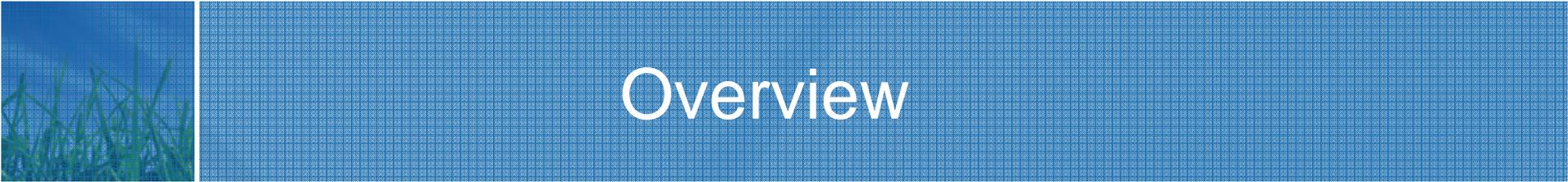


# Federal Organizational-Level EMS Workgroup Overview and Status

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for the Organizational-Level EMS Workgroup of the  
Interagency Environmental Leadership Workgroup

Federal Environmental Symposium West & East  
June 2009



# Overview

- Typology of EMSs
- Agency Meetings with the Federal Environmental Executive
- Letter and Guidance from the Federal Environmental Executive
- Questions and Answers



## New Language in EO 13423

- EO 13148 previously required EMS  
**“at all appropriate facilities”**
  - The Interagency Workgroup clarified this definition to include “organizations”
- EO 13423 requires EMS  
**“at all appropriate organizational levels”**

# Confusion of Terminology

Workgroup members used many different terms

- We used *different* terms for the *same* thing
- We used the *same* term for *different* things

