

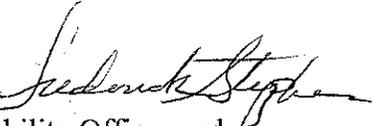


UNITED STATES DEPARTMENT OF COMMERCE
Chief Financial Officer and
Assistant Secretary for Administration
Washington, D.C. 20230

JAN 08 2013

MEMORANDUM FOR THE FILE

FROM:

Fred Stephens 
Senior Sustainability Officer and
Deputy Assistant Secretary for Administration

SUBJECT:

Environmental Management System Declaration of Continued
Conformance

The headquarters-level, highest-tier Environmental Management System (EMS) is the primary management system for meeting or exceeding the goals of our Strategic Sustainability Performance Plan, as required by Executive Order 13514, *Federal Leadership in Environmental, Energy, and Economic Performance*, and for maintaining compliance with applicable environmental laws, regulations and other energy and environmental requirements. EMS facilitates continual improvement in the Department's overall environmental performance.

I am pleased to determine that the Department's (DOC or Department) headquarters-level EMS continues to conform to the requirements of Executive Order (EO) 13423, *Strengthening Federal Environmental, Energy, and Transportation Management*, and applicable elements of the ISO 14001:2004(E) standard for EMS. This determination is based on compliance with the following self-declaration requirements set forth in the Council on Environmental Quality's *Instructions for Implementing Executive Order 13423* and supplementary guidance issued by the Office of the Federal Environmental Executive:

- 1) the highest-tier EMS has been subject to a minimum of a first-party audit;
- 2) the audit findings have been recognized by the appropriate level of the agency implementing the EMS; and
- 3) the appropriate senior manager accountable for implementation of the EMS has declared conformance to EMS requirements.

DOC's EMS underwent an external audit on 14 – 15 November 2012. The audit determined that the Department's EMS was in conformance with the following elements of Office of the Federal Environmental Executive guidance:

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- 1) an environmental policy has been established and implemented;
- 2) the Department has set objectives and targets with metrics, derived from its Strategic Sustainability Performance Plan (SSPP) and other environmental guidelines to which it attests;
- 3) it has implemented a monitoring and reporting system to track progress on SSPP goals;
- 4) it has implemented an internal EMS audit system; and
- 5) roles and responsibilities have been fully implemented and communicated

The EMS audit identified one (1) major non-conformance of the ISO 14001:2004(E) standard; DOC, though it has created a Corrective and Preventative Action System (CPAS), failed to utilize the management controls put into place. This has now been corrected by the interim use of a spreadsheet as a CPAS planning, tracking and reporting tool. Final implementation will be through a web-based auditing and reporting tool, iEHS (refer below), effective in May 2013.

The EMS audit identified one (1) minor repeat non-conformance of the ISO 14001:2004(E) standard; DOC does not have a system in place for reporting compliance with environmental laws and regulations from the bureaus to the headquarters level. This issue is being addressed through the development of the Department's Environmental Compliance Auditing and Reporting System (ECARS). Through ECARS the Department is rolling out iEHS, a web-based environmental, health and safety auditing tool.

The EMS audit identified an additional nine (9) minor non-conformities of the ISO 14001:2004(E) standard; all having to do with administration of the EMS. These nine (9) minor non-conformities will be addressed through revisions to, approval and release of the Department's EMS Operations Manual.

The Department has established corrective action plans to address the above non-conformities. As the Department's Senior Sustainability Officer, I have recognized the audit results and corrective action plan to address the findings, and hereby declare the Department of Commerce's highest-tier EMS to be fully implemented.