

Procedure Title & Number Internal EMS Auditing Guidelines	Corresponding req.	ISO 14001 4.5.4 EMS manual xxx	
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Internal EMS Auditing Guidelines

Internal auditors should utilize the following guidance when developing questions for audits. Auditors may develop additional questions.

- I. Environmental Policy
 - A. Confirm that the policy is up-to-date and still appropriate to the nature and scale of current activities, products, and services.
 - B. Determine that the policy is communicated to employees:
 1. New employees. Check new employee training to verify that it covers the environmental policy, and interview new employees to ensure that they understand the policy.
 2. Existing employees. Determine how the policy is discussed or communicated to existing employees. Interview randomly selected existing employees at several levels within the organization (including top management) to determine if they know of the policy's existence and general content.
 3. Review external communication request logs to determine that the policy has been made available to the public (at least when requested).
 4. Review the current objectives and targets to determine if they are consistent with the intent of the policy.

- II. Environmental Aspects
 - A. Determine whether or not the procedure for periodic review and analysis of the environmental aspects and significance is followed.
 - B. Determine that the current set of significant environmental aspects is reflected in the current objectives and targets.
 - C. Determine that all significant changes (e.g. chemical use, process changes, activity/production level, and use of contractor changes in neighbors) have been reviewed as part of the update process. Pick several changes and follow them through the review process to determine that they have been appropriately analyzed and addressed.

- III. Legal and Other Requirements
 - A. Determine that the procedure for periodic review and analysis of legal and other requirements is followed.
 - B. Determine that all significant changes (e.g. chemical use, process changes, activity/production level, and use of contractors, changes in neighbors) have been reviewed as part of the change management process. Pick several examples and follow them through the update and review process to ensure that any changes in requirements are communicated and implemented.

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- C. Determine that there is access to up to date copies of the relevant legal requirements and internal corporate requirements and external industry standards.
- D. Review the results of recent compliance audits to determine if they indicate any deficiencies in the legal requirements review (e.g. the personnel conducting the legal analysis are not qualified to conduct the review or not doing it in a timely manner).

IV. Objectives and Targets/Environmental Management Program

- A. Determine that the current objectives and targets reflect the division's current environmental aspects and the commitment to continual improvement and prevention of pollution.
- B. Determine that each objective and target has an appropriate environmental management program that includes:
 - 1. specific and measurable targets with assigned deadlines and designation of responsibility for achievement; and
 - 2. a description of how targets will be achieved
- C. Determine that progress towards achievement of objectives and targets is measured and evaluated on a periodic basis and the results have been reported to top management. For areas not meeting targets and objectives, determine that corrective actions have been initiated.

V. Structure and Responsibility

- A. Review documented roles and responsibilities and ensure that the information has been kept current with respect to any reorganizations, departures, hiring, and/or new requirements.
- B. Pick a random sample of the documented roles and responsibilities and discuss these roles with the named parties to ensure that the responsible parties know these assignments.
- C. For known EMS-related staffing changes that have occurred since the last audit (e.g., new hires, promotions, new positions, etc...), ensure that the documented roles and responsibilities reflect the change.
- D. Review the responsibilities of the EMS Coordinator, including reporting to top management, and determine if these are being carried out. This process might involve interviews and review of reports to determine that issues are being fully communicated to top management.
- E. Determine whether personnel identified as not fulfilling their assigned roles and responsibilities are held accountable for their actions through inclusion of this issue in their performance reviews, or through other actions.
- F. Determine that adequate human, financial, and technological resources are in place to enable achievement of EMS goals, including current objectives and targets and related environmental management programs. This might involve

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review of budget and staffing plans.

- VI. Training, Awareness, and Competence
- A. Review the Document/Control Training matrix and ensure that it has been kept current with respect to any reorganizations, departures, hiring, and/or new requirements.
 - B. Select several procedures and determine whether the training has taken place. Check to see that the procedures have been implemented and that staff functioning in the various positions have been trained. Review documentation to determine that appropriate records have been developed and maintained.
 - C. Review the new employee training process and interview employees who are new within the division. Determine if the training program has been effective in informing new employees of the environmental policy and their duties within the EMS.
 - D. Review training requirements that apply to contractors. Interview selected contractors to determine that their training programs address appropriate requirements (e.g. EMS policy, safety, etc...) and have been implemented.
- VII. Communication Programs
- A. Determine that the external communication procedure is followed. Using a sampling process, determine that documentation of the receipt and responses to external inquiries is maintained. Interview key personnel, who initially receive inquiries to determine how these inquiries are documented and, where appropriate, referred to other personnel. Review records of the receipt and response.
 - B. Review internal communication programs and determine that they are being implemented. Interview selected staff and supervisors concerning the effectiveness of this program.
- VIII. EMS Documentation
- A. Review the current EMS documentation and ensure it is up-to-date.
- IX. Document Control
- A. Determine that the current document control program is followed. Select a few documents and check that they have been reviewed and, where appropriate, updated.
 - B. Review a sample of official copies of controlled documents and ensure that:
 1. they are available to employees who need access to them;
 2. they have been appropriately updated; and
 3. all obsolete copies have been removed or appropriately marked according to the established procedures.

