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Environmental Compliance Evaluation Procedure

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Environmental Compliance Evaluation Procedure

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Environmental Compliance Evaluation Procedure

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Environmental Compliance Evaluation Procedure

Table of Contents

- 1.0 PURPOSE..... 5**
- 2.0 SCOPE..... 5**
- 3.0 DEFINITIONS..... 5**
- 4.0 REFERENCES..... 5**
- 5.0 RESPONSIBILITIES 5**
 - 5.1 Facility Manager or Contractor Responsible 5
 - 5.2 HSE Responsible 5
 - 5.3 Environmental Compliance Audits 6
- 6.0 REQUIREMENTS 6**
 - 6.1 Discussion 6
 - 6.2 Project Environmental Inspections..... 6
 - 6.3 HSE Assessments..... 7
- 7.0 ATTACHMENTS 7**
 - Attachment 1 - EOM-KSE-TP-000002 Environmental Audit Checklist Template 8



Environmental Compliance Evaluation Procedure

1.0 PURPOSE

This procedure describes the methods for the inspection, assessment, and review of environmental performance. Where applicable compliance with this procedure may demonstrate conformance with the International Organization for Standardization (ISO) 14001:2015 Environmental Management System (EMS) Standard 6.1.3: Environmental Compliance Evaluation.

2.0 SCOPE

The scope of this procedure is to provide guidance to the user how to create a procedure for auditing program to ensure compliance with ISO14001:2015. This should also include the requirements and responsibilities of the Facility Management or Contractor Responsible on inspection, auditing and training. This procedure applies to Facility's throughout the Kingdom of Saudi Arabia and environmental control activities on government owned facilities and O&M projects where these activities occur.

3.0 DEFINITIONS

Definitions	Description
EC	Environmental Compliance
EPA	Environmental Protection Agency
ES	Environmental Services
ESA	Environmental Site Assessment
HSE	Health, Safety and Environment
ISO	International Standards Organization
ISO 14001:2015	International standard related to environmental management systems
JHA	Job Hazard Analysis
PPE	Personal Protective Equipment.
Responsible Contractor	The contractor in overall charge of the work (Principal Contractor)

4.0 REFERENCES

- EPM-KS0-PR-000002 Project HSSE Assessment Process Procedure
- ISO 14001:2015 Environmental management systems.
- <https://www.epa.gov/laws-regulations/significant-guidance-documents-air>

5.0 RESPONSIBILITIES

5.1 Facility Manager or Contractor Responsible

- Responsible for the implementation and execution of this procedure.
- Ensuring personnel are trained in the environment management system requirements.
- Ensuring follow up, and closeout, of audit finding report and action items.

5.2 HSE Responsible

- Ensuring environmental awareness training is included in the training plan of personnel.
- Ensuring follow up, and closeout, of audit finding report and action items.
- Monitoring the compliance on quartile basis and introducing changes to procedures and working practices when required.
- Reporting to the Facility Management breaches in the procedure once identified.



Environmental Compliance Evaluation Procedure

5.3 Environmental Compliance Audits

Trained Environmental Services (ES) staff SHALL conduct focused environmental compliance audits for Facility's, providing an independent evaluation of the Facility's environmental performance and compliance with ISO 14001: 2015, Statutory specific and legal requirements.

As a minimum recommended frequency, Environmental Compliance audits SHALL be conducted annually. Environmental Compliance (EC) audits shall be scheduled and coordinated with the responsible Facility Manager or Contractor Responsible.

Findings and recommendations from the EC Audits are compiled into a final audit report and shared directly with the Facility Manager or Contractor Responsible Management Health, Safety, and Environment (HSE) Management. Facility management is responsible for periodically (monthly) reporting back to the corporate ES Manager regarding the status of closing out recommended corrective actions (if any) contained in the final report.

The corporate ES Manager is responsible for reviewing and confirming feedback received from Project Management and, when appropriate, formally notifying that the audit process is complete.

6.0 REQUIREMENTS

6.1 Discussion

Audits and routine Environmental Inspections may be combined, comprising of Facility Environmental Compliance audits, Facility Environmental Inspections, Safety and Health and Environmental (HSE) assessments to provide overlapping mechanisms to gauge performance against established environmental requirements contained within legal and regulatory standards, corporate policies, procedures, and any legal or contractual stipulations. The following is a brief description of each type of environmental compliance evaluation:

- **Environmental Inspections:** Performed by trained and qualified HSE Responsible personnel on a routine basis in accordance with established procedures. They are primarily focused on assessing and documenting compliance with Facility specific environmental requirements and management system for environmental controls. Corrective actions resulting from such inspections are addressed by the Facility Management
- **Facility HSE Assessments:** Evaluation of overall HSE performance of a specific Facility.
- **Environmental Compliance (EC) Audits:** Performed by independent environmental professionals as an independent assessment, the Facility environmental performance and compliance with ISO 14001:2015 and other requirements. The audits also function as an internal risk management tool in that recommendations and advice regarding identified corrective actions are provided to the Facility Management to achieve or maintain compliance.

