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**DEPARTMENT OF COMMERCE
ENVIRONMENTAL MANAGEMENT SYSTEM**

**Audit Report
Audit Dates: November 14-15, 2012**

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1. Executive Summary

Goal and Scope

The Department of Commerce (DOC) Environmental Management System (EMS) Audit was performed to gauge the implementation, sufficiency, and effectiveness of the DOC's EMS against the ISO 14001:2004 standard. The results of the audit will be used to generate corrective and preventive actions that demonstrate continual improvement.

The audit was conducted from November 14 – 15, 2012. The scope of this audit was limited to the DOC's "organizational" EMS which included the following EMS components:

- Policy (ISO 14001:2004, Element 4.2)
- Legal and other requirements (ISO 14001:2004, Element 4.3.2)
- Objectives, targets and programs (ISO 14001:2004, Element 4.3.3)
- Resources, roles, responsibility and authority (ISO 14001:2004, Element 4.4.1)
- Competence, training and awareness (ISO 14001:2004, Element 4.4.2)
- Communication (ISO 14001:2004, Element 4.4.3)
- Documentation (ISO 14001:2004, Element 4.4.4)
- Control of documents (ISO 14001:2004, Element 4.4.5)
- Monitoring and measurement (ISO 14001:2004, Element 4.5.1)
- Evaluation of compliance (ISO 14001:2004, Element 4.5.2)
- Nonconformity, corrective action and preventive action (ISO 14001:2004, Element 4.5.3)
- Control of records (ISO 14001:2004, Element 4.5.4)
- Internal audit (ISO 14001:2004, Element 4.5.5)
- Management review (ISO 14001:2004, Element 4.6)

Interviews were conducted with Office of Sustainable Energy and Environmental Programs (OSEEP) staff and DOC management. The audit included document reviews of EMS policies and procedures.

Results Summary

Findings from this audit have been characterized as:

Major Nonconformity: Absence or complete breakdown of a system element; or, several instances of non-conformity with an element of the ISO 14001 standard.

Minor Nonconformity: Single observed nonconformity with the ISO 14001 standard.

Opportunity for Improvement (OFI): An idea for improvement; if unaddressed, OFI's could become nonconformities.

System Strength: Best practice in the system or an environmental management positive practice.

Detailed results are listed in Section 3 below by ISO 14001 element.

Major Non-conformities:

- A corrective and preventive action process has not been sufficiently established, implemented, and maintained. This is evidenced by a lack of significant progress on implementing corrective plans since the prior year's audit, inadequate procedures, and failure to implement existing procedures.

Minor Non-conformities:

- The "General/Policy Goals" listed in the FY2013 Objectives and Targets do not have "programs" for achieving the objectives and targets identified, including responsible individuals, means, or timeframe, as required by the ISO 14001 standard.
- The management system documentation does not include a "description of the main elements of the environmental management system and their interaction, and reference to related documents" as required by the ISO standard, section 4.4.4 Documentation. The EMS Operating Manual is in draft form and has not been approved or issued for use.
- There is no procedure identified for monitoring progress of "General/Policy Goals" as identified in fiscal year objectives and targets. While OMB Scorecard goals are identified as being monitored using the SSPP and quarterly "dasher" updates, the process currently used, weekly staff updates provided to the OSEEP Direct, is not identified in the objectives and targets monitoring section of the manual. Consider documenting progress toward these objectives and targets.
- There was a lack of evidence demonstrating that top management has "reviewed the environmental management system" as required by the ISO 14001 standard.

Opportunities for Improvement:

