ISO 14001 Environmental Management System (EMS) Implementation Training

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IOWA DEPARTMENT OF NATURAL RESOURCES

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Training Agenda

- · Day 3
- Audit Process
- Internal Auditing
- Exercise: Open-Ended Questions
 Workshop: Objective Evidence

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Why Audit?

- ISO 14001 require regular audits of the EMS
- Audits can be performed by in-house personnel or external party



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EMS Audits vs. Compliance Audits

Compliance auditing is carried out to determine whether a company is operating according to applicable legal, regulatory and other environmental requirements.

Compliance audits address legal requirements (e.g., 40 CFR, state regulations, permit requirements, etc).

Environmental compliance audits are referred to as <u>compliance</u> audits.

EMS audits are conducted to evaluate the effectiveness of the EMS (e.g., meeting the requirements of ISO 14001, facility EMS procedures, etc).

EMS audits are referred to as conformance audits.



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EMS Audit

Systematic and documented verification process of objectively obtaining and evaluating to determine whether an organization's EMS conforms to EMS audit criteria.



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EMS Audit

- Purpose of Audits: To collect Objective Evidence to permit an Informed Judgment about the status of the EMS.
- Goal of Audits: To improve the system through corrective actions and continual improvement.

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Phases of Auditing

- Planning
- Execution
- Reporting
- Close-out



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Audit Planning

The Audit Plan includes:

- Audit objective
- Audit scope
- · Identification of lead auditor/audit team
- Duration and schedule
- Sources of background information



Audit Objective



The reason(s) for conducting the audit :

- Meet customer requirements
- Facilitate effective EMS implementation
- · Identify areas for improvement
- Measure EMS effectiveness
- Gain or Maintain ISO 14001 registration

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Audit Scope



- **Audit Scope** defines the criteria and boundary of the audit
- <u>Criteria</u> ISO 14001 standard, written EMS procedures and documentation
- <u>Boundary</u> physical location, organization, facility, EMS elements, operations

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Audit Team

Selection of Audit Team:

- Audit team size
- Dependent upon duration of audit
- Need appropriate number to meet audit objective
- Experience and training
- Experience with function being audited
- Avoid potential conflicts of interest



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Auditor Responsibilities

- Remain within the audit scope
- Remain objective
- Gather evidence to draw conclusions
- Interpret policies and procedures and determine conformance
- Satisfy sample
- Document audit results
- · Conduct follow-up



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Audit Plan & Schedule

- Date the audit begins
- Number of days
- Schedule for opening and closing meetings
- Schedule of areas to be audited, times, auditees, auditors



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Working Documents

Sources of Background Information:

- EMS Documents (Manual, Policy, Procedures, Work Instructions, etc.)
- Audit Checklists
- · Location and layout map
- · Organizational chart



Checklists Keep the audit organized, on-track Open-ended questions: - Who, What, When, Where, Why and How Can be used to record objective evidence

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Audit Execution

- Opening meeting
- Examination
- Collecting evidence
- Observation
- Reporting
 Closing meeting



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Opening Meeting: Agenda

- Thank auditee
- · Introduce audit team to auditee
- Take attendance (sign-in sheet)
- Review scope and objective
- Summarize methods
- Establish communication links and availability of guides
- Confirm resources / facilities
- Discuss use of safety equip. or restricted access areas
- Confirm timing for further meetings

Collecting Evidence • Observations • Interviews • Document and record reviews

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Objective Evidence

- Evidence that exists
- Not influenced by emotion
- May be stated or documented
- May be based on observation
- About the EMS
- CAN BE VERIFIED



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Informed Judgment

Once the **objective evidence** is identified and reviewed, an **informed judgment** is made to determine whether there is a nonconformity or not.



Is There a Nonconformity?

- Non-fulfillment of a requirement
- A nonconformity is the difference between what you "say you do" and "what you do"



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Minor Nonconformity

- Isolated, witnessed incident or failure to conform with a procedure or a requirement of the standard
- Minor problem that warrants attention
- Cause and solution can be easily identified

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Major Nonconformity

- Significant nonconformity with requirements of the standard
- Failure of a complete system or lack of an EMS requirement
- Significant quantity of minor nonconformities

Closing Meeting

Follow-up/Close-out:

- Summary
- Recommendations
- Corrective action / follow-up



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Closing Meeting: Agenda

- Thanks
- · Reiteration of objectives and scope
- Presentation of findings
- Reporting system
- Limitations
- Summary
- Agreement
- ClarificationList of attendees

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Summarizing the Audit

- Total number of nonconformities
- Where they were found
- Areas where none were found
- Recommendation



