



# What is Required for an EMS to be 'Fully Implemented'?

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# Overview



- New Requirements for EMS
- Definition of 'Fully Implemented'
- External Audit
- Declaration Process
- Deadline
- Reporting



# Incorporate New EMS Requirements



- Reflect the EMS elements and framework of ISO 14001:2004
- Include environmental, energy, and transportation objectives and measurable targets
- Include environmental compliance elements
  - Policy statement
  - Roles and responsibilities
  - Compliance audit and review program
  - Corrective action program

– DOE O 450.1A §4.b.



# Incorporate New EMS Requirements (cont.)



- Review identification of legal requirements, as well as the 'other requirements to which the organization subscribes' (such as DOE O 450.1A, DOE O 430.2B, TEAM initiative)
- Ensure that these are considered in
  - Identifying significant environmental aspects
  - Establishing objectives and targets



# To Have A 'Fully Implemented' EMS



- Conduct external audit
  - Formal audit
  - Qualified party
  - Party outside the scope of the EMS
- Recognize and address findings
  - contractor senior management
  - DOE Field Office management
- Declare conformance
  - DOE O 450.1A §4.d.(1)



# “Formal Audit”



A formal audit is one that follows generally accepted practices for EMS audits and has the following critical elements:

- 1) an **audit plan** that reflects the scope and schedule of the audit;
- 2) a **review of background documents** prior to the actual site visit



## “Formal Audit” (cont.)



- 3) a **physical audit** of the facility or organization to determine
  - *conformance* with the Standard,
  - *consistency* between the elements of the EMS as they are implemented within the facility or organization and
  - *continual improvement* of the EMS;
- 4) preparation of an **audit report** which outlines findings
- 5) an **out-briefing** with senior managers

– FEE, “Clarification,” 01/15/08 p 2



# “Qualified Party”



Auditors should

- be competent and have the proper and relevant skills
- have a working knowledge and understanding of
  - the ISO 14001:2004(e) EMS Standard
  - general management system auditing methodologies and techniques.

It is recommended that those conducting EMS audits at Federal facilities or organizations have formal ISO 14001 Lead Auditor Training and general auditing skills training

– FEE, “Clarification,” 01/15/08 p 2





# Auditors “Outside the Control or Scope of the EMS”



- ISO 14001 requires that the scope of the EMS be defined
- Those personnel included in that scope would not be considered “independent”
- The auditors should not:
  - have been involved in the development of the facility or organization EMS
  - have been involved in the day-to-day implementation of that EMS
  - otherwise work in the facility or organization where the EMS is implemented
  - have any direct responsibility associated with the EMS being reviewed.

– FEE, “Clarification,” 01/15/08 p 2



# Auditors “Outside the Control or Scope of the EMS” (cont.)



Examples of auditors outside the scope or control of the EMS:

- *a qualified agency headquarters audit team* may review the EMS of a facility or organization within that agency
- *qualified auditors from one facility* from a given agency may audit the EMS of another facility within that agency
- a qualified consultant/contractor
- some other qualified unbiased party such as individuals
  - from a state or federal voluntary program or
  - from another federal organization

– FEE, “Clarification,” 01/15/08 p 2



# What about Previous Audits?



- EMS audit now required every three years.  
[DOE O 450.1A §4.d.(3)]
- Not all previous EMS assessments would meet the new requirements for a ‘formal audit by a qualified party outside the scope of the EMS’
- You can review a previous external audit to see whether it qualifies  
(ISO 14001 registration audit would qualify)
- If you had a qualified EMS audit within the past three years, then document this, and you can base your declaration on this audit
- We will be glad to assist you in this review



# Declaration Process



- Complete the audit in sufficient time
  - to conduct management review and corrective action
  - to prepare and submit declaration
- If you have an ISM declaration process – integrate to the extent possible
- Revised Guidance will provide suggested letter templates



# Deadline



“EMSs, including those already declared under the previous requirements of DOE O 450.1, must meet the new requirements for being ‘fully implemented’ by **March 31, 2009**”

– DOE O 450.1A §4.d.(2)



# Reporting



- Annual site EMS reporting process
  - Report by December for previous fiscal year
  - HS-20 submits DOE's report to EPA
- Reporting includes
  - Declaration status ('fully implemented')
  - Expanded EMS metrics
- Provides input to OMB's "Environmental Stewardship" scorecard



# Conclusion



- Update your EMS to incorporate new requirements
- Determine whether you need an outside audit
- Prepare and schedule in plenty of time
- Complete declaration by March 31, 2009



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