

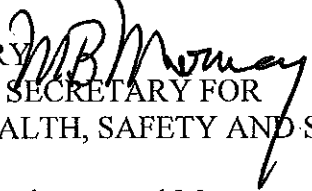


## Department of Energy

Washington, DC 20585

October 24, 2016

### MEMORANDUM FOR DISTRIBUTION

FROM: MATTHEW B. MOURY   
ASSOCIATE UNDER SECRETARY FOR  
ENVIRONMENT, HEALTH, SAFETY AND SECURITY

SUBJECT: Departmental Use of Environmental Management Systems

Executive Order (E.O.) 13693, *Planning for Federal Sustainability in the Next Decade*, requires each Federal agency to continue to implement and deploy formal environmental management systems (EMSs) where effective and appropriate, in order to meet the goals of the E.O. and achieve desired performance in environmental management and sustainability.

Department of Energy (DOE) Order (O) 436.1, *Departmental Sustainability*, requires Departmental elements to maintain EMSs, consistent with American National Standard, ANSI/ISO/ASQ E14001 "Environmental Management Systems – Requirements with guidance for use" (ISO 14001), to ensure a systemic approach to achieving sustainability goals. DOE O 436.1 further directs the Office of the Associate Under Secretary for Environment, Health, Safety and Security (AU) to provide technical assistance in the implementation and maintenance of Departmental EMSs, and to develop and maintain policies and directives for environmental protection.

Since 2005, the Department has ensured effective implementation of EMS, and conformance to ISO 14001, through annual reporting, audits and triannual declarations of conformance. In the past, the Department relied on available and applicable Federal guidance on reporting and declarations. These Federal guides are no longer available or applicable. Therefore, to assist you in your annual reporting, auditing and declarations of conformance, AU is providing the following guidance.

As part of maintaining each Departmental EMS, Departmental elements with EMSs report annually to the Office of the Associate Under Secretary for Environment, Health, Safety and Security on the performance of these EMSs and the appropriate integration of applicable sustainability goals, during the fiscal year, by January 31 of the following year. The DOE Environmental Management System Metrics, Fiscal Year 2016, (attachment 1) are based on metrics developed by the Federal Interagency EMS Community of Practice and have been revised to address comments from Departmental elements.

To ensure that each EMS conforms with ISO 14001, DOE O 436.1 requires that each EMS shall be the subject of a formal audit by a qualified party outside the control or scope of the EMS every three years. The DOE Environmental Management System Declarations of Conformance to ISO 14001:2015, Fiscal Year 2018, (attachment 2) provides guidance for completing these audits and declarations of conformance.



If AU can be of any assistance, please contact Debbie Rosano, Acting Director of the Office of Sustainable Environmental Stewardship, at 301-903-8177, or [debbie.rosano@hq.doe.gov](mailto:debbie.rosano@hq.doe.gov).

#### Attachments

1. Department of Energy Environmental Management System Metrics, Fiscal Year 2016
2. Department of Energy Environmental Management System Declarations of Conformance to ISO 14001:2015, Fiscal Year 2018

**DEPARTMENT OF ENERGY**  
**ENVIRONMENTAL MANAGEMENT SYSTEM METRICS**  
**FISCAL YEAR 2016**

## **Introduction**

Executive Order (E.O.) 13693, *Planning for Federal Sustainability in the Next Decade*, March 25, 2015, requires each Federal agency to continue to implement and deploy formal environmental management systems (EMSs) where effective and appropriate, in order to meet the goals of the E.O. and achieve desired performance in environmental management and sustainability.

Department of Energy (DOE) Order (O) 436.1, *Departmental Sustainability*, provides the requirements and responsibilities for managing sustainability within DOE. DOE O 436.1 requires Departmental elements to maintain EMSs, consistent with American National Standard, ANSI/ISO/ASQ E14001 “*Environmental Management Systems – Requirements with guidance for use*” (ISO 14001), to ensure a systemic approach to achieving sustainability goals.

To meet the requirements of past E.O.s, Federal agencies have measured the performance of their EMSs using metrics released in 2009.<sup>1</sup> These metrics were based on the requirements in ISO 14001:2004. In past years, DOE has used these Federal metrics to measure the performance of EMSs, against the requirements of DOE O 436.1 and its predecessor Order, DOE O 450.1A.

