### Environmental Stewardship Policy
- As per
- EMS Initial Review and Affirmative 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 leasees, as deemed appropriate. Regional staff shall direct interested members of the public to ENV P05, as requested.
- There is a record of a Regional Director (RD) memorandum to all employees committing to ENV P05 each year. See also Control of Records.
- The objectives of ENV P05 are either included or referenced in the memorandum. If referenced, it is a link to the Reclamation Manual Web site to view the full policy is provided.
- Management and employees understand and support the objectives established by ENV P05.

### Environmental Aspects and Impacts
- 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/delete/modify) environmental aspects and impacts periodically.
- The EMS manual contains procedures to identify and evaluate environmental aspects within the scope of the regional EMS.
- 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 records and documentation demonstrate consideration of the sustainability goals in the EMS.
- There is evidence that changes to environmental aspects are reviewed and approved by management.
- There is evidence that environmental aspects are reviewed and updated (add/delete/modify) by the appropriate regional staff periodically.

### 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, 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.
- 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.
- 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 Sustainability Goals.
- 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.
- Those aspects determined to be significant are clearly identified.

### 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 the 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.
- 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.
- 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.
- The region assigns clear responsibility for monitoring, updating, and communicating changes to applicable legal and other environmental requirements at various levels of the organization.

### Sustainability Goals
- Regions shall address in the EMS the sustainability goals as defined in Paragraph 5.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:
  1. Identify applicable sustainability goals as legal or other requirements.
  2. Consider the impact of environmental aspects on achievement of sustainability goals as a criteria for determining significance.
  3. Consider sustainability goals in the development of objectives and targets.
  4. Develop a plan and schedule to include the sustainability goals in the EMS through continual improvement.
  5. Provide rationale for sustainability goals not addressed in the EMS.
- 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 rationalization as to why they are not addressed.
  1. Asset registers, significance criteria, Environmental Management Plans (EMP), and other EMS records and documentation demonstrate consideration of the sustainability goals in the development and implementation of the EMS.

### Control and Concessionaire Activities
- The EMS manual contains procedures to identify the roles, responsibilities, and procedures for identifying and addressing EMS requirements in applicable contracts.
- 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 Standards, Sustainable Operation and Maintenance Requirements for Certain Water-Related Contracts (PEC 06-06).
- Other contract, lease, or concessionaire documents contain environmental and EMS language in accordance with Federal and Reclamation environmental requirements.
EMSI Required Elements: Recalculation Manual Objective and Standard (EMSI), Environmental Management System (EMS) Implementation (ENV EMS) Requirements

Evidence of Conformance

Year(s) - 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)

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Actions Necessary to Achieve Conformance

Appendix A
The region 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:

- approval of final documents prior to distribution;
- review, update, and re-approval of documents, when necessary;
- identification and date of document changes and current versions;
- availability and location of current versions; and
- archiving or eliminating obsolete versions.

The EMS manual contains procedures, roles, and responsibilities for controlling documents that address the required elements.

- 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.

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.

The EMS manual contains procedures, roles, and responsibilities for the control of documents that address the required elements.

- 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.

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.

The EMS manual contains references procedures, roles, and responsibilities for developing and exercising emergency action plans.

- Emergency action plans are 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).

- Emergency action plans are reviewed and exercised according to an established schedule. Plans are updated to capture changes in responsibilities, processes, chemicals, or facilities.

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:

- the effectiveness of operational controls in place to reduce environmental impacts associated with significant environmental aspects;
- performance in achieving the environmental objectives and targets; and
- review of quality assurance procedures for generating reliable EMS performance data; and
- the overall effectiveness of the EMS.

The EMS manual contains procedures, roles, and responsibilities for developing and measuring significant environmental aspects and EMS performance. Reports, 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.

- Reports, data, calibrations, and work procedures demonstrate monitoring and measurement 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.

The region shall establish procedures to generate, maintain, and control records of EMS performance. Procedures shall address how records are generated, stored, protected, retained, released, related, and disposed. Examples of EMS records that shall be controlled include:

- Records of calibration and quality assurance activities, where applicable;
- Conformance or internal audit reports and records of completed corrective and preventative actions; and
- Environmental compliance reviews, notices of violation, and incident reports.

The EMS manual contains procedures, roles, and responsibilities for the control of records of EMS activities, as required.

- 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, accessible, and disposed of in accordance with procedures.

- EMS records are readily accessible and up-to-date. Appropriate regional staff have the latest version of EMS records.

The region shall establish and implement procedures defining the responsibilities and processes for:

- The physical and organizational scope of the region’s EMS; and
- the region’s EMS objectives and targets; and
- applicable legal and other requirements; and
- the region’s decision to communicate the EMS to external stakeholders.

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- The physical and organizational scope of the region’s EMS; and
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Actions Necessary to Achieve Conformance

Evaluations of Compliance

The region shall establish and implement procedures for periodically evaluating compliance with legal environmental requirements, RM-D&S, Environmental Compliance Audit Program (ENV 05-02), and the 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 areas, 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 audit;
(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.

Management Reviews

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 shall address how the organization will:

(a) identify nonconformities and their 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.

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 management commitment. The management review shall be documented and include the following topics:

(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.

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Directives and Standards

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Nonconformity, Corrective and Preventative Action

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