

NCCOS	EMS ENVIRONMENTAL MANAGEMENT SYSTEM STANDARD	Date Issued/Revised: 10/19/05; 02/25/08
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## EMS 013 REGULATORY COMPLIANCE AND EMS AUDITS AND SELF-ASSESSMENTS

### 1. PURPOSE

To reinforce conformance to the NOAA Regulatory Compliance Audit Policy and process and describe an EMS self-assessment and audit process that ensures conformance is maintained to the environmental management system.

### 2. SCOPE

This procedure applies to NOAA line functions that have implemented an Environmental Management System (EMS).

### 3. METHODOLOGY - REGULATORY COMPLIANCE ASSESSMENT

3.1 NOAA regulatory compliance assessments follow [NOAA Environmental Audit Policy 97-01](#) and [Guidance: Environmental Auditing at NOAA Facilities](#), 08/95. The NOAA Environmental Compliance and Safety Assessment System (NECSAS) assessment process consists of:

3.1.1 Environmental Compliance Audits conducted by NOAA Environmental Compliance Staff and Regional Compliance Officers.

3.1.2 External Compliance Audits managed by the Environmental Compliance Staff and conducted by parties outside the NOAA organization.

3.1.3 Internal Compliance Audits managed jointly by the Line Office DRO and the Facility Environmental Coordinator.

3.1.4 An environmental survey follows a self-assessment process and is conducted off-site by NOAA staff

3.1.5 Environmental Management Reviews follow a survey approach and are conducted by NOAA staff.

3.2 The tools and templates used in NOAA's Environmental Compliance audits include:

- [NOAA Facility Pre-Visit Questionnaire](#)
- [NOAA Assessor Checklists](#)

3.3 The schedule for these audits can be found through the NOAA website: [Regulatory Compliance Audit Schedule](#)

3.4 The facility should determine if the Environmental Compliance Audit process is adequate as a procedure for EMS conformance to all aspects of the EMS.

3.4.1 The level of EMS auditing integrated within NOAA's Compliance Audits includes:

- Identification of legal requirements
- Integration of legal requirements in operating standards
- Conformance to operating standards

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#### 4. FACILITY REQUIREMENTS AND RESPONSIBILITIES FOR IMPLEMENTATION

NOAA NCCOS should take the following steps to implement and maintain an EMS that conforms to NOAA's EMS requirements and E.O.13423.

##### **EMS External audits**

*NCCOS will follow the Department of Commerce "Environmental Management Manual" (October 1, 2005, chapter 5) for internal and external audits.*

##### **EMS Self-Assessments (internal audits)**

1. The facility EMS team (or organization as defined by the scope of the EMS) should develop an internal EMS audit program this will include internal EMS audits scheduled on the basis of need as reflected by the importance of activities or the results of previous audits, but not less than annually, in order to verify that the system is implemented and functioning as expected. An individual audit may be limited to a sampling of EMS elements or areas of the facility, and can be both random and/or focused on certain activities based on their importance and/or results of previous audits.
2. The EMS Coordinator will select the audit team and the internal audit leader. The audit team will consist of employees that have received internal EMS auditor training and are deemed competent to conduct such audits. The designated internal audit leader is responsible for conducting and completing the audit as planned with the audit team.
3. The EMS Coordinator and the internal audit leader will define the audit scope (e.g., headquarters, headquarters and service area, and/or individual programs that are included within the audit scope).
4. The EMS Coordinator and internal audit leader shall use the NOAA audit criteria, previous EMS audit reports and any other pertinent information to develop internal audit criteria. These criteria are used to assess EMS documents, answers from interviewees, and other observations to determine conformance of the EMS against NOAA's EMS audit protocol.
5. The internal audit leader and audit team will develop an audit schedule and audit plan, which may include the following:
  - Audit scope and objectives
  - Audit criteria to be applied
  - Contacts and coordination with the auditee(s)
  - Audit dates, times and other logistics
  - Review of previous audits, records, profiles and descriptions
  - Protocol for conducting the audit (e.g., interviews, access, coordination, safety, resolution of findings)
  - Responsibilities for writing the audit report and for follow-up actions.
6. The internal audit team will coordinate with the EMS Coordinator to confirm that the audit schedule is amenable to all parties.

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**On-site audit process:**

7. The internal audit team will hold a kick-off meeting with the EMS Team and other appropriate individuals (such as senior managers) to discuss the scope, agenda, and process and delivery of audit report.
8. The internal audit team will conduct interviews with key staff as scheduled in the audit schedule (accommodating changes if necessary). Interviews should include:
  - EMS Coordinator
  - Members of the EMS Team
  - Senior managers
  - Individuals with responsibilities in the Environmental Management Programs and operational controls
  - General employees.
9. The internal audit team will review records referenced in the EMS documents (such as those resulting from executing procedures or achieving objectives or targets) as well as the EMS documents themselves.
10. The internal audit team will identify any findings, recommendations, and/or best practices against the internal audit criteria based on the information gathered from document review (prior to or during the site visit), interviews, and other observations.
11. The internal audit team will hold a closeout meeting with the EMS Team and other appropriate individuals (such as senior managers) to discuss the major themes of the audit including findings, best practices, and general trends. The team may also the process for corrective actions and responding to the audit report.

**Audit Report:**

12. Following the site visit the audit team will develop an audit report that will include findings, recommendations, and/or best practices.
13. Input to Management Review.
14. The Audit Report and actions taken to address findings will be inputs to the Management Reviews.

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