Facility EMS

Site EMS

Corporate EMS

Enterprise EMS

Umbrella EMS

Headquarters EMS

Office EMS

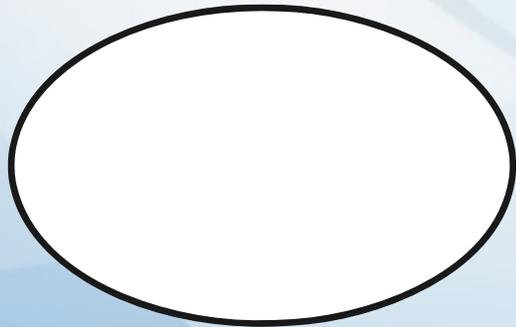
Multi-Site EMS

Agency-wide EMS

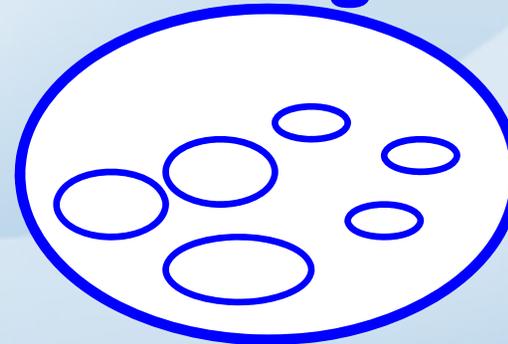
Program EMS

# The EMS Typology

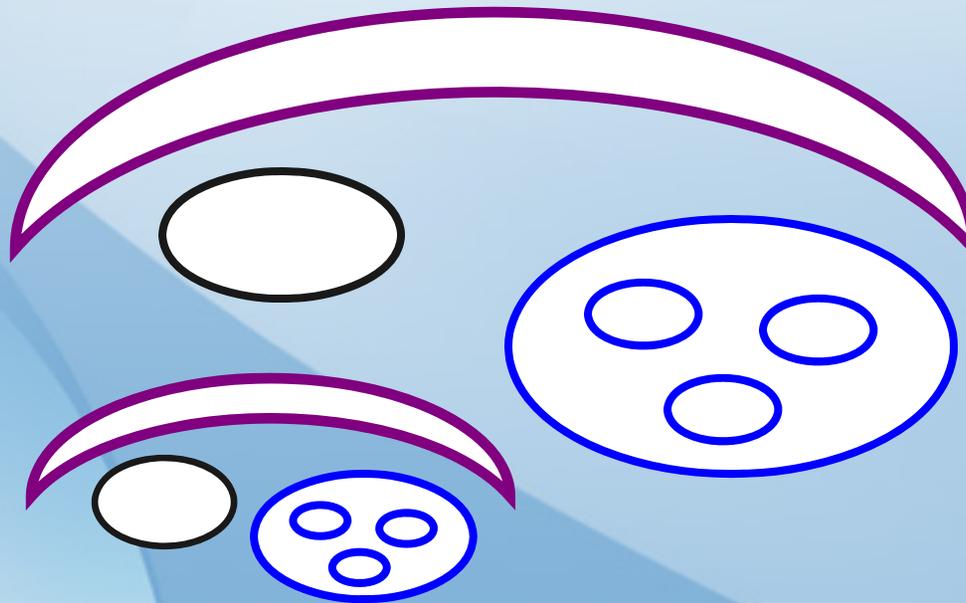
**Facility**



**Multi-Site Organization**

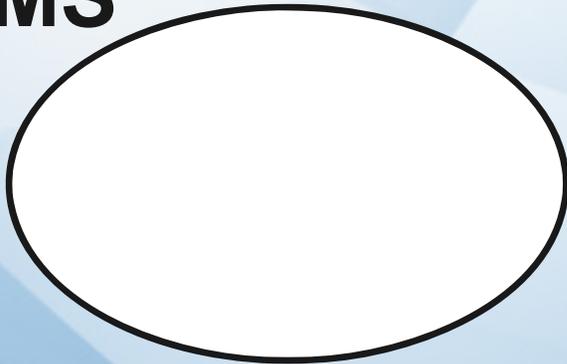


**Higher-Tier**



# Facility EMS

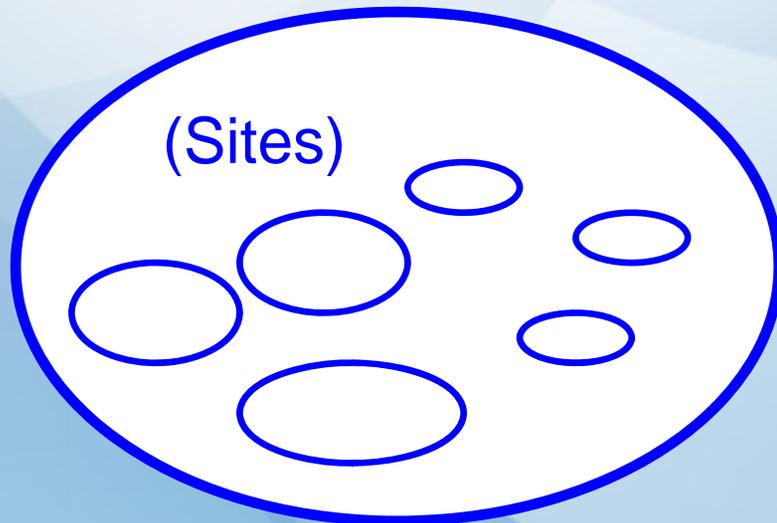
## Facility EMS



- Traditional facility-level or site-level EMS
- Typically defined by a single organization
- Typically within a discrete 'fence-line'

