
Guideline

Tenant Environmental Management



**Assisting Airport Tenants to Manage and
Improve Environmental Performance**

Purpose

Adelaide Airport Limited and Parafield Airport Limited (AAL/PAL) are committed to minimising the environmental impacts of their operational and development activities. AAL/PAL are also dedicated to minimising environmental harm by helping tenants manage potential environmental risks associated with their site activities. The purpose of this guideline is to provide tenants with information on the appropriate management of environmental risks related to tenant activities undertaken on airport land.

Background

Since 1998 Adelaide Airport Limited (AAL) and Parafield Airport Limited (PAL) have leased the Adelaide and Parafield Airport sites from the Federal Government. Activity on leased federal airport land is controlled by the *Airports Act 1996* (Airports Act), *Airport (Building Control) Regulations 1996* (ABCR 1996) and *Airports (Environment Protection) Regulations 1997* (Airport Regulations).

The Department of Infrastructure and Regional Development and Cities (DoIRDC) is charged with administration of the Airports Act and is responsible for overseeing the activities on leased airport land. As head lessees, AAL and PAL are responsible for managing airport activities and are required to report any potential degradation and devaluation of the land from its operations to DoIRDC. To oversee protection of the environment on airports, an Airport Environment Officer (AEO) is employed by DoIRDC to administer the Airports Act and the Airports Regulations.



Airport Environmental Legislation

As discussed above, Adelaide and Parafield Airports are located on federal land and activities occurring on-airport are thus subject to the provisions of the following federal legislation:

- Airports Act 1996
- Airports (Environment Protection) Regulations 1997
- Airport (Building Control) Regulations 1996

Furthermore, because the airports are located on federal land, environmental management, including soil and groundwater contamination, does not fall within the jurisdiction of the South Australian Environment Protection Authority (SA EPA).

Consequently, all environmental management must be compliant with federal airport legislation rather than state legislation. State environmental legislation is only applicable to on-airport activities when there is an established material risk to the off-airport environment or where federal legislation is silent.

Notification under s83A of the Environment Protection Act 1993 (SA)

There is **no** requirement to notify the SA EPA of actual or potential harm to groundwater, as required under s83 of the Environment Protection Act 1993; unless, there is clear evidence that on-airport contamination presents a risk of serious or material harm to groundwater off-airport.

Where required, AAL/PAL is able to provide copies of official communications with the SA EPA, confirming that there is no requirement to notify under s83A.

As head lessee of Adelaide and Parafield Airports, AAL/PAL expects tenants and their contractors to notify AAL/PAL of the potential need for notification under s83A, rather than directly approaching the SA EPA on behalf of AAL/PAL or sub-lessees (unless circumstances require consultants to do so in order to meet regulatory obligations).

Airport Environment Strategy

AAL/PAL is required to implement an Airport Environment Strategy (AES) in accordance with the Airports Act 1996. The Strategy is implemented via the AAL/PAL Environmental Management System (EMS), which provides the framework for linking environmental impacts, legal obligations, objectives/goals and day-to-day management actions. All airport operators and occupiers (including tenants) must take all reasonable steps to ensure that the Airport Environment Strategy is complied with.

The Airport Environment Strategy forms Chapter 10 of the Adelaide Airport Master Plan, which can be accessed at:

<https://www.adelaideairport.com.au/corporate/community/adelaide-airport-master-plan/>.

Tenant Responsibilities

Tenants are responsible for:

- ✓ environmental management of their site in accordance with the AES and relevant legislation, standards and guidelines;
- ✓ ensuring that all risks to the environment have been identified, and appropriate control measures implemented;
- ✓ implementing an Environmental Management Plan (EMP), if required by AAL/PAL;
- ✓ taking all reasonable and practicable measures to prevent and minimise pollution from their operations, including appropriate spill response;
- ✓ reporting all spills over two litres to the Airport Coordination Centre (ACC); and
- ✓ ensuring all environmental incidents and complaints resulting from operational activities are investigated and corrective actions implemented.

Identification and Management of Risk

Risk Assessment

The Environment Department conduct initial assessments of tenant sites to determine the level of environmental risk associated with their site activities. The potential consequence and likelihood of environmental impacts associated with various site activities is assessed using the AAL tenant risk register.

In addition to assessing the potential environmental risks posed by tenant activities, assessment using the AAL risk register also considers the following aspects of tenants environmental risk management to ensure that a more appropriate risk category is allocated to tenants:

- implemented control measures,
- environmental management systems,
- previous environmental performance.

This information is obtained via periodic tenant inspections conducted by the Environment Department and online self-assessments that are completed by tenants.

