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SOP-232

Mutual Audit Planning, Conducting and Reporting

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1 Aim and scope

The objective of this procedure is to:

- define responsibilities and detailed rules used by all the operators to plan, conduct and report the audit as necessary
- ensure that the operations of any other operator within the installation are compatible with those of the auditing operator
- identify any amendments to such procedures which are required, in order to ensure that procedures adopted by one operator do not impede the operations of the other operators within the installation.

2 References

EN ISO 14001:2015 Clause 9.2

EN ISO 19011:2011

IPPC IP 0002/07/G – Framework document

3 Terms and Definitions

Audit plan	Description of activities to be carried out in a specific audit
Audit program	Group of several audits planned over a defined period of time, addressed for a specific aim
Audit team	Group of persons charged to carry out an audit
Auditor	Person competent to conduct an audit. The persons conducting the audit should be competent and in a position to do so impartially and objectively
D3PG	Delimara 3 Power Generation Ltd
EGM	ElectroGas Malta Ltd
ENE	Enemalta plc
EMS	Environmental Management System
ER	Environmental Representative
Installation	Technical unit within an establishment and whether at or below ground level, in which dangerous substances are produced, used, handled or stored; it includes all the equipment, structures, pipework, machinery, tools, private railway sidings, docks, unloading quays serving the installation, jetties, warehouses or similar structures, floating or otherwise, necessary for the operation of that installation
IPPC	Integrated Pollution Prevention and Control

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Internal audit	<p>Systematic, independent and documented process to obtain audit evidence, and through objective evaluation determines the extent to which the safety management system audit criteria, set by the organization are fulfilled</p> <p>Note 1: Auditor independence can be demonstrated by an auditor being free from responsibility for the activity being audited</p> <p>Note 2: Internal audit is a process which enables sharing of experience and improves the effectiveness of the workings of the organisation</p>
Lead auditor	Responsible of the audit team
NR	Nominated representative
Nonconformity	Non-fulfilment of a requirement
Operator (Main)	Company that operates, control and maintains one or more units owned by a stakeholder. The operators Involved in the implementation are ENEMALTA, International Energy Service Centre (IESC), ESB International (ESBI), Reganosa, BUMI ARMADA and others which may be appointed in the future
Operator	The personnel working for or on behalf of the four main operators
EGM operators	ESBI Power Generation, Reganosa Regasification, BUMI LNG storage
SOP	Standard Operating Procedure; An established written procedure to be followed by ENE staff, providing technical and organisational requirements to perform a specific activity
Q-Pulse	Database Application

4 Responsibilities

4.1 Management representative (MR ENE, D3PG, EGM):

- approves the audit program
- provides resources for the audit program. These resources could include human resources, transport, co-operation from interviewed persons, etc.

4.2 Nominated representative (NR ENE, D3PG, EGM):

- co-ordinates together with the lead auditor to evaluate the effectiveness of actions taken following nonconformity. The NR signs off the action plan when all actions are completed

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4.3 Lead Auditor (ENE):

Based on data collected from past audits and the non-conformities identified, and taking into consideration the operator's exigencies, the lead auditor shall consult with the operator's auditors and/ or NR to develop a rationalised program intended to result in improved environmental and safety performance. The lead auditor:

- prepares the audit program and submits it to the respective MR;
- ensures that the audits are being carried out according to the audit program;
- coordinates the audits within the audit program;
- identifies the members of the audit team together with the other operators representatives;
- defines the audit conclusions and issues the audit report;
- where necessary, issues an action plan.

4.4 Environmental representative (ER ENE, D3PG, EGM):

- supports the Lead Auditor in carrying out the environmental audit program (participating in audits and following up on audit report), depending on the site to be audited.

4.5 Auditors (ENE, D3PG, EGM):

- assist the Lead Auditor during the audits.

4.6 Audit Team (ENE, D3PG, EGM):

The persons forming part of the audit team may include personnel from the Enemalta, D3PG and ElectroGas Malta. Depending on the nature of the audit, these personnel can vary from Regulatory Affairs Office/Management, who are all qualified as internal auditors, or persons from management who have experience in the departments or documents being audited.

4.7 Interviewed Persons (ENE, D3PG, EGM):

- The interviewed persons will be either the site responsible persons or the document responsible persons, or any other person nominated by them.

5 Frequency

An annual audit program shall be prepared by the lead auditor taking into account:

- the results of the previous audit program;
- any specific request coming from an internal or external party;
- requirements from the framework IPPC permit

Document Use – This document needs to be used whenever a work with the impact described in the scope is undertaken.

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Document revision - This document should be reviewed and updated every twenty- four (24) months, unless it is deemed necessary that it should be revised prior.

6 Detailed procedural rules

6.1 Mutual Audit program

The mutual audit program will be planned following a meeting with the ENE, D3PG and EGM management representative/s, nominated representative/s, lead auditor and other auditor/s to discuss and establish the criteria and priorities necessary as per ISO 19011.

