



RETAIL
COMPLIANCE
CENTER

ENVIRONMENTAL MANAGEMENT SYSTEMS FOR THE RETAIL SECTOR

SAMPLE PROCEDURES

Guide Five in a Series of Five.
These guides may be used sequentially if your company is at the initial stages of implementing an EMS or in a modular approach for those looking to improve elements of their existing EMS.

This material is provided for informational purposes only and should not be construed as legal, financial or other professional advise.

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INTRODUCTION

These sample procedures incorporate the approach presented in this Guide and can be modified to fit your approach and situation. Highlighted text in brackets can be modified for your facility. The combination of these procedures and tools from the Guide can serve as documentation for your EMS.

Keep in mind that an EMS is designed as a framework that should fit your organization's specific situation. Therefore, not all of these procedures will be applicable. They are just suggestions and should be treated as such.

MODULE 2: PLANNING – ENVIRONMENTAL ASPECTS

PROCEDURE 1-1: SAMPLE PROCEDURE FOR IDENTIFICATION OF ENVIRONMENTAL ASPECTS

Purpose

This procedure defines [Facility Name]'s method for the identification of environmental aspects and impacts associated with its operations.

Responsibilities of the EMS Team

The EMS Team, led by the EMS Manager or designee, is responsible for completing *Tool 2-1: Environmental Aspects and Impacts Common in Retail* for each core process and supporting activity. If possible, members of the EMS Team will conduct site visits, interviews, and physical inspections when completing the form.

At a minimum, the EMS Team will review the completed forms when they are first created, annually, and before, and immediately after implementation of new or modified processes or activities.

All environmental aspects are evaluated for significance as defined in *Procedure 4-1: Sample Procedure for Determination of Significant Environmental Aspects*.

Frequency

This procedure will be repeated at least annually. More frequent updates will be conducted for new projects or processes that affect the facility's significant aspects.

Records

The EMS Manager or designee maintains the completed *Tool 2-1*.

MODULE 3: PLANNING – COMPLIANCE OBLIGATIONS

PROCEDURE 3-1: SAMPLE PROCEDURE FOR IDENTIFICATION OF COMPLIANCE OBLIGATIONS

Purpose

This facility is committed to complying with all applicable environmental regulations. It will also strive to meet other commitments made in its environmental policy, such as commitments to community involvement, pollution prevention, and continuous improvement. This procedure describes how this facility identifies applicable compliance obligations.

Procedure

The EMS Manager is responsible for tracking applicable environmental laws and regulations and evaluating their potential impact on the facility's operations. The EMS Manager employs several techniques to track, identify, and evaluate laws and regulations. These techniques include [commercial databases, information from the trade association, direct communication with national and state regulatory agencies, periodic refresher training on environmental laws. . .].

As necessary, the EMS Manager may use off-site resources such as consultants or attorneys.

The EMS Manager reviews, compiles, and maintains copies of or links to applicable environmental laws and regulations.

The EMS Manager or subject matter expert, as delegated or assigned by the EMS Manager, reviews applicable environmental laws and regulations for changes on an annual basis.

The EMS Manager, working with the EMS Team and appropriate subject matter experts, determines the applicability of laws and regulations to the facility's business activities and environmental aspects and records the basis of determination. The EMS Coordinator maintains files of the Basis of Determination Memos.

The EMS Manager, working with the EMS Coordinator and EMS Team, correlates these regulations to the business activities and associated environmental aspects using *Tool 2-1: Environmental Aspects and Impacts Common in Retail* and *Tool 3-2: Legal Requirements Detail*.

Frequency

Ongoing.

Records

The EMS Coordinator maintains the Basis of Determination Memos, *Tool 2-1: Environmental Aspects and Impacts Common in Retail* and *Tool 3-2: Legal Requirements Detail*.

MODULE 4: PLANNING – DETERMINING SIGNIFICANCE

PROCEDURE 4-1: SAMPLE PROCEDURE FOR DETERMINATION OF SIGNIFICANT ENVIRONMENTAL ASPECTS

Purpose

This procedure defines [Your Facility]'s method for the determination of significance for aspects that have actual or potentially significant impacts on the environment.

