

# Reclamation Manual

## Directives and Standards

<b>Subject:</b>	Environmental Management Systems (EMS) Implementation
<b>Purpose:</b>	The purpose of this Directive and Standard (D&S) is to establish the requirements and responsibilities for EMS implementation within the Bureau of Reclamation. The benefit of this D&S is sound management of Reclamation's environmental aspects, streamlined environmental information for decision making, reduced risk to natural resources and human health, more efficient operations, and improved environmental performance.
<b>Authority:</b>	Executive Order (EO) 13693, <i>Planning for Sustainability in the Next Decade</i> , March 25, 2015 (EO 13693), and the Department of the Interior's Departmental Manual (DM) Part 515, Chapter 4, ( <a href="#">515 DM 4</a> ).
<b>Approving Official:</b>	Director, Mission Assurance and Protection Organization (MAPO)
<b>Contact:</b>	MAPO, Environmental Compliance Division (84-53000)

### 1. Introduction.

A. **Background.** Reclamation is required by Executive Order (EO), Department Manual (DM), and Reclamation Policy to implement EMS. EO 13693 expands and extends Federal sustainability goals and targets established in previous EOs and requires that Federal agencies continue implementation of formal EMS where proven effective to address sustainability goals of the Order. The Department's 515 DM4 requires that each bureau implement at least one EMS in accordance with EO 13693, *The Department of the Interior Sustainability and Environmental Policy Statement*, and the elements and framework of the International Organization for Standardization (ISO) 14001 EMS series and do so at appropriate organizational levels to address the sustainability goals, environmental aspects, and legal and other requirements unique to Reclamation. Further, Reclamation Manual (RM) Policy, [The Bureau of Reclamation's Commitment to Environmental Stewardship](#) (ENV P05), states that EMS is Reclamation's managerial framework to ensure compliance with environmental laws and regulations, identify and address environmental aspects and sustainable practices, and foster continual improvement of environmental performance. EMS has proven effective as Reclamation's management framework for addressing environmental aspects and implementing sustainability goals. This D&S establishes Reclamation's roles, responsibilities, and procedures to implement effective EMS.

### B. Explanation of Environmental Management Systems.

- (1) EMS is a standardized management approach to address the environmental aspects of an organization's operations and activities that have potential environmental impacts. Commonly recognized environmental aspects include the generation of hazardous and solid waste, air pollution, greenhouse gas (GHG)

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emissions, water pollution and the consumption of natural resources.

Reclamation's environmental aspects result from a wide-range of operations and activities, from facility construction and maintenance to office activities and purchasing. Many of the required EMS process elements are common practices inherent in any sound organizational management system. However, EMS attempts to increase management control over environmental aspects through a standardized and consistent approach.

- (2) Organizations that fully implement an EMS follow a prescribed "Plan, Do, Check, Act" model to ensure the systematic and consolidated management of environmental aspects, by:
  - (a) identifying the day-to-day operations and activities that interact with the environment and have the potential to cause environmental impacts<sup>1</sup> (e.g., environmental aspects);
  - (b) establishing environmental objectives and targets to address significant environmental aspects, legal and other requirements, and management priorities;
  - (c) clearly defining and communicating responsibilities, instituting operational controls and emergency procedures, and training staff;
  - (d) monitoring activities to prevent or minimize potential environmental impacts; and
  - (e) taking corrective and preventative action where necessary to avoid and reduce adverse environmental impacts.
- (3) When an EMS framework is employed, managers can more easily assess, prioritize, control, monitor, and assign responsibility for the organization's environmental issues. Successful implementation of the EMS can enhance