The 2009 Federal EMS metrics were evaluated by the Interagency EMS Community of Practice Workgroup and revised and updated to include the goals in E.O. 13693, and reflect the revised ISO 14001:2015 standard. In line with guidance from the Interagency EMS Community of Practice, DOE has further revised these metrics, to eliminate internal redundancies and be consistent with the sustainability requirements of DOE O 436.1. The metrics in this document will be used (as a pilot) for Fiscal Year (FY) 2016 EMS reporting within the Department.

As in past years, reporting will be completed electronically through FedCenter, at: <https://www.fedcenter.gov/assistance/fedrpts/ems/doe/>. EMS reporting for FY 2016 will open on December 1, 2016 and close on January 31, 2017.

The Department is using EMS as a strategic framework for ensuring environmental compliance and achievement of Federal sustainability goals. An ISO 14001 conformant EMS provides an iterative process for: 1) establishing necessary environmental objectives and processes; 2) implementing processes as planned; 3) monitoring, measuring and reporting on processes; and 4) taking actions to continually improve processes and the EMS (e.g., Plan-Do-Check-Act model). An EMS is distinct from a Site Sustainability Plan, which is a framework for reporting site progress and planning on sustainability goals outlined in the current Departmental Strategic Sustainability Performance Plan.

---

<sup>1</sup> On November 23, 2009, the Federal Environmental Executive, sent an email to Agency Senior Sustainability Officers providing information on the annual EMS data call. The data call included documents for accomplishing the 2009 reporting. Files and guidance documents can be accessed at <https://www.fedcenter.gov/Announcements/index.cfm?id=14017>.

**DEPARTMENT OF ENERGY**  
**ENVIRONMENTAL MANAGEMENT SYSTEM METRICS**  
**FISCAL YEAR 2016**

**Section 1: EMS Performance Metrics**

The metrics in the table below represent EMS metric areas that will provide the basis for an evaluation of the performance of the EMS. Note that not all essential EMS elements are included in this reporting form. For each EMS Metric Area listed in the first column, reporting sites will select the applicable performance level that represents the status of the EMS with "A" being the highest score and "D" being the lowest score. Responses to these scored questions are part of the site EMS scoring process. The responses should reflect FY 2016.

<i>EMS Metric Area</i>	<i>EMS Metric Area Performance Criteria</i>
<b>1. Environmental Aspects</b>	<p>A. Using an established procedure(s), previously identified activities, products and services (and their associated environmental aspects) and all newly identified activities, products and services (and their associated environmental aspects) were evaluated for significance within the past FY. Also, the results of the analysis were documented and any necessary changes were made or are scheduled to be made.</p> <p>B. Using an established procedure(s), all previously identified activities, products and services (and their associated environmental aspects) and all newly identified activities, products and services (and their associated environmental aspects) were evaluated for significance within the past FY. However, at least one of the following is true:</p> <ul style="list-style-type: none"> <li>• The results of the analysis were not documented.</li> <li>• Necessary changes were not made.</li> </ul> <p>C. A procedure is established requiring review of identified activities, products and services (and their associated environmental aspects) for significance, but that procedure was not exercised within the past FY.</p> <p>D. No established procedure is in place to evaluate activities, products and services (and their associated environmental aspects) for significance.</p>
<b>2. Environmental Objectives</b>	<p>A. Documented measurable environmental objectives are in place at relevant functions and levels. Additionally, by the end of the FY, at least 80% of them had either already been accomplished or were on schedule to be met.</p> <p>B. Documented measurable environmental objectives are in place at relevant functions and levels. Additionally, by the end of FY, 50 to 79% of them had either already been accomplished or were on schedule to be met.</p> <p>C. Documented measurable environmental objectives are in place at relevant functions and levels. However, by the end of FY, less than 50% of them had either already been accomplished or were on schedule to be met.</p> <p>D. No documented measurable environmental objectives have been established.</p>
<b>3. Operational Controls</b>	<p>A. Within the past FY, operational controls associated with identified significant environmental aspects are established, implemented, controlled, and maintained in accordance with operating criteria.</p> <p>B. Within the past FY, operational controls are established and implemented, but have not been controlled and maintained in accordance with operating criteria.</p> <p>C. Within the past FY, operational controls are established, but have not been implemented, controlled and maintained in accordance with operating criteria.</p> <p>D. Operational controls have not been established.</p>