Audit Report

- Audit number and date(s)
- Audit scope and objective
- Auditors/auditees
- Concise summary
- Nonconformities
- Attach opening and closing meeting sign-in sheet
- Recommendation



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INTERNAL AUDITING



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Purpose of Internal Audits

- Required by ISO 14001
- $^{\circ}$ Evaluate effectiveness of EMS
 - Find deficiencies in our system we want to find problems before our outside auditor does
 - Identify improvement opportunities and make our system hetter
- Key tool for "continual improvement"



Internal Audits

- May be a single audit or a series of small audits throughout the year.
- May be conducted by internal resources, such as an internal audit team.
 - Team should be qualified/competent based upon education, training, and experience.
 - Internal auditor training
 - OJT by shadowing experienced auditor
- May be performed by a qualified auditor acting as internal auditor (i.e., consultant).

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Objective Auditing

- Need objective/unbiased auditors
- Requirement of ISO 14001
- Auditor should not be responsible for area/ function being audited to get unbiased assessment
- "Fresh set of eyes"



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Effective Internal Audits

- Audit schedule covers everything?
- Audits are conducted in a timely manner?
- Unbiased/objective auditors?
- Audits yield value-added findings, observations, recommendations?
- Appropriate follow-up?





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Audit Preparation

- Review documents to be audited
- Prepare questions to ask and records to review
- Make arrangements with auditee, including when/where/what will be audited



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Audit Preparation



- $\boldsymbol{\cdot}$ Other things to consider:
- When was this last audited?
- Where there any previous findings/nonconformities?
- Have the previous issues been resolved?
- Have there been any recent revisions to the documentation since the last audit?

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Conducting the Audit

- Observe actions
- If possible, conduct audit when you can observe the procedure "in action"
- Interview auditee(s)
- Gather info
- Measures awareness
- Review records/collect objective evidence
- Take good notes





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Interviewing Techniques



- Ask open-ended questions
- Keep questions simple
- · Ask one question at a time
- Listen and let them talk
- Answers often lead to more questions
 - Don't limit yourself to your "prepped" questions only



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Example Audit Questions

- What are your job responsibilities?
- · What is the environmental policy?
- What does this policy mean to you?
- Can you tell me about any environmental aspects associated with your job?
- How might you impact the environment?
- Can you tell me about any objectives related to your responsibilities?
- · How did you learn your job?
- What training have you had?
- What procedures are related to your job?
- How do you know your procedures are current?
- Why is it important to follow
- policies and procedures?
 What records do you keep?
- What would you do if you had a concern or a suggestion related to the EMS?

What to avoid

- Asking questions too rapidly
- $\ensuremath{^{\circ}}$ Asking more than one question at a
- Asking questions that are too lengthy
- Asking questions that imply the answers
- Interrupting the auditee



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Collect Evidence

- Look for records to obtain "objective evidence"
- Take good sample don't just look at last 2 or 3 records
- Gather historical data go back several months or years, as appropriate
- The longer it's been since the last audit, the further back you should go
- Ensure records are completed and kept consistently, as
- An auditor should not let the auditee choose what is to be sampled



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Be Thorough!

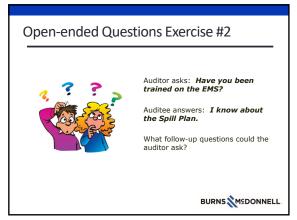
Follow where the audit trail leads

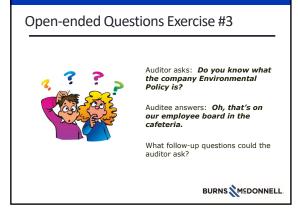
- Ask questions
- Ask for records
- "Show me" "Prove it"

Remember, our purpose is to improve our system! We want to dig deeper than the outside auditors.



Open-ended Questions Exercise #1 Auditor asks: What wastes do you generate in your department? Auditee answers: Used batteries and used oil What follow-up questions could the auditor ask?





Recording Audit Evidence

Keep good notes and be sure to include:

- Personnel interviewed (can use position instead of name)
- Statements made
- · Document numbers
- · Records reviewed
- DepartmentsIdentifiers
- Date



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Documenting the Audit

Document what you observed/asked/reviewed/looked at

- Objective evidence
- Include good and bad findings/observations

Need evidence of what was reviewed

- Don't rely on memory!
- Provides historical information for the next audit of this procedure/element/section
- Provides evidence of audit effectiveness for external audit

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Workshop: Objective Evidence

- Is there a nonconformity?
- Do we have enough information?
- What additional questions should we ask to obtain the necessary objective evidence?



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