# Multi-Site Organization EMS

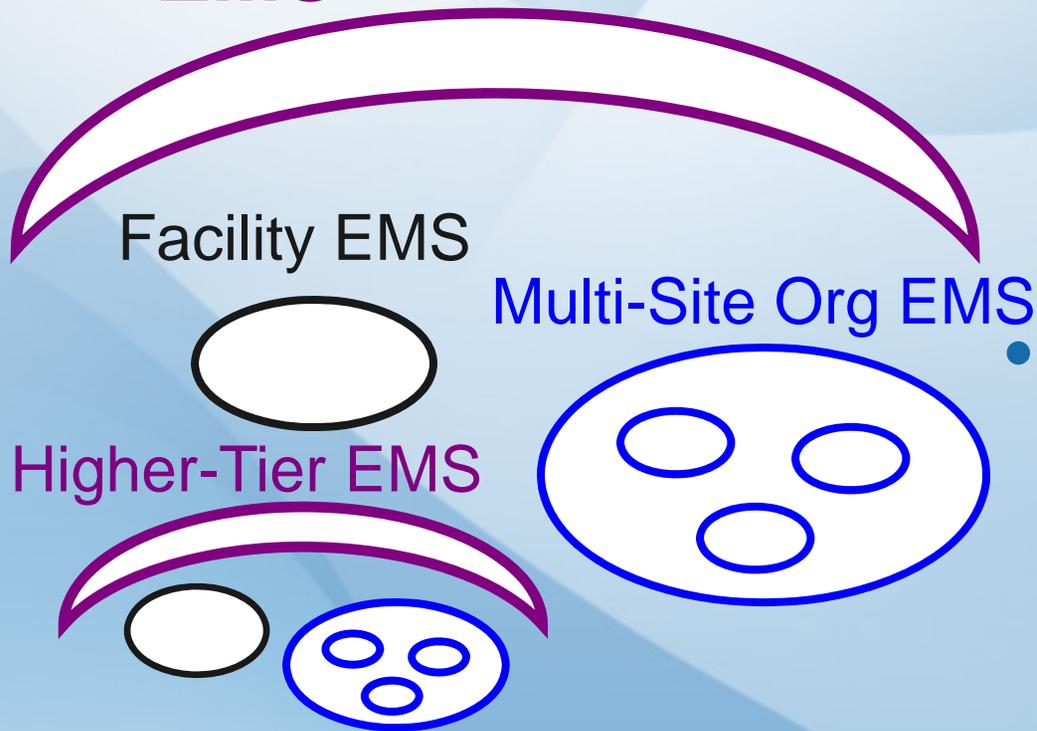
## Multi-Site EMS



- Scope is a broader organization, which encompasses multiple facilities or operating units.
- The significant aspects of activities/products/services of all the units are managed as part of a single EMS.

# Higher-Tier EMS

## Higher-Tier EMS

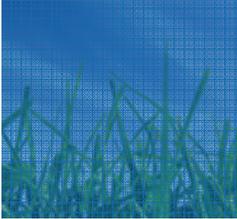


- Individual facilities (or organizations) maintain their own EMS.
- Additional EMS addresses issues which are best addressed at a higher level.



# Key Principles

- Sites/Activities are covered (at an appropriate level) by an EMS with all ISO 14001 elements
- A ‘multi-site organization’ EMS flows down robustly to activities and employees at the ‘ground level’ and can be audited at that level
- A higher-tier EMS must have a “full” EMS at some level below it
  - It need not include every EMS element;
  - it includes only those elements appropriate to the activities/responsibilities at the higher level



# Agency Meetings with the Federal Environmental Executive

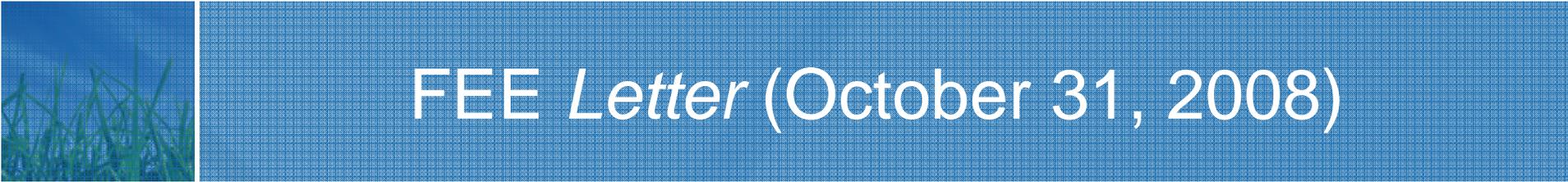
- In August-September 2008, FEE met with Senior Agency Officials (SAOs) to review
  - Status of currently identified EMSs
  - How agency will plans to address ‘all appropriate levels of the organization’
- FEE met with all SAOs on October 16, 2008 to review inputs
- Agency plans were summarized in two tables (provided to transition teams)



