

Environment Information Sheet 2

Airport Operator Environment Management Responsibilities

Issue: Environmental Management

The Airports (Environment Protection) Regulations (the Regulations) requires operators on airport to avoid generating pollution including excessive noise (Regulations 4.01 & 4.06)

This Regulation places a requirement on tenants to assess the environmental risks associated with their operations on airport and to put in place processes to mitigate or manage any activities that may cause pollution.

The Airport Environment Strategy addresses this matter by requiring tenants to prepare and implement Environment Management Plans for their operations (see section below).

The Regulations require operators to ensure their activities have no adverse consequences for local biota / ecosystems / cultural heritage and also to give notice to the ALC & AEO in the event they identify a site of previously unrecognised environmental or cultural significance in the course of their operations on airport (Regulations 4.04 & 4.05)

This Regulation requires operators to establish whether there are any biota / ecosystems having significant environmental value, or any areas / items having cultural heritage significance in the vicinity of their operations. Where such issues are identified an operator must put in place processes to avoid adversely impacting these.

The Airport Environment Strategy addresses this matter by requiring tenants to prepare and implement an Environment Management Plan for their operations (see section below for further details).

The Regulations require tenants to assist the Airport Lessee Company (ALC) by monitoring the environmental consequences of any activities on their site and reporting the results to the ALC (Regulation 6.05).

This Regulation requires tenants to undertake such monitoring as is necessary to establish whether or not activities on their site are causing pollution or adversely impacting upon biota / ecosystems having significant environmental value, or any areas / items having cultural heritage significance in the vicinity of their operations and to provide the results of the monitoring to the ALC.

The Airports Act specifies a person may not carry out a building activity on airport unless the activity is in accordance with an approval issued for the activity (Section 99(3)).

This Section requires tenants to seek Development Approval from the ALC and Building Approval from the Airport Building Controller before commencing a building activity.

Section 98 of the Act defines what is meant by building activity and includes amongst other things any alteration to a building. Exemptions may apply however these need to be established with the ALC and the ABC.

The Airport Environment Strategy requires all Tier 1 & 2 tenants to prepare and implement an Environment Management Plan (EMP) for their operations.

An Environment Management Plan (EMP) identifies the environmental risks, and legal obligations, associated with the day to day operation of a business and specifies the management measures, including environmental monitoring, that will be implemented in order to prevent or minimise the environmental impacts associated with the operations.

Sydney Metro Airports has prepared guidance material to assist tenants and operators to prepare an EMP. This material has been placed on the airport's website and is also available from the Sydney Metro Airports Environment Manager.

An EMP that is implemented and regularly maintained will help an organisation to manage their environmental risks and meet their legal obligations.

Tier 1 tenants typically include those that store and/or use bulk chemicals including petroleum products i.e. refuelling companies, service stations, larger aircraft component manufacturers

Tier 2 tenants typically include those that store and/or use moderate quantities of chemicals including petroleum products i.e. aircraft/vehicle workshops, motor vehicle storage, transport companies, hardware store /nurseries, fast food outlets

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The Airport Environment Strategy requires preparation and implementation of Construction EMP for building works on the airport.

A Construction EMP identifies the environmental risks, and legal obligations, associated with construction works and specifies the management measures that will be implemented in order to prevent or minimise the environmental impact associated with the works.

Sydney Metro Airports has prepared guidance material to assist proponents to prepare a Construction EMP. This material has been placed on the airport's website and is also available from the Sydney Metro Airports Environment Manager.

The Airport Environment Strategy requires Tier 1 & 2 tenants to conduct annual environmental audits.

An environment audit is a useful tool that can help identify which particular aspects of an organisation's activities impact on the environment. It also enables an organisation to check how well it complies with environmental legislation.

The benefit of an environmental audit is that where environmental harm, or *risk of harm*, is identified action can be taken to avoid or minimise the impacts. If non-compliance with environmental legislation is identified, action can be taken to ensure operations meet legislative requirements.

Environment audits can also identify opportunities for improvement that result in cost savings.

The EPBC Act requires persons operating on Commonwealth land to refer a matter to the Commonwealth if it has, will have, or is likely to have a significant impact on the environment.

Bankstown and Camden Airports operate on commonwealth land and are subject to Commonwealth legislation including the EPBC Act.

