

(1 = low, 5 = high)

1. No environmental values identified (eg existing industrial facility with environmental controls in place). No human population
2. A limited number of environmental values identified. Community not close by
3. A limited number of significant environmental values identified. Small community close by
4. A range of significant environmental values identified. Significant community close by

5. Many significant environmental values identified (eg area of international significance). Densely populated community.

**Risk score = Likelihood x (Severity + Sensitivity)**

<b>Score</b>	<b>Minimum Audit Frequency</b>
	<b>Note: all areas are to be audited at least four times during the implementation phase</b>
2 to 5	12 monthly
6 to 10	9 monthly
11 to 24	6 monthly
25 to 50	3 monthly

Note: The information and reasons behind the allocation of risk scores must be documented by the Environmental Manager.

## ATTACHMENT E.3 – INTERNAL ENVIRONMENTAL AUDITOR COMPETENCIES

The key competencies for auditors are as follows:

- ~ Understanding and interpreting the requirements of the AquaSure EMS, relevant ISO standard (eg 14001, 9001) and where applicable, legislation and regulations relating to Auditing and Corporate Governance
- ~ Understanding, interpreting and assessing general compliance with relevant environmental:
  - Legislation, regulations, government policies, permits and licences
  - Codes of practice
  - Performance standards, eg contract specification requirements
- ~ Knowledge and experience in auditing methods and techniques
- ~ The ability to identify and assess actual and potential environmental risks/hazards/incidents/impacts and their significance
- ~ Knowledge of the relevant industry processes and technologies
- ~ Understanding of relevant environmental context (social, physical and cultural)
- ~ The ability to effectively manage the entire audit process.

Relevant managers need to justify the competencies of an auditor using one or more of the following criteria:

Elements	Auditor	Lead Auditor
Competent to	Carry out internal project/workplace audits Assist Lead Auditor	Carry out Environmental audits
<b>Minimum Requirement</b>		
<b>Education</b>	<b>Environmental</b> Environmental Management Skills course or equivalent deemed appropriate by Environmental Manager	<b>Environmental</b> Tertiary education in environmental or other relevant field
<b>Auditor Training</b>	<b>Environmental</b> Completed a relevant two day RABQSA approved internal auditor course	<b>Environmental</b> Completed a relevant five day RABQSA equivalent approved auditor course
<b>Work Experience</b>	<b>Minimum two years Environmental</b> Minimum two years or one year with relevant qualification in environmental or relevant field	<b>Minimum five years Environmental</b> Minimum five years or two years with relevant qualification in environmental or relevant field
<b>Specific Experience</b>	<b>Environmental</b> One year, including implementation of a workplace/project Environmental Management Plan	<b>Environmental</b> Two years, including development and implementation of a workplace/project Environmental Management Plan
<b>Audit Experience</b>	Not applicable	<b>Environmental</b> Three audits, one accompanied by a Lead Auditor. A Lead Auditor must sign off all three audits

## ATTACHMENT E.4 – ENVIRONMENTAL AUDITOR REGISTRATION FORM

This application must be lodged for any AquaSure employee wishing to undertake internal environmental audits on behalf of AquaSure.

For guidance please refer to EMS Manual Appendix E.3 Internal Environmental Auditor Competencies.

**1. Please tick the grade of Environmental Auditor Registration requested.**

Auditor  Lead Auditor

**2. Personal information**

Name: .....

Position: .....

Location: .....

**3. Information required**

3.1 List environmental auditor certification with Professional Organisation, if held.

Organisation .....

Certification Level ..... Certification Number .....

Contact Details .....

3.2 List relevant environmental qualifications and education received (eg courses)

Tertiary Education .....

Environmental Management Courses: .....

.....

3.3 List Auditor Training courses completed:

.....

.....