# Federal Environmental Executive Letter and Guidance

## FEE *Letter and Guidance*

- Issued to Agencies on October 31, 2008
- Addresses Higher-Tier EMSs
  - Where they are appropriate
  - How to decide
  - How to audit



## FEE *Letter* (October 31, 2008)

- Transmits *Guidance*
- Establishes that
  - Higher-tier EMS need not address each of the ISO 14001 elements
  - Higher-tier EMS should have periodic *internal* audit (need not have an *external* audit)
- Approves sampling when auditing a multi-site organization EMS
  - in accordance with the International Accreditation Forum's *Mandatory Document for the Certification of Multiple Sites Based on Sampling* (IAF MD 1:2007), or
  - with written approval from OFEE



## FEE *Guidance* (October 31, 2008)

### Purpose:

- To assist Agencies in identifying how they manage environmental responsibilities throughout the agency
- To assist agencies in determining at what level or levels it is appropriate to implement an EMS or EMSs



# Multiple Levels of Management

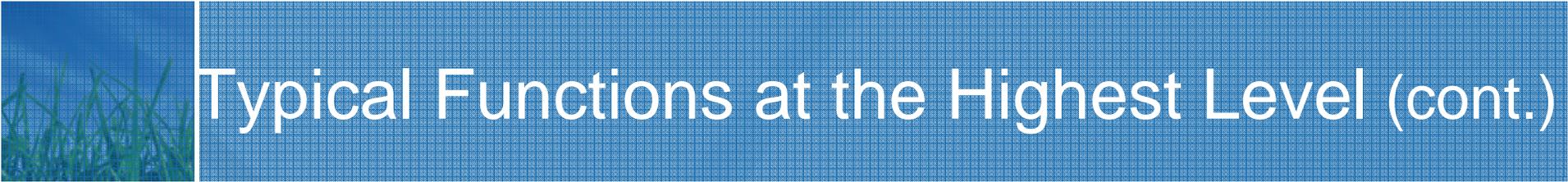
Guidance addresses generic levels of management

- Highest Level
- Middle Level(s)
- Lowest level



# Typical Functions at the Highest Level

- Establish agency-wide policies
- Establish agency-wide objectives and targets (e.g., environment, energy, fleet)
- Communicate how the agency is organized and managed on a day-by-day basis including identification of responsibility for addressing objectives and targets
- Ensure accountability for environmental management, and establish performance measures



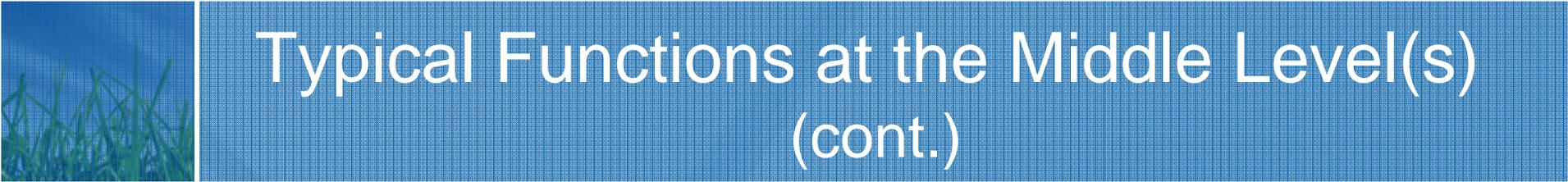
## Typical Functions at the Highest Level (cont.)

