

Bureau of Reclamation Environmental Management System (EMS) Conformance Audit Criteria Checklist					
EMS Required Elements	Reclamation Manual Directive and Standard (D&S), <i>Environmental Management System (EMS) Implementation</i> (ENV 05-01) Requirements	Evidence of Conformance	Yes/No - Description of Nonconformance	Actions Necessary to Achieve Conformance	Appropriate Organization Corrective and Preventative Action Plan (to be completed 60 days following receipt of the final audit report)
<b>Environmental Stewardship Policy</b>	The RD shall review and affirm his/her commitment to ENV P05, including additional commitments to reflect the region's priorities, as necessary. The commitment to ENV P05 shall be communicated to all employees of the region annually via memorandum, and to onsite contract employees, operators of Reclamation facilities, key external stakeholders, visitors, and lessees, as deemed appropriate. Regional staff shall direct interested members of the public to ENV P05, as requested.	<ul style="list-style-type: none"> <li>• There is record of a Regional Director (RD) memorandum to all employees committing to ENV P05 each year. See also <b>Control of Records</b>.</li> <li>• The objectives of ENV P05 are either included or referenced in the memorandum. If referenced, a link to the Reclamation Manual Web site to view the full policy is provided.</li> <li>• Management and employees understand and support the objectives established by ENV P05.</li> </ul>			
<b>Environmental Aspects and Impacts</b>	The region shall establish and implement procedures to identify and evaluate its environmental aspects and impacts. The region shall review current and planned activities, operations, products, and services within the scope of the EMS that it can control or influence to determine its aspects and shall provide rationale for environmental aspects not identified in the EMS. The region shall establish and implement procedures to review and update (add/deleted/modify) environmental aspects and impacts periodically.	<ul style="list-style-type: none"> <li>• The EMS manual contains procedures to identify and evaluate environmental aspects within the scope of the regional EMS.</li> <li>• Meetings minutes, reports, lists, registers, or other documentation demonstrate that the procedures were followed and identify the environmental aspects and impacts of core mission activities, products and services. Rationale is provided in meeting minutes, aspect register, EMS manual, or other documentation when aspects for core activities have been omitted.</li> <li>• There is evidence that changes to environmental aspects are reviewed and approved by management.</li> <li>• There is evidence that environmental aspects are reviewed and updated (added/deleted/modified) by the appropriate regional staff periodically.</li> </ul>			
<b>Determination of Significance</b>	The region shall establish and implement procedures to determine those aspects that have or can have significant impact on the environment. The region shall develop, document, and apply criteria for evaluating significance in a consistent manner. Regional procedures may be qualitative or quantitative. Application of at least 3 of the criteria stipulated in Paragraph 5.B.(2). is evidence that they were considered.	<ul style="list-style-type: none"> <li>• The EMS manual contains procedures, roles, and responsibilities to rank the significance of environmental aspects and clearly describes the significance ranking process and criteria applied.</li> <li>• Meetings minutes, reports, lists, registers, or other documentation demonstrate that the ranking procedures were followed and at least three of the required ranking criteria were applied. This evidence demonstrates an analysis of the relationship of aspects to the sustainability goals of EO 13693. See also <b>Sustainability Goals</b>.</li> <li>• If a numerical rating system is applied, there is clear description of the values, their meaning, and how they were applied to determine and rank significance.</li> <li>• Those aspects determined to be significant are clearly identified.</li> </ul>			
<b>Legal and other Requirements</b>	The region shall establish, implement, and maintain procedures for identifying Federal, state, and local environmental regulations and other environmental requirements and commitments, and determine their applicability to their organization's environmental aspects. The procedures shall include a periodic review of legal and other requirements and the responsibilities and processes for identifying, documenting, and communicating changes.	<ul style="list-style-type: none"> <li>• The EMS manual contains procedures, roles, and responsibilities for identifying and documenting applicable environmental legal requirements, corporate policies, and other environmental requirements, including identifying Federal laws, regulations, and Executive order addressing the sustainability goals.</li> <li>• A register, report, matrix or other document identifies the region's major legal and other environmental requirements and how they relate to the region's aspects. The latest legal and other environmental requirements are tracked, documented, and communicated to applicable staff via appropriate communication vehicles (e.g., Web site, environmental compliance handbook, online environmental regulation tracking service, etc.). Procedures are in place for identifying state and local requirements at lower levels of the organization.</li> <li>• The region assigns clear responsibility for monitoring, updating, and communicating changes to applicable legal and other environmental requirements at various levels of the organization.</li> </ul>			