3.4 Attach copy of current Curriculum Vitae (CV) or CV extract highlighting appropriate environmental and auditing work experiences, preferably verified by sponsor(s). Applicants should ensure that details include:

~ Positions held

~ Employer

~ Dates of employment (including months and years)

~ Role and responsibilities for each position referenced

~ Professional Memberships held

~ Specific auditing and environmental auditing experiences.

3.5 Lead Auditor only – list three audits completed and signed off by another Lead Auditor.

Audit date	Project	Audit scope	Accompanied (A) /Unaccompanied(U) <sup>+</sup>	Lead auditor sign-off (Name) <sup>++</sup>

+ At least one audit must be accompanied by other AquaSure Lead Auditors

++ All 3 audits must be signed off by another AquaSure Lead Auditor

**4. Signature of Applicant**

Signature:

Date:

**5. Application Sponsor**

This should normally be the Environmental Manager.

Name: .....

Position: .....

Location: .....

Relation to Applicant: .....

Signature:

Date:

## ATTACHMENT E.6 ENVIRONMENTAL AUDIT HELP GUIDE

### 1. Introduction

#### 1.1 Environmental auditing in AquaSure

Environmental audits are an important aspect of the AquaSure environmental management system.

Internal environmental audits provide one means of measuring and reporting:

- ~ Compliance with the EMS, ISO14001, legal and other obligations
- ~ Management of environmental issues, risks and opportunities
- ~ On the ground environmental performance
- ~ Workforce environmental cultures and behaviours.

Other measures include monthly HSE statistic reports, monthly, quarterly and six monthly environmental reports, external environmental audits (ISO14001, The State and other regulators), incident reports and records, and site inspections.

The objective of an internal audit is to:

- ~ Provide a systematic and objective assessment of environmental performance
- ~ Provide assurance that environmental risks and opportunities are effectively managed
- ~ Build knowledge, experience and professional networks by exposing auditors to a wide range of site issues and conditions
- ~ Appraise the need for additional support or resources.

The nature and scope of different audit types is described in the AquaSure EMS Manual Attachment L. This help guide provides reference material to support Project/Workplace Systems Audits. While this audit tool is specifically designed for use in the construct and operate phases of a project, where the vast majority of current audits are undertaken, it encompasses many of the requirements of other phases with a few exceptions. In particular start-up and commission/handover phases have additional requirements that will be addressed in a future guidance and tool.

#### 1.2 Overview of the environmental auditing tool

The environmental auditing tool was developed to provide auditors with:

- ~ A simple, yet robust framework to assess environmental performance
- ~ Connection to the *AquaSure EMS Manual*
- ~ A means to communicate results and findings to relevant stakeholders
- ~ An action allocation and closeout facility integrated into the HSE Reporting System

Maintaining consistency with previous audit processes, the audit tool uses a semi-quantitative scoring mechanism to summarise results. To enter results into the audit tool, auditors must be registered by the Environment and Approvals Manager in accordance with the requirements described in Internal Auditor Competencies Attachment L of the EMS Manual.

The process of scheduling, planning, conducting and reporting internal environmental audits is described in Audits (Attachment L of the EMS Manual). Use of this process by AquaSure auditors is mandatory for all internal audits.

### 1.3 Environmental auditing tool scoring

The AquaSure environmental audit protocol allows partial scores to be allocated for each question. These are:

- 0 – no or minor (25%) implementation
- 1 – partial (26-50%) implementation
- 2 – some (51-75%) implementation
- 3 – 76-80% implemented
- 4 – Mostly (81-95%) implemented
- 5 – Fully implemented

Each question is weighted according to its significance in managing the project/workplaces environmental outcomes. These weightings are set by the Environment and Approvals Manager.

The scoring system also recognises questions which:

- ~ Were not relevant to the project (eg no monitoring or sampling being undertaken)
- ~ Were not examined though are still applicable to the project (eg time constraints).

The proportion of applicable questions answered is included in the audit summary report and helps distinguish projects actually performing well overall from projects which were only partially audited and performing well for the subset of questions considered. For all questions considered the auditor should record the objective evidence sited to support the score awarded and provide reference for gauging progress in future audits.