- Establish reporting mechanisms that promote accountability for environmental management and measure performance
- Collect, analyze, and report agency-wide performance information
- Establish a process to ensure that all agency EMSs are in conformance with E.O. 13423



## Typical Functions at the Middle Level(s)

- Establish environmental policy for the sub-agency, within the agency-wide policy
- Establish sub-agency objectives and targets to address agency-wide objectives and targets
- Address its unique set of significant environmental aspects



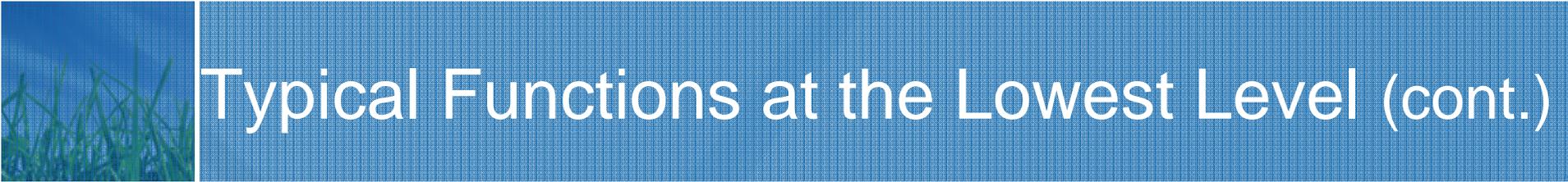
## Typical Functions at the Middle Level(s) (cont.)

- Establish procedures for the sub-agency organization
- Allocate resources necessary to ensure EMS implementation and successful pursuit of objectives and targets
- Collect, analyze, and report sub-agency performance information



## Typical Functions at the Lowest Level

- Establish environmental policy for the facility or field level organization, within the agency-wide policy and any applicable middle level(s)
- Identify environmental aspects of its activities (including energy and fleet)
- Identify legal and other requirements applicable to that organization's aspects
- Establish environmental objectives and targets
- Implement environmental programs to achieve those objectives and targets



## Typical Functions at the Lowest Level (cont.)

- Implement operational controls for activities which could cause significant environmental impacts
- Provide training to employees whose activities could cause significant environmental impacts
- Conduct internal audits of the EMS
- Conduct annual reviews with management at that level to ensure the continuing adequacy, suitability, and effectiveness of the EMS



## FEE *Guidance* – Questions to Ask

FEE *Guidance* lists some sample “questions to ask.” They address issues such as:

- How is does your Agency manage? Is it centralized? Decentralized?
- Who establishes policy? Strategic plans? Budgets?
- How similar or different are your activities?
- Where do your ‘aspects’ occur? Where are they controlled? (May differ for different aspects!)
- Are there opportunities to reduce duplication?



## Reporting for Higher-Tier EMSs

- There are currently no metrics for Higher-Tier EMSs
- The Annual Agency EMS Report for FY2009 will include:
  - A narrative description of the Agency's strategy for implementing EMS "at all appropriate organizational levels"
  - Identification of the (existing or planned) "higher tier" EMSs at the agency, along with their scope and status



# Auditing

- OFEE *Clarification* (January 2008)
  - Expands on key terms in the declaration requirements, including audit requirement
- OFEE *Letter* (October 2008)
  - Adopts IAF MD 1:2007 standard for sampling multiple sites when auditing a 'multi-site organization' EMS (or specific permission from OFEE)
  - Requires periodic *internal* audit for 'higher tier' EMSs

# Auditing a Multi-Site Organization EMS

- The International Accreditation Forum provides requirements and guidelines for auditor-certification organizations.
- IAF has issued requirements for the certification of multiple sites based on sampling [IAF MD 1:2007].  
The document defines (among other things)
  - ‘multi-site organization’
  - when a multi-site organization is eligible for sampling
  - sampling methodology and sample sizes
- FEE *Letter* requires adherence to this standard, or approval from OFEE