- There is an opportunity to clarify the scope of the EMS as described in the EMS Operating Manual.
- There is an opportunity to improve the environmental policy by including a commitment with other requirements to which the organization subscribes.
- There is an opportunity to improve communication regarding the environmental policy.
- The procedure for setting objectives and targets should include a more explicit requirement to consider legal requirements when developing objectives and targets and how this is done.
- There is an opportunity to improve the understanding of roles and responsibilities in relation to the ISO 14001 standard by clearly documenting the Senior Sustainability Officer as the organization's "environmental management representative" and the Secretary of Commerce and specific members of the executive management team as "top management" and updating associated responsibilities in the manual.
- There is an opportunity to improve the procedure for external communication by adding language to describe the process for receiving, documenting, and responding" to comments or complaints from the public or stakeholders.
- There is an opportunity to improve the procedure for record control in the EMS Operating Manual by referencing DAO 205-1 Records Management. Consider incorporating any requirements from the DAO regarding "retrieval, retention and disposal of records" as these are required by the ISO 14001 standard.
- There is an opportunity to improve the management system procedure for internal audit by revising the specified scope of audits to match the revised scope of the EMS,

including resources, roles, and responsibilities; aspects; legal and other requirements; training; communication; document control; record control; internal audit; evaluation of compliance; and corrective and preventive action.

- The management review procedure in the EMS Operating Manual could be improved by including the ISO 14001 requirement to incorporate the “status of corrective and preventive actions” in management review. While the most recent documented management review did include this, the procedure does not state that this is a required input.
- As mentioned by the Director of Administrative Services, consider the potential for increasing bureau participation in management review.

System Strengths:

- The Energy and Environmental Management Department Administrative Order (DAO 217-16) has been issued, authorizing the issuance of other documents and requirements necessary for the EMS.
- The development of an environmental liabilities management program to provide improved oversight of the identification and management of environmental risk is a positive practice.
- Census Bureau office equipment and office supplies were reused by DOC staff resulting in \$1.3 million in cost savings.
- Annual environmental stewardship awards are an excellent way to recognize great work within the DOC and encourage staff to find ways to protect the environment while saving money.
- The collection, exchange within the DOC, and auction of unused toner cartridges resulted in significant environmental benefits while avoiding \$90,000 in costs of new toner cartridges and bringing in \$30,000 in auction sales of cartridges.
- Management review presentation slides appear to provide an effective communication of conclusions and challenges throughout.

2. Approach

The DOC EMS Audit was performed to gauge the implementation, sufficiency, and effectiveness of the organization’s EMS and determine conformance to the ISO 14001 standard. Interviews and document and record reviews were conducted. The results of the audit will be used to generate corrective and preventive actions that demonstrate continual improvement.

Audit Team

Due to the limited scope of the audit, the lead auditor, Kurt Schlomberg, conducted all interviews and document reviews.

Interviews

Interviews were conducted with DOC management and staff, including:

- Greg Falzetta, EMS Coordinator
- Jedd Narsavage, Support Contractor

- Rob Tomiak, Director, Office of Sustainable Energy and Environmental Programs (OSEEP)
- Rosaline Hill, Pollution Prevention Program Manager
- Bob Scinta, Energy Program Manager
- Mary Pleffner, Director, Office of Administrative Services (Deputy Senior Sustainability Officer)

Documentation and Records Review

A number of documents and records were reviewed during the audit including:

- Department Statement of Environmental Management Policy (memo from Secretary of Commerce dated 12/9/2010)
- DOC Environmental Management System Operating Manual (October, 2011) (Draft)
- DOC EMS FY2012 and FY2013 Objectives and Targets
- DOC EMS Annual Review presentation (Dec. 6, 2011)
- Energy and Environmental Management Manual (EEMM) (Sept., 2012)
- DOC EMS Significant Environmental Aspects (11-05-10) list
- DOC EMS Determination of Significant Aspects (Oct. 14, 2010) spreadsheet
- DOC Strategic Sustainability Performance Plan (June, 2011)
- Annual Review of DOC Significant Environmental Aspects and FY2013 Objectives and Targets (Nov. 5, 2012) memo
- Facilities Management Council presentation samples (April 18, 2012; Dec. 14, 2011; Feb. 8, 2012)
- “Dashers” for October, 2012
- EMS Audit for DOC (Nov. 16, 2011) audit report

On-site tours and inspections

No site tours or inspections were conducted.

Corrective and Preventive Action Plan

A corrective and preventive action plan to address the nonconformities identified will be provided to the lead auditor within 60 days of receipt of the final audit report. The plan should address:

- 1) Correction of immediate problems
- 2) Determination if the nonconformances exist elsewhere in the system
- 3) Preventive measures

The lead auditor will review the plan and, if adequate, approve the plan.

