EMS 004
ENVIRONMENTAL IMPACT IDENTIFICATION

1. PURPOSE

To ensure a documented process is implemented and maintained to identify, assess and evaluate existing and/or potential environmental impacts over which a NOAA facility has or can be expected to have an influence. Provide a means for identification of critical or significant impacts, whereby improvements and management controls can be established.

2. SCOPE

This procedure applies to NOAA line functions that have implemented an Environmental Management System (EMS).

3. METHODOLOGY

3.1 The methodology below describes how NOAA facilities shall identify activities, products and/or services that might interact with the environment (i.e., have environmental aspects) and assess whether the potential impacts of these should be deemed significant and therefore managed as part of the EMS. Facilities shall use the approach below to develop a list of significant environmental aspects and associated activities. Environmental aspects will be reassessed on a minimum of an annual basis.

3.1.1 Create a baseline list of activities, products, and services that have the possibility of interacting with the environment (e.g., possess environmental aspects), including those of an administrative, management or technical nature.

3.1.2 List the ways that these activities, products, and/or services can interact with the environment, such as through air emissions, releases to land or water or disposal of waste to landfill.

3.1.3 For each of these activities and associated environmental aspects briefly summarize the potential environmental impact of the aspect. For example, if the aspect is air emissions the impact might be degradation of air quality.

3.1.4 For each of the activities and associated aspects identify any regulatory or other requirements that governs that activity and aspect. Those activities and aspects with regulatory or other requirements should be deemed significant.

3.1.5 Establish significance criteria for potential environmental impacts of activities. While organizations may use criteria that they believe is appropriate it must include environmental impacts, impacts to mission or operations and potential social or cultural impacts. Organizations may use the criteria attached in Table 1 as a guide.

3.1.6 Assess the potential environmental impacts against each of the criteria to determine a significance level (this may be numeric or qualitative). For example, the potential environmental impacts may have a large impact to the environment but a small impact to the mission. The organization should choose a significance level above which an aspect is deemed significant. All those aspects above the significance level are “significant environmental aspects”.

3.1.7 Create a final list of all significant aspects (either because they have regulatory or other requirements or surpass the significance criteria). This is the list of issues and activates that is managed under the EMS.

3.1.8 Whenever a new activity, product or service is initiated at the organization the requirements of this procedure will be applied to it to ascertain if any new significant environmental aspects have been introduced.

3.1.10 This procedure will be applied as necessary to ensure the EMS addresses all significant aspects but not less than once per year to maintain currency.

Table 1: Example Significance Criteria

Criteria	Rating		
	Low	Medium	High
Regulation (Regulatory or other requirement)	No regulation or applicable legal requirement, no other requirement applicable.	Regulation or legal requirement applicable, but facility activity/impact is exempt. No other requirement applicable.	Regulation or other legal requirement is applicable. Other requirement applicable.
Risk (Risk, financial, environmental liability and/or cost)	No potential risk to human health or community. Risk to environment low, and/ or Cost less than $10,000.	Some risk to human health, community or environment, and/or Cost from $10,001 to $50,000.	High risk to human health, community or environment, and/or Cost exceeding $50,000.
Stewardship & Operations (Environmental Stewardship & NOAA Operations)	No affect on natural resource use and/or sustainability. No public concern, not an issue.	Affects wise use of natural resources and/or facility operations. Some public concern.	Sustainability of natural resources greatly affected and/or significantly affects facility ability to maintain operations. High public concern.
Pollution Prevention (Pollution prevention opportunity)	No pollution prevention opportunities.	Pollution prevention opportunities known but not considered priority due to low risk and cost effectiveness.	Pollution prevention opportunities possible but requires formal priority assessment. Pollution prevention opportunities known and can be implemented. Pollution prevention will help attain goals and objectives including elimination or reduction of toxic pollutants.

The associated impacts of an activity can be considered positive or negative.

4. FACILITY REQUIREMENTS AND RESPONSIBILITIES FOR IMPLEMENTATION

Facility EMS Teams should follow the methodology above to identify significant aspects.