Environmental Management Plans (EMPs)

Tenants assessed by AAL/PAL as posing a 'serious' or 'material' risk are required to submit and implement an Environmental Management Plan (EMP). EMPs are the principal means by which the AAL/PAL Environment Department assess the proposed management of tenant environmental risks.

An effective EMP integrates environmental management into the daily operations of a Company and can help to ensure that your environmental legal responsibilities are met. AAL/PAL understand that the majority of tenants have established environmental management frameworks, including EMPs. AAL/PAL does not therefore seek to provide EMP templates to tenants. AAL expects tenants to establish EMPs that have adequately addressed site-specific environmental risks, rather than providing generic documents that do not relate to the on-airport tenant activities and unique on-airport regulatory environment. Utilising the services of an Environmental Consultant can typically be worthwhile in developing an initial EMP.



AAL/PAL expects to see the following **principal components** included in **EMPs** provided to AAL/PAL:

- detailed description of all operational activities conducted at each location/site
- identification of all site-specific **environmental risks** associated with the site-specific operational activities (e.g. using aspects and impacts assessment)
- clearly defined **management measures** to address each of the identified environmental risks (including references to operational procedures)
- details of all applicable licences/permits held (e.g. dangerous substances, SA Water trade waste etc.)
- process for **measuring the effectiveness** of the proposed **management measures** (e.g. staff training, audits and inspections)
- details of internal environmental responsibilities and authorities applicable your site.

In addition to these principal EMP components, other factors that need to be considered include:

- references must be to the Airport Regulations, rather than other inapplicable state or federal environmental legislation (e.g. *Environment Protection Act 1993* (SA) and subsidiary legislation)
- appropriate reporting of environmental incidents (i.e. to AAL/PAL, who report to DoIRDC, not the SA EPA)
- referencing of AAL/PAL guidelines (see below) as part of management measures.

Tenant Inspections

To assist tenants in complying with the provisions of the Airports (Environment Protection) Regulations 1997 and other applicable environmental legislation, the AAL Environment Department conduct periodic inspections of tenant lease sites. The inspection frequency is based on the tenant risk categories, which are determined via the AAL/PAL risk assessment process.

The online self-assessments enable tenants to provide information on environmental compliance and also provides a means of uploading compliance documentation. In addition

to confirming regulatory compliance, the inspections also provide an opportunity for AAL/PAL to assist tenants in managing environmental risks and/or addressing any identified non-conformances or non-compliances.

Tenants will generally be provided with copies of inspection reports within 2 days following completion of the inspection. Inspection reports detail any non-conformances or observations and the agreed measures to address them.

Waste Management

AAL has a waste management Strategy that aligns with the waste management hierarchy. Most types of general waste that are currently disposed to landfill can actually become resources - if segregated correctly, they can be recycled, composted or reused. Tenants should seek to segregate waste, or if space is an issue, engage a contractor who will sort these at an off-site facility.



Some tenants are entitled to a 240L yellow mixed recycling wheelie bin from either the City of Salisbury (Parafield Airport) or the City of West Torrens (Adelaide Airport). This can be used for general mixed recycling which is appropriate for the typical wastes generated from a workplace kitchen or lunchroom. If larger volumes of waste are generated, then additional bins need to be obtained from a licensed waste contractor.

T1 Waste Management Plan

The T1 Waste Management Plan (TWMP) provides a more specific and detailed outline of the waste management system in T1. It provides clear strategies to effectively manage waste and recyclables. The TWMP seeks to ensure a consistent waste management system is applied across T1, one that maximises recycling to help meet AAL's diversion targets.

Waste and wildlife hazards

Uncontrolled storage and disposal of waste can attract birds and release Foreign Object Debris (FOD) that present a hazard to aviation. Airports have a legal responsibility under the Civil Aviation Safety Regulations 1998 to manage the risks associated with bird strike and as such, the generation of food waste needs to be strictly controlled.

Tenants are required to take all reasonable and practicable measures to avoid attracting birds when handling, storing and disposing of food waste. Placement of food waste in closed or sealed bins that cannot be tipped over is one of the most effective means to avoid attracting birds. Tenants are encouraged to develop Waste Management Plans (WMP), especially if their activities present a high risk of attracting wildlife.

Hazardous and trade wastes

Hazardous waste must be stored in a secure bunded area, in appropriate containers and disposed of by an SA EPA licensed contractor. Waste Tracking Forms supplied by the licensed contractor must be kept on file.

Trade Waste must either be disposed of by a licensed waste contractor or by acquiring a Trade Waste Authorisation from SA Water authorising the discharge of liquid Trade Waste to sewer.

Spills & Incident Reporting

Poor storage, handling and disposal resulting in spills of chemicals or substances, cannot only cause pollution but can also pose a risk to human health. Tenants and contractors that have dangerous goods and hazardous substances on site, including fuel, must ensure they have spill kits and emergency response measures in place (such as emergency stops) to limit the potential impacts to the environment.