Other external environmental-related evaluations may also be undertaken as part of specific management systems or unique Facility requirements. External evaluations are typically required for maintenance of external certifications (e.g., ISO 14001:2015), while Facility external evaluations are typically driven by the facility Management or other driving factors such as Government or Regional requirements.

Records generated shall be maintained in accordance to this procedure.

6.2 Project Environmental Inspections

Environmental inspections are focused on Facility compliance with their specific environmental requirements and also ISO 14001:2015 as defined in the Facility Environmental Requirements and in line with general environmental best management practices. Such inspections provide an opportunity for



Environmental Compliance Evaluation Procedure

Facility to self-assess, document, and track their own compliance with their respective environmental requirements.

Environmental Audits shall be conducted by Environmental Services (ES) personnel or other qualified personnel (e.g., trained/experienced HSE representatives). However, they should be independent of the Facility.

The frequency of audits will be annually with deviations tracked in the managements system. The Environment Inspection frequency shall be conducted and documented no less than monthly.

Inspection findings will be documented in an inspection report and shared with management. Recommended/required corrective actions associated with findings will be implemented by the management and assigned to the appropriate function within the Facility team. The inspector or auditor shall arrange a meeting to clarify findings, of any, inspection or audit.

Adequate completion of corrective actions will be re-viewed and approved by the inspector prior to closing out of the inspection report. Facility management will help ensure that corrective actions are implemented in a timely manner as defined in the inspection report.

6.3 HSE Assessments

The HSE assessment process provides an opportunity for Facility's to receive experienced and independent evaluation and constructive feedback on their HSE (including environmental) performance and conformance with HSE functional programs, processes, and procedures. The HSE assessment is based on a series of questions which support HSSE Management Systems.

The outcome of each HSE assessment is a compliance rating for the Facility. Findings from HSE assessments are incorporated into a final HSE Assessment report and presented to and discussed with specific Facility Management.

7.0 ATTACHMENTS

1. EOM-KSE-TP-000002 Environmental Audit Checklist Template.



Environmental Compliance Evaluation Procedure

Attachment 1 - EOM-KSE-TP-000002 Environmental Audit Checklist Template

Environment Audit Checklist

Please complete all sections starting immediately below. This internal self-assessment will evaluate the compliance of your Environmental Management System with ISO 14001:2015. Remember to attach evidence to items where required, and to sign off and complete this assessment at the end.

4.1 General requirements

Has the organization established and maintained an environmental management system consistent with the requirements contained in ISO 14001?

☐ Yes ☐ No ☐ N/A

4.2 Environmental Policy

Has top management defined the organization's environmental policy?

☐ Yes ☐ No ☐ N/A

Is the environmental policy appropriate to the nature, scale, and environmental impacts of the organization's activities, products, or services?

☐ Yes ☐ No ☐ N/A

Does the environmental policy include a commitment to continual improvement and prevention of pollution?

☐ Yes ☐ No ☐ N/A

Does the environmental policy include a commitment to comply with relevant environmental legislation and regulations and with other requirements to which the organization subscribes?

☐ Yes ☐ No ☐ N/A

Does the environmental policy provide a framework for setting and reviewing environmental objectives and targets?

☐ Yes ☐ No ☐ N/A

Is the environmental policy documented, implemented, and maintained and communicated to all employees?

☐ Yes ☐ No ☐ N/A

Is the environmental policy available to the public?

☐ Yes ☐ No ☐ N/A



Environmental Compliance Evaluation Procedure

4.3 PLANNING

4.3.1 Environmental aspects

Has the organization established and maintained (a) procedure(s) to identify the environmental aspects of its activities, products, or services that it can control and over which it can be expected to have an influence?

☐ Yes ☐ No ☐ N/A

Has the organization determined which of its aspects have a significant impact on the environment?

☐ Yes ☐ No ☐ N/A

Has the organization ensured that its aspects and related significant impacts are considered in setting its environmental objectives?

☐ Yes ☐ No ☐ N/A

Does the organization periodically update information regarding its aspects and significant impacts?

☐ Yes ☐ No ☐ N/A

4.3.2 Legal and other requirements

Has the organization established and maintained a procedure to identify and have access to legal and other requirements to which the organization subscribes, that are applicable to the environmental aspects of its activities, products, or services?

☐ Yes ☐ No ☐ N/A

4.3.3 Objectives and targets

Has the organization established and maintained documented environmental objectives and targets, at each relevant function and level within the organization?