The weighted scores are combined to yield a total audit score expressed as a percentage. The total score is compared against a rating framework which describes:

- ~ Who the audit summary report is to be communicated to
- ~ The level of urgency in undertaking corrective or preventative actions.

Score	Classification and action
>90%	Good – minor improvements necessary
75-90%	Satisfactory – some improvements required, report results to Area Manager (AM), Project Manager (PM) to confirm completion of all corrective actions to Environment Manager (EM) and Project Director (PD).
60-75%	Less than Satisfactory – immediate action required, report results to AM, PM, DA, and EM. PM to confirm completion of all corrective actions to EM, DA, and AM.
<60%	Poor – immediate action required, report results and schedule of corrective and preventative actions to AM, PM, DA and EM. EM/DA will brief parent company Managing Directors if necessary. PM to confirm completion of all corrective actions to EM, DA and AM.

Should the auditor identify any material non-compliance consistent with a class 2 environmental incident the audit will be allocated a less than satisfactory rating irrespective of the final score or audit outcome.

Should the auditor identify any serious non-compliance consistent with a class 1 environmental incident, the audit will be allocated a poor rating irrespective of the final score or audit outcome. Non-conformances identified during an audit should be raised as environmental incidents in the HSE incident reporting system.

### 1.4 Environmental auditor registration

The value of audit findings is very dependent on the skill and knowledge of the auditor.

Auditors will be given access to the audit reporting tool once the auditor has demonstrated to the Environmental Manager that they:

- ~ Understand and can interpret the requirements of the EMS and ISO14001, particularly as it relates to corporate governance
- ~ Understand, can interpret and assess general compliance with environmental legislation
- ~ Regulations, government and client policies, permits, licences, codes of practice, and where applicable, performance standards and obligations, eg contract specification requirements
- ~ Have knowledge and experience in auditing methods and techniques
- ~ Have the ability to identify and assess actual and potential environmental risks, hazards, incidents, impacts and their significance
- ~ Have knowledge of relevant industry processes and technologies
- ~ Can champion the value of environmental management to the business
- ~ Have good communication and reporting skills, and the ability to effectively manage the entire audit process.

Auditor and lead auditor requirements are detailed in the table below.

	<b>Auditor</b>	<b>Lead Auditor</b>
Education	Environmental Management Skills course or equivalent approved by Group Environmental Manager	Tertiary qualification in a relevant field
Auditor Training	Completed a two day RABQSA approved internal ISO14001 auditor course	Completed a five day RABQSA equivalent approved ISO14001 auditor course
Work Experience	Minimum two years or one year with relevant qualification in environmental or relevant field	Minimum five years or two years with relevant qualification in environmental or relevant field
Specific Environ. Experience	One year, including implementation of a workplace/project Environmental Management Plan	Two years, including development and implementation of a Environmental Management Plan
Auditing Experience	Not applicable	Three audits, one accompanied by a Lead Auditor. A lead auditor must sign off all three audits

Extracted from Internal Auditor Competencies Attachment L of EMS Manual

To register as an auditor or lead auditor, complete Environmental Auditor Registration Form Attachment L.4 and supporting information described on the form and forward to the Environment and Approvals Manager. Access will be granted upon approval.

## 2. Construct, operate stage audits

### 2.1 Communicate EMP obligations

Before site activities commence, the core elements of a project's Environmental Management Plan (EMP) must be in place. The EMP should be a user-friendly management tool that complies with ISO14001 and evolves with the project.

#### Question A

The auditor will seek evidence that a competent person has been assigned to maintain the project EMP. This may include but is not limited to evidence provided by:

- ~ Interviews with the Environmental Representative
- ~ Organisation charts and position descriptions

- ~ Roles and responsibilities defined in project management plans (PMP).

Environmental Representative competency is to be assessed by considering:

- ~ Level of environmental risk, nature and scale of the project
- ~ Qualifications and experience
- ~ Internal environmental courses undertaken by the representative.