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- X. Operational Control
- A. Review the current operational procedures. Determine that these procedures are being followed using one or more of the following techniques:
 - B. observation of the activity covered by the procedure (e.g. watching a sampling activity covered by the procedure take place);
 - C. interview of key employees to establish whether they know and understand their duties under the procedure; and
 - D. review of records developed as part of implementing the procedure.
 - E. Ensure that the written procedures represent current practice. If there is a deviation between current practice and written procedures, include this as a finding.
 - F. Review the current list of significant environmental aspects to determine if current operational procedures are addressing all operations and activities associated with the significant environmental aspects.
- XI. Emergency Preparedness and Response
- A. Review the current emergency identification, prevention (preventative maintenance, etc...), and mitigation program(s) (spill response and clean-up, etc...), including any drills or equipment maintenance programs. This review should include both regulatory-based and internal programs. Determine, through physical inspection, interviews, and checking of records, that these have been implemented and maintained. Determine if facility changes have been reviewed for their effect on these programs.
 - B. Review the current emergency response plan(s), including any drills and equipment maintenance programs. Determine, through physical inspection, interviews, and checking of records that: the emergency response equipment is maintained, emergency response procedures are available, and personnel understand and are trained in their roles. Determine if facility changes have been reviewed for their effect on these programs.

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XII. Monitoring and Measurement

- A. Review the current monitoring and measurement programs, both regulatory and non-regulatory, and ensure that they are appropriately implemented. This will include review of written procedures and records, interview of key employees, and review of reports. It may also include inspection of equipment, where appropriate.
- B. Review procedures for measuring progress towards achieving established objectives and targets. This will include review of improvement plan summary (objectives and targets document) tasks for progress or completion.
- C. Review calibration programs and their implementation. This will include review of written procedures and records, interview of key employees, and physical inspection of equipment.
- D. Review the compliance audit program and determine if it reflects current regulatory requirements (i.e. any recent regulatory changes) and has been implemented in accordance with the schedule and requirements stated in the written compliance audit procedure.

XIII. Nonconformance and Corrective and Preventative Action Program

- A. Determine that the corrective action procedure is implemented and followed.
- B. Review the methods for collecting and referring items to the formal corrective action program. Determine, through interviews and review of records, that these methods are operating effectively.
- C. Select a sample of identified nonconformances and track their progress through the corrective action program. Determine that items referred to the program are appropriately investigated and corrective actions determined and documented. This will typically involve interviews, review of documents, and occasionally, physical inspections. Determine that the program has an effective method of ensuring that corrective actions are implemented.
- D. Review any corrective action that required a change(s) in documented procedures, and verify that such change has been made to the controlled copy of the procedure and that personnel are following the revised procedure.

XIV. Records

- A. Determine that the record management procedure is implemented and followed.
- B. Use a sampling process to determine that records are appropriately developed and maintained. This will involve physical inspection of the records to determine that they are legible, complete, available, and traceable to the activity involved.
- C. Determine that new record-keeping requirements resulting from facility changes are appropriately implemented and maintained.
- D. Determine that the record retention procedure is maintained and followed.

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This will typically involve physical inspection of records and record destruction.

XV. EMS Audit Program

- A. Review the EMS audit procedure and determine that the EMS audit program is conducted according to the procedure. Check that audits are conducted according to the established schedule and nonconformances are referred to the corrective action system.
- B. Verify that the results of the EMS audits are communicated to appropriate parties (i.e. top management, etc...)

XVI. Management Review

- A. Determine that the management review program has been appropriately implemented in accordance with the requirements of the management review procedure. Verify the following:
 - B. the review meetings with appropriate personnel (i.e. top management) are occurring according to the stated schedule;
 - C. the information provided to the top management accurately represents the performance of the EMS;
 - D. appropriate issues are discussed at review meetings (check meeting minutes and other records and conduct interviews with participants to verify this); and
 - E. the results of management review are properly documented and maintained.
- F. Verify that issues identified during management reviews have resulted in management consideration of potential changes to the policy, objectives, and other elements of the EMS.