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<sup>1</sup> There is often confusion between the requirements of EMS and the National Environmental Policy Act of 1969 (NEPA). NEPA requires that Federal agencies analyze the environmental impacts of proposed actions "significantly affecting the quality of the human environment." NEPA commonly provides impact prediction, analysis, and consideration of mitigation measures at a *discrete proposal design and decision phase*. The EMS differs from NEPA in that it requires identification of environmental aspects associated with an organization's ongoing operations and activities and prioritization of those which have or can have significant impacts on the environment. The EMS provides a framework to improve the environmental performance of ongoing day-to-day operations, not only "major Federal actions." Personnel working in EMS can use information resulting from the NEPA process to determine aspects and impacts, legal and other requirements, and environmental objectives and targets. For more information on the relationship between EMS and NEPA, please see the CEQ, *Aligning National Environmental Policy Act Processes with Environmental Management Systems*, [http://www.fedcenter.gov/kd/Items/actions.cfm?action=Show&item\\_id=6899&destination=ShowItem](http://www.fedcenter.gov/kd/Items/actions.cfm?action=Show&item_id=6899&destination=ShowItem).

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compliance efforts<sup>2</sup>, reduce environmental liability, foster more efficient and sustainable operations, conserve resources, prevent pollution, and reduce an organization's environmental footprint.

### 2. Applicability.

A. **Regional Directors (RDs).** The responsibilities and requirements for implementing an EMS, as specified in this D&S, apply to RDs and their staff, as appropriate.

(1) **Reclamation as Owner.** The RD shall implement a regional EMS to address the activities, operations, and assets owned by Reclamation within the physical boundaries under the RD's area of responsibility. Priority shall be given to addressing the activities and operations within reserved works facilities and on Reclamation lands. Transferred works operation and maintenance activities are governed under contract and will be addressed in accordance with Paragraph 5.B.(5).

(2) **Reclamation as Tenant.** When a regional office resides in, or operation occurs in, a leased facility, the RD shall ensure that the EMS includes the significant aspects within the region's direct control. The RD shall ensure that appropriate regional managers coordinate with the facility owner, as necessary, to address the significant aspects to which it contributes, but does not directly manage, as a tenant<sup>3</sup>.

B. **Area and Field Office Managers.** Area and field office managers shall implement EMS procedures to address the environmental aspects and impacts of their organizational level activities and operations, in accordance with the regional EMS.

C. **Denver and Washington Directors.** Denver and Washington Office directors shall address their environmental aspects as tenants in accordance with their roles and responsibilities in Paragraph 4.C. The Director, MAPO, facilitates and supports regional EMS implementation as described in Paragraph 4.B.

D. **All Employees.** All employees shall support their appropriate directors in EMS implementation as described in Paragraphs 2. A.-C. above and incorporate the environmental stewardship principles of ENV P05 into their daily work activities.

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<sup>2</sup> An EMS is not an environmental compliance program. Rather, it requires that certain procedures exist to ensure compliance, including identification of legal and other requirements, periodic assessment of compliance, consideration of legal requirements in setting environmental objectives, and management commitment to compliance.

<sup>3</sup> Examples of common environmental aspects within the control of tenants include the consumption of natural resources and generation of waste from office activities and purchasing, and generation of GHG emissions from work-related and commuter travel, among others.

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3. **Definitions.** In addition to the definitions below, see Paragraph 3 of [ENV P05](#) for definitions applicable to this D&S.
- A. **Appropriate Organizational Level.** The management level or structure within the organization best-suited to implement the EMS to address significant environmental aspects of the agency's operations and activities. For purposes of this D&S, Reclamation defines the regions as the appropriate organizational level.
  - B. **Conformance.** Fulfillment of EMS requirements established in Paragraph 5 of this D&S and within each region's respective EMS.
  - C. **Corrective/Preventative Action.** Action to eliminate or prevent the cause of nonconformity with EMS requirements in order that it does not recur or occur elsewhere.
  - D. **Environmental Management Systems.** See [ENV P05](#).
  - E. **Environmental Management Systems Record.** Documentation of implemented or completed EMS activities, procedures, responsibilities, and other requirements.
  - F. **Environmental Aspect.** See [ENV P05](#).
  - G. **Environmental Impact.** See [ENV P05](#).
  - H. **Environmental Objective.** Statement of an environmental goal, consistent with the environmental stewardship policy, that the region sets itself to achieve. It is expressed as a desired environmental or programmatic outcome or accomplishment.
  - I. **Environmental Target.** Detailed performance requirement, applicable to the region and the programs and offices within it, that arises from the environmental objective. Targets define the expected results of operations, work activities, and programs implemented to achieve or make progress towards the environmental objective.
  - J. **International Organization for Standardization.** A federation founded in 1947 that is recognized worldwide for the promotion and development of international manufacturing, trade, and communication standards. Over time, the acronym ISO has come to represent the International Organization for Standardization. ISO 14000 is a series of voluntary standards for managing environmental aspects. EMS is part of the ISO's 14000 Environmental Management series.
  - K. **Nonconformity.** A demonstrated lack of conformance to the EMS requirements established in Paragraph 5 of this D&S and within each region's respective EMS.
  - L. **Operational Controls.** The procedures, practices, programs, and physical controls necessary to adequately prevent or minimize potential environmental impacts of