**DEPARTMENT OF ENERGY  
ENVIRONMENTAL MANAGEMENT SYSTEM METRICS  
FISCAL YEAR 2016**

<i>EMS Metric Area</i>	<i>EMS Metric Area Performance Criteria</i>
<b>4. Compliance with Regulatory Requirements/ Corrective Actions</b>	<p>An environmental compliance audit program should include an established frequency for review of environmental program elements (e.g., air, water, waste, etc.).</p> <p>A. Within the past FY, an environmental compliance audit program was in place, audits were completed according to schedule, audit findings were documented, and corrective and preventative actions were defined/documented and on schedule for completion by an established date.</p> <p>B. Within the past FY, an environmental compliance audit program was in place, audits were completed according to schedule or were rescheduled as needed, audit findings were documented, and corrective and preventative actions were defined/documented. However, the corrective and preventative actions were not always on schedule for completion by an established date.</p> <p>C. Within the past FY, an environmental compliance audit program was in place, but at least one of the following statements is true:</p> <ul style="list-style-type: none"> <li>• Audits were not completed according to schedule, and have not be rescheduled, as needed.</li> <li>• Audit findings were not documented.</li> <li>• No process was established to define/document corrective and preventative actions.</li> </ul> <p>D. No established environmental compliance audit program exists.</p>
<b>5. EMS/E.O. Goals Integration</b>	<p>Use <b>Section 2: EMS/E.O. Integration Indicator Worksheet</b> to calculate your score for this Metric:</p> <p>A. 80 to 100 percent of applicable E.O. 13693 sustainability goals are addressed in the EMS.</p> <p>B. 65 to 79 percent of applicable E.O. 13693 sustainability goals are addressed in the EMS.</p> <p>C. 50 to 64 percent of applicable E.O. 13693 sustainability goals are addressed in the EMS.</p> <p>D. Zero to 49 percent of applicable E.O. 13693 sustainability goals are addressed in the EMS.</p>

**DEPARTMENT OF ENERGY  
ENVIRONMENTAL MANAGEMENT SYSTEM METRICS  
FISCAL YEAR 2016**

**Section 2: EMS/E.O. Integration Indicator Worksheet**

These sustainability goal areas may be covered by facilities or headquarters offices. Review and specify if the following E.O. 13693 sustainability goals are 1) applicable, and 2) included in the EMS.

Reporting sites will select **Yes** or **No** for each column and line item.

- For question 1, select **Yes** or **No** to specify if the goal area is applicable or not. For all “and/or” options in a goal area, if one or more bullets apply, then select **Yes** for question 1. A goal is “not applicable” (select **No** for question 1) if:
  - Aspect/ability to meet goal does not exist at organization/facility; and/or
  - The goal is fully addressed at a different level of the organization; or fully addressed outside the EMS; or has been fully addressed through prior EMS objectives.
- If applicable (question 1 is **Yes**), then select **Yes** or **No** for question 2 to specify if the goal area is addressed in the EMS. Select **Not Applicable** if the goal area was marked **No** in question 1.

The resulting calculation (given at the bottom of the table) is used to determine the A, B, C or D score for EMS Metric Area 5 in the table in Section 1.

E.O. 13963 Goal Areas		1. Applicability: is the Goal Area Applicable to the EMS?*	2. Integration: is the Goal Area Addressed in the EMS?***
<b>Goal 1 – Greenhouse Gas (GHG) Reduction</b>	<ul style="list-style-type: none"> <li>• Reduce Scope 1 GHG emissions and/or</li> <li>• Reduce Scope 2 GHG emissions and/or</li> <li>• Reduce Scope 3 GHG emissions</li> </ul>		
<b>Goal 2 - Sustainable Buildings</b>	<ul style="list-style-type: none"> <li>• Reduce building energy consumption and intensity and/or</li> <li>• Meter buildings for electricity, natural gas, steam and/or water and/or</li> <li>• Build new buildings as, or convert existing building to be, compliant with the <i>Guiding Principles for Sustainable Federal Buildings and Associated Instructions</i> and/or</li> <li>• Build new buildings as, or convert existing buildings to, net zero energy/water/waste</li> </ul>		
<b>Goal 3 – Clean &amp; Renewable Energy</b>	<ul style="list-style-type: none"> <li>• Increase the use of clean energy and/or</li> <li>• Increase the use of renewable energy</li> </ul>		