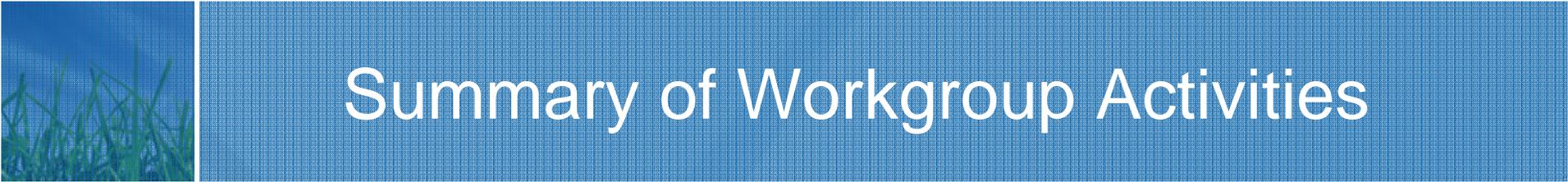




# Questions and Answers Document

The Workgroup is developing a Q&A document

- Draft questions have been circulated for review
- Will include examples of how different Federal agencies have structured their EMSs



# Summary of Workgroup Activities

- Developed a typology of EMSs
- Supported OFEE in development of October *Letter and Guidance*
- Continued to coordinate with Metrics Workgroup on common reporting issues
- Resumed development of a Q & A document



# Federal Organizational-Level EMS Workgroup

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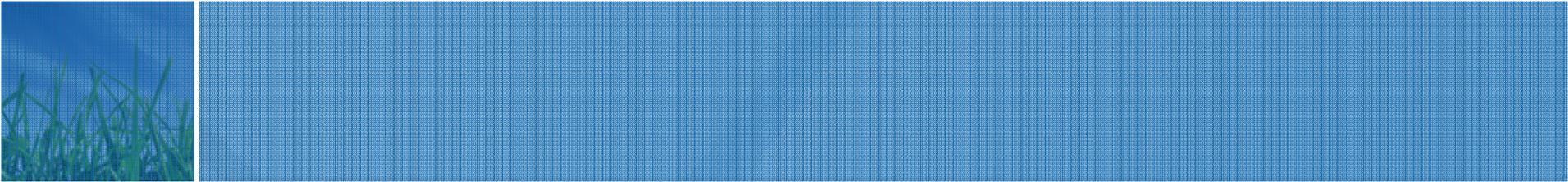
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# BACKUP SLIDES

“Examples of Questions to Ask”  
*FEE Guidance*, October 2008



## Examples of Questions to Ask

- How are other management functions, such as budget or strategic planning, carried out? Are they centralized? Decentralized?
- Are operations and activities somewhat standardized and uniform throughout the agency or sub-organization?
- Does the agency or any of its sub-agencies have facilities with significant environmental aspects with on-site staff?
- Does the agency or any of its sub-agencies have many facilities conducting similar activities?



## Examples of Questions to Ask (cont.)

- At what level(s) do significant environmental aspects occur?
- At what level(s) are significant environmental aspects controlled (including budget and resource allocation and operational decisions)?
- Are some environmental aspects of functions managed at different levels than others (e.g., hazardous chemicals, fleet management, and building design and construction)?
- What level(s) is (are) most appropriate for providing guidance?



## Examples of Questions to Ask (cont.)

- What level(s) would benefit from established, common procedures?
- What level(s) are appropriate to establish such common procedures?
- What are opportunities for economies of scale and to reduce duplication of effort, and at what level(s) do those opportunities exist?
- What actions can be taken, and at which level(s), to best ensure ownership of the EMS at the operational level?