### Question B

The auditor will seek evidence that key roles with potential to impact on environmental outcomes have been identified, assigned and documented. Evidence may include:

- ~ Roles and responsibilities within the EMP or PMP
- ~ Position descriptions.

The auditor will consider how effectively these roles and responsibilities have been communicated to relevant personnel, particularly those in roles that could significantly affect environmental outcomes.

The auditor will assess whether adequate resources and appropriate personnel have been allocated to fulfil the roles and responsibilities and verify assigned accountabilities are understood and being put into effect.

### Question C

The auditor will seek evidence that the Project Manager has approved, and is familiar with, the current EMP (ie reviewed in the last 12 months). Evidence may include:

- ~ Controlled documents incorporating current EMP revision sign off by the Project Manager
- ~ Interviews to determine Project Manager understanding of EMP requirements.

### Question D

The auditor will seek evidence that the EMP is a controlled document and confirm associated documents are reviewed, updated and approved in accordance with the project/workplace document control system. Records should be readily accessible and document changes and/or revisions and retention periods will be readily identified.

### Question E

The auditor will seek evidence that the scope of the EMP, and the project stages to which the EMP applies, is clearly defined and consistent with other project plans.

### Question F

The auditor will seek evidence that Environmental Objectives and Targets are documented in the current EMP or the Project Management Plan with applicable references.

Objectives and Targets should be SMART (Specific, Measurable, Achievable, Realistic and have a Timeframe) and the auditor should consider the suitability of project objectives and targets and consistency with Parent Company targets and objectives.

### Question G

The auditor will seek evidence that site personnel have undergone, or are scheduled to complete, an induction that includes reference to the Environmental Policy, EMP, key obligations, incident reporting, and critical risks and controls. Evidence may include the content of the induction and attendance records and induction schedules.

Trainer Competence will also be considered.

### Question H

The auditor will seek evidence that subcontractor agreements include information concerning:

- ~ The Thiess Environmental Policy
- ~ The project/workplace Environmental Management Plan and Programs
- ~ Environmental obligations, critical risks and controls.

### Question I

The auditor will seek evidence that the environmental experience and qualifications of subcontractors is considered prior to contract award.

## 2.2 Track budget, resources and program

Successfully managing environmental outcomes during construction requires an understanding of what personnel, equipment, and financial resources are available and the balanced allocation of those resources throughout the life of the project.

### Question A

The auditor will seek evidence the Environmental Representative is familiar with the environmental budget, resources and financial reporting requirements. Evidence that sufficient financial resources are available to implement the EMP will be cited.

The Environmental Representative should demonstrate:

- ~ An awareness of which cost centres they are responsible for managing
- ~ Knowledge of the allocation of budget(s) over the life of the project
- ~ An understanding of project purchasing procedures.

### Question B

The auditor will seek evidence that work programs allow adequate time and resources to obtain and maintain relevant approvals.

Work programs will include allowances for submission of applications, processing of approvals by relevant authorities and potential requests for additional information where required.

### Question C

The auditor will seek evidence that the environmental budget and/or work programs are reviewed in response to material changes in project scope and whether these changes are adequate to control the impacts of the changes.

### Question D

The auditor will seek evidence that sufficient resources, equipment and materials required to implement the EMP have been planned and allocated for:

- ~ Human resources, consultants, sub contractors
- ~ Monitoring equipment
- ~ Environmental controls
- ~ Scheduled maintenance.

## 2.3 Plan approvals, obligations and controls

It is important to understand legal obligations and plan for approval applications well in advance of planned commencement to avoid delays to critical timeframes.

### Question A

The auditor will observe a documented legal register which details the legal obligations and approvals associated with Thiess managed activities for all current and impending project phases (including relevant requirements of client and subcontractors).

The auditor will consider whether the register is adequate to the nature and scope of the project/workplace and confirm that it is current and periodically reviewed for relevance/adequacy.