**DEPARTMENT OF ENERGY  
ENVIRONMENTAL MANAGEMENT SYSTEM METRICS  
FISCAL YEAR 2016**

<b>E.O. 13963 Goal Areas</b>		<b>1. Applicability: is the Goal Area Applicable to the EMS?*</b>	<b>2. Integration: is the Goal Area Addressed in the EMS?***</b>
<b>Goal 4 - Water Use Efficiency &amp; Management</b>	<ul style="list-style-type: none"> <li>• Reduce potable water consumption and intensity and/or</li> <li>• Reduce industrial, landscaping, and agricultural water consumption and/or</li> <li>• Identify, promote, and implement water reuse strategies and/or</li> <li>• Improve storm water and wastewater management</li> </ul>		
<b>Goal 5 - Fleet Management</b>	<ul style="list-style-type: none"> <li>• Reduce petroleum use and/or</li> <li>• Increase alternative fuel consumption and/or</li> <li>• Reduce fleet per-mile GHG emissions and/or</li> <li>• Increase acquisition of alternative fuel, zero emission, and/or plug-in hybrid electric vehicles and/or</li> <li>• Support fleet right-sizing and optimization</li> </ul>		
<b>Goal 6 - Sustainable Acquisition</b>	<ul style="list-style-type: none"> <li>• Promote progress on federal sustainable acquisition requirements and goals and/or</li> <li>• Ensure applicable contracts contain BioPreferred and biobased criteria and/or</li> <li>• Ensure compliance for printing and writing paper purchases containing at least 30 percent postconsumer recycled content and/or</li> <li>• Reduce supply chain emissions and incorporate criteria or contractor requirements into procurements</li> </ul>		

**DEPARTMENT OF ENERGY  
ENVIRONMENTAL MANAGEMENT SYSTEM METRICS  
FISCAL YEAR 2016**

<b>E.O. 13963 Goal Areas</b>		<b>1. Applicability: is the Goal Area Applicable to the EMS?*</b>	<b>2. Integration: is the Goal Area Addressed in the EMS?***</b>
<b>Goal 7 – Pollution Prevention &amp; Waste Reduction</b>	<ul style="list-style-type: none"> <li>Promote pollution prevention and non-hazardous solid waste reduction through elimination, source reduction, and recycling <b>and/or</b></li> <li>Divert construction and demolition materials and debris <b>and/or</b></li> <li>Reduce the toxic and hazardous chemicals acquired, used, sold and disposed of <b>and/or</b></li> <li>Eliminate, reduce, or recover refrigerants and other fugitive emissions <b>and/or</b></li> <li>Implement integrated pest management and improved landscape management practices <b>and/or</b></li> <li>Reduce purchase of, and improve management and disposal of HFCs</li> </ul>		
<b>Goal 8: Energy Performance Contracts</b>	<ul style="list-style-type: none"> <li>Utilize performance contracting to meet identified energy and water efficiency and management goals</li> </ul>		
<b>Goal 9 – Electronic Stewardship &amp; Data Centers</b>	<ul style="list-style-type: none"> <li>Ensure acquisition of sustainable electronic products (e.g., Electronic Product Environmental Assessment Tool (EPEAT)-registered products; ENERGY STAR certified and low standby power) <b>and/or</b></li> <li>Enable power management, automatic duplexing, and other energy efficient or sustainable electronics features <b>and/or</b></li> <li>Ensure environmentally sound electronics disposal at end of life <b>and/or</b></li> <li>Implement data center metering and improve efficiency, as measured by data center power usage effectiveness (PUE)</li> </ul>		
<b>Goal 10 – Climate Change Resilience</b>	<ul style="list-style-type: none"> <li>Identify and address projected impacts of climate change on mission critical water, energy, communication, and transportation demands <b>and/or</b></li> <li>Incorporate climate resilient-design and management elements into the operation, repair, and renovation of existing agency buildings and the design of new agency buildings <b>and/or</b></li> <li>Update policies, procedures, protocols and programs to reflect the impacts of climate change</li> </ul>		
<b>Total number of applicable areas (Total "Yes" in Column 1)</b>			
<b>Total number of addressed areas (Total "Yes" in Column 2):</b>			