<b>Sustainability Goals</b>	Regions shall address in the EMS the sustainability goals as defined in Paragraph 3.H, based upon their applicability to the region's activities and operations. The region shall address sustainability goals in the EMS in the following manner:  (a) identify applicable sustainability goals as legal or other requirements; (b) consider the impact of environmental aspects on achievement of sustainability goals as a criteria for determining significance; (c) consider sustainability goals in the development of objectives and targets; (d) develop a plan and schedule to include the sustainability goals in the EMS through continual improvement; and (e) provide rationale for sustainability goals not addressed in the EMS.	<ul style="list-style-type: none"> <li>• The EMS manual contains procedures, roles, and responsibilities for addressing sustainability goals. The manual identifies the sustainability goals applicable to the region and establishes a timeframe for their inclusion in the EMS or rationale as to why they are not addressed.</li> <li>• Aspect registers, significance criteria, Environmental Management Plans (EMPs), and other EMS records and documentation demonstrate consideration of the sustainability goals in the development and implementation of the EMS.</li> </ul>			
<b>Lessee, Contractor, and Concessionaire Activities</b>	Where lessee, concessionaire, and contractor activities on Reclamation lands, including contractor operation of Reclamation-owned facilities and vehicles (e.g., transferred works), affect Reclamation's environmental aspects, the region shall:  (a) address the activities in the EMS, as appropriate; and (b) ensure that new or renewed contracts and agreements entered into after the date of this D&S specify the lessee, concessionaire, or contractor role and responsibilities to reduce their significant environmental aspects and support ENV P05 in accordance with the applicable program requirements.	<ul style="list-style-type: none"> <li>• The EMS manual contains procedures to identify the roles, responsibilities, and procedures for identifying and addressing EMS requirements in applicable contracts.</li> <li>• New or renewed contracts for the operation of Reclamation facilities contain language to meet EMS and EO 13693 requirements in accordance with Reclamation Manual, Directive and Standard, <i>Sustainable Operation and Maintenance Requirements for Certain Water-Related Contracts</i> (PEC 05-06).</li> <li>• Other contract, lessee, or concessionaire documents contain environmental and EMS language in accordance with Federal and Reclamation environmental requirements.</li> </ul>			

Reclamation Manual  
Directives and Standards

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<b>Objectives and Targets</b>	<p>The region shall establish and implement procedures for the development and periodic review of environmental objectives and targets. The environmental objectives and targets shall support ENV P05 to promote regulatory compliance, prevent pollution, and improve environmental performance at all levels of the organization. The region shall align objectives and targets to the significant environmental aspects or document the rationale for omitting significant environmental aspects as objectives and targets in the EMS. The objectives and targets shall be measurable, realistic, and time-specific. The region shall consider the following in developing objectives and targets:</p> <p>(a) significant environmental aspects;                      (b) legal and other requirements, including sustainability goals required in Paragraph 3.H;                      (c) financial, operational, and business requirements;                      (d) management priorities; and                      (e) views of interested parties.</p>	<ul style="list-style-type: none"> <li>The EMS manual contains procedures, roles, and responsibilities to establish environmental objectives and targets.</li> <li>Meetings minutes, reports, lists, registers, or other documentation demonstrate that the established procedures and criteria were considered when identifying environmental objectives.</li> <li>The rationale for selecting current objectives and targets is documented.</li> <li>Objectives are clearly stated, understandable, and realistic. Targets are quantifiable and time-specific.</li> <li>Rationale is provided for significant aspects for which objectives and targets are not set in the current EMS cycle.</li> </ul>			
<b>Environmental Management Plans</b>	<p>The region shall develop EMPs or similar action plans and programs for each objective and target established. The EMP shall document:</p> <p>(a) the objective and related targets, actions, and milestones;                      (b) roles and responsibilities of program, area, and other office personnel in implementing the objectives and targets; and                      (c) other information deemed useful by the region such as the applicable operational controls, resources, legal and other requirements, training, etc., necessary to implement, manage, and track the objectives and targets.</p>	<ul style="list-style-type: none"> <li>The EMS manual contains procedures, roles, and responsibilities for developing EMPs. The EMPs address the required elements.</li> <li>Staff understand their roles and responsibilities for achieving objectives and targets.</li> <li>The required EMP information is relevant, up-to-date, communicated to staff, and readily available.</li> <li>The significant environmental aspects for which an EMP addresses, if applicable, is clearly identified.</li> </ul>			