The auditor will seek evidence that all necessary approvals have been obtained prior to commencement of relevant works. Evidence of approvals being obtained or sought may include:

- ~ Correspondence to and from relevant authorities
- ~ Approval's on the HSE License database.

### Question B

The auditor will seek evidence that the Environmental Management Program provides a means of demonstrating compliance with:

- ~ Legal requirements
- ~ Approval conditions
- ~ Parent Company requirements
- ~ Voluntary commitments
- ~ Contract requirements
- ~ Applicable standards
- ~ Stakeholder concerns.

The auditor will consider how the above are identified and addressed in the EMP and the nature and frequency of programs to review compliance with these requirements.

### Question C

The auditor will check that the project/workplace has been registered correctly on the HSE Reporting System and the core data for that project/workplace is up-to-date and appropriate.

The auditor will also seek evidence that all approvals identified in question 3A that have been acquired by the project and have been uploaded to the HSE reporting system.

### Question D

The auditor will seek evidence that all documentation associated with obtaining and maintaining approvals is readily available and controlled in accordance with the document control system employed by the project. Evidence of relevant controlled documentation may include:

- ~ Application forms
- ~ Consent forms
- ~ Correspondence to and from government departments
- ~ Annual returns and associated data.

### Question E

The auditor will seek evidence that processes are in place for maintaining awareness of changing legal and other requirements. Evidence may include:

- ~ Access and review of Envirolaw
- ~ Minutes of HSE committee meetings
- ~ Correspondence with the Environmental Manager
- ~ Legal information from Legal and Contract Services.

### Question F

The auditor will seek evidence that EMP, Legal and obligations registers, and/or Project procedures and controls are reviewed in response to changes in applicable legislation where relevant.

## 2.4 Review risks and opportunities, encourage value and sustainability

Good environmental practice will help minimise environmental impacts, protect individuals, clients, and Thiess from prosecution and litigation. It also helps deliver outcomes that meet or exceed stakeholder expectations and improve AquaSure's reputation as a reliable business partner.

### Question A

A documented risk register which identifies both environmental risks and opportunities for current and impending project activities and phases will be cited. The auditor will seek evidence that the risks and opportunities have been assessed using tools described in the EMS Manual prior to the commencing work. Risks assessments will be prioritised and current.

### Question B

The auditor will seek documented evidence that the effectiveness of controls and residual risk have been assessed using HSE Risk Assessment Matrix described in the EMS Manual. The auditor will consider the adequacy and currency of the proposed controls and residual risks.

### Question C

The auditor will assess the Environmental Representatives knowledge of project environmental risks, opportunities and controls documented in the EMP and risk assessment.

### Question D

The auditor will seek evidence that the environmental performance of plant and equipment has been assessed prior to procurement for relevant aspects such as:

- ~ Exhaust emissions
- ~ Noise emissions and abatement
- ~ Fuel efficiency
- ~ Energy efficiency
- ~ Water efficiency
- ~ Use of refrigerants and ozone depleting substances
- ~ Lighting requirements pertaining to night works (ie nuisance light).

**Question E**

The auditor will seek evidence that environmental concerns have been properly considered during design activities. Aspects for the auditor's consideration may include:

- ~ Environmental risks, opportunities, obligations, and criteria in design specifications
- ~ Reviews of concept and detailed designs against environmental obligations, risks and opportunities described in EMP
- ~ Ongoing liaison between the environmental representative and design team.

**2.5 Implement and maintain controls**

Environmental controls are developed and maintained to manage environmental risks, obligations and approvals during construction so the project can achieve successful environmental outcomes.

**Question A**

The auditor will seek evidence that controls documented in the EMP to mitigate risk are appropriate for current project activities and are consistent with:

- ~ Approvals, licences and permits
- ~ Legal requirements
- ~ Contractual obligations
- ~ AquaSure and Group voluntary commitments
- ~ Australian and International Standards
- ~ Stakeholder concerns.