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significant environmental aspects. In Reclamation, operational controls are often identified and documented in policies, standing operating procedures, D&S, and guidance.

- M. **Significant Environmental Aspect.** An environmental aspect resulting from Reclamation's operations or activities that the region deems as having, or potentially having, a significant impact on the environment.
- N. **Sustainability Goals.** The sustainability goals are Federal performance targets defined in EO 13693<sup>4</sup>, Section 3, *Sustainability Goals for Agencies*. These goals aim to reduce GHG emissions, create a clean energy economy, promote energy security and safeguard environmental health. The goals address the following key issues:
- (1) Reducing greenhouse gas emissions;
  - (2) Conserving energy and water;
  - (3) Promoting clean and renewable energy;
  - (4) Improving fleet and vehicle efficiency;
  - (5) Improving building efficiency and performance;
  - (6) Promoting sustainable acquisition and procurement;
  - (7) Advancing waste prevention and waste diversion;
  - (8) Promoting electronic stewardship; and
  - (9) Supporting Federal facility climate change preparedness and resilience.

#### 4. Responsibilities.

- A. **Regional Directors.** RDs shall implement EMS in accordance with this D&S to address the significant environmental aspects and achieve sustainability goals under their area of responsibility. In implementing the EMS, an RD shall:
- (1) clearly define the scope of the regional EMS;
  - (2) ensure that the EMS is implemented in accordance with Paragraph 5 below;
  - (3) provide resources to implement the EMS;

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<sup>4</sup> In addition to EO 13693, the *Implementing Instructions for Executive Order 13693 Planning for Federal Sustainability in the Next Decade*, defines sustainable practices, goals, and targets for Federal agencies.

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- (4) review the organization's progress in achieving conformance with EMS requirements in accordance with Paragraph 5.E.;
- (5) address challenges and issues to implementing EMS and achieving environmental objectives, and ensuring continual improvement;
- (6) report the status of EMS conformance to the Director, MAPO, in accordance with Paragraph 6;
- (7) designate a regional EMS manager accountable for the planning, management, implementation, and oversight of the region's EMS; and
- (8) designate a regional EMS core team comprised of area office and program representatives to assist the regional EMS manager in his/her responsibilities.

**B. Director, MAPO.** The Director, POLICY, is Reclamation's Chief Sustainability Officer responsible for overseeing adherence to EO 13693, 515 DM 4, and Department and Reclamation sustainability policy, including ensuring EMS implementation and maintenance at all appropriate organizational levels within Reclamation. The Director shall:

- (1) establish EMS policy, guidance, and tools;
- (2) provide training and technical assistance;
- (3) support regional EMS implementation and maintenance of EMS.
- (4) collect and analyze data to identify Reclamation-wide strategies to achieve conformance to the EMS requirements of this D&S;
- (5) report the status of EMS implementation to the Department; and
- (6) designate a Reclamation-wide EMS coordinator to provide staff support in meeting these responsibilities.

**C. Denver and Washington Office Directors.** Directors within Reclamation's Denver and Washington Offices shall address the significant environmental aspects of their office activities in conjunction with the Department's EMS and shall work cooperatively with the General Services Administration, as requested, to reduce their environmental impacts as tenants.