☐ Yes ☐ No ☐ N/A

Has the organization, when establishing and reviewing its objectives, considered:

- The legal and other requirements?
- Its significant environmental aspects?
- Its technological options?
- Its financial, operational, and business Requirements?
- The views of interested parties?

☐ Yes ☐ No ☐ N/A

Are the organization's objectives and targets consistent with its environmental policy, including the commitment to the prevention of pollution?



Environmental Compliance Evaluation Procedure

☐ Yes ☐ No ☐ N/A

4.3.4 Environmental management program(s)

Has the organization established and maintained environmental management program(s) for achieving its objectives and targets?

☐ Yes ☐ No ☐ N/A

Do environmental management program(s) designate responsibility for achieving objectives and targets at each relevant function and level of the organization?

☐ Yes ☐ No ☐ N/A

Do environmental management program(s) define the means and timeframe by which they are to be achieved?

☐ Yes ☐ No ☐ N/A

Are environmental management program(s) reviewed and changed when appropriate if new or modified activities, products, or services are implemented in the organization?

☐ Yes ☐ No ☐ N/A

4.4 Implementation and Operation

4.4.1 Structure and responsibility

Has the organization defined, documented, and communicated the roles, responsibilities, and authorities to facilitate effective environmental management? How is this done?

☐ Yes ☐ No ☐ N/A

Has management provided resources essential to the implementation and control the environmental management system?

☐ Yes ☐ No ☐ N/A

Resources include human resources and specialized skills, technology, and financial resources?

☐ Yes ☐ No ☐ N/A

Has the organization's top management appointed (a) specific management representative(s) who irrespective of other responsibilities, has defined roles, responsibilities, and authority to:

- Ensure that the environmental management system (EMS) requirements are established, implemented, and maintained in accordance with this International Standard.
- Report on the performance of the EMS to top management for review and as a basis for improvement of the EMS.

☐ Yes ☐ No ☐ N/A



Environmental Compliance Evaluation Procedure

4.4.2 Training, awareness and competence

Has the organization identified the training needs for all personnel whose work may create a significant impact upon the environment? How is this done?

☐ Yes ☐ No ☐ N/A

Has the organization established and maintained procedure to make it employees at each relevant function aware of:

☐ Yes ☐ No ☐ N/A

The importance of conformance with the environmental policy and procedures and with the requirement of the environmental management system (EMS)?

☐ Yes ☐ No ☐ N/A

The significant environmental impacts, actual or potential, of their work activities and the environmental benefits of improved personal performance?

☐ Yes ☐ No ☐ N/A

Their roles and responsibilities in achieving conformance with the environmental policy and procedures and with the requirements of the EMS, including emergency preparedness and response requirements?

☐ Yes ☐ No ☐ N/A

The potential consequences of departure from specified operating procedure?

☐ Yes ☐ No ☐ N/A

How does the organization ensure that personnel performing tasks which can cause significant environmental impacts are competent on the basis of appropriate education, training, and experience?

☐ Yes ☐ No ☐ N/A

4.4.3 Communication

Regarding its environmental aspects and environmental management system, has the organization established and maintained procedures to ensure:

Internal communication between the various levels and functions of the organization?

☐ Yes ☐ No ☐ N/A

Proper receiving, documenting, and responding to relevant communication from external interested parties?

☐ Yes ☐ No ☐ N/A



Environmental Compliance Evaluation Procedure

Has the organization considered its process for external communication on its significant environmental aspects and recorded its decision?

☐ Yes ☐ No ☐ N/A

4.4.4 Environmental management system documentation

Has the organization established and maintained information in paper or electronic form to:

Describe the core elements of the management system and their interaction? Provide direction to related documentation?

☐ Yes ☐ No ☐ N/A

4.4.5 Document control

Has the organization established and maintained procedures for controlling all documents required by this International Standard to ensure:

☐ Yes ☐ No ☐ N/A

They can be located?

☐ Yes ☐ No ☐ N/A

They are periodically reviewed, revised as necessary, and approved for adequacy by authorized personnel?

☐ Yes ☐ No ☐ N/A

The current versions of relevant documents are available at all locations where operations essential to the effective functioning of the environmental management system are performed?

☐ Yes ☐ No ☐ N/A

Obsolete documents are promptly removed from all points of issue and points of use, or otherwise assured against unintended use?

☐ Yes ☐ No ☐ N/A

Any obsolete documents are retained for legal and/or knowledge preservation purposes are suitably identified?

☐ Yes ☐ No ☐ N/A

Are the organization's documents legible, dated (with dates of revision), and readily identifiable, maintained in an orderly manner and retained for a specified period?

☐ Yes ☐ No ☐ N/A

Has the organization established and maintained procedures and responsibilities concerning the creation and modification of the various types of documents?

☐ Yes ☐ No ☐ N/A



Environmental Compliance Evaluation Procedure

4.4.6 Operational control

Has the organization identified those operations and activities that are associated with the identified significant environmental aspects in line with its policy, objectives, and targets?