The auditor will seek evidence that on the ground implementation of controls is consistent with EMP commitments and that there are processes in place to assess the effectiveness of controls.

When constrained in ability to complete a full review of the entire EMP, auditors should endeavour to review higher risk activities as a priority. In completing the review, the auditor should check that controls for high risk activities are being implemented as described in the EMP. The specific sections of the EMP reviewed should be detailed along with details of non-conformances in the audit report.

Where the auditor considers controls are inadequate, corrective actions will be raised and documented.

The auditor will seek evidence that control methods have been developed in collaboration with relevant workforce personnel.

**2.6 Manage monitoring, inspections and audits**

Monitoring and auditing programs helps to ensure obligations are met, prevents pollution incidents and facilitates continual improvement in performance.

**Question A**

The auditor will seek evidence that environmental monitoring programs detailed in the EMP are being implemented in accordance with the relevant standards and that results are periodically evaluated against criteria/targets and reported to management.

**Question B**

The auditor will seek evidence that the results of monitoring, inspections and audits are utilised to assess the effectiveness of controls. Where deficiencies in the effectiveness of controls have been identified evidence that corrective actions have been implemented will be cited.

Deficiencies in the effectiveness of controls may include:

- ~ Environmental breach of licence/approval/obligation or contract
- ~ Procedures (site specific or EMS) which are not being applied correctly and/or
- ~ Behaviours that are inconsistent with AquaSure policies, targets and objectives.

### Question C

The auditor will seek evidence that the monitoring programs are being undertaken in accordance with the relevant Australian or International Standards. When assessing sampling regimes the auditor will consider standard sampling procedures, chain of custody arrangements and competence of personnel undertaking sampling and analysis.

The auditor will confirm that monitoring equipment is calibrated, maintained and operated in accordance with manufacturer's recommendations.

### Question D

The auditor will seek evidence that corrective and preventative actions arising from inspections and audits have been documented\* and closed out in a reasonable timeframe considering:

- ~ Severity of the incident/non-conformance
- ~ Likelihood of recurrence
- ~ Availability of resources
- ~ Whether the action is linked to
  - A legal or other obligation
  - Project or company objectives, and targets
  - Impacts on productivity and commercial outcomes
- ~ All preventative and corrective actions must be closed out prior to project completion.

The auditor will also seek evidence that all incidents and near hits have been recorded in the HSE System and that HSE Alerts were published for Class 1 and 2 incidents.

## 2.7 Manage incidents and complaints

Environmental incidents and complaints must be resolved as soon as possible to prevent harm, minimise potential for prosecution, negative impacts on reputation, and prevent recurrence.

### Question A

The auditor will seek evidence that environmental incidents, complaints and non compliances with the EMP have been managed in accordance with the EMS Manual and reported through the HSE Reporting System, taking particular note of:

- ~ Immediate incident response
- ~ Appropriate classification and notification
- ~ Action plan development and implementation
- ~ Inclusion of trained and supervisory staff in investigation process
- ~ Review of incident report by supervisors and signed off by workplace manager
- ~ Communication of incident cause and corrective action to workplace
- ~ HSE Alerts raised for significant incidents.

The auditor will assess quality and completeness of incident management and reports submitted to the HSE database.

The auditor will review current registers of community complaints and enquiries and assess whether incidents pertaining to the complaints have been raised where appropriate. The auditor will also verify received complaints have been closed out in a timely manner.

### Question B

The auditor will seek evidence that:

- ~ Actions entered into the HSE Action Database or equivalent action tracking systems have been promptly closed out
- ~ Incident causal factors have been identified and documented
- ~ Corrective and preventative actions arising from non-conformances, incident investigations or previous audits are appropriate and closed out in a reasonable timeframe.

### Question C

The auditor will seek evidence that potentially significant environmental emergencies identified in risk assessments are addressed in the Emergency Response Plan.

The auditor will also note whether:

- ~ Key responsibilities have been identified and assigned
- ~ Emergency phone numbers are available to the workplace
- ~ Appropriate communication systems are defined and in place.