**DEPARTMENT OF ENERGY  
ENVIRONMENTAL MANAGEMENT SYSTEM METRICS  
FISCAL YEAR 2016**

E.O. 13963 Goal Areas	1. Applicability: is the Goal Area Applicable to the EMS?*	2. Integration: is the Goal Area Addressed in the EMS?**
<b>Scoring:</b> $\frac{\text{(total number of "Yes" in Column 2)}}{\text{(total number of "Yes" in Column 1)}} \times 100 = \underline{\hspace{2cm}} \%$		
<b>Use the percentage calculated to determine the score for EMS Metric Area 5 in Section 1.</b>		
<b>Notes:</b> <i>*A goal is "not applicable" if:</i> - Aspect/ability to meet goal does not exist at organization/facility; and/or - The goal is fully addressed at a different level of the organization or fully addressed outside the EMS or has been fully addressed through prior EMS objectives. <i>** Goal areas which are considered addressed in the EMS should also be marked as applicable in Column 1.</i>		

**DEPARTMENT OF ENERGY  
ENVIRONMENTAL MANAGEMENT SYSTEM METRICS  
FISCAL YEAR 2016**

**Section 3: EMS and Agency Scoring**

Using the compilation of scores for reported items in Section 1 above to calculate the overall EMS metric score for a reporting site:

Compilation of Scores	Overall Metric Score
<ul style="list-style-type: none"> <li>At least 3 A's</li> <li>No C's or D's</li> <li>Rest B's</li> </ul>	Green
<ul style="list-style-type: none"> <li>No D's</li> <li>No more than 3 C's</li> <li>Rest A's and B's</li> </ul>	Yellow
<ul style="list-style-type: none"> <li>Any D's</li> <li>4 or more C's</li> <li>Rest A's and B's</li> </ul>	Red

Departmental Level Scoring Methodology:

Green	At least 80% of reporting EMSs are rated as Green
Yellow	At least 60%, but fewer than 80%, of reporting EMSs are rated as Yellow or Green
Red	Does not meet minimum percentages for departmental level scoring for Green or Yellow

**Section 4: EMS Experiences (short write-in answers)**

- Please provide bulleted statements identifying any EMS best practices. Include details/outcomes. Include no more than four bullets.
- Describe how EMS implementation has enabled your organization/facility to operate more effectively in accomplishing its missions in the past year.
- List the challenges faced when implementing an EMS to accomplish the facility's or organization's mission in the past year.

**DEPARTMENT OF ENERGY  
ENVIRONMENTAL MANAGEMENT SYSTEM  
DECLARATIONS OF CONFORMANCE TO ISO 14001:2015  
FISCAL YEAR 2018**

## **Introduction**

Executive Order (E.O.) 13693, *Planning for Federal Sustainability in the Next Decade*, March 25, 2015, requires each Federal agency to continue to implement and deploy formal environmental management systems (EMSs) where effective and appropriate, in order to meet the goals of the E.O. and achieve desired performance in environmental management and sustainability.

Department of Energy (DOE) Order (O) 436.1, *Departmental Sustainability*, provides the requirements and responsibilities for managing sustainability within DOE. DOE O 436.1 requires Departmental elements to maintain EMSs, consistent with American National Standard, ANSI/ISO/ASQ E14001 “*Environmental Management Systems – Requirements with guidance for use*” (ISO 14001), to ensure a systemic approach to achieving sustainability goals.

To ensure that each Departmental EMS is conformant with ISO 14001, by October 1, 2018 and every three years thereafter, each EMS shall be the subject of a formal audit by a qualified party outside the control or scope of the EMS. The audit findings shall be accepted by the Field Manager, or other appropriate senior manager, accountable for implementation of the EMS. The Field Manager, or other appropriate senior manager, shall declare conformance to EMS requirements, based on the results of the formal audit.