3. Results by ISO 14001 EMS Element

The following table lists all the major elements of ISO 14001 and details any findings identified during the audit.

ISO §4.1 — General requirements

ISO Requirement:	<p>The organization shall establish, document, implement, maintain and continually improve an environmental management system in accordance with the requirements of this International Standard and determine how it will fulfill these requirements.</p> <p>The organization shall define and document the scope of its environmental management system.</p>
Comments / Findings:	
<p>OFI - There is an opportunity to clarify the scope of the EMS as described in the EMS Operating Manual. The manual lists only the environmental policy development; objectives, targets and metrics; monitoring and measurement; and management review as being in the scope. However, the manual also describes other elements of the management system including resources, roles, and responsibilities; environmental aspects; legal and other requirements; training; communication; document control; record control; internal audit; evaluation of compliance; and corrective and preventive action.</p>	

ISO §4.2 — Environmental policy

ISO Requirement:	<p>Top management shall define the organization's environmental policy and ensure that, within the defined scope of its environmental management system, it</p> <ul style="list-style-type: none"> a) is appropriate to the nature, scale and environmental impacts of its activities, products and services, b) includes a commitment to continual improvement and prevention of pollution, c) includes a commitment to comply with applicable legal requirements and with other requirements to which the organization subscribes which relate to its environmental aspects, d) provides the framework for setting and reviewing environmental objectives and targets, e) is documented, implemented and maintained, f) is communicated to all persons working for or on behalf of the organization, and g) is available to the public.
Comments / Findings:	
<p>OFI - There is an opportunity to improve the environmental policy by including a commitment with other requirements to which the organization subscribes. Currently, the policy includes a commitment to "applicable Presidential Executive Orders." However, there is at least one additional "other requirement" in place, the Energy and Environmental Management Department Administrative Order (DAO 217-16).</p>	
<p>OFI – There is an opportunity to improve communication regarding the environmental policy.</p>	

While the policy has been communicated to all staff via a departmental letter and newsletter, further opportunities to communicate the key policy commitments of pollution prevention, compliance, and continual improvement include new employee orientation, additional information on the EMS website, and the Environmental Stewardship Training.

System Strength – The Energy and Environmental Management Department Administrative Order (DAO 217-16) has been issued, authorizing the issuance of other documents and requirements necessary for the EMS.

ISO §4.3.1 — Environmental aspects

ISO Requirement:	<p>The organization shall establish, implement and maintain a procedure(s)</p> <p>a) to identify the environmental aspects of its activities, products and services within the defined scope of the environmental management system that it can control and those that it can influence taking into account planned or new developments, or new or modified activities, products and services, and</p> <p>b) to determine those aspects that have or can have significant impact(s) on the environment (i.e. significant environmental aspects).</p> <p>The organization shall document this information and keep it up to date.</p> <p>The organization shall ensure that the significant environmental aspects are taken into account in establishing, implementing and maintaining its environmental management system.</p>
Comments / Findings:	
<p>System Strength – The development of an environmental liabilities management program to provide improved oversight of the identification and management of environmental risk is a positive practice.</p>	

ISO §4.3.2 — Legal and other requirements

ISO Requirement:	<p>The organization shall establish, implement and maintain a procedure(s)</p> <p>a) to identify and have access to the applicable legal requirements and other requirements to which the organization subscribes related to its environmental aspects, and</p> <p>b) to determine how these requirements apply to its environmental aspects.</p> <p>The organization shall ensure that these applicable legal requirements and other requirements to which the organization subscribes are taken into account in establishing, implementing and maintaining its environmental management system.</p>
Comments / Findings:	
<p>System Strength – The Energy and Environmental Management Manual provides a clear, concise and practical guide to operating units to comply with federal environmental requirements.</p>	

ISO §4.3.3 — Objectives, targets and programme(s)

