

Technical Annex: Management systems

What is a management system?

An Environmental Management System (EMS) is a document required by the permit which explains how an operator will manage their activity whilst minimising the risk to the environment and abstractors. By thinking about aspects such as a maintenance plan, accident procedures and staff training, the operator will be able to show that they have thought about the consequences of their activities and written them into a document which is accessible for staff working on the site. Management systems must be kept up to date to make sure they accurately describe the activities and procedures taking place on site.

Who will need a management system?

Defra is proposing that all newly granted permits or varied transitional permits will contain a set of conditions requiring the permit holder to operate in accordance with a written management system. The Environment Agency may require new permit applications to submit a summary of the management system as part of the permit application process.

Customers with time limited licences which are due to expire after the move into the Environmental Permitting Regulations (EPR) will be required to apply for a renewal and will be issued with a permit which will contain the management system condition.

It is not proposed to add the management condition on to any existing licences transitioning into EPR.

How complex does it need to be?

Management systems are scalable as they are based upon the risk of the activity and complexity of the permit. As an example, a single abstraction point on a farm with no conditions other than the restrictions of quantities and time periods will only require a simple management system. Equally, a large complex hydropower site with multiple intakes, discharges, aggregates and fish screens would require a much more detailed management system.

What needs to be included in the management system?

For most EPR regimes, a management system is largely focused on pollution prevention. This is different for water resources. However abstraction and impounding activities can cause harm to the environment therefore considerations need to be made to prevent this. The key difference for abstraction and impounding activities will be the greater focus on how the operator will ensure they keep within the limits of their permit, for example not over-abstracting. Any complexities such as Hands off Flow (HOF) conditions or aggregated quantities can be explained to demonstrate how they will ensure these conditions will be complied with.

An example of the sections that might be expected in a management system include:

- Site Plan
- Site Operations
- Roles and Responsibilities

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- Site Equipment and Maintenance Plan
- Contingency Plan
- Accident Prevention and Management Plan
- Changing Climate
- Complaints Procedure
- Competence and Training Records
- Records

The Environment Agency has guidance on how to develop a management system here - <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

Roles and Responsibilities

Newly granted permits will require the permit holder to be the operator. The site EMS is a useful tool to help the operator demonstrate how they will maintain day-to-day control of the permitted activities.

If third parties work on the site, the permit holder can still be classed as the operator if they are able to demonstrate they still have sufficient control over the actions of the third party. This should be outlined in the EMS to help define the roles of each party. If things change and the contractor takes over sufficient control of the activities, the permit must be transferred to them.

Making sure people understand what you do

One important aspect of an EMS is for staff to have access to and understand any sections of the management system that deal with activities they carry out. It is up to the operator how this happens, for example whether the EMS is printed out or whether electronic copies are provided.

The operator must be able to show the Environment Agency the management system if asked.

Where can I find more information on management systems?

There is information available on [gov.uk](https://www.gov.uk)¹ and in the [Environmental Permitting core guidance](#)² on how to develop a written management system.

¹ <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

² <https://www.gov.uk/government/publications/environmental-permitting-guidance-core-guidance--2>