



# Lusail Real Estate Development Company

## Health, Safety, Security, Environment, Logistics & Quality Department

### STANDARD OPERATION PROCEDURE – ENVIRONMENTAL INSPECTION & AUDIT PROCEDURE

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## 1.0 ENVIRONMENTAL INSPECTION & AUDIT PROCEDURES

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### 1.1. PURPOSE

The purpose of this Procedure is to guide the Contractors and / Operation Contractors and sub-contractors on how the environmental compliance of any Project construction and / or operation activities on QD or LREDC premises with respect to the CEMP and / or OEMP will be periodically inspected.

### 1.2. OPERATION CONTRACTOR INSPECTIONS & AUDITS

#### 1.2.1. OPERATION CONTRACTOR INTERNAL INSPECTIONS

The following requirements are mandatory for all Operation Contractors within LREDC site:

- a) The Environmental Officer, or representatives, shall make daily inspections of each area of the construction / operation site to monitor compliance of their own activities and site conditions against OOEMP and the Projects' OEMP, and document these inspections;
- b) Operation Contractors develop their own Environmental Inspection Checklist for their site and activities;
- c) The routine inspections must be carried out by the Operation Contractor's environmental representative, who has undergone the mandatory training (refer to OOEMP Section 6);
- d) Completed Environmental Inspection Checklists must be retained at the operation contractor's site office;
- e) All non-conforming actions (non-compliance) observed during the routine environmental inspections must be recorded. A non-compliance can be, for example, an incorrectly stored fuel drum, over-full waste skips, or an environmental incident, such as an oil spill or leaking sewage or other utility line. The following information about non-compliances must be recorded within the Environmental Inspection Checklist, or in an attached report:
  - i. Description of each non-compliance, including location;
  - ii. Corresponding corrective actions for each non-compliance. Corrective actions must include preventative measures, where necessary;
  - iii. Due dates for completion of corrective actions; and
  - iv. The responsible party to complete each corrective action;
- f) The non-compliance must be checked during the next routine site inspection, or earlier. Progress must be noted, until the action has been satisfactorily completed;
- g) If an environmental incident has been observed, the appropriate incident response actions must be taken (refer to OOEMP Section 11);
- h) The operation contractor's senior management must receive a copy of the routine Environmental Inspection Checklists and any attached non-compliance reports, along with written and signed evidence of the completion of any corrective actions, such as a written and signed report attached to the Environmental Inspection Checklist, or notes regarding the remedy of the non-compliance in the subsequent signed routine Environmental Inspection Checklist; and

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- i) Operation Contractor environmental inspection records are subject to audit by the Supervising Consultant, and/or LREDC , and must be produced upon request.

### **1.2.2. OPERATION CONTRACTOR INTERNAL AUDITS**

The Operation Contractor shall carry out regular environmental audits of the environmental records, processes and systems. The subject and work area of the audit shall be agreed with LREDC prior to notifying the relevant staff. The Operation Contractors shall prepare an audit schedule prior to the audit and carry out a pre-audit briefing with the concerned parties. This briefing shall be completed not less than one week before the audit. The Operation Contractors shall prepare an audit checklist based upon previous inspection reports.

The following records will be audited:

- a) Weekly site environmental inspections;
- b) Environmental audits;
- c) Waste collection and disposal record keeping;
- d) Environmental training records;
- e) Environmental incident and complaint records;
- f) OEMP documentation; and
- g) Any other relevant issue.

The audit will record:

- a) Description of any non-conformances;
- b) Corrective actions;
- c) Due date for completion;
- d) Party/person responsible for completing the corrective actions; and
- e) Audit details, including the date and staff who participated in the audit.

Copies of the completed environmental audits will be reported to the Project Manager, with any supporting information, and signed report noting progress of completion of corrective actions.

All environmental audit records will be made available to the Supervising Consultant, and/or LREDC upon request and within 30 days of the audit taking place.

### **1.3. CONSULTANCY & DEVELOPER INSPECTIONS**

The supervising consultancy and third party developer may conduct regular environmental inspections or second party audits of the Main Contractor.