An action that has, will have, or may have a significant impact on the environment at these airports requires referral to the Environment Minister for consideration whether formal assessment is required under the EPBC Act.

Since such an action is also considered a Major Airport Development the matter must also be referred to the Transport Minister for consideration whether a Major Development Plan is required under the Airports Act.

Issue: Fuel, Oil and Dangerous Goods Management

The Occupational Health and Safety Act 2000 and Regulation 2001 establish a number of actions that persons storing, using or disposing chemicals must take.

The OHS Act and Regulations requires employers to maintain a register of the chemicals used in the workplace and to obtain, and maintain up-to-date, a Material Safety Data Sheet (MSDS) for each chemical in the workplace.

Material Safety Data Sheets (MSDS) can be obtained from the place of purchase, or the manufacturer, of the chemical product. They can also be obtained from the internet.

Staff must be trained in the use of MSDS and know where to obtain a copy for reference.

WorkCover must be notified if specified quantities of dangerous goods are stored or used on site. The trigger levels for notification are specified in Schedule 5 of the OHS Regulation 2001.

The Regulations specify that dangerous goods and chemicals must be stored appropriately and those which may react with each other must be stored separately.

Further, provision must be made to contain potential spillages and in event of a spill, immediate action must be taken to clean up and dispose the spilled product. This means that chemicals must be stored in such a way that accidental spills are contained.

The organisation must also have procedures in place, and appropriate equipment, to deal with accidental spills and staff must be trained in how to manage such incidents safely.

Issue: Water Pollution

The Airport (Environment Protection) Regulations 1997 establish;

- Reg 4.01 operators at the airport take all reasonable and practicable measures to prevent pollution.
- Reg 2.02 defines water pollution as something that causes or is reasonably like to cause the physical, chemical or biological condition of waters to be adversely affected
- Schedule 2 Water Pollution – accepted limits establishes limits for the level of a variety of contaminants in stormwater.

The Regulations require operators on airport to put in place measures to prevent storm and ground water pollution.

This means operators need to assess the likelihood that the following activities will cause storm water or ground water pollution and put in place measures, including monitoring, to control the risk of pollution associated with these activities;

- aircraft / vehicle refuelling;
- aircraft / vehicle maintenance^{1&2} (including washdown);
- product storage and disposal; and
- the failure to maintain stormwater protection equipment.

1: The EPA Guidelines: Servicing and Mechanical Repairs 1998, Information Sheet 3, Storm Water Management specify;

- Engines may be degreased in a workshop if it is done in an approved wash bay, or if there is some other means of storing and treating the waste water.
- Engines must not be degreased outside the workshop or in any area where run-off can enter the storm water system.

2: Runoff from aircraft wash down contains detergents, sediment and traces of hydrocarbons (oil, fuel, grease, solvents) all of which are pollutants and must not be discharged to stormwater

Issue: Soil & Groundwater Pollution

The Airport (Environment Protection) Regulations 1997 establish;

- Reg 4.01 operators at the airport take all reasonable and practicable measures to prevent pollution.
- Reg 2.03 establish soil pollution has occurred when, amongst other things, land / groundwater is contaminated by a substance that causes or is reasonably likely to cause the chemical or biological condition of the soil to be adversely affected
- Schedule 3 Soil Pollution – accepted limits establishes limits for the level of a variety of contaminants in soil.

The Regulations require operators on airport to put in place measures to prevent soil and ground water pollution.

This means operators need to assess the likelihood that the following activities will cause soil or ground water pollution and put in place measures, including monitoring, to control the risk of pollution associated with these activities;

- aircraft / vehicle refuelling;
- aircraft / vehicle maintenance (including washdown);
- product storage and disposal; and
- importation of fill and landscaping materials.

Issue: Air Pollution

The Airport (Environment Protection) Regulations 1997 establish;

- Reg 4.01 operators at the airport take all reasonable and practicable measures to prevent the generation of pollution.
- Reg 2.01 establish that air

The Regulations require operators on airport to put in place measures to prevent air pollution.

This means operators need to assess the likelihood that the following activities will cause air pollution and put in place measures, including monitoring, to control the risk of pollution associated with these activities;

- Spray painting;
- Storage of products that vent emissions; and

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pollution has occurred when a pollutant is present in air in a quantity, way, or condition, or under a circumstance, in which harm is likely to be caused to the environment; or unreasonable inconvenience is likely to be caused to a person.