**D. Area Office Managers.** Area office managers shall:

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- (1) provide adequate staff resources and support participation in the development and implementation of the regional EMS;
- (2) identify the significant environmental aspects of operations and activities within their area of responsibility at Reclamation facilities and on Reclamation lands in accordance with the scope of the regional EMS; and
- (3) develop and implement plans, activities, programs and operational controls to achieve environmental objectives and targets and reduce environmental impacts in support of and alignment with the regional EMS.

**E. Regional Environmental Management Systems Managers.** Regional EMS managers shall:

- (1) implement processes and procedures to meet the required EMS elements of Paragraph 5 of this D&S;
- (2) communicate EMS roles and responsibilities to applicable managers and staff;
- (3) review EMS implementation with regional senior leadership annually;
- (4) immediately inform the RD of any issues that may affect conformance to EMS requirements; and
- (5) identify and oversee a regional EMS coordinator and other support staff, as necessary, to assist in these responsibilities.

**F. Reclamation-wide Environmental Management Systems Coordinator.** The Reclamation-wide EMS coordinator shall support the Director, MAPO, in meeting her/his responsibilities. The Reclamation-wide EMS coordinator will work with regional EMS coordinators in the implementation of Reclamation-wide strategies to implement the EMS in accordance with this D&S.

**G. Regional Environmental Management Systems Coordinators.** Regional EMS coordinators are responsible for facilitating and coordinating EMS implementation within their respective regions. The regional EMS coordinator shall:

- (1) support the regional EMS manager in accomplishing the required elements of Paragraph 5 of this D&S;
- (2) lead and facilitate an EMS core team to plan and implement the EMS;
- (3) develop, manage, and control key documents related to the EMS;
- (4) brief the regional EMS manager and/or regional senior management annually on the status of the EMS; and

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- (5) serve as the point-of-contact to MAPO on the development of Reclamation-wide EMS policy, guidance, strategies, tools, and reports.
- H. **Regional Environmental Management Systems Core Team.** The core team facilitates the accomplishment of EMS objectives and assists the regional EMS coordinator in the development of manuals, programs, plans, tools, and reports and in the monitoring and assessment of EMS conformance.
5. **Environmental Management Systems-Required Elements.** The regions shall meet the following minimum EMS requirements reflective of the ISO EMS 14001, “Plan, Do, Check, Act” framework:
- A. **Environmental Stewardship Policy.** The RD shall document his/her commitment to Reclamation’s environmental stewardship policy in ENV P05 and shall include region-specific commitments and priorities, as necessary. The RD commitment to ENV P05 shall be communicated to all regional employees annually via memorandum, and to onsite contract employees, operators of Reclamation facilities, key external stakeholders, visitors, and lessees, as deemed appropriate.
- B. **Plan.**
- (1) **Environmental Aspects and Impacts.** The region shall establish and implement procedures to identify, review, and update the environmental aspects and impacts within the defined scope of the EMS. The region shall review current and planned activities, operations, products, and services that it can control or influence to determine its aspects. The region shall review and update (add/delete/modify) environmental aspects and impacts periodically.
- (2) **Determination of Significance.** 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 and apply a ranking scheme to individual aspects to identify the most significant. Ranking schemes may be qualitative or quantitative, but shall consider the following evaluation criteria in analyzing each aspect and include at least three in the determination of significance:
- (a) relationship to the sustainability goals;
  - (b) scope and severity of environmental and human health impacts;
  - (c) probability and frequency of occurrence;
  - (d) cost and feasibility;



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- (e) level of regional control or influence;
  - (f) applicable local, state, and/or Federal laws, or other requirements; and
  - (g) interest of third parties.
- (3) **Legal and Other Requirements.** 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.
- (4) **Sustainability Goals.** The region shall address the sustainability goals defined in Paragraph 3.N. that are applicable to the region's activities and operations in the following manner:
- (a) identify the applicable EOs, laws, and regulations mandating accomplishment of the sustainability goals as legal and other requirements;
  - (b) consider the correlation between the sustainability goals and the region's environmental aspects as a criterion for determining significance as required in Paragraph 5.B.(2)(a) above;
  - (c) consider the sustainability goals in the development of objectives and targets and provide rationale for sustainability goals not addressed in Environmental Management Plans (EMPs); and
  - (d) develop a plan and schedule to include the sustainability goals in the EMS through continual improvement.
- (5) **Lessee, Contractor, and Concessionaire Activities.** This requirement applies to the acquisition of products and services (e.g., design and construction), concessionaire agreements, lease agreements for use of Reclamation lands, and contracts for third-party operation and maintenance of Reclamation-owned facilities (e.g., transferred works). Where lessee, contractor, and concessionaire activities on Reclamation lands 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 specify the lessee, concessionaire, or contractor role and responsibilities to reduce their