The routine and procedures will be similar to as described in the OOEMP Section 9.1.

### **1.4. PMPC OR CONSULTANT'S INSPECTIONS/ AUDIT**

Regular compliance inspections and audits will be undertaken by the PMCM or Consultant (on behalf of LREDC ) to monitor Operation Contractor's environmental activities and assess the Contractor's environmental records, processes and systems using an ISO 14001:2004 compliant audit checklist.

The Operation Contractor's Environmental Representative shall participate in scheduled environmental audits to be conducted by the Employer. The Contractor shall allow free access to all documents and records pertaining to environmental protection as required, allowing the auditor to:

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- a.) Validate and confirm accuracy of monitoring results, monitoring equipment, monitoring location, monitoring procedures and location of sensitive receptors.
  - b.) Review effectiveness of environmental mitigation measures and environmental performance
  - c.) Provide an early indication and suggest appropriate additional or remedial measures should any of the environmental mitigation measures or controls fail to achieve compliance with relevant regulations/standards.
  - d.) Verify if necessary, any additional mitigation measures or alternative measures to be undertaken by Contractors and / or Operation Contractors as corrective actions to prevent adverse environmental impacts arising from their activities,
  - e.) The Training Register is up-to-date, and staff induction records are complete;
  - f.) Corrective actions arising from incident investigations or environmental inspections are complete;
  - g.) All records relating to waste collection and disposal are retained and on file; and
  - h.) Monthly Operation Contractor Environmental Performance Reports are all up-to-date

The effectiveness of inspections can often be enhanced by the use of unannounced spot checks and involvement of the Contractor's and / or Operation Contractor's responsible supervisory personnel.

### **1.5. EXTERNAL INSPECTIONS/AUDITS**

External audits of the Project or an individual Contractor may be undertaken by the Ministry of Environment (MoE) or other government agencies in charge at any time to assess how effectively the CEMP and / or OEMP is being implemented, to identify non-conformances and to recommend corrective actions to be taken.

- a.) To facilitate this, the Operation Contractor will provide the respective government agency with all reasonable access to the site and to all relevant documentation and records;
- b.) The Operation Contractor should ensure that its personnel are aware of and comply with the procedures to be taken in the event of a government inspection of any type;
- c.) The Operation Contractor shall notify the LREDC Representative if a regulatory agency inspector requests entry onto the site; and
- c.) Following any regulatory agency inspection the Operation Contractor shall submit a written report to the LREDC Representative which details all aspects of the inspection.

### **1.6. CORRECTIVE & PREVENTIVE ACTIONS**

All non-conforming actions (non-compliance) observed during the routine environmental inspections will be recorded as a non-compliance. This can be, for example, an incorrectly stored fuel drum, over-full waste skips, or an environmental incident, such as an oil spill or leaking sewage holding tank.

- a) When a non-compliance with the OOEMP, CEMP or any relevant legislation is noted the relevant person should be instructed of the required corrective action and the time period within which it should be implemented. This communication shall be documented.
- b) The Operation Contractor shall immediately rectify any situation or condition that poses an immediate risk to the environment. If the situation or condition cannot be corrected immediately, the Operation Contractors shall provide temporary measures as necessary for the protection of the environment.
- c) The following information about non-compliances will be recorded within the Environmental Inspection Report, Audit Report, or Non-Conformance report (NCR):
  - i. Description of each non-compliance, including location;

- ii. Corrective actions corresponding to each non-compliance. Corrective actions must include preventative measures, where necessary;
  - iii. Due dates for completion of corrective actions; and
  - iv. Responsible person/party for completion of each corrective action.
- d.) The non-compliance must be checked during the next routine site inspection, or earlier. Progress must be noted, until the action has been satisfactorily completed.
- e.) A copy of all environmental inspection reports shall be given to the Consultant, PMCM and LREDC Representatives.

## **2.0 RELATED DOCUMENTS**

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OOEMP Overall Operation Environmental Management Plan