Responsibilities of the EMS Team

The EMS Team, led by the EMS Manager or designee, is responsible for completing *Tool 4-1: Significance Determination of Environmental Aspects* for each environmental aspect identified for the facility. To start, the aspects recorded on *Tool 2-1: Environmental Aspects and Impacts Common in Retail* should be copied over to *Tool 4-1*. Individual aspects can be grouped when transferred to *Tool 4-1*; for example, if energy use is listed as an environmental aspect in several areas, these listings can be grouped so that energy use appears just once on *Tool 4-1*.

NOTE

The criteria and scale (numeric, "Yes" or "No") that you use to determine significance will be unique to your business and your needs. This procedure should be modified to reflect your approach. The procedure shown here is just an example.

What is important is that your approach is clearly documented and applied consistently.

Determination of Significant Environmental Aspects (SEAs)

The criteria defined below will be used to determine the significance of each environmental aspect.

- a. *Legal Requirements/Voluntary Commitments/Company Policy*: When an aspect is subject to legislation, regulation, and/or permit requirements and ongoing regulatory obligations that require actions on the part of the company, the aspect is significant. Aspects that are subject to environmental regulations only in the event of an incident (for example, an oil spill) will be recognized as significant when the event occurs, but also may be considered significant after taking into consideration its prevalence, frequency, and probability.

Community Concern: Aspects that are of concern to the community, such as common conditions of property entitlement of re-zoning, complaints, or critical inquiry.

Pollution Prevention Potential: Based on technical and business conditions, aspects with a high potential for pollution prevention or resource-use reduction.

Potential Impact to the Environment: Aspects associated with potential impacts to human health and the environment due to one or more of the following, will be considered significant:

Toxicity (compositional characterization of materials and wastes);

- Amount (volume of emissions, waste, or releases);
- Amount (consumption of renewable and non-renewable resources);
- Frequency of episodes; and
- Severity of actual or potential impacts.

Using Tool 4-1, the EMS Team will evaluate each aspect to determine if it is significant. The criteria are coded using the following approach.

CRITERIA	CODING	RANKING
Legal & Other Requirements	Yes - legal requirement, Other - other requirement or No	Yes = 3 Other = 2 No = 0
Community Concerns	High - majority of community members have expressed concern Medium - some community members have expressed concern Low - community members have expressed little to no concern	Low = 1 Medium = 2 High = 3
Pollution Prevention Potential	High - definite opportunity to reduce resource use Medium - potential opportunity to reduce resource use Low - little opportunity to reduce resource use	Low = 1 Medium = 2 High = 3
Potential Impact to the Environment	High - could cause severe impacts to the environment that would require outside assistance to address Medium - could cause some impacts to the environment that may require outside assistance to address Low - could cause minor impacts to the environment that can be addressed without outside assistance NA - no risk of environmental impacts	Low = 1 Medium = 2 High = 3 NA = 0

Aspects are considered to be "significant" if the aspect has an impact on the environment and meets one or more of the four criteria above. For criteria that are a "Yes" for Legal or Other Requirements, rank in the top half of aspects or have other important criteria, indicate "S" for significant in the appropriate column. Otherwise, indicate "N" for not significant. Provide the rationale for S or N in the comments section.

Frequency

This procedure will be repeated at least annually. More frequent updates will be conducted for new projects or processes that affect the facility's significant aspects.

Records

The originals of completed Tool 4-1 are maintained by the EMS Manager or designee.

MODULE 5: PLANNING - OBJECTIVES AND TARGETS

PROCEDURE 5-1: SAMPLE PROCEDURE FOR IDENTIFICATION OF OBJECTIVES AND TARGETS

Purpose

[Your Facility] sets objectives for environmental improvement and develops targets and action plans to meet those objectives. These objectives are directly related to the facility's significant environmental aspects (SEA) and follow from its environmental policy commitments.

Procedure


- a. For each SEA, the organization will establish an appropriate objective and target. The EMS Team or designee identifies objectives and targets that the [manager/title] reviews and approves for each SEA. The environmental objectives and targets for each SEA are recorded on *Tool 5-2: Objectives and Targets Worksheet*. There are three types of objectives represented as follows:
 - C -- Control or Maintain
 - I -- Improve
 - S -- Study or Investigate

Guidance regarding use of these objectives is provided for use by the EMS Team.

