

National Oceanic and Atmospheric Administration

**Environmental Management System
Internal Audit Criteria**

September 2005

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Introduction

Purpose

The purpose of this document is to support the internal validation assessment of the Environmental Management System (EMS) implemented at the National Oceanic and atmospheric Administration (NOAA) so that it can self-declare in compliance with Executive Order 13148 and in conformance with the requirements of ISO 14001.

1 – Policy

Goal: To identify whether the organization has an environmental policy.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that the environmental policy is dated and subscribed by top management.			
2	Verify that persons working for or on behalf of the organization have received the environmental policy and that they are aware of its content in general terms.			
3	Verify that the environmental policy is available to the public.			
4	Does the environmental policy reflect the true intentions of management and are those working for or on behalf of the organization aware of these intentions?			
5	Does the policy contain basic commitments to comply with legal and other requirements, to continually improve the EMS and to employ pollution prevention?			

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2 – Roles and Responsibilities

Goal: To identify whether the organization has formed a team to conduct the activities required for the implementation and continual improvement of the EMS and whether the organization has defined the roles and responsibilities for the EMS team members.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that the organization has formally designated an EMS Management Representative (Coordinator).			
2	Verify that the organization has formed an EMS cross-functional team (CFT).			
3	Verify that roles, responsibilities and accountabilities for tasks and functions related to the EMS implementation and maintenance are established and clearly communicated.			
4	Verify that all team members have been properly declared competent to fulfill their EMS roles and responsibilities.			

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3 – Personnel Performance Standards

Goal: To identify whether the organization has established personnel performance standards and to ensure that personnel are assessed in line with their EMS responsibilities.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that the organization has integrated environmental performance into personnel assessments.			
2	Verify that employees are fully aware of personal liabilities for environmental law violations as it applies to their roles and responsibilities.			

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4- Environmental Impact Identification

Goal: To verify whether the organization has established a process to identify and assess existing and/or potential environmental impacts resulting from its activities, products and services.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that the organization has identified and documented its activities, products and services that result in environmental interactions. Ask to see any records that contain this information.			
2	Verify that the organization has established and maintains a methodology for identifying its environmental impacts and determining which ones are significant.			
3	Verify that the organization has been following the procedure, especially with respect to the frequency of review.			

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5 – Environmental Laws, Regulations, and Other Requirements

Goal: To verify whether the organization has established a process to identify, interpret applicability and provide means to comply with Federal, State, and Local regulatory requirements and other requirements applicable to facilities activities, operations, products or services.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that the organization has established and maintains a procedure to identify legal and other requirements that are applicable to the aspects of its activities, products, and services.			
2	Verify that the organization maintains a list of applicable legal and other requirements.			
3	Review the list of legal and other requirements to determine if it is up-to-date, legible, and readily accessible.			

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6 – Environmental Improvement Activities

Goal: To identify whether the organization has established objectives for environmental improvement and that it has developed environmental improvement activities to achieve these objectives.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that the organization has established objectives for environmental improvement addressing the following broad areas: <ul style="list-style-type: none"> • Regulatory compliance • Risk minimization • Facility Stewardship • Pollution Prevention 			
2	Verify that the organization has developed Environmental Improvement Activities using a work plan format that includes: <ul style="list-style-type: none"> • Specific objectives • Work plan actions including responsibilities, means and time frame • Means to monitor performance • Quantifiable data whenever possible 			
3	Verify that the objectives set are consistent with the commitments in the environmental policy, including compliance, pollution prevention and continual improvement.			
4	Verify that the objectives established take into account the significant impacts and legal requirements previously identified.			
5	Verify that the organization has established performance indicators (measures) for monitoring progress towards achieving its objectives.			

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7 – Environmental Awareness and Training

Goal: To identify whether the organization has assessed awareness and training requirements to help promote a culture of environmental protection and stewardship at all NOAA locations and line functions that have adopted an EMS.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that the EMS Awareness Training covered, at a minimum: <ul style="list-style-type: none"> • Environmental Policy • Environmental Improvement Activities inclusive of Pollution Prevention, and • Environmental Operational controls applicable to all facility 			
2	Verify that Level-to-Level Training, specific to job function has been provided to employees, and covered, at a minimum: <ul style="list-style-type: none"> • Roles and Responsibilities • Environmental Impacts and Improvement Activities • Operational Controls covering normal, abnormal or emergency, and maintenance conditions 			
3	Verify that employees and contractors (where applicable) have the necessary skills and knowledge to perform their work in an environmentally sound manner.			
4	Verify that records generated during training sessions have been properly maintained.			

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8 – Environmental Operational Controls

Goal: To identify whether the organization has developed operational controls to be applied to its significant activities and environmental impacts.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that the organization has established the appropriate operational controls in line with activities and significant environmental impacts.			
2	Verify that the operational controls are updated, as necessary, due to organizational changes.			