ISO	The organization shall establish, implement and maintain documented
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Requirement:	<p>environmental objectives and targets, at relevant functions and levels within the organization.</p> <p>The objectives and targets shall be measurable, where practicable, and consistent with the environmental policy, including the commitments to prevention of pollution, to compliance with applicable legal requirements and with other requirements to which the organization subscribes, and to continual improvement.</p> <p>When establishing and reviewing its objectives and targets, an organization shall take into account the legal requirements and other requirements to which the organization subscribes, and its significant environmental aspects. It shall also consider its technological options, its financial, operational and business requirements, and the views of interested parties.</p> <p>The organization shall establish, implement and maintain a programme(s) for achieving its objectives and targets. Programme(s) shall include</p> <ol style="list-style-type: none"> designation of responsibility for achieving objectives and targets at relevant functions and levels of the organization, and the means and time-frame by which they are to be achieved.
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Comments / Findings:

Minor Nonconformity – The “General/Policy Goals” listed in the FY2013 Objectives and Targets do not have “programs” for achieving the objectives and targets identified, including responsible individuals, means, or timeframe, as required by the ISO 14001 standard.

OFI – The procedure for setting objectives and targets should include a more explicit requirement to consider legal requirements when developing objectives and targets and how this is done. The procedure is currently focused on developing objectives and targets related to Executive Order 13514, the OMB Scorecard, and the Strategic Sustainability Performance Plan (SSPP). While the organization has set some objectives and targets in addition to the Order, the OMB Scorecard, and SSPP (e.g., FY2013 Objectives and Targets “General/Policy Goals”), the procedure does not describe *how* this is done. The procedure states that “The EMS Coordinator shall recommend measurable DOC-wide objectives for improvement in accordance with the Strategic Sustainability Performance Plan *and other environmental requirements* (emphasis added) to the Senior Sustainability Officer and the Committee.” This could be expanded upon to include further definition of how objectives and targets are developed such as consideration of risk, compliance, management input, organizational goals, etc.

ISO §4.4.1 — Resources, roles, responsibility and authority

ISO Requirement:	<p>Management shall ensure the availability of resources essential to establish, implement, maintain and improve the environmental management system. Resources include human resources and specialized skills, organizational infrastructure, technology and financial resources.</p> <p>Roles, responsibilities and authorities shall be defined, documented and communicated in order to facilitate effective environmental management.</p>
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	<p>The organization’s top management shall appoint a specific management representative(s) who, irrespective of other responsibilities, shall have defined roles, responsibilities and authority for</p> <p>a) ensuring that an environmental management system is established, implemented and maintained in accordance with the requirements of this International Standard,</p> <p>b) reporting to top management on the performance of the environmental management system for review, including recommendations for improvement.</p>
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Comments / Findings:

OFI – There is an opportunity to improve the understanding of roles and responsibilities in relation to the ISO 14001 standard by clearly documenting the Senior Sustainability Officer as the organization’s “environmental management representative” and the Secretary of Commerce and specific members of the executive management team as “top management” and updating associated responsibilities in the manual.

System Strength – Census Bureau office equipment and office supplies were reused by DOC staff resulting in \$1.3 million in cost savings.

System Strength – Annual environmental stewardship awards are an excellent way to recognize great work within the DOC and encourage staff to find ways to protect the environment while saving money.

System Strength – The collection, exchange within the DOC, and auction of unused toner cartridges resulted in significant environmental benefits while avoiding \$90, 000 in costs of new toner cartridges and bringing in \$30,000 in auction sales of cartridges.

ISO §4.4.2 — Competence, training and awareness

<p>ISO Requirement:</p>	<p>The organization shall ensure that any person(s) performing tasks for it or on its behalf that have the potential to cause a significant environmental impact(s) identified by the organization is (are) competent on the basis of appropriate education, training or experience, and shall retain associated records.</p> <p>The organization shall identify training needs associated with its environmental aspects and its environmental management system. It shall provide training or take other action to meet these needs, and shall retain associated records.</p> <p>The organization shall establish, implement and maintain a procedure(s) to make persons working for it or on its behalf aware of</p> <p>a) the importance of conformity with the environmental policy and procedures and with the requirements of the environmental management system,</p> <p>b) the significant environmental aspects and related actual or potential</p>
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	<p>impacts associated with their work, and the environmental benefits of improved personal performance,</p> <p>c) their roles and responsibilities in achieving conformity with the requirements of the environmental management system, and</p> <p>d) the potential consequences of departure from specified procedures.</p>
Comments / Findings:	
No findings.	