### Question D

The auditor will seek evidence that the Emergency Response Plan has been communicated to the workplace team and sub-contractors. The auditor will also seek evidence that workplace/project personnel have been properly trained in emergency response requirements.

### Question E

The auditor will seek evidence that responses for potentially significant environmental emergencies identified in the Emergency Response Plan are periodically tested.

## 2.8 Develop and monitor competencies

Personnel designated to manage environmental risks and outcomes need to be competent to carry out their roles and responsibilities and meet the needs of the project and business.

### Question A

The auditor will seek evidence to verify that environmental training needs have been identified and documented in the EMP or Human Resources Plan.

The auditor will seek evidence that key roles which can significantly influence environmental outcomes have been identified as well as any additional training required. Evidence will be sought to verify additional training is programmed and documented for these roles.

Evidence that environmental training needs have been reviewed following incidents, inspections and audits will be noted.

**Question B**

The auditor will observe a documented Environmental Training program and note how the program is being implemented and assessed. The auditor will verify that the training program:

- ~ Defines the competencies required to achieve the EMP
- ~ Identifies skills and capability gaps in available resources
- ~ Includes a Training and development plan to address gaps
- ~ Includes performance reviews to evaluate personal environmental performance.

Employee's environmental skills, qualifications, training and experience should be documented and accessible in the Human resources information system or similar record system.

**2.9 Review and report performance**

All projects are required to review and report on compliance with the EMS on a monthly basis and to raise issues, best practices and ideas for improvement with AquaSure teams.

**Question A**

The auditor will seek evidence that environmental reporting requirements are documented in the EMP, as per the requirements of the EMS such as:

- ~ Monthly HSE statistics
- ~ Formal biennial environmental system review
- ~ Project Managers' monthly report
- ~ AquaSure Reports
- ~ Parent Company Quarterly reports

Reporting for the following will also be document in the EMP where applicable:

- ~ Greenhouse Challenge Plus
- ~ National Pollutant Inventory
- ~ Energy Efficiency Opportunities Assessment
- ~ Client (contractual) requirements
- ~ Regulatory (legal and licence) requirements
- ~ Refrigerant trading quantities
- ~ Stakeholder requirements (eg community groups).

**Question B**

The auditor will seek evidence that the Environmental Representative routinely collects and assesses environmental performance data as required by the EMP. Evidence may include:

- ~ Monthly and Quarterly performance reports.
- ~ AquaSure reports
- ~ Annual Returns
- ~ Regulatory reports
- ~ Client reports.

### Question C

The auditor will seek evidence that environmental performance is reported in accordance with the requirements of the EMP. Evidence may include:

- ~ Signed off copies of reports
- ~ Controlled reports
- ~ Emails, written correspondence
- ~ Use of HSE Reporting System (eg incident records)
- ~ Minutes of HSE Committee meetings.

### Question D

The auditor will verify all environmental documents and records are easily accessible by the workplace management team and employees with specific environmental responsibilities. The location of documents will be identified in the EMP.

### Question E

The auditor will seek evidence environmental performance data is reviewed against project, objectives and targets. The auditor will also confirm objectives and targets are updated to reflect the outcomes of environmental reviews and consider:

- ~ How and when environmental performance is communicated to the workforce
- ~ Whether the workplace is achieving environmental objectives and targets.

### Question F

The auditor will seek evidence that good practices and lessons learnt are communicated to the workplace, AquaSure teams and parent companies where relevant. Evidence of such communications may include:

- ~ Uploading items to the Thiess Knowledge Bank
- ~ Publishing reports, papers and presentations
- ~ Toolbox talk handouts and notes
- ~ Noticeboards containing Bright Ideas, lessons learnt and environmental newsletters from other workplaces and sources.

The auditor will seek evidence that the site team is maintaining an awareness of relevant lessons learnt and good practices from other sites and applying where relevant.