To meet the requirements of past E.O.s, DOE has completed these triannual audits, and declarations of conformance to ISO 14001:2004, using guidance released in 2008 by the Office of the Federal Environmental Executive (OFEE). ISO 14001:2004 was cancelled and replaced by ISO 14001:2015 on September 15, 2015. OFEE’s guidance on declarations of conformance was revoked with E.O. 13423, by E.O. 13693, on March 25, 2015.

DOE O 436.1 specifically references ISO 14001:2004, and the now revoked OFEE guidance. In recognition of the revocation of the Federal guidance; the publication of ISO 14001:2015; and the inability to audit and register to ISO 14001:2004 in 2018, this guidance provides details on how Departmental EMSs will be declared in conformance to ISO 14001:2015.

## **Explanation of Terms**

**Formal audit:** A formal audit is one that follows generally accepted practices for EMS audits and has the following critical elements: 1) an audit plan that reflects the scope and schedule of the audit; 2) a review of background documents prior to the actual site visit including review of the environmental policy and relevant documented information determined by the organization as being necessary for the effectiveness of the EMS; 3) a physical audit of the facility or organization to determine conformance with the Standard; 4) preparation of an audit report which outlines findings from the audit; and, 5) an out briefing with senior managers from the facility or organization conveying the findings of the audit.

**DEPARTMENT OF ENERGY  
ENVIRONMENTAL MANAGEMENT SYSTEM  
DECLARATIONS OF CONFORMANCE TO ISO 14001:2015  
FISCAL YEAR 2018**

**Qualified party:** Those conducting the audit should be competent and have the proper and relevant skills to carry out that task. They should have a working knowledge and understanding of both the ISO 14001:2015 EMS Standard and general management system auditing methodologies and techniques. It is preferable that the auditor(s) have an education or background that reflects general environmental science and technology relevant to the facility or organization to be audited, as well as knowledge of compliance obligations that might apply to the facility or organization to be audited. It is appropriate and, in many cases, recommended that the audit be conducted by a team of individuals who collectively have the appropriate skills and knowledge. While not required, formal ISO 14001 Lead Auditor Training and general auditing skills training are recommended for those conducting EMS audits.

**Outside the control or scope of the EMS:** To ensure that the audit is independent and objective, those conducting the audit should not have been involved in the development of the EMS or day-to-day implementation of the EMS. Likewise, the auditors should not otherwise work in the facility or organization where the EMS is implemented or have any direct responsibility associated with the EMS being reviewed. In other words, ISO 14001:2015 requires that the scope of the EMS be defined and personnel included in that scope would not be considered outside the control or scope of the EMS.

**Findings accepted by the Field Manager, or other appropriate senior manager:** This step indicates that the EMS has been audited, and information on whether the EMS is in conformance has been presented to the Field Manager (if applicable), or other appropriate senior manager, for their consideration and action. It is strongly encouraged that the findings also be reviewed and accepted by any contracted organization which is responsible for maintaining the EMS. In order for the EMS process to be effective and worthwhile, the findings from the formal audit must be presented to senior decision makers with authority over policy and resources within the EMS and, in order to address the findings and affirm their EMS commitment to continual improvement, those individuals must follow through on recommendations.

**Field Managers, or other appropriate senior manager, declare conformance to EMS requirements:** Once the findings from the audit have been "accepted," the Field Manager (if applicable), or other appropriate senior manager, should declare conformance with ISO 14001:2015 by stating that the facility or organization has maintained an EMS, conformant with ISO 14001:2015, consistent with DOE O 436.1.

### **ISO 14001 Registration**

If an EMS is ISO-registered, then the registrar constitutes a qualified party outside the control or scope of the EMS. The registrar conducts a full audit every three years (as well as interim audits every six or twelve months). The most recent registration audit meets the three-year audit requirement.