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significant environmental aspects and support ENV P05 in accordance with the applicable program, legal, and contractual requirements.<sup>5</sup>

- (6) **Objectives and Targets.** The region shall establish and implement procedures for the development, implementation, and periodic review of environmental objectives and targets. The environmental objectives and targets shall be achievable, measureable, and time-specific, where feasible, and 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 region shall consider the following in developing objectives and targets:
- (a) significant environmental aspects;
  - (b) legal and other requirements, including the sustainability goals defined in Paragraph 3.N.;
  - (c) financial, operational, and business requirements;
  - (d) management priorities; and
  - (e) views of interested parties.
- (7) **Environmental Management Plans.** The region shall develop EMPs or similar action plans and programs for each objective and target established in accordance with Paragraph 5.B.(6) above. The EMP shall document:
- (a) the environmental objective;
  - (b) related targets, actions, and milestones;
  - (c) roles and responsibilities of regional, program, area office, and other personnel in implementing the objectives and targets; and
  - (d) other information deemed useful by the region such as operational controls, resources, performance indicators (e.g., data), legal and other requirements, training, etc., necessary to implement, measure, manage, and track the objectives and targets.

### C. Implementation and Operation.

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<sup>5</sup> Reclamation has established minimum requirements for addressing sustainable operations and maintenance of Federal facilities by non-Federal parties in RM D&S, *Sustainable Operation and Maintenance Requirements for Certain Water-Related Contracts* (PEC 05-06).

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- (1) **Resources, Roles, Responsibilities, and Authorities.** To ensure successful implementation of the EMS, the region shall:
  - (a) make available the necessary staff, skills, and technical and financial resources to implement the EMS;
  - (b) define, assign, and communicate EMS roles, responsibilities, and authorities to internal staff and onsite contractors working on behalf of the region<sup>6</sup> (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.
  
- (2) **Competency, Training, and Awareness.** The region shall establish and implement procedures to ensure that employees and onsite contractors are competent to implement the EMS and address the region's significant environmental aspects. Regions shall:
  - (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 impacts, and the importance of conformance to ENV P05 and regional EMS procedures;
  - (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.
  
- (3) **Internal Communication.** The region shall establish and implement procedures to communicate information on EMS implementation between organizational levels and functions to ensure successful implementation of the EMS. Information communicated shall include:

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<sup>6</sup> This does not include non-Reclamation employees working in contractor-operated Reclamation assets (e.g., transferred works facilities).

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- (a) the environmental stewardship principles of ENV P05;
  - (b) the region's EMS procedures, significant environmental aspects, environmental objectives and targets, and EMPs; and
  - (c) the roles and responsibilities of key personnel in implementing the EMS and addressing significant environmental aspects.
- (4) **External Communication.** The region shall establish and implement procedures to communicate information on EMS to external stakeholders in the following manner:
- (a) refer interested external stakeholders to Reclamation's environmental stewardship policy in ENV P05 through the RM Internet site;
  - (b) determine whether or not to communicate the EMS, in whole or in part, to external stakeholders and document the decision; and
  - (c) receive, document, and respond to communication relevant to the EMS from external parties.
- (5) **Documentation.** The region shall, at a minimum, document the following EMS information:
- (a) the RD 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.
- (6) **Control of Documents.** Regions shall ensure that required EMS documents are adequately maintained and controlled so that they are up-to-date, legible, consistent, and available<sup>7</sup>. The procedures for controlling documents must address:
- (a) approval of final documents prior to distribution;

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<sup>7</sup> Creation of an EMS Manual is not required by ISO or this D&S, but is a widely accepted business practice for documenting and controlling required EMS information.