<b>Resources, Roles, Responsibilities, and Authorities</b>	<p>To ensure successful implementation of the EMS, the region shall:</p> <p>(a) make available the necessary staff, skills, and technical and financial resources to implement the EMS;                      (b) define, document, assign, and communicate EMS roles, responsibilities, and authorities to internal staff and onsite contractors working on behalf of the region (e.g., information technology support technicians), including:                      (i) responsibilities for implementation and oversight of EMS at various levels of the organization;                      (ii) responsibilities for management of significant environmental aspects; and                      (iii) responsibilities for achievement of the environmental objectives and targets.</p>	<ul style="list-style-type: none"> <li>The EMS manual establishes roles and responsibilities for implementing the EMS. Roles and responsibilities for overall management and coordination of the EMS, management of significant environmental aspects, and for achieving objectives and targets are clearly defined.</li> <li>Staff and managers understand their roles and responsibilities in relation to EMS implementation.</li> </ul>			
<b>Competency, Training and Awareness</b>	<p>The region shall establish and implement procedures to ensure that employees and onsite contractors are competent to implement the EMS and address Reclamation's significant environmental aspects. Regions shall:</p> <p>(a) provide EMS awareness training or other forms of outreach to all regional employees and onsite contractors on a periodic basis to generate understanding of the EMS, the region's significant environmental aspects and related environmental impacts, and the importance of conformance to ENV P05 and regional EMS procedures and requirements;                      (b) identify competency requirements and training needs for employees working in activities or operations with significant environmental aspects;                      (c) provide training, work experience, or other means to meet competency requirements identified; and                      (d) verify achievement of competency requirements and retain associated training records.</p>	<ul style="list-style-type: none"> <li>The EMS manual contains procedures, roles, and responsibilities for identifying training related to EMS and the region's significant environmental aspects.</li> <li>Employees are aware and have a general understanding of the EMS, ENV P05, and the region's significant environmental aspects and objectives and targets.</li> <li>The EMS manual, position descriptions, performance plans, individual development plans, or other documentation identify the competency and training requirements for staff working in significant environmental aspects.</li> <li>Records demonstrate that identified training has been received by appropriate employees at the required frequency.</li> <li>Staff working on significant environmental aspects demonstrate competency and knowledge to perform their duties in an environmentally sound manner.</li> </ul>			
<b>Internal Communication</b>	<p>The region shall establish and implement procedures to communicate information on EMS implementation between organizational functions and levels. RDs shall communicate their commitment to ENV P05 in accordance with Paragraph 5.A. The RD or EMS manager shall communicate other relevant EMS information such as the region's significant environmental aspects and environmental objectives and targets to all employees and levels of the organization, as deemed necessary to ensure successful implementation of the EMS.</p>	<ul style="list-style-type: none"> <li>Memoranda, meeting minutes, notes, online sharing systems (e.g., SharePoint), internet, and other means demonstrate communication between key players on EMS. Key players demonstrate knowledge of EMS responsibilities, information, and activities.</li> <li>Employees receive RD memorandum on his/her commitment to ENV P05. Employees receive information on the region's significant environmental aspects and environmental objectives and targets.</li> </ul>			
<b>External Communication</b>	<p>The region shall communicate ENV P05 to the public and determine whether or not to communicate the EMS, in whole or in part, to external stakeholders and shall document their decision. The region shall establish procedures for receiving, documenting, and responding to communication relevant to the EMS from external parties</p>	<ul style="list-style-type: none"> <li>The EMS manual contains procedures to receive and address external communication on environmental issues and documents the region's decision to communicate the EMS to the public. The public is directed to ENV P05 via the Reclamation Manual internet site. Memorandum and other documentation demonstrate that procedures for responding to the public are followed.</li> </ul>			

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<b>Documentation</b>	This EMS element requires that certain EMS-related information be documented and maintained. At a minimum, the region shall document the following EMS information: (a) the commitment to ENV P05; (b) the physical and organizational scope of the region's EMS; (c) the region's significant environmental aspects; (d) the region's EMS objectives and targets; (e) applicable legal and other requirements; and (f) the region's decision to communicate the EMS to external stakeholders.	<ul style="list-style-type: none"> <li>The EMS manual contains procedures, roles, and responsibilities for the management of EMS documentation in accordance with Reclamation and regional records management requirements.</li> <li>The required information is documented either in the EMS manual or other document or in an electronic form. The EMS Coordinator or other position maintains the documents.</li> </ul>			
