





9.0 Environmental Self-Audits and EMS Audits

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9.1 Authority, Responsibility and Correcting Noncompliance

Keys



Define the authority, responsibility, and methods for investigating and correcting noncompliance with the procedures set forth in the environmental management system. [R 336.2405 (2)(b)(viii)]

Make EMS responsibility part of your employee's job descriptions.

**Compliance vs Conformance?
For the purposes of this manual, these two words have the same meaning. Are you meeting the requirements (e.g. EMS policies and procedures, environmental/legal)?**

You should clearly define the persons (or job titles) responsible for the elements of your EMS. At this point in your system development you should already know what person is responsible for what element or who functions in what role. You need to formalize this for your system documentation and so that people know what their job responsibilities are and to prevent noncompliance with your EMS.

On the following page is a responsibility matrix for Joseph's Forklift and Hauling Company to document the roles their employees will play in their EMS. Also included for your review is an Environmental Responsibility Matrix and a Environmental Responsibilities of Key Environmental and Operations Staff table for Wisconsin Electric - Presque Isle Power Plant which was developed for their EMS. Review these examples and develop your system documentation for authority and responsibility.

Include in your documentation table or chart who is responsible for investigating and correcting noncompliance within the EMS. Procedures for formally identifying a noncompliance and for taking corrective and preventative action should be documented and monitored by the EMS or responsible manager. Noncompliance can occur due to the following reasons:

- EMS procedures are not followed (including work instructions, monitoring, calibration, and recordkeeping requirements),
- Process upsets in significant operations and activities, or
- Violations of environmental/legal requirements.



EXAMPLE 9.1

Joseph's Forklift and Hauling Company

EMS Responsibility Matrix

POSITION	ROLES											
	EMS Manager	Police Development	Aspects & Impacts	Objectives & Targets	Operations & Activities	Reports & Recordkeeping	Training & Tracking	Emergency Response	Internal Communication	Public Communication	Authority for Investigating and Correcting Noncompliance	Environmental Self-Audits & EMS
Vice President	L	L	L	L	S	L	S	S	L	L	L	L
Operations/Shipping/Warehouse Manager		L	L	L	L	S	L	L	S	S	L	L
Maintenance Supervisor		S	S	S	L	S	S	L	S	S	S	S
Office Administration – Staff		S	S	S	S	L	L	S	L	S	S	S
Operator		S	S	S	S			S				

L = Lead Role
S = Supporting Role