Control or Maintain is an appropriate objective for SEAs that are the subject of environmental regulations, because the environmental policy states that we will comply with the law. In these cases, the objective will be to maintain conformance with operational controls, such as procedures and work instructions that apply to the related SEA. The target will be ongoing.

Improve is appropriate for SEAs that our company goals commit us to improving. For example, objects relating to energy- or water-use reductions that are not required by law, but fall within our commitment to pollution prevention. Improvement objectives can also be used for SEAs that have regulatory drivers and environmental improvement goals. For example, we have regulatory requirements and stormwater pollution reduction goals for our stores. Fine sediments and oils from parking lots are carried away in rainwater and snowmelt. We wish to reduce our stormwater discharge levels below the limits common in many city stormwater ordinances. Thus, the objective for stormwater management will be C and I (that is, maintain compliance and reduce pollutant levels).

Study or Investigate is appropriate in cases where the EMS Team thinks improvement will be feasible and beneficial, but study is needed to determine how much improvement is possible, as well as appropriate approaches and timeframes. The objective will be to study alternatives by a target date in preparation for later setting an improvement objective (or dropping the objective if the study reveals that the changes are not financially, technologically, or logistically feasible).



The EMS Team is also responsible for developing and recommending potential new environmental objectives to senior management. In identifying potential new objectives, the EMS Team considers the following:

- Environmental policy;
- SEAs (especially, those SEAs that pose significant health or environmental risk);
- Applicable laws and regulations and potential future laws and regulations;
- Practical business criteria, such as the potential costs and benefits of pursuing a particular environmental objective and our commitment to sustainability; and
- The views of employees and other interested parties.

When developing and recommending objectives, the EMS Team should consider the ranking of aspects on Tool 4-1. SEAs with higher rankings will likely be good candidates for control, improvement, or investigation. The EMS Team, with input from operations managers, will also select one or more indicators to monitor the environmental performance for [Your Facility's Name] related to each SEA and measure progress in meeting the objectives and targets. Indicators will be recorded on Tool 5-2.

Once environmental objectives are approved by senior management, the EMS Manager assigns responsibility (for example, to the manager of the process in question) for developing targets and action plans to realize the objectives. Sometimes, this may require an alternatives evaluation (or study) as the first target (or action item).

Frequency

Environmental objectives should be reviewed at least annually. The targets and action plans are developed and revised as needed by the EMS Team or designee.

Records

Environmental objectives and targets, as well as the metrics, are recorded using Tool 5-2. The EMS Manager or designee is responsible for maintaining these records.

MODULE 8: DOING – TRAINING

PROCEDURE 8-1: SAMPLE PROCEDURE FOR ENVIRONMENTAL TRAINING

Purpose

To ensure that employees carry out their duties in as environmentally responsible a manner as possible, [Facility Name] provides environmental awareness training to all employees and task-specific training to employees whose jobs are associated with significant environmental aspects (SEA). *Tool 8-2: Sample Training Needs Analysis Form* will be used to document [Facility Name]'s training needs analysis.

Procedure

Awareness Training:

- a. All new employees receive a 10-minute introduction to the [Facility Name]'s EMS, specifically its environmental policy, SEAs, and environmental objectives, as part of the mandatory New Employee Orientation. New Employee Orientation is provided via the company intranet-based learning management system (LMS). Records of employees who have received New Employee Orientation are maintained in the LMS.

The EMS web page on the company web page includes a summary of the environmental policy, SEAs, and environmental objectives, as well as news updates on EMS implementation and EMS success stories. The page includes a mechanism for employee input and feedback and allows employees to receive RSS feeds from the EMS web page to their own personalized company home page.

A link to the EMS intranet web page, a short summary of the EMS's environmental policy, SEAs, environmental objectives, news updates on the EMS implementation, and EMS success stories will be included in six of the twelve monthly internal company newsletters.

Task-Specific Training:

Task-specific training is conducted for the following employees:

- Individuals and job titles with designated EMS roles and responsibilities; and
 - Job titles/functions with responsibility for managing or executing activities associated with SEAs.
- a. Using root cause analysis as a tool, the EMS Team, working with the appropriate operations managers, identifies the job functions that are associated substantially with each SEA.

The EMS Team, in conjunction with the relevant operations manager, then determines what training employees performing each of these job functions should receive in order to control environmental impacts to the greatest possible extent and comply with environmental regulations.

