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Project Compliance Evaluation Procedure

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Project Environmental Training and Awareness Procedure

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Project Environmental Training and Awareness Procedure

1.0 PURPOSE

This procedure describes the methods for the inspection, assessment, and review of environmental performance. Where applicable compliance with this procedure may demonstrate conformance with the International Organization for Standardization (ISO) 14001 Environmental Management System (EMS) Standard 4.5.2: Compliance Evaluation.

2.0 SCOPE

The scope of this procedure applies to all works performed under all Government Construction Contracts executed throughout the Kingdom of Saudi Arabia.

3.0 DEFINITIONS

Definitions	Description
ISO 14001	International standards related to environmental management and management systems
Responsible Contractor	The contractor in overall charge of the work (Principal Contractor)
HSSE	Health, Safety, Security and Environment
CECP	Construction Environmental Control Plan
WMS	Work Method Statement
STARRT	Safety Task Analysis and Risk Reduction Talk.
PPE	Personal Protective Equipment.
JHA	Job Hazard Analysis

4.0 REFERENCES

- EPM-KSE-PR-000004 Project Compliance Evaluation Procedure
- EPM-KS0-PR-000002 Project HSSE Assessment Process Procedure

5.0 RESPONSIBILITIES

5.1 Environmental Compliance Audits

Trained Environmental Services (ES) staff conduct focused environmental compliance audits for High Risk Projects, providing an independent evaluation of the Project's environmental performance and compliance with Project-specific requirements.

Environmental Compliance (EC) audits are scheduled and coordinated through the responsible Contractor Management and directly with Project Management.

Findings and recommendations from the EC Audits are compiled into a final audit report and shared directly with the Project/site management team as well as responsible contractor Health, Safety, Security and Environment (HSSE) Management.

Project management is responsible for periodically (monthly) reporting back to the corporate ES Manager regarding the status of closing out recommended corrective actions (if any) contained in the final report.

The corporate ES Manager is responsible for reviewing and confirming feedback received from Project Management and, when appropriate, formally notifying that the audit process is complete.



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6.0 RISK ASSESSMENT

An integral aspect of the work planning process is the performance of risk assessment. Risk Assessments must be conducted at the Planning Stage to identify the hazard risks and determine control measures. Environmental risk assessments are a requirement for all construction activities where significant environmental aspects are identified.

The Risk Assessments that shall be conducted at the Planning Stage are as follows:

- Project Risk Assessment.
- Work Method Statements (WMS)
- Job Hazard Analysis (JHA).
- Safety Task Analysis and Risk Reduction Talk (STARTR).

It is imperative that prior to beginning any work activity, a STARTR briefing occurs to discuss the contents of the WMS/JHA which includes mitigations for any other hazards noted by the crew at the jobsite. The discussion shall also include job steps, expected hazards associated with the activity, and the mitigation and protection methods that shall be implemented to prevent incidents.

If circumstances change by way of the environment, other work crews are in the area, additional hazards are now present, change of methodology of the task etc..... another STARTR briefing shall occur.

The Hierarchy of control shall be used to reduce the likelihood of an incident occurring.

- **Elimination** (Remove the Hazard)
- **Substitution/Isolation** (Replacing material, process or hazard with a lower risk one/ separate people from the hazard (such as suitable guarding, distance, etc.)
- **Engineering Controls** (Redesign or replacement of plant and equipment)
- **Administration Controls** (Procedures, training, signage)
- **PERSONAL PROTECTIVE EQUIPMENT (PPE)**

No work is to commence until the above has been implemented and signed by the relevant Supervisor in charge.

7.0 REQUIREMENTS

7.1 Discussion

Compliance evaluations, comprised of Project-level environmental inspections, Environmental, Safety and Health (HSSE) assessments, and Environmental Compliance Audits, provide overlapping mechanisms to gauge performance against established environmental requirements contained within legal and regulatory standards, corporate policies and procedures, and customer programs and contractual stipulations. The following is a brief description of each type of environmental compliance evaluation:

- **Project Environmental Inspections:** Performed by qualified Project-assigned personnel on a routine basis in accordance with an established project-level procedure. They are primarily focused on assessing and documenting compliance with project-specific environmental requirements and best management practices for environmental controls. Corrective actions resulting from such inspections are addressed by the project construction team in the field.
- **Environmental Assessments:** Performed by trained off project HSSE personnel as part of HSSE Assessment process. This process assesses compliance through a defined question set based primarily on conformance with HSSE policies and procedures for sound HSSE management. The question set used for each assessment is dependent on Project scope and other circumstances, although the questions themselves are identical for each project assessed.
- **Environmental Compliance (EC) Audits:** Performed by off-project environmental professionals as an independent assessment of project environmental performance and compliance with project-specific environmental requirements. The audits also function as an internal risk management tool in that recommendations and advice regarding identified corrective actions are provided to the Project to achieve or maintain compliance the environmental requirements.



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Other external environmental-related evaluations may also be undertaken as part of specific management systems or unique project circumstances. External evaluations are typically required for maintenance of external certifications (e.g., ISO 14001), while project-level external evaluations are typically driven by the Contractor or even financing agency mandates.

Records generated because of this procedure shall be maintained in accordance with EPM-KSE-PR-000004 Compliance Evaluation.

7.2 Project Environmental Inspections

Environmental inspections are focused on Project/site compliance with their specific environmental requirements as defined in the Project-specific Environmental Requirements Matrix, in the project's Construction Environmental Control Plan (CECP), and with general environmental best management practices. Such inspections provide an opportunity for Project/sites to self-assess, document, and track their own compliance with their respective environmental requirements.

Inspections will be conducted by Environmental Services (ES) personnel or other qualified site personnel (e.g., trained/experienced HSSE representatives).

The frequency of inspections will be in accordance with criteria defined in the CECP. Where no project-specific inspection frequency is defined, regular environmental inspections should be conducted and documented no less than weekly.

Inspection findings will be documented in an inspection report as prescribed in the CECP. Recommended/required corrective actions associated with findings will be implemented at the Project/site level by the appropriate function within the site management team with the technical assistance of the environmental inspector. Adequate completion of corrective actions will be re-viewed and approved by the inspector prior to closing out of the inspection report.

Site management will help ensure that corrective actions are implemented according to the schedule defined in the inspection report.

7.3 Environmental Assessments

The HSSE assessment process provides an opportunity for Projects to receive experienced and independent evaluation and constructive feedback on their HSSE (including environmental) performance and conformance with HSSE functional programs, processes, and procedures. The HSSE assessment is based on a series of questions which support HSSE Management Systems.

The outcome of each HSSE assessment is a compliance score for the Project overall. Findings from HSSE assessments are incorporated into a final HSSE Assessment report and presented to and discussed with Senior Project Management. in accordance with EPM-KS0-PR-000002 Project HSSE Assessment Process Procedure.

8.0 ATTACHMENTS

N/A