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- (b) review, update, and re-approval of documents, when necessary;
  - (c) record keeping of dates of changes to and new versions of documents;
  - (d) availability and location of current versions; and
  - (e) archiving or eliminating obsolete versions.
- (7) **Operational Controls.** The region shall establish procedures and define responsibilities for identifying, establishing, implementing, and maintaining 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 the environmental objectives, prevent potential environmental impacts, and avoid deviation from the principles of ENV P05 and the region's environmental objectives and targets.
- (8) **Emergency Preparedness and Response.** The region shall establish, implement, exercise, and maintain emergency response procedures for potential occurrences that can have an environmental impact in accordance with RM [D&S, Emergency Management \(FAC 01-01\)](#). Regional EMS procedures shall reference existing emergency action plans, as appropriate.

### D. Checking.

- (1) **Monitoring and Measurement.** 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 programmatic quality assurance procedures for generating reliable EMS performance data; and
  - (d) the overall effectiveness of the EMS.
- (2) **Control of Records.** The region shall establish procedures to generate, maintain, and control records of EMS performance in accordance with Reclamation and regional record keeping procedures. 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:

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- (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 incidence reports.
- (3) **Evaluation of Compliance.** The region shall implement an environmental compliance auditing program in accordance with RM D&S, *Environmental Compliance Audit Program* (ENV 15-03), which establishes Reclamation's procedures for reviewing compliance with major Federal and state environmental laws and regulations.
- (4) **Internal Audit.** The region shall conduct periodic assessments to ensure the EMS is functioning and properly implemented and maintained in accordance with this D&S and region-specific EMS procedures. The region shall evaluate itself against the audit criteria specified in [Appendix A](#) of RM D&S, *Environmental Management System (EMS) Independent Conformance Audit and Declaration of Conformance Process* (ENV 05-02). 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:
- (a) responsibilities for conducting internal audits;
  - (b) schedule and frequency, including the individual programs and offices scheduled for inclusion in the audits;
  - (c) internal audit approach and methodology<sup>8</sup>; and

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<sup>8</sup> ENV 05-02 defines the processes, roles, and responsibilities associated with *independent* EMS conformance audits. Although the audit procedures of ENV 05-02 are not required for internal audits, they provide a useful framework for conducting any type of EMS audit.

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- (d) procedures for reporting audit results and retaining audit records.
- (5) **Nonconformity, Corrective and Preventative Actions.** 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 measuring of the EMS, internal audits, and independent conformance audits. The nonconformity, corrective and preventative action procedure must address how the region will:
  - (a) identify nonconformities and their root causes;
  - (b) establish and implement corrective and preventative actions to address nonconformities and prevent their recurrence; and
  - (c) evaluate the effectiveness of corrective and preventative actions taken and record their completion.
- E. **Management Review.** The EMS manager shall plan for and conduct an EMS review 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:
  - (1) EMS-related communication from external 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.
- 6. **Declaration and Maintenance of Conformance.** Conformance is achieved when the region implements the EMS requirements established in Paragraph 5 of this D&S and its regional EMS procedures, and undergoes an independent conformance audit in accordance

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with ENV 05-02. To maintain conformance, the region shall undergo independent conformance audits in accordance with the schedule established in ENV 05-02, Paragraph 9.



## RECLAMATION MANUAL TRANSMITTAL SHEET

Effective Date: \_\_\_\_\_

Release No. \_\_\_\_\_

Ensure all employees needing this information are provided a copy of this release.

### Reclamation Manual Release Number and Subject

### Summary of Changes

NOTE: This Reclamation Manual release applies to all Reclamation employees. When an exclusive bargaining unit exists, changes to this release may be subject to the provisions of collective bargaining agreements.

### Filing instructions

Remove Sheets

Insert Sheets

All Reclamation Manual releases are available at <http://www.usbr.gov/recman/>

Filed by: \_\_\_\_\_

Date: \_\_\_\_\_