

Contractor Environmental Management System Requirements

Selected contractors are required to develop a C-EMS that includes each of the following components:

Plan

- Identifies the legal requirements that may apply to the scope of work associated with their onsite operations.

Do

- Clearly assigns roles and responsibilities for environmental compliance functions/tasks associated with the contract scope of work.
- Complies with all laws, regulations, and permits applicable to the job
- Identifies, implements and maintains any controls for legal requirements as appropriate. Controls may include documented standard operating procedures (SOPs), engineered controls, training, employee expertise, checklists, and preventive maintenance. At a minimum, these controls include a plan to address the following events that could occur as a result of the contracted operation and/or service provided:
 - Prevent, report, mitigate, and clean-up any spill
 - Manage wastes generated
 - Respond to an emergency
- Ensures employees are trained and competent to perform their job in conformance with legal requirements. At a minimum this training addresses:
 - Contractor EMS
 - BP HSE Policy
 - Roles, responsibilities and procedures associated with legal requirements
 - Incident reporting procedures

Check

- Verifies compliance with legal requirements and the C-EMS. This includes periodic compliance audits. Ensures that personnel performing these audits or other environmental performance self-assessments are objective.
- Monitors performance against any environmental performance measure contained in the contract
- Maintains records that demonstrate compliance with legal requirements, including but not limited to, training, preventive maintenance, waste management, environmental monitoring, and assurance reviews.

Act

- Implements corrective actions identified from any reported environmental event, spot checks, compliance audits, and monitoring and measurement methods.
- Reports an environmental event associated with BP.

A contractor may develop a C-EMS independently or may choose to consult with BP during the development process. BP will make tools available to selected contractors to assist in development, implementation, and maintenance of their C-EMS's.