ISO §4.4.3 — Communication

ISO Requirement:	<p>With regard to its environmental aspects and environmental management system, the organization shall establish, implement and maintain a procedure(s) for</p> <p>a) internal communication among the various levels and functions of the organization,</p> <p>b) receiving, documenting and responding to relevant communication from external interested parties.</p> <p>The organization shall decide whether to communicate externally about its significant environmental aspects, and shall document its decision. If the decision is to communicate, the organization shall establish and implement a method(s) for this external communication.</p>
Comments / Findings:	
<p>OFI – There is an opportunity to improve the procedure for external communication by adding language to describe the process for receiving, documenting, and responding” to comments or complaints from the public or stakeholders. While the procedure addressed Freedom of Information Act (FOIA) requests, complaints or comments are not addressed. Consider identifying areas within the DOC that potentially receive such communications and identify a process for tracking any such communications and incorporating a summary of these types of communication into management review.</p>	

ISO §4.4.4 — Documentation

ISO Requirement:	<p>The environmental management system documentation shall include</p> <p>a) the environmental policy, objectives and targets,</p> <p>b) description of the scope of the environmental management system,</p> <p>c) description of the main elements of the environmental management system and their interaction, and reference to related documents,</p> <p>d) documents, including records, required by this International Standard, and</p> <p>e) documents, including records, determined by the organization to be necessary to ensure the effective planning, operation and control of processes that relate to its significant environmental aspects.</p>
Comments / Findings:	
<p>Minor Nonconformity – The management system documentation does not include a “description of the main elements of the environmental management system and their</p>	

interaction, and reference to related documents” as required by the ISO standard, section 4.4.4 Documentation. The EMS Operating Manual is in draft form and has not been approved or issued for use.

ISO §4.4.5 — Control of documents

<p>ISO Requirement:</p>	<p>Documents required by the environmental management system and by this International Standard shall be controlled. Records are a special type of document and shall be controlled in accordance with the requirements given in 4.5.4.</p> <p>The organization shall establish, implement and maintain a procedure(s) to</p> <ul style="list-style-type: none"> a) approve documents for adequacy prior to issue, b) review and update as necessary and re-approve documents, c) ensure that changes and the current revision status of documents are identified, d) ensure that relevant versions of applicable documents are available at points of use, e) ensure that documents remain legible and readily identifiable, f) ensure that documents of external origin determined by the organization to be necessary for the planning and operation of the environmental management system are identified and their distribution controlled, and g) prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose.
<p>Comments / Findings:</p>	
<p>No findings.</p>	

ISO §4.4.6 — Operational control

<p>ISO Requirement:</p>	<p>The organization shall identify and plan those operations that are associated with the identified significant environmental aspects consistent with its environmental policy, objectives and targets, in order to ensure that they are carried out under specified conditions, by</p> <ul style="list-style-type: none"> a) establishing, implementing and maintaining a documented procedure(s) to control situations where their absence could lead to deviation from the environmental policy, objectives and targets, and b) stipulating the operating criteria in the procedure(s), and c) establishing, implementing and maintaining procedures related to the identified significant environmental aspects of goods and services used by the organization and communicating applicable procedures and requirements to suppliers, including contractors.
<p>Comments / Findings:</p>	
<p>This element was not included in the scope of the audit.</p>	

ISO §4.4.7 — Emergency preparedness and response

<p>ISO Requirement:</p>	<p>The organization shall establish, implement and maintain a procedure(s) to identify potential emergency situations and potential accidents that can have an impact(s) on the environment and how it will respond to them.</p>
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	<p>The organization shall respond to actual emergency situations and accidents and prevent or mitigate associated adverse environmental impacts.</p> <p>The organization shall periodically review and, where necessary, revise its emergency preparedness and response procedures, in particular, after the occurrence of accidents or emergency situations.</p> <p>The organization shall also periodically test such procedures where practicable.</p>
Comments / Findings:	
This element was not included in the scope of the audit.	