Job-title-wide training is assigned and managed by the LMS. The LMS keeps electronic records of the training received by each employee.

Individual task-specific training (which is not applicable to all employees in a given job title) will be assigned by the Environmental Manager in coordination with the employees' first-line supervisors. Records of the training will be entered into the LMS manually by the employee using the Transcripts Module of the LMS. Where possible, environmental training is integrated with other types of training (e.g. operational) that employees receive.



Frequency

Awareness training is given to new employees during their first week at [Facility Name] and annually to all employees. Task-specific training is given to relevant employees when they take on a new function associated with a SEA and refresher courses are given as required. Both awareness and task-specific training are reviewed at least annually for updates or when there are significant changes to operations.

Records

Records of the awareness and task-specific training received by each employee are kept electronically by the LMS. Tool 8-2 is used to document the training needs analysis and is maintained by the Human Resource Manager.

MODULE 9: DOING – COMMUNICATIONS

PROCEDURE 9-1: SAMPLE PROCEDURE FOR COMMUNICATION WITH STAKEHOLDERS ABOUT THE EMS

Purpose

To ensure that stakeholders receive information about, and can provide input regarding, environmental activities, [Your Facility] has developed this company policy for considering and, where appropriate, responding to queries, comments, or complaints from both internal and external stakeholders.

Procedure

- a. The EMS Team will identify stakeholders and their potential interests in the environmental performance of [Your Facility] using *Tool 9-2: Stakeholder Communications Matrix*. The EMS Team also determines what communication on significant environmental aspects (SEA) will occur and records its decision on Tool 9-2. If the EMS Team decides that proactive communication on environmental issues is necessary with any group, that decision is recorded on Tool 9-2 and the EMS Manager or EMS Team assigns responsibility. Engagement with external stakeholders requires concurrence from Corporate Communications, who will seek concurrence from Senior Management, General Counsel, Investor

Relations, Community Affairs, and Government Affairs, as appropriate. Internal stakeholder communication is addressed through a variety of elements of our EMS, including training, objectives and targets, and implementation that all require internal stakeholder communication.

Internal communication about the EMS is documented as appropriate.

The EMS Manager also maintains communication with emergency response agencies as required.

Communication received from external stakeholders regarding our environmental performance or management is immediately forwarded to the EMS Manager. The EMS Manager considers the nature of communications from external stakeholders and after concurrence from Corporate Communications (who seeks input from Senior Management, General Counsel, Investor Relations, Community Affairs, and Government Affairs, as appropriate) makes a decision on whether and how to respond. The EMS Manager is responsible for maintaining records of each external stakeholder communication and response using Tool 9-2.

Guidance for Communicating with Stakeholders on Environmental Issues

This [facility/organization]'s environmental policy will be made available to all stakeholders upon request. Our facility will also do its best to respond in kind to all good-faith communications from stakeholders about environmental issues. However, our facility (under guidance of the EMS Manager, Corporate Communications, and General Counsel) may choose not to respond in all cases, particularly if a request is made in bad faith or if sensitive data is requested.

Frequency

On an as-needed basis for external input, and as shown on Tool 9-2.

Records

Records of environmental communications from external stakeholders and our responses are kept by the EMS Manager and are tracked using Tool 9-2. Copies of the records are provided to Corporate Communications, who will distribute as appropriate. An updated version of Tool 9-2 is kept in the EMS Manual.

NOTE

It is important to make sure all policies are followed. This is especially important when it comes to your organization's policy for communicating with external stakeholders. Since these types of communications could become available to anyone, be consistent when sharing information about the EMS and environmental performance.

MODULE 10: DOING – DOCUMENTATION & DOCUMENT CONTROL

PROCEDURE 10-1: SAMPLE PROCEDURE FOR EMS DOCUMENTATION

Purpose

To ensure effective operation of the EMS, [Your Facility's Name] documents its EMS procedures and keeps records of the outcomes of EMS processes and of the important environmental issues facing the organization. This constitutes the facility's EMS Manual, which along with the referenced policies, procedures, and systems, comprises the EMS documentation.

Procedure

a. The EMS Manager maintains the procedures that define the EMS in the EMS Manual.

The EMS Team formally reviews and, if necessary, revises this manual on an annual basis and provides a summary of what was changed.