All spills over two litres must be reported to the Airport Coordination Centre (ACC) on (08) 8154

9444. The ACC will contact the relevant authorities, such as Aviation Rescue and Fire Fighting (ARFF), Metropolitan Fire Service (MFS) and Ambulance, and notify relevant Airport staff, such as the Environment Department.

If AAL/PAL is requested by the company who caused the spill to assist in the clean-up, or if AAL/PAL is required to provide materials for use in the clean-up process; fees will apply.



Construction Activities

Construction activity on Adelaide and Parafield Airports is subject to statutory controls under the Airports Act, the ABCR 1996 and the Airports Regulations. Accordingly, all construction activity must be approved by AAL/PAL and the Airport Building Controller (ABC) via the documented AAL/PAL Building Activity Approval (BA) process. Assessment of potential environmental risks and their management forms part of the AAL/PAL BA process.

Before Building Consent is issued for BAs, the AAL/PAL Environment Department needs to review and accept contractor Construction Environmental Management Plans (CEMPs). Once AAL/PAL have completed their review and either accepted or provided comment on submitted CEMPs, they are forwarded to the AEO for review and comment.

Once approved on-airport construction works have commenced, the AAL/PAL Environment Department will arrange to undertake one or more construction environment inspections to confirm conformance with the management measures described in CEMPs and relevant environmental legislation. Inspections will usually be organised in collaboration with the AAL/PAL Project Officer assigned to the project and a report will be issued by the AAL/PAL Environment Department.

Guidelines

AAL/PAL have produced guidelines to provide information on a range of operational activities with potential environmental impacts and to provide guidance on how these activities can be undertaken in a manner consistent with applicable legislation.

All activities on airport land must be undertaken in accordance with these guidelines and AAL/PAL encourage the use of these guidelines in the development of EMPs. It is considered acceptable to state in EMPs that activities will be '*undertaken in a manner consistent with the... AAL/PAL Guideline*' (or words to this effect), to demonstrate adequate management of a particular environmental risk.

A brief overview of the guidelines' contents is provided below.

AAL/PAL guidelines available to tenants include:

- Aircraft Vehicle Washing
- Asbestos Management
- Construction Environmental Management
- Dangerous Goods and Hazardous Chemicals
- Environmental Site Assessment
- Fuel Management
- Landscaping
- Ozone Depleting Substances
- Noise Management
- Spill Response
- Spray Painting
- Trade Waste Management

Aircraft Vehicle Washing

Details requirements for washing engines, airframes (whether entire or in parts) and ground service vehicles.

Asbestos Management

Provides information on common sources of asbestos, tenant/contractor responsibilities and Asbestos Registers.

Construction Environmental Management

Provides Building Approval (BA) applicants and contractors with information on construction environmental management for activities undertaken on airport land and the requirements

for on-airport Construction Environmental Management Plans (CEMPs).

Dangerous Goods and Hazardous Chemicals

Discusses the risks associated with dangerous goods and hazardous chemicals and tenant responsibilities for storage, labelling, training, monitoring and waste disposal.

Environmental Site Assessment

Provides information on appropriate soil and groundwater sampling methodologies and the use of the Airports Regulations criteria for comparison with contaminant concentrations.

The Guideline also includes consideration of potential Per- and poly-fluorinated alkyl substances (PFAS) contamination risks.

Fuel Management

Details fuelling procedures for the transfer of fuel from a mobile tanker to a bulk storage tank as well as the fuelling of GSE equipment from a bulk tank or mobile tanker.

Landscaping

Explains how on-airport landscaping can be undertaken in a sustainable manner to minimise potential risk to aviation due to vegetation penetrating the obstacle limitation surface or encouraging on-airport bird activity.

The guideline also includes a list of acceptable plant species for use in on-airport landscaping.



Ozone Depleting Substances

Outlines requirements for transitioning to alternative refrigerants and maintaining a refrigerant inventory.

Noise management

Discusses the principal sources of on-airport noise and the responsibilities of contractors to manage construction related noise.

Spill Response

Details requirements for spill prevention, response and reporting, including the development of an emergency response plan.

Spray Painting

Outlines requirements for tenants that seek building approval for a facility that is capable of spray-painting or surface coating on Adelaide or Parafield Airport land. The guideline also applies to any temporary facility that is capable of spray painting.

Trade Waste Management

Provides information regarding waste generated from commercial and industrial activities including dangerous substances and hazardous chemicals. States requirements for Trade Waste Authorisations, waste storage and licensed waste contractors.

Communications

Members of the AAL/PAL Environment Department are available to provide further guidance on tenant environmental management. Please do not hesitate to contact us on environment@aal.com.au.

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