ISO §4.5.1 — Monitoring and measurement

<p>ISO Requirement:</p>	<p>The organization shall establish, implement and maintain a procedure(s) to monitor and measure, on a regular basis, the key characteristics of its operations that can have a significant environmental impact. The procedure(s) shall include the documenting of information to monitor performance, applicable operational controls and conformity with the organization's environmental objectives and targets.</p> <p>The organization shall ensure that calibrated or verified monitoring and measurement equipment is used and maintained and shall retain associated records.</p>
Comments / Findings:	
<p>Minor Nonconformity – There is no procedure identified for monitoring progress of “General/Policy Goals” as identified in fiscal year objectives and targets. While OMB Scorecard goals are identified as being monitored using the SSPP and quarterly “dasher” updates, the process currently used, weekly staff updates provided to the OSEEP Direct, is not identified in the objectives and targets monitoring section of the manual. Consider documenting progress toward these objectives and targets.</p>	

ISO §4.5.2 — Evaluation of compliance

<p>ISO Requirement:</p>	<p>4.5.2.1 Consistent with its commitment to compliance, the organization shall establish, implement and maintain a procedure(s) for periodically evaluating compliance with applicable legal requirements.</p> <p>The organization shall keep records of the results of the periodic evaluations.</p> <p>4.5.2.2 The organization shall evaluate compliance with other requirements to which it subscribes. The organization may wish to combine this evaluation with the evaluation of legal compliance referred to in 4.5.2.1 or to establish a separate procedure(s).</p>
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	The organization shall keep records of the results of the periodic evaluations.
Comments / Findings:	
No findings.	
<p>Note for next audit: The Energy and Environmental Management Manual (EEMM) (pg. 19) states “The Department will convene a team comprised of representatives from other operating units (OUs) and conduct an Environmental Quality Assessment (EQA) of each OU with owned or delegated leased facilities no less than once every 3 years. The team will conduct 2 EQAs per year...” Verify that these have been implemented and there is a schedule in place.</p>	

ISO §4.5.3 — Nonconformity, corrective action and preventive action

ISO Requirement:	<p>The organization shall establish, implement and maintain a procedure(s) for dealing with actual and potential nonconformity(ies) and for taking corrective action and preventive action. The procedure(s) shall define requirements for</p> <ul style="list-style-type: none"> a) identifying and correcting nonconformity(ies) and taking action(s) to mitigate their environmental impacts, b) investigating nonconformity(ies), determining their cause(s) and taking actions in order to avoid their recurrence, c) evaluating the need for action(s) to prevent nonconformity(ies) and implementing appropriate actions designed to avoid their occurrence, d) recording the results of corrective action(s) and preventive action(s) taken, and e) reviewing the effectiveness of corrective action(s) and preventive action(s) taken. <p>Actions taken shall be appropriate to the magnitude of the problems and the environmental impacts encountered.</p> <p>The organization shall ensure that any necessary changes are made to environmental management system documentation.</p>
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Comments / Findings:

Major nonconformity – A corrective and preventive action process has not been sufficiently established, implemented, and maintained. This is evidenced by a lack of significant progress on implementing corrective plans since the prior year’s audit, inadequate procedures, and failure to implement existing procedures.

Description: Corrective action plans to address 2011 internal audit findings for the following EMS elements remain open and lack significant progress: Objectives, targets, and programs (4.3.3); Nonconformity, corrective action and preventive action (4.5.3); and Internal audit (4.5.5). Implementation of a plan to address a finding in the elements of Legal and other requirements (4.3.2) and Evaluation of compliance (4.5.2) has begun. The manual includes a corrective and preventive action procedure, but the procedure does not “define requirements for determining their cause” or define requirements for “reviewing the effectiveness of corrective actions and preventive actions taken.” In addition, the procedure has not been adequately

implemented. For example, actions have not been tracked “via a table or database” (as required by the procedure); evidence of causal analysis, evaluation of the need for preventive action(s), or a review of the effectiveness of corrective action(s) and preventive action(s) could not be demonstrated (as required by ISO 14001); and results of corrective action(s) and preventive action(s) taken have not been recorded (as required by ISO 14001). The necessary resources to establish, implement, and maintain a sufficient corrective and preventive action process may not have been made available.