Revised manuals are assigned a new revision number (a minor set of revisions would change the number from, say, 1.1 to 1.2; a major revision would change the number from, say, 1.1 to 2.0). The EMS Coordinator ensures that employees do not use outdated revisions of this manual.

Frequency

The EMS Manual will be reviewed and revised on an annual basis.

Records

The EMS Manual will be maintained as described above.

PROCEDURE 10-2: SAMPLE PROCEDURE FOR DOCUMENT CONTROL


Purpose

To ensure effective operation of the EMS, [Your Facility's Name] will ensure that EMS documents are easy to find and up-to-date.

Procedure

a. The EMS Coordinator maintains updated documents for the following outcomes or results:

- Environmental aspects and Significant Environmental Aspects (SEAs);
- Applicability of legal requirements to environmental aspects;
- Objectives, targets, and action plans for environmental management programs;
- List of operational control procedures related to SEAs;
- Results of internal audits;
- Corrective and preventive actions taken; and
- Management reviews.



In addition, lists of (including links to) the regulations applicable to the EMS are maintained by the EMS Manager, who will also maintain documentation of how applicability and non-applicability were determined (Basis of Determination)

The EMS Coordinator is not responsible for maintaining records of environmental training and emergency response preparations, or the operational control procedures themselves. These records are maintained by the appropriate person or group.

The EMS Manager or designee will control all EMS documents and records from items 1 and 2 using *Tool 10-3: Sample Document Control Tool* and *Tool 10-4: Sample Document Index Form*.

Frequency

The document control process will be reviewed at least annually.

Records

Maintained as outlined in this procedure.

MODULE 11: DOING - OPERATIONAL CONTROLS

PROCEDURE 11-1: SAMPLE PROCEDURE FOR DEVELOPMENT OF OPERATIONAL CONTROL PROCEDURES

Purpose

By developing operational control procedures for critical activities associated with significant environmental aspects (SEA), [Your Facility's Name] intends to mitigate and control, to the extent possible, the environmental impacts associated with its SEAs.

Procedure

- a. The EMS Team, with input from other employees as needed, carries out a root cause analysis of each SEA to determine the underlying causes of the environmental impact. As part of the root cause analysis, the EMS Team will determine the need for (and adequacy of, if already existing) operational control procedures to control the critical activities related to the findings on *Tool 11-2: Sample Worksheet for Determining Which Operations or Activities Require Operational Controls*.

Where there is a need to create or modify an operational control procedure, the EMS Team assigns a member of the Team to draft or edit an operational control procedure, with input from relevant employees. Where possible, environmental controls will be integrated into existing operational control procedures. In other cases, a new procedure will be written. The operational control procedure will be issued as a "Work Instruction" (a summary list of required steps or measures). In addition to describing the steps necessary to carry out the activity in an environmentally sound manner, the Work Instruction will include steps to conduct monitoring, as applicable.

After the operational control procedure has been developed and implemented, its status is recorded on *Tool 11-3: Sample Worksheet for Operational Control Responsibilities*. The procedure itself is entered into the relevant [Your Facility's Name] operator's handbook and/or is posted at the site of the activity. It is also listed in the EMS Manual or included in it as a procedure related to the EMS.

Frequency

As new SEAs are identified or there are significant changes to regulations or conditions. For existing SEAs, a review of the root cause analysis and operational control procedures is conducted yearly.

Records

Tools 11-2 and 11-3 are maintained by the EMS Coordinator. The specific procedures are maintained in the relevant [Your Facility's Name] operator's handbook and/or posted at the site of the activity in question.

MODULE 12: DOING - EMERGENCY PREPAREDNESS AND RESPONSE

PROCEDURE 12-1: SAMPLE PROCEDURE FOR EMERGENCY PREPAREDNESS AND RESPONSE

[This procedure assumes that your company has an existing general Emergency Preparedness and Response Plan, into which environmental considerations can be integrated.]

Purpose

As part of its EMS, [Your Facility's Name] strives to ensure that the environmental impacts associated with emergency situations are prevented or mitigated to the greatest extent possible. The facility will comply with all regulatory requirements related to emergency situations.