**DEPARTMENT OF ENERGY  
ENVIRONMENTAL MANAGEMENT SYSTEM  
DECLARATIONS OF CONFORMANCE TO ISO 14001:2015  
FISCAL YEAR 2018**

At the time the initial declarations are due, October 1, 2018, organizations will not be able to register to ISO 14001:2004, and must register to ISO 14001:2015. Therefore, only registration to ISO 14001:2015 will be sufficient for meeting the audit and declaration requirements.

### **Selecting an Auditor**

If an EMS will not be registered to ISO 14001:2015, the organization will need to identify a qualified auditor(s) outside the control or scope of the EMS. It is appropriate and, in many cases, recommended that the audit be conducted by a team of individuals who collectively have the appropriate skills and knowledge (see explanation of “Qualified party” above).

For example, members of a qualified audit team might come from:

- A DOE Field/Site office;
- A DOE Program Office (PO);
- Another DOE site;
- The contractor’s corporate parent(s); or
- A private consultant.

An exception would be the case where the DOE site office, program office, or corporate parent was significantly involved in the process or details of developing or implementing the EMS.

An independent oversight or audit office of the organization covered by the EMS is not “outside the control or scope” of the EMS, and so is ineligible to conduct the independent external audit.

### **Timing of Declarations**

All Departmental EMSs shall submit a new declaration of conformance to ISO 14001:2015, by October 1, 2018. Departmental EMSs shall submit a new declaration of conformance, every three years thereafter. The deadline for subsequent declarations of conformance is three years from the last declaration.

### **Format for Declarations**

DOE O 436.1 assigns responsibility to Field Managers to ensure implementation of EMSs [§5.e.(2)]. For sites or organizations not under the purview of a Field Manager, an appropriate senior manager should ensure implementation of EMS. The Field Manager, or other appropriate senior manager, should maintain appropriate records documenting:

1. Completion of the required three-year independent external EMS audit, and
2. The Field Manager’s, or other appropriate senior manager’s, determination that the EMS conforms to the ISO 14001:2015 standard.

**DEPARTMENT OF ENERGY  
ENVIRONMENTAL MANAGEMENT SYSTEM  
DECLARATIONS OF CONFORMANCE TO ISO 14001:2015  
FISCAL YEAR 2018**

The attached Memorandum-to-File templates (see Attachments 2a and 2b) may be used to document conformance based on:

1. Registration to the ISO 14001:2015 standard by an ISO registrar; or
2. Completion of a formal audit by a qualified party outside the control or scope of the EMS.

If the audit is conducted by an ISO registrar, and the audit identifies no major non-conformances, then the registrar will issue a certificate of registration. This document supports the Field Manager's, or other appropriate senior manager's, declaration of conformance (see Attachment 2a). If the ISO registrar identifies non-conformities which prevent the issuance of a certificate of registration, the Field Manager or other appropriate senior manager, must wait until the necessary corrective actions are completed and the ISO registrar issues a certificate of registration, to make a declaration of conformance.

If the audit is conducted by another qualified party outside the control or scope of the EMS, there are several possible outcomes.

1. The audit identifies no non-conformances. Based on this, the Field Manager, or other appropriate senior manager, can declare the EMS to be in conformance with ISO 14001:2015 (see Attachment 2b); or
2. The audit identifies some minor non-conformances. Based on this, the organization implementing the EMS must develop and adopt a Corrective Action Plan; then the Field Manager, or other appropriate senior manager, can declare the EMS in conformance with ISO 14001:2015 (see Attachment 2b); or
3. The audit identifies one or more major non-conformances. Based on this, the organization implementing the EMS must develop and complete a Corrective Action Plan. The Field Manager, or other appropriate senior manager, must verify its completion, prior to declaring the EMS to be in conformance with ISO 14001:2015.

Declaration of conformance should reflect the severity of any non-conformances found during the formal audit. Although an EMS can be considered conformant even with some minor non-conformances, it is necessary that corrective actions be defined and planned, and that senior management commit to these actions. Major findings, such as systemic problems with an element(s) or completely missing elements, will lead to the system being non-conformant and conformity should not be declared. A trained auditor can distinguish between major and minor non-conformances. Minor non-conformances would not hinder declaration as long as corrective action is defined, planned, and endorsed, i.e. "accepted," by the Field Manager or other appropriate senior manager.