☐ Yes ☐ No ☐ N/A

Has the organization planned these activities, including maintenance, in order to ensure that they are carried out under specified conditions?

☐ Yes ☐ No ☐ N/A

Establishing and maintaining documented procedures to cover situations where their absence could lead to deviations from the environmental policy and the objectives and targets?

☐ Yes ☐ No ☐ N/A

Stipulating operation criteria in the procedures?

☐ Yes ☐ No ☐ N/A

Establishing and maintaining procedures related to the identifiable significant environmental aspects of goods and services used by the organization and communicating relevant procedure and requirements to suppliers and contractors?

☐ Yes ☐ No ☐ N/A

4.4.7 Emergency preparedness and response

Has the organization established and maintained procedures to identify potential for and respond to accidents and emergency situations, and for preventing and mitigating the environmental impacts that may be associated with them?

☐ Yes ☐ No ☐ N/A

Has the organization reviewed and revised, where necessary, its emergency preparedness and response procedure, in particular, after the occurrence of accidents or emergency situations?

☐ Yes ☐ No ☐ N/A

Has the organization periodically tested such procedures where practicable?

☐ Yes ☐ No ☐ N/A

4.5 Checking and Corrective Action

4.5.1 Monitoring and measurement

Has the organization established and maintained documented procedures to monitor and measure, on a regular basis, the key characteristics of its operations and activities that can have a significant impact on the environment?

☐ Yes ☐ No ☐ N/A



Environmental Compliance Evaluation Procedure

Does the monitoring and measurement include the recording of information to track performance, relevant operational controls and conformance with the organization's environmental objectives and targets?

☐ Yes ☐ No ☐ N/A

Does the organization calibrate equipment and maintain records according to the organization's procedures?

☐ Yes ☐ No ☐ N/A

Has the organization established and maintained a documented procedure for periodically evaluating compliance with relevant environmental legislation and regulations?

☐ Yes ☐ No ☐ N/A

4.5.2 Nonconformance and corrective and preventive action

Has the organization established and maintained procedures for defining responsibility and authority for handling and investigating nonconformance, taking action to mitigate any impacts caused, and for initiating and completing corrective and preventive action?

☐ Yes ☐ No ☐ N/A

When corrective and preventive actions are taken to eliminate the causes of actual and potential non conformances, are they appropriate to the magnitude of problems and commensurate with the environmental impact encountered?

☐ Yes ☐ No ☐ N/A

Has the organization implemented and recorded any changes in the documented procedures resulting from corrective and preventive action?

☐ Yes ☐ No ☐ N/A

4.5.3 Records

Has the organization established and maintained procedures for the identification, maintenance, and disposition of environmental records, including:

- Training records?
- The results of audits (EMS audits)?
- The results of reviews (Management Reviews)?

☐ Yes ☐ No ☐ N/A

Are the organization's records legible, identifiable, and traceable to the activity, product, or service involved?

☐ Yes ☐ No ☐ N/A

Are the environmental records stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration, or loss?

☐ Yes ☐ No ☐ N/A



Environmental Compliance Evaluation Procedure

Are the retention times for records established and recorded?

☐ Yes ☐ No ☐ N/A

Are records maintained, as appropriate to the system and to the organization, to demonstrated conformance to the requirements of this International Standard?

☐ Yes ☐ No ☐ N/A

4.5.4 Environmental management system audit

Has the organization established and maintained program(s) and procedure(s) for periodic environmental management system audits to be carried out in order to:

-Determine whether or not the environmental management system conforms to planned arrangements for environmental management including the requirements of this International Standard and has been properly implemented and maintained?

Provide information on the results of audits to management?

☐ Yes ☐ No ☐ N/A

Is the organization's audit program, including any schedule, based on the environmental importance of the activity concerned and the results of previous audits?

☐ Yes ☐ No ☐ N/A

Do the audit procedure cover the audit scope, frequency, and methodologies, as well as the responsibilities and requirements for conducting audits and reporting results?

☐ Yes ☐ No ☐ N/A

4.6 Management Review

Does the organization's top management, at intervals it determines, review the environmental management system to ensure its continuing suitability and effectiveness?

☐ Yes ☐ No ☐ N/A

Does the management review process ensure that the necessary information is collected to allow management to carry out this evaluation?

☐ Yes ☐ No ☐ N/A

Are the management reviews documented?

☐ Yes ☐ No ☐ N/A

Does each management review address the possible need for changes to policy, objectives, and other elements of the environmental management system, in the light of:

- Environment management system audit results?
- Changing circumstances?
- The commitment to continual improvement?

☐ Yes ☐ No ☐ N/A



Environmental Compliance Evaluation Procedure

Sign Off

I undersigned, confirm this audit took place and was completed accurately.