Procedure

- a. [Your Facility's Name] has an Emergency Response Committee charged with identifying potential emergency scenarios and developing and ensuring the implementation of appropriate procedures in emergencies. With the assistance of the EMS Coordinator, the Emergency Response Committee:
 - Identifies the potential negative significant environmental aspects (SEA) associated with potential emergency scenarios;
 - Incorporates measures into Emergency Preparedness and Response (EP&R) procedures to prevent these emergencies or minimize the impacts;
 - Identifies, with assistance from Corporate Environmental Health and Safety, federal, state, and local environmental regulatory requirements, such as release reporting and develops procedures for ensuring compliance;
 - Ensures that adequate training, including simulations, is provided to appropriate staff; and
 - Records information on this process in *Tool 12-2: Emergency Preparedness and Response Requirements Matrix*.

Input is obtained from staff in relevant areas who might have suggestions on how to improve the EP&R program.

The Emergency Response Committee maintains records of the potential emergency scenarios, the potential environmental impacts associated with each scenario, and the procedures established to minimize these impacts.

The Emergency Response Committee or designee maintains contact with local emergency response personnel that might assist in the event of an actual emergency.

The company's online Learning Management System keeps electronic records of training received by staff on emergency response procedures.

Frequency

The Emergency Response Committee meets annually to review the status of its work. Contact with Logistics and Transportation facilities' designated emergency personnel is made at least annually or as necessary based on regulatory requirements or activity changes at the facility that may impact the EP&R program.

Records

Records of emergency scenarios, associated potential environmental impacts, and procedures to mitigate these impacts (including Tool 12-2) are kept by the Emergency Response Committee. Training records are maintained by the company's online Learning Management System.

MODULE 13: CHECKING – MONITORING AND MEASUREMENT

PROCEDURE 13-1: SAMPLE PROCEDURE FOR COMPLIANCE ASSESSMENT

Purpose

[Your Facility's Name] will conduct periodic compliance assessments to ensure that it complies with all applicable local, state, and federal environmental regulations.

Procedure

a. The EMS Manager and EMS Coordinator will implement and maintain this compliance assessment procedure based on applicable legal regulations and input from internal subject matter experts in Corporate Compliance, Legal, Maintenance, and Operations, as well outside resources such as vendors and consultants. This procedure sets out the frequency of assessment, the number and kinds of facilities to assess, the general logistical approach to performing the assessments (site visits, telephone survey with backup documentation, etc.), and a list of questions as a compliance assessment protocol (audit questionnaire/checklist). Selection of facilities to be assessed must consider the following factors with the goal of assessing a representative sample of stores:

- Store format;
- Store age;
- Revenue performance;
- Past compliance performance;
- Store management turnover;
- Employee turnover; and
- Demographic and geographic attributes of the facility (e.g. neighborhood income; urban, suburban, or rural; neighborhood minority population).

The compliance assessment procedure is intended to determine the compliance status of [Your Facility's Name] with respect to applicable environmental regulations.

For stores, the Regional Loss Prevention Managers will conduct the assessments by answering the compliance assessment protocol. When they are done with the compliance assessment, they deliver a copy to the EMS coordinator, who records any actual or potential compliance issues on *Tool 13-3: Compliance Tracking Log*. Each actual and potential compliance issue is immediately referred to corrective action.

Frequency

Annual. The compliance assessment will be performed each fiscal year.

Records

The EMS Coordinator records and maintains assessment results on Tool 13-3.

MODULE 14: CHECKING – NONCONFORMITY AND CORRECTIVE AND PREVENTIVE ACTION

PROCEDURE 14-1: SAMPLE PROCEDURE FOR CORRECTIVE AND PREVENTIVE ACTION

Purpose

The purpose of this procedure is to establish the process for identifying, documenting, analyzing, and implementing corrective and preventive actions.

Scope

Corrective or preventive actions may be initiated using this procedure for any environmental problem affecting the organization.