ISO §4.5.4 — Control of records

ISO Requirement:	<p>The organization shall establish and maintain records as necessary to demonstrate conformity to the requirements of its environmental management system and of this International Standard, and the results achieved.</p> <p>The organization shall establish, implement and maintain a procedure(s) for the identification, storage, protection, retrieval, retention and disposal of records.</p> <p>Records shall be and remain legible, identifiable and traceable.</p>
Comments / Findings:	
<p>OFI – There is an opportunity to improve the procedure for record control in the EMS Operating Manual by referencing DAO 205-1 Records Management. Consider incorporating any requirements from the DAO regarding “retrieval, retention and disposal of records” as these are required by the ISO 14001 standard.</p>	

ISO §4.5.5 — Internal Audit

ISO Requirement:	<p>The organization shall ensure that internal audits of the environmental management system are conducted at planned intervals to</p> <ol style="list-style-type: none"> a) determine whether the environmental management system <ol style="list-style-type: none"> 1) conforms to planned arrangements for environmental management including the requirements of this International Standard, and 2) has been properly implemented and is maintained, and b) provide information on the results of audits to management. <p>Audit programme(s) shall be planned, established, implemented and maintained by the organization, taking into consideration the environmental importance of the operation(s) concerned and the results of previous audits.</p> <p>Audit procedure(s) shall be established, implemented and maintained that address</p> <ul style="list-style-type: none"> — the responsibilities and requirements for planning and conducting audits, reporting results and retaining associated records, — the determination of audit criteria, scope, frequency and methods. <p>Selection of auditors and conduct of audits shall ensure objectivity and the</p>
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	impartiality of the audit process.
Comments / Findings:	
<p>OFI - There is an opportunity to improve the management system procedure for internal audit by revising the specified scope of audits to match the revised scope of the EMS, including resources, roles, and responsibilities; aspects; legal and other requirements; training; communication; document control; record control; internal audit; evaluation of compliance; and corrective and preventive action.</p>	

ISO §4.6 — Management Review

<p>ISO Requirement:</p>	<p>Top management shall review the organization's environmental management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. Reviews shall include assessing opportunities for improvement and the need for changes to the environmental management system, including the environmental policy and environmental objectives and targets. Records of the management reviews shall be retained.</p> <p>Input to management reviews shall include</p> <ul style="list-style-type: none"> a) results of internal audits and evaluations of compliance with legal requirements and with other requirements to which the organization subscribes, b) communication(s) from external interested parties, including complaints, c) the environmental performance of the organization, d) the extent to which objectives and targets have been met, e) status of corrective and preventive actions, f) follow-up actions from previous management reviews, g) changing circumstances, including developments in legal and other requirements related to its environmental aspects, and h) recommendations for improvement. <p>The outputs from management reviews shall include any decisions and actions related to possible changes to environmental policy, objectives, targets and other elements of the environmental management system, consistent with the commitment to continual improvement.</p>
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Comments / Findings:	
<p>Minor nonconformity – There was a lack of evidence demonstrating that top management has “reviewed the environmental management system” as required by the ISO 14001 standard. Outputs of management review, such as “any decisions and actions related to possible changes to environmental policy, objectives, targets and other elements” of the EMS have not been recorded. Minutes or other evidence is unavailable to demonstrate that top management and other required attendees were present at management review and to record items for follow up, record management feedback and recommendations for improvement, and document that possible changes to elements of the EMS were included. Note: a management review presentation was viewed, but this is not an adequate record. A template for recording management review minutes was reviewed; however this template has not been used.</p>	

OFI – The management review procedure in the EMS Operating Manual could be improved by including the ISO 14001 requirement to incorporate the “status of corrective and preventive actions” in management review. While the most recent documented management review did include this, the procedure does not state that this is a required input.

OFI – As mentioned by the Director of Administrative Services, consider the potential for increasing bureau participation in management review.

System Strength – Management review presentation slides appear to provide an effective communication of conclusions and challenges throughout.

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