Copies of the Memorandum-to-File should be sent to the EMS contact in the appropriate PO, where applicable; to the director of the Office of Sustainable Environmental Stewardship (AU-21); and to the director of the Sustainability Performance Office (SPO).

**DEPARTMENT OF ENERGY  
ENVIRONMENTAL MANAGEMENT SYSTEM  
DECLARATIONS OF CONFORMANCE TO ISO 14001:2015  
FISCAL YEAR 2018**

**Establishing a New EMS**

If a site is implementing an EMS for the first time, it should consult with its PO and with AU-21. The site should identify a target date for implementing the EMS; the PO and AU-21 will assist the site in finalizing the implementation schedule. The implementation schedule will establish a deadline for declaring the EMS to be fully implemented and conformant to the ISO 14001:2015 standard.

**Ending an Existing EMS**

If a site is expected to no longer be under the purview of the Department by October 1, 2018, a declaration of conformance is not necessary. The site should consult with its PO and AU-21 of the site transition or closure, and cessation of the associated Departmental EMS.

**DEPARTMENT OF ENERGY  
ENVIRONMENTAL MANAGEMENT SYSTEM  
DECLARATIONS OF CONFORMANCE TO ISO 14001:2015  
FISCAL YEAR 2018**

**Attachment 2a  
Three-Year EMS Declaration Memorandum Template:  
ISO 14001:2015 Registered**

Date: [Date]

From: [Name], [Field/Site Office] OR [Other Appropriate Senior Manager]

To: File

Subject: Declaration that [Contractor/Organization/Site] EMS conforms to the ISO 14001:2015 standard

This memorandum documents that the Environmental Management System (EMS) for [Contractor/Organization/Site] conforms to the International Organization for Standardization's (ISO) 14001:2015 standard, on the basis of its registration to the standard by an accredited ISO registrar. This satisfies the requirements of DOE O 436.1, §§ 4.c.(3) and 5.e.(2).

The most recent full registration audit was conducted by [Name of ISO registrar], and certificate of registration [###] was issued on [Date]. A copy of the certificate is attached.

The scope of the EMS includes [specify e.g.: on- and off-site activities of employees and contractors, tenants and concessionaires, environmental remediation activities].

[Name], [Field/Site Office] OR  
[Other Appropriate Senior Manager]

Attachment: [Copy of ISO 14001:2015 Certificate of Registration]

cc: [Name of EMS Contact], [Program Office]  
[Name], Director, Office of Sustainable Environmental Stewardship (AU-21)  
[Name], Director, Sustainability Performance Office (SPO)



**DEPARTMENT OF ENERGY  
ENVIRONMENTAL MANAGEMENT SYSTEM  
DECLARATIONS OF CONFORMANCE TO ISO 14001:2015  
FISCAL YEAR 2018**

**Attachment 2b  
Three-Year EMS Declaration Memorandum Template:  
Formal Audit by a Qualified Party**

Date: [Date]

From: [Name], [Field/Site Office] OR [Other Appropriate Senior Manager]

To: File

Subject: Declaration that [Contractor/Organization/Site] EMS conforms to the ISO 14001:2015 standard

This memorandum documents that the Environmental Management System (EMS) for [Contractor/Organization/Site] conforms to the International Organization for Standardization's (ISO) 14001:2015 standard, on the basis of the results of a formal audit by a qualified party outside the control or scope of the EMS, and of my oversight of the EMS. This satisfies the requirements of DOE O 436.1, §§ 4.c.(3) and 5.e.(2).

The audit was conducted on [Dates]. The audit report is attached. Based on my review of the audit results, and my oversight of the EMS, I find that the EMS conforms to the ISO 14001:2015 standard.

The scope of the EMS includes [specify e.g.: on- and off-site activities of employees and contractors, tenants and concessionaires, environmental remediation activities].

[Name], [Field/Site Office] OR  
[Other Appropriate Senior Manager]

Attachment: [Report of the Formal Audit by a qualified Party Outside the Control or Scope of the EMS]

cc: [Name of EMS Contact], [Program Office]  
[Name], Director, Office of Sustainable Environmental Stewardship (AU-21)  
[Name], Director, Sustainability Performance Office (SPO)