<b>Control of Documents</b>	Regions shall ensure that required EMS documents are adequately maintained and controlled so that they are up-to-date, legible, consistent, and available. The procedures for controlling documents must address:  (a) approval of final documents prior to distribution; (b) review, update, and re-approval of documents, when necessary; (c) identification and date of document changes and current versions; (d) availability and location of current versions; and (e) archiving or eliminating obsolete versions.	<ul style="list-style-type: none"> <li>The EMS manual contains procedures, roles, and responsibilities for the control of documents that address the required elements.</li> <li>The required EMS documents are approved, if applicable, dated, latest versions identified and readily available, and obsolete versions not accessible. Regional staff have the latest version of documents.</li> </ul>			
<b>Operational Controls</b>	The region shall establish and implement procedures defining the responsibilities and processes for identifying, establishing, implementing, maintaining, documenting, and referencing operational controls related to the region's significant environmental aspects. The region shall ensure that the operational controls are understood and carried out by applicable personnel in order to achieve environmental objectives, avoid deviation, and prevent potential environmental impacts.	<ul style="list-style-type: none"> <li>The EMS manual contains procedures, roles, and responsibilities to identify, develop, implement, and update operational controls appropriate to the organization's significant environmental aspects.</li> <li>Policies, D&amp;S, operating procedures, technical guidance documents, and work procedures and practices demonstrate that operations controls are in place for significant environmental aspects and are adequate to ensure that environmental impacts are appropriately managed.</li> <li>Management and staff working in activities and operations with significant environmental aspects understand and communicate operational controls.</li> </ul>			
<b>Emergency Preparedness and Response</b>	The region shall establish, implement, exercise, and maintain emergency response procedures for potential occurrences that can have an environmental impact. The region shall reference existing emergency action plans, as appropriate.	<ul style="list-style-type: none"> <li>The EMS manual contains or references procedures, roles, and responsibilities for developing and exercising emergency action plans.</li> <li>Emergency action plans include procedures to prevent and/or mitigate the environmental effects associated with accidents and emergencies, respond to actual emergency situations and accidents, and perform periodic testing (where practicable).</li> <li>Emergency action plans are reviewed and exercised according to an established schedule. Plans are updated to capture changes in responsibilities, processes, chemicals, or facilities.</li> </ul>			
<b>Monitoring and Measurement</b>	The region shall establish, document, and implement procedures to monitor and measure the key operations related to significant environmental aspects and EMS performance. Monitoring and measurement activities shall include an assessment of:  (a) the effectiveness of operational controls in place to reduce environmental impacts associated with significant environmental aspects; (b) performance in achieving the environmental objectives and targets; (c) review of quality assurance procedures for generating reliable EMS performance data; and (d) the overall effectiveness of the EMS.	<ul style="list-style-type: none"> <li>The EMS manual contains procedures, roles, and responsibilities to monitor and measure significant environmental aspects and achievement of EMS objectives and targets.</li> <li>Reports, reviews, data, calibrations, and work procedures demonstrate monitoring and measurement of the effectiveness of operational controls for significant aspects. There is evidence of good quality assurance practices in place.</li> <li>Reports, data call results, and other documents demonstrate monitoring of the accomplishment of objectives and targets on a reoccurring basis. Management reviews, briefing papers, and other reports demonstrate that data on objectives and targets are assessed.</li> </ul>			
<b>Control of Records</b>	The region shall establish procedures to generate, maintain, and control records of EMS performance. Procedures shall address how records are generated, stored, protected, retrieved, retained, and disposed. Examples of EMS records that shall be controlled include, but are not limited to:  (a) register/matrix ranking the significant aspects; (b) certificates of completion of training related to EMS awareness and significant aspects; (c) minutes, notes, or summary reports of the management review; (d) memorandum from the RD committing to ENV P05; (e) status reports on the accomplishment of objectives and targets; (f) records of calibration and quality assurance activities, where applicable; (g) conformance or internal audit reports and records of completed corrective and preventative actions; and (h) environmental compliance reviews, notices of violations, and incident reports.	<ul style="list-style-type: none"> <li>The EMS manual contains procedures, roles, and responsibilities for the control of records of EMS activities, as required.</li> <li>Hard copy or electronic filing systems, online information sharing sites (e.g., SharePoint), and other means demonstrate that the required EMS records are maintained, controlled, accessed, and disposed of in accordance with procedures.</li> <li>EMS records are readily accessible and up-to-date. Appropriate regional staff have the latest version of EMS records.</li> </ul>			

