



FS_ITA04



Industrial and Trade Activities Preparing an Environmental Management Plan (EMP)

This factsheet, part of a series that provides information on how and what controls are required by industrial and trade activities, introduces the **Environmental Management Plan (EMP)**. We are aware that for many companies, writing an EMP can be daunting. This factsheet builds on the information provided in the factsheet series and provides a framework for documenting the structural and operation controls, recording staff training requirements and assessing the effectiveness of these on a regular basis. Using an EMP helps sites and businesses better understand and meet their obligations under the Auckland Unitary Plan (AUP) industrial and trade activity provisions. We are currently working on EMP templates. While these will aid most sites, it is important that any EMP works for the site and the people who need to implement it.

These resources are available on request (see below) or at www.aucklandcouncil.govt.nz

Who requires one?

Under the AUP an EMP is a requirement of **E33.6.1.1- Use of land for an industrial or trade activity** :

“(13) Operations must be undertaken in accordance with an environmental management plan specific to the industrial and trade activity. This plan must be in accordance with Table E33.9.2 and supplied to Council upon request.”

What is an EMP?

An Environment Management Plan (EMP) provides a framework for the effective management of your company's day to day operations for the discharge of contaminants from industrial and trade activities. In some areas it simply formalises many practices that are already undertaken on the site. It is not intended to be an excessively onerous document but is required to clearly and concisely outline how these activities should be undertaken in a practical and easily understood manner and to facilitate an audit trail for internal and external interests.

The EMP must reflect the scale and significance of the risk at each site. Where appropriate, the EMP may include cross references to relevant documentation that is readily accessible at the site, rather than including the full documents (e.g. inspection checklists, standard operating procedures, staff training audits).

This standard applies to moderate risk sites (as per E33.4.3) and sites requiring ITA consent. We recommended that ITAs develop and implement an EMP to aid and ensure that they continue to meet their obligations under environmental legislation. Table E33.9.2 of the AUP sets out minimum requirements for the content and implementation of an EMP (Table E33.9.2).

Environmental Management Plan Requirements (AUP E33.9.2)

	Requirement	Explanation and details
(i)	Specify how the permitted activity controls will be complied with.	These present typical Best Management Practices , though some sites may not be able to fully implement them due to the nature of the activity or confines of their site. This is where an EMP is critical in being able to demonstrate that the site is managed in accordance relevant standards, as it sets out the Best Practicable Option (BPO) for the site to meet similar levels of environmental management and compliance with conditions of consent. Our factsheet series is based on these standards and can help you understand the types of controls that you may require.
(ii)	Identify the environmentally hazardous substances associated with the activities undertaken on site	<p>To effectively manage and avoid or reduce/improve the quality of contaminant discharges, it is first necessary to establish the actual and potential environmental risks from activities and facilities on site. This requires assessing onsite processes (i.e receipt, processing, storage, dispatch, washing etc) and identifying the likely contaminants from each aspect of your sites activity, for instance hydrocarbons from leaks or spills, detergents from washdown, sediment from tracking etc.</p> <p>A simple but comprehensive site plan, included as one of the appendices, should support this section by showing activity areas of risk and their proximity to site drainage.</p> <p>Emergency preparation and procedures should be established to respond to unplanned events such as chemical spills or fire. The procedures need to define control mechanisms, operational requirements, and other controls during these events. Testing of emergency procedures (twice a year) will also be undertaken in accordance with criteria set out within this section of the management plan.</p>
(iii)	Set out the methods to be used to avoid discharges of environmentally hazardous substances onto or into land or water.	<p>Having established the existing risks, management controls should be developed to avoid or mitigate the risks identified. Generally, these take the form of:</p> <p>Operational Controls : Set out responsibility for implementing controls and monitoring requirements associated with them. They often take the form of Standard Operating Procedures (SOPs) These controls should provide a comprehensive reference of the procedures implemented to manage and undertake activities to avoid discharges or the steps required to operate or maintain structural controls. Examples include Spill Response Plans, process for receiving material/products, how to sample discharges.</p>
(iv)	For discharge of contaminants arising from land on which the ITA is undertaken, set out the primary treatment or source control methods that may be necessary to avoid, remedy or mitigate more than minor adverse effects on the receiving environment.	<p>Structural controls : while these will require SOPs to check that they are operating and being maintained as required, they play a significant role in reducing risk, both environmental and Health and Safety, aiding management of the site. They include such things as bunded areas, connects to Trade waste for heavily contaminated process and/or wash water, shut off valves and, where discharges can't be avoided, may treatment devices. If the nature of your activity or site requires controls to detail procedures, the EMP can summarise these and refer to the SOPs in an appendices or other relevant management documentation you may have on site, for instance your Health and Safety Manual, where appropriate.</p> <p>Training and Awareness: Every employee can have potential impacts on the environment. To ensure the effective implementation of the management / operational controls a programme for appropriate training and awareness of all staff should be implemented. This may reference to elements of existing EMS or other management system where appropriate</p>

	Requirements	Explanation and details
(v)	Specify the methods for the operation and maintenance of any treatment devices on site	<p>Roles and Responsibilities - establishes the roles and responsibilities of staff throughout the organisation and sets out a commitment to environmental protection at all levels.</p> <p>Operation and Maintenance: Checks of the EMP and your sites operational and structural controls are used to ensure that they are operating properly and the EMP is functioning and continually improving.</p> <p>To achieve environmental targets and ensure compliance with relevant legal requirements, such as consent conditions, and to avoid significant environmental impacts; procedures to monitor and measure the key discharges to the environment are required.</p>
(vi)	Identifies assessment requirements to report on the performance of the EMP	This section should describe the procedures for periodic self-assessment of the site and EMP to ensure performance of all components of the EMP, provide feedback into the continual improvement loop and provide information to management and Auckland Council regarding site compliance. The method by which the EMP is reviewed by management to ensure its continuing suitability, adequacy and effectiveness is set also out in this section of the Plan.

Contact an ITA Specialist

In our experience it helps to work proactively and collaboratively. Call our contact centre and ask to speak to an Industrial and Trade Activity Specialist in the Proactive Compliance or Specialist Unit of Regulatory Services or email your enquiry to the address below and we'll be happy to get in touch to provide assistance and advice.



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