General

- A. Corrective action is generally a reactive process used to address problems after they have occurred. Corrective action is initiated using the Corrective and Preventive Action Notice (CAPAN) in Tool 14-2. Corrective action may be triggered by a variety of events, including internal audits and management reviews. Other items that might result in a corrective CAPAN include neighbor complaints or the results of monitoring and measurement.
- B. Preventive action is generally a proactive process intended to prevent potential problems before they occur or become more severe. Preventive action also is initiated using the CAPAN in Tool 14-2. Preventive action focuses on identifying negative trends and addressing them before they become significant. Events that might trigger a preventive CAPAN include monitoring and measurement, trends analysis, tracking of progress on achieving objectives and targets, response to emergencies and near misses, and customer or neighbor complaints, among other events.
- C. CAPANs are prepared, managed, and tracked using the corrective and preventive action database (or *Tool 14-3: Sample Corrective and Preventive Action Tracking Log*).
- D. The EMS Coordinator (or designee) is responsible for reviewing issues affecting the EMS, the application, and maintenance of this procedure, and any updates to EMS documents affected by the corrective and preventive actions.
- E. The EMS Coordinator is responsible for logging CAPANs into the database, as well as tracking and recording the submission of solutions. The requester and the recipient of the CAPAN are responsible for verifying the effectiveness of the solution. The EMS Manager is responsible for overall tracking and reporting on preventive and corrective actions.
- F. Personnel receiving CAPANs are responsible for instituting the required corrective or preventive action, reporting completion of the required action to the EMS Manager, and assuring sustained effectiveness.
- G. Completed records of CAPANs are maintained in the corrective and preventive action database for at least two years after completion of the corrective or preventive action.

Procedure

1. Issuing a CAPAN

- a. Any employee may request a CAPAN and bring the problem to the attention of the EMS Manager. The EMS Manager is responsible for determining whether a CAPAN is appropriate and entering it into the corrective and preventive action database. Responsibility for resolving the problem is assigned to a specific individual ("the recipient").

The EMS Manager, working with the recipient, determines an appropriate due date for resolving the CAPAN.

2. Determining and Implementing Corrective and Preventive Actions

- a. The CAPAN is issued to the recipient, who is responsible for investigating and resolving the problem. The recipient is also responsible for communicating the corrective or preventive action taken.
- b. If the recipient cannot resolve the problem by the specified due date, he/she is responsible for determining an acceptable alternate due date with the EMS Manager.

3. Tracking CAPANs

- a. Close-out of CAPANs are tracked by the EMS Manager or her/his designee using Tool 14-2. CAPANs whose resolution dates are overdue are listed on the Overdue Solutions report. The EMS Manager is responsible for issuing this report on a weekly basis to the appropriate manager and the recipients of any overdue CAPANs.
- b. Records of CAPANs are maintained in the corrective and preventive action database for at least two years after completion of the corrective or preventive action.

4. Tracking Effectiveness of Solutions

- a. The recipient of a CAPAN, in conjunction with the requester, is responsible for verifying the effectiveness of the solution. If the solution is deemed not effective, the CAPAN will be reissued to the original recipient.

Frequency

CAPANs are requested and issued as needed.

Records

The EMS Coordinator maintains records of the CAPANs in the corrective and preventive action database (Tool 14-3). CAPANs are kept for two years after resolution of the issue.

MODULE 15: CHECKING – EMS AUDITS

PROCEDURE 15-1: SAMPLE PROCEDURE FOR EMS AUDITS

Purpose

To define the process for conducting periodic audits of the EMS. This procedure defines the process [Your Facility's Name] will use to schedule, conduct, and report EMS audits.

Scope

This procedure applies to all internal EMS audits conducted in this facility. The scope of EMS audits may cover all activities and processes comprising the EMS or selected EMS elements. This will be specified at the beginning of each audit.

General

Internal EMS audits help ensure the proper implementation and maintenance of the EMS by verifying that activities follow documented procedures and that corrective actions are undertaken and are effective.

All audits are conducted by trained auditors.

When a candidate for EMS auditor is assigned to an audit team, the Lead Auditor will prepare an evaluation of the candidate auditor's performance following the audit.

The EMS Manager and the EMS Coordinator are responsible for maintaining EMS audit records, including a list of trained auditors, auditor training records, audit schedules and protocols, and audit reports. Training records also will be maintained by the Human Resource Manager in accordance with the EMS Training procedure.

EMS audits are scheduled to ensure that all EMS elements and EMS-managed operations and functions are audited at least once each year. The EMS Manager is responsible for scheduling audits. The Lead Auditor is responsible for ensuring that the audit, audit report, and any feedback to the operational or functional groups covered by the audit are completed per the audit schedule.