- *Schedule 1 Air Pollution-Accepted limits establishes limits for the level of a variety of substances in air emissions.*

- Excavation and ground clearing (dust).

Issue: Excessive Noise

The Airports (Environment Protection) Regulations 1997 establish;

- *Reg4.06 operators at the airport must take all reasonable and practicable measures to prevent the generation of offensive noise from an undertaking*
- *Reg 2.04 establishes when noise that is offensive is deemed to occur*
- *Schedule 4 Excessive noise – guidelines, Parts 2.05 and 2.06 sets out indicators of noise that is excessive in relation to ground based aircraft operations and other airport operations.*

The Regulations require operators on airport to put in place measures to prevent excessive noise.

This means operators need to assess the likelihood that the following activities will cause excessive noise and put in place measures, including monitoring, to control the risk of excessive noise associated with these activities;

- Engine maintenance testing;
- Operation of air extraction systems; and
- Operation of air conditioning units.

Issue: Waste Management

The Protection of the Environment Operations (Waste) Regulations 2005 establish;

- *Owners of waste (as well as the transporters and receivers) have a responsibility to ensure their waste is managed, transported and disposed of appropriately.*
- *Reg 48 Peoples storing waste on premises must ensure it is stored in an environmentally safe manner. (This applies to all classes of waste).*

The Regulations require waste owners to ensure that their waste is stored, transported and disposed is an appropriate manner.

This means that waste owners must ensure

- Solid and liquid³ wastes are stored in containers that prevent them escaping into the environment;
- Waste containers are positioned away from high risk areas in the event of accidental spills;
- Waste is separated and disposed according to its classification i.e. General, Industrial or Hazardous;
- Waste is transported by an appropriately licensed contractor to an appropriately licensed waste facility; and
- Relevant records are retained as required.

3: EPA Bunding and Spill Management Guidelines 2004 provides information on common issues and controls associated with the storage of liquid waste.

Issue: Flora, Fauna and Ecological Communities

The Airports (Environment Protection) Regulations 1997 establish;

- *Regulation 4.04 operators at the airport must take all reasonable and practicable measures to ensure their undertakings do not have an adverse consequence for local biota and ecosystems; flora and fauna that it know to be endangered or vulnerable; or endangered ecological communities.*
- *Regulation 4.05 requires an operator who in the course of their operations discovers a species or ecological community of significance to notify the Airport Lessee Company and the AEO*

The Airports Act 1996, Section 98(1) (f), deems land clearing on airports a building activity.

The Regulation requires operators on airport to identify areas of local biota, including the ecosystems and habitats of native species, any vulnerable or endangered flora or fauna or any endangered ecological community in the vicinity of their operations and ensure that their operations do not have an adverse effect on these species and / or areas.

This means that operators must ensure their activities do not adversely impact

- Any species or ecological community listed under the EPBC Act and the NSW Threatened Species Conservation Act.
- Any flora and fauna generally.

The Act requires that a Building Application is submitted for a land clearing activity. Land Clearing Guidelines issued by the Department of Infrastructure, Transport, Regional Development and Local Government specify that pruning or removal of any vegetation is a 'land clearing' activity.

- This means that operators must submit a Building Application to the Airport Building Controller prior to undertaking significant pruning or removal of any vegetation on their site.

Issue: Heritage Management

The Airports (Environment Protection) Regulations 1997 establish;

- *Regulation 4.04 operators at the airport must take all reasonable and practicable measures to ensure their undertakings do not have an adverse consequence for existing aesthetic, cultural, historical, social or scientific values of the local area, including sites of indigenous significance.*
- *Regulation 4.05 requires an operator who in the course of their operations discovers a object of significance to notify the Airport Lessee Company and the AEO*

The Regulation requires operators on airport to identify any area or item of aesthetic, cultural, historical, social or scientific values in the vicinity of their operations and to ensure that their operations do not have an adverse effect on these items and / or areas.

This means that operators must

- ascertain whether their site has any heritage values; and, if it does
- put in place procedures that ensure their operations do not adversely affect those values.

If an item of cultural or heritage significance is discovered on airport, in the course of operations, it must be reported to Sydney Metro Airports and the Airport Environment Officer.