The objectives of the mutual audit program are to:

- assess the degree of implementation of the common EMS documents and procedures;
- assess the effectiveness of the EMS;
- assess the EMS capability to grant compliance with legal requirements;
- assess the operation of any other operator within the installation
- assess the operation of any other operator within the common areas
- assess the operation and maintenance of common site services, including but not limited to firefighting, DM and evaporated water, foul water, etc.
- assess common activities, like water discharge, use of interceptors, etc.
- identify any amendments to such procedures which are required in order to ensure that procedures adopted by one operator do not impede the operations of the other operators within the installation
- identify areas for EMS improvement

The audit program shall be defined for each operator's area/activity as per EMS scope:

- the month of the year when the audit shall be conducted;
- the status of the audit (i.e. planned, conducted)

The audit program shall be approved by the MR of all operators in order to provide the requested resources.

6.2 Auditors

The lead auditor shall identify internal or external audit team members according to the following requirements:

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6.2.1 Lead auditor requirements:

- Three years' experience in environmental/safety activities;
- Three years' experience in electrical energy production from fossil fuels;
- Attendance to a specific auditor training course or having a specific safety auditor certification / qualification;
- Experience in conducting audits in the role of responsible of the audit.

6.2.2 Auditor requirements:

- One year experience in environmental/ safety activities;
- One year experience in electrical energy production from fossil fuels;
- Attendance to a specific auditor training course or having a specific safety auditor certification / qualification;
- Experience in conducting at least two internal audits under the leadership of a lead auditor.

6.2.3 Audit Team

- If lead auditor does not have the required three years' experience, at least one member of the audit team should have the required criteria. This could be a person from management who has the required experience, who will assist the lead auditor during the audit preparation and/or the audit execution. If this is not satisfied an external auditor must be outsourced to conduct that specific audit.

6.3 Planning audits

The lead auditor shall plan the audit as follows:

- Analyses the coordinated EMS and SMS documents relevant for the audit scope;
- Provides specific tasks to all audit team members;
- Decides if checklists or other tools and / or records are required for the audit and compiles them in coordination with the other operators.

The lead auditor shall prepare the audit plan for the specific audit, where necessary. The audit plan should define:

- The audit date, starting time and duration;
- Names and roles of the audit team members;
- The audit objectives/criteria/priorities;
- The audit scope: Areas / Sections to be audited; Operator's activities to be audited;
- The locations to be visited;
- Persons to be contacted.

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The lead auditor shall inform all those concerned, including the NR of the audit by email in advance.

6.4 Conducting audits

The audit team shall conduct the audit under the coordination and responsibility of the lead auditor by:

- Visiting working areas and places;
- Referring to relevant procedures and documents;
- Checking of records, forms, etc.
- Interviewing people working within the audit scope;
- Analysing processes and activities.

All the above mentioned audit activities are to be addressed to find evidence that can demonstrate the conformity and/or nonconformity to the coordinated EMS procedures, SOPs and other documents or site conditions.

6.5 Audit reporting

Following each audit, the lead auditor shall prepare an audit report within a month after the audit, which may contain the following information:

- persons interviewed;
- a summary of the audit activities carried out;
- the list of nonconformities and/or recommendations including a description of the situation and of the reasons for the nonconformity/recommendation;
- a remark on any difficulty encountered during the audit, including any lack of agreement on the audit conclusions;
- any area which was not covered during the audit;
- strong and weak areas;
- the observations found and the responsibilities
- a non-disclosure claim by audit team members (external).

The lead auditor will issue the audit report listing the non-conformities identified during the audit and any recommendations deemed fit to be implemented in order to improve the process/site being audited. The audit details and audit report are registered in audits section database (Q-Pulse). Any nonconformities or recommendations are recorded in the Non Conformance Register (Q-Pulse).

The audit report will be finalised after a closing meeting with the ENE, D3PG and EGM management representative/s, nominated representative/s, lead auditor and other auditor/s, to clarify any issues that were observed. The report should be forwarded to the respective operator concerned; ENE, D3PG and EGM Management representative.

If during the closing meeting there are issues that the three operators cannot find an agreement on who is responsible to tackle the issue/s, any charges incurred for the corrective

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action must be either divided between ENE, D3PG and EGM or divided between ENE, D3PG and EGM according to the area where the issue is situated. This would mean that if for example there is an issue in Phase 1 pump house, corrective action measures are divided between ENE/D3PG. And if for example there is an issue at Gas intake of GPRS, corrective action is divided between EGM/ENE.

7 Related documents

DWG-038 (DPS-XZ 161) – Tie in points Enemalta with D3

DWG-033 (DPS-XZ 180) - Tie in points Enemalta with D4

DWG-039 (DPS-XZ 193) – Emissions points to sea

DWG-040 (DPS-XZ 194) – DPS common areas not considered as tie in points