# BACKUP SLIDES

Auditing a  
Multi-Site Organization EMS  
Using Sampling

# Certification of Multiple Sites Based on Sampling

- Mandatory Document issued by the International Accreditation Foundation
- Establishes requirements for certifying audit organizations





# Multi-Site Organization

*Multi-site organization* – an organization having

- “an identified central function (hereafter referred to as a central office – but not necessarily the headquarters of the organization) at which certain activities are planned, controlled or managed,” and
- “a network of local offices or branches (sites) at which such activities are fully or partially carried out.”

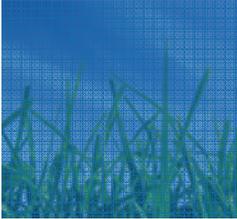
– IAF MD1:2007 Multiple Site Sampling, § 1.5



# Eligibility for Sampling

- “Normally ... audits ... should take place at every site of the organization that is to be covered by the certification”
- However, sampling may be used “where an organization’s activity subject to certification is carried out
  - in a similar manner at different sites,
  - all under the organization’s authority and control”

– IAF MD1:2007, § 0.2



## Eligibility for Sampling (cont.)

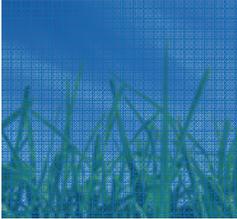
- Processes at all the sites must be substantially of the same kind, and have to be operated to similar methods and procedures [ § 3.0.1]
- Where processes in each location are not similar (but are clearly linked) the sampling plan shall include at least one example of each process [ § 3.0.1]
- Management system shall be under a centrally controlled and administered plan and be subject to central management review [ § 3.0.3]
- Not all organizations meeting definition of “multi-site organization” are eligible for sampling [ § 3.0.6]



# Factors Which May Restrict Use of Sampling

- Risk or complexity of activities
- Size of sites
- Variations in local implementation of the management system

– [ § 3.0.8 ]



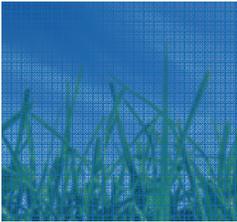
# Selection of Sample

- Partly selective, to include a representative range of sites [ § 5.1.1]
- At least 25% selected at random [ § 5.1.2]
- Selection may include considerations such as [ § 5.1.4]
  - Results of previous internal audits and management reviews
  - Records of complaints and other relevant aspects of corrective and preventive action
  - Variations in the size of sites
  - Variations in work procedures
  - Complexity of the management system and processes conducted at the sites
  - Environmental issues and extent of aspects and associated impacts
  - Differences in regulatory requirements
  - Geographical dispersion



# Minimum Size of Sample

- For low-to medium risk activity, with <50 employees at each of n sites [ § 5.2.3]
  - Initial audit: square root of the number of remote sites  $s = \sqrt{n}$  (rounded up)
  - Surveillance audit:  $s = 0.6 \sqrt{n}$  (rounded up)
  - Re-certification audit: same as initial audit (where management system has proved effective, may be reduced to  $s = 0.8 \sqrt{n}$  (rounded up))
- Central office shall be audited during each audit, and annually as part of surveillance [ § 5.2.5]



# When to Use a Larger Sample

Size or frequency of sample *shall be increased* if risk analysis indicates special circumstances in respect of factors such as:

- Size of site and number of employees (e.g. > 50 employees at a site)
  - Complexity or risk level of the activity and the management system
  - Variations in working practices
  - Significance and extent of aspects and associated impacts
  - Records of complaints and other relevant aspects of corrective and preventive action
  - Results of internal audits and management review
- [ § 5.2.6 ]



# Sampling A Hierarchical Organization

- When the organization has a hierarchical system of branches (e.g. head (central) office, national offices, regional offices, local branches) the sampling model defined above applies to *each level*
- Example:

1 head office	visited at each audit cycle
4 national offices	$s = 2$ ; minimum 1 at random
27 regional office	$s = 6$ ; minimum 2 at random
1700 local branches	$s = 42$ ; minimum 11 at random

– [ § 5.2.7 ]