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<b>Evaluation of Compliance</b>	The region shall establish and implement procedures for periodically evaluating compliance with legal environmental requirements. RM D&S, <i>Environmental Compliance Audit Program</i> (ENV 15-03), establishes Reclamation's environmental compliance review program for the statutes, regulations, and guidelines identified in ENV 15-03. The region shall reference and implement the environmental compliance review procedures in ENV 15-03 to meet this EMS required element.	<ul style="list-style-type: none"> <li>• The EMS manual contains or references procedures, roles, and responsibilities for evaluating environmental compliance.</li> <li>• Audit checklists, reports, and other documentation demonstrate that the region conducts environmental compliance reviews at facilities on an established schedule in accordance with ENV 02-08.</li> <li>• Audit reports document facility-level compliance with environmental regulatory requirements and identify audit findings and recommendations. Corrective and preventive actions are developed and tracked to completion.</li> </ul>			
<b>Internal Audit</b>	<p>The region shall conduct periodic assessments to ensure the EMS is functioning and properly implemented and maintained in accordance with this D&amp;S, the audit criteria found in Appendix A of RM D&amp;S, Environmental Management System (EMS) Independent Conformance Audit and Declaration of Conformance Process (ENV 05-02), and region-specific EMS procedures. The internal audit must be conducted such that the regional EMS, including representative programs and sub-organizational levels, is reviewed for conformance within 3 years of an independent conformance audit. Internal audit procedures shall address:</p> <p>(a) responsibilities for conducting internal audits;            (b) schedule and frequency, including the individual programs and offices scheduled for inclusion in the audits;            (c) review methodology;            (d) procedures for reporting audit results and retaining audit records; and            (e) audit scope and criteria, including reference to the audit criteria in Appendix A of ENV 05-02.</p>	<ul style="list-style-type: none"> <li>• The EMS manual contains procedures, roles, and responsibilities for conducting internal reviews of the EMS and establishes a frequency for such reviews. EMS procedures address how the results of internal reviews and external audits, including nonconformities, will be documented and communicated.               <ul style="list-style-type: none"> <li>• Reports, audit checklists, memoranda and other documents demonstrate that internal reviews occurred within 3 years of the independent conformance audit, evaluated regional conformance to the requirements of ENV 05-01, and identified and documented nonconformities.</li> </ul> </li> </ul>			
<b>Nonconformity, Corrective and Preventative Action</b>	<p>The region shall establish, implement, and maintain procedures to identify and correct nonconformities to EMS requirements and prevent their recurrence. Nonconformities shall be identified through monitoring and measurement, evaluation of environmental compliance, internal audits, and independent conformance audits. The nonconformity, corrective and preventative action procedure must address how the organization will:</p> <p>(a) identify nonconformities and their the root causes;            (b) establish and implement actions to address nonconformities and prevent their recurrence; and            (c) evaluate the effectiveness of corrective and preventative actions taken and record their completion.</p>	<ul style="list-style-type: none"> <li>• The EMS manual contains procedures, roles, and responsibilities for identifying nonconformities; developing, implementing, and tracking corrective and preventative actions; and confirming closure of nonconformities.</li> <li>• Reports, audit checklists, action plans, reviews, and other documents demonstrate nonconformities were identified during internal and external audits, monitoring and measurement activities, and management and other reviews, and corrective and preventative actions were developed, implemented, and tracked to completion.</li> </ul>			
<b>Management Review</b>	<p>The EMS manager shall plan for and conduct EMS reviews with the region's senior leadership annually, to ensure continued suitability, adequacy, and effectiveness of the EMS and reaffirm conformance. The management review shall be documented and include the following topics:</p> <p>(1) EMS-related communication from external interested parties;            (2) changes to EMS-related requirements, if any;            (3) status of compliance with environmental regulations and other legal requirements;            (4) status and accomplishment of EMS objectives and targets;            (5) results of internal audits and independent conformance audits, including nonconformities identified;            (6) status of corrective and preventative actions to address nonconformities;            (7) review of actions from previous management reviews;            (8) status of EMS conformance declarations; and            (9) planned actions or decisions for continual improvement.</p>	<ul style="list-style-type: none"> <li>• The EMS manual contains procedures, roles, and responsibilities for conducting management reviews and the schedule of occurrence.</li> <li>• Meeting minutes, briefing papers, presentations, and notes demonstrate that the management review includes all required information.</li> <li>• Attendee lists demonstrate that the region's senior level management participated in the management review in accordance with procedures.</li> <li>• Adequate data in the form of briefing papers or reports are provided to management to ensure that they perform a thorough and effective review.</li> <li>• Meeting minutes and notes record management actions and decisions and are maintained and available.</li> </ul>			