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9 – Internal Communications

Goal: To identify whether the organization has taken measures to ensure that effective communications are maintained among all departments within NOAA, and within Line Office functions and departments. To ensure that all employees and contractors are aware of EMS matters and that free and open communications regarding environmental issues are encouraged.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that the organization has established and maintains an EMS supporting website where the following documentation is available: <ul style="list-style-type: none"> • EMS Introduction • EMS Manual • EMS Launch Guidance • EMS Implementation Guidance including Compliance Assurance Program covering Federal requirements • EMS Pilot status and implementation products 			
2				

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10 – External Communications

Goal: To identify whether the organization has developed procedures and practices to ensure proper external communications among NOAA Line Offices, facilities and field offices and interested parties which include government agencies, non-government groups, community and neighborhood representatives.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that the organization has developed a formal method for receiving inquiries from external parties.			
2	Verify that the organization reports to NOAA Administration all communications with government agencies associated with: <ul style="list-style-type: none"> • Emergency situations • Health and safety major injury or death • Incident involving neighbor/community personal property 			
3	Verify that the organization is in conformance with all external reporting requirements to government agencies.			

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11 – Documentation and Control of EMS Documents and Records

Goal: To identify whether the organization has established procedures and practices for proper EMS documents and records control.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that the organization has developed and maintains an EMS Document Control Guidance.			
2				

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12 – Environmental Sampling, Monitoring and Performance Measurements

Goal: To identify whether the organization has identified the appropriate performance measurements to track and report its environmental performance.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that the organization has been performing environmental sampling when deemed necessary.			
2	Verify that the organization maintains a list of monitoring requirements associated with the key characteristics of its activities and environmental impacts.			
3	Verify that the organization retains all monitoring, measurement and analysis results for the appropriate retention period.			
4	Verify that the instruments used in the collection of data are calibrated in conformance with manufacturer’s recommendations.			

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13 – Regulatory Compliance and EMS Audits and Self-Assessments

Goal: To identify whether the organization has implemented a process for conducting self-assessments and audits to ensure conformance is maintained to the EMS, and to reinforce conformance to the NOAA Regulatory Compliance Audit Policy.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that the organization has established and followed a procedure for assessing regulatory compliance.			
2	Verify that the organization has established and maintains a procedure for conducting periodic EMS self-assessments and internal audits.			

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14 – Corrective Action to Regulatory Compliance Audits and EMS Non-Conformances Corrective and Preventive Actions

Goal: To identify whether the organization has implemented a process to address EMS non-conformances through corrective and preventive actions.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that the organization has been following NOAA Environmental Corrective Action Resolution Policy 98-02 to handle EMS related non-conformances and regulatory non-compliances.			
2	Verify that the organization has identified and documented the following information about EMS non-conformances: <ul style="list-style-type: none"> • Auditor and staff identifying the non-conformance • Date and location • Description of the non-conformance • Identification of any associated operational controls and records • Associated legal requirement non-compliance • Proposed corrective and preventive actions 			

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15 – Management Review

Goal: To identify whether the management review of the EMS has been conducted to ensure it continues to be effective, suitable and adequate.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that the top management has been provided with all the necessary information for the management review. This includes: <ul style="list-style-type: none"> • EMS audit results • Communication(s) from external interested parties, including complaints • The environmental performance of the organization • Progress towards achievement of objectives and goals • Regulatory compliance status • Status of corrective and preventive actions • Follow-up actions from previous audits and management reviews • Changing circumstances, including developments in legal and other requirements related to the organization’s environmental aspects, and • Recommendations for improvement 			
2	Verify that the management review procedure provides for management decisions and actions for the continual improvement of the EMS.			

No.	Requirement	C / N	Relevant Documents	Observations
3	Verify that top management has conducted a review of the EMS and determined that the system continues to be adequate and suitable for its intended purposes.			
4	Verify that top management has determined that the system continues to be effective, specifically on its ability to achieve the objectives and targets.			
5	Verify that top management has determined any necessary changes or actions, and new objectives and targets, as needed, to ensure the system's continual improvement.			
6	Verify that the decisions of the management review have been adequately documented and communicated to the appropriate parties in the organization.			
7	Verify the implementation status of all follow-up actions resulting from the management review.			

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16 – Change, New Project Management and Procurements

Goal: To identify whether the organization has adequately considered the environmental impacts of changes associated with its operations and activities.

No.	Requirement	C / N	Relevant Documents	Observations
1	Verify that locations have been using the Management of Change Authorization Form, whenever a change is identified.			
2	Verify that the potential environmental impacts of proposed changes have been identified by using the Project Environmental Checklist.			
3	Verify that acquisitions and contracting is subject to an environmental assessment covering: <ul style="list-style-type: none"> • Applicable legal and other requirements • Minimization of environmental impact • Use and application of “best technologies” • Changes to the EMS 			

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