Procedure

1. *Audit Team Selection* - An audit team consists of one or more auditors. When the team consists of more than one auditor, a Lead Auditor will be designated. The Lead Auditor is responsible for the audit team orientation, coordinating the audit process, and coordinating preparation of the audit report.
2. *Audit Team Orientation* - The Lead Auditor will ensure that the team is adequately prepared to initiate the audit. Pertinent policies, procedures, standards, regulatory requirements, and prior audit reports are made available for review by the audit team. Each auditor will have appropriate audit training, as defined by the Training Procedures.
3. *Written Audit Plan* - The Lead Auditor is responsible for ensuring the preparation of a written plan for the audit. Tool 15-2: Sample EMS Audit Form may be used as a guide for this plan.
4. *Prior Notification* - The facility areas and/or functions to be audited are to be notified a reasonable amount of time prior to the audit.

5. *Conducting the Audit*

- A pre-audit conference is held with appropriate personnel to review the scope, plan, and schedule for the audit.
- Auditors can modify the audit scope and plan if conditions warrant.
- During the audit, objective evidence is examined to verify conformance to EMS requirements, including operating procedures. All audit findings must be documented.
- Specific attention is given to corrective actions for audit findings from previous audits.
- A post-audit conference is held to present audit findings, clarify any misunderstandings, and summarize the audit results.

6. *Reporting Audit Results*

- The Lead Auditor coordinates the preparation of the audit report, which summarizes the audit scope, identifies the audit team, describes sources of evidence, and summarizes the audit results.
- Findings requiring corrective action are entered into the corrective action database.

7. *Audit Report Distribution*

- The EMS Manager is responsible for communicating the audit results and making the audit report available to responsible area and/or functional management.
- The EMS Manager is responsible for ensuring availability of audit reports for the annual Management Review.

8. *Audit Follow-up*

- Management in the affected areas and/or functions is responsible for follow-up actions needed as a result of the audit.
- The EMS Manager is responsible for tracking the completion and effectiveness of corrective actions.

Records

Audit reports are retained for at least two years from the date of audit completion. The EMS Manager is responsible for maintaining such records. Auditor training records will be retained by both the EMS Manager and the Human Resources Manager.

Frequency

EMS audits are scheduled to ensure that all EMS elements and EMS-managed operations and functions are audited at least once each year.

MODULE 16: CHECKING - MANAGEMENT REVIEW

TOOL 16-1: SAMPLE PROCEDURE FOR MANAGEMENT REVIEW

Purpose

To ensure the effectiveness of the EMS and its continual improvement, [Your Facility's Name]'s top management periodically reviews the important elements and outcomes of the EMS. The Management Review process is intended to provide a forum for discussion and improvement of the EMS and to provide management with a vehicle for making any changes to the EMS necessary to achieve the organization's goals.

Procedure

- a. In preparation for the management review, the EMS Manager makes the following information available to senior management:
 - Environmental policy;
 - List of the EMS Team members and others responsible for major parts of the EMS;
 - List of significant environmental aspects (SEA) and criteria for determining significance;
 - Update on compliance status of the facility and on any potential upcoming regulations or issues that might require an advance strategy;
 - List of environmental objectives and targets;
 - Environmental performance results (from monitoring and measuring SEA indicators and indicators of progress toward environmental objectives and targets);
 - Bullet-point descriptions of other accomplishments of the EMS (e.g. number of people trained);
 - Results of most recent EMS internal assessment, compliance assessment, and corrective actions taken;
 - Description and documentation of feedback from stakeholders; and
 - Analysis of the costs and benefits of the EMS (as quantitative as possible).

Top facility management meets to review and discuss the information. The EMS Manager and EMS Coordinator will also be present. Depending on its review, top management may direct specific and/or significant changes in the scale and direction of the EMS in order to improve its effectiveness and business value. The conclusions and directives that result from the management review are recorded on *Tool 16-2: Management Review Record* and kept by the EMS Coordinator.

Frequency

The management review will be conducted at least annually.

Records

Results of management reviews are recorded using Tool 16-2. Records are kept by the EMS Coordinator.

ABOUT THE RETAIL COMPLIANCE CENTER

The Retail Compliance Center (RCC) provides resources on environmental compliance and sustainability for all types and sizes of retailers. The RCC's goal is to develop retail-specific resources, tools and innovative solutions to help companies cost-effectively improve their compliance and environmental performance.