ISO 14001:2004
Implementation Workbook
For Facilities and Suppliers
ISO 14001:2004 Implementation Workbook

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This workbook is intended to be used by Lear Corporation Manufacturing facilities and Suppliers as a tool to facilitate development and implementation of Environmental Management Systems (EMS) that conform to the requirements of the International Standard ISO 14001:2004.

The completed workbook should be retained by the facility as objective evidence of the proper implementation of the EMS, fulfilling many requirements of the ISO 14001: 2004 standard. Therefore it is vitally important that all sections of the workbook are completed, and that management sign-off is obtained as required.

As you complete each task, please check it off on the Lear ISO 14001 Implementation Action Checklist.

Good luck with developing and implementing your Environmental Management System.

For Lear Corporation plants, prior to using this workbook, please contact the Lear Corporation Environmental Staff.
Lear Corporation developed additional resources for each of their manufacturing facilities to use as they implemented ISO 14001. All of the resources listed are available on the Environmental Page on the Lear Intranet.

These resources are not supplied as part of this Workbook and are not available to Lear Corporation Suppliers.
ISO 14001 Implementation

6 Tasks:

- Task 1: Preparation
- Task 2: Planning
- Task 3: Development
- Task 4: Implementation
- Task 5: System Certification
- Task 6: Operation and Maintenance

Full implementation of an EMS that conforms to ISO 14001 typically requires 6 steps. Note that these steps are not necessarily sequential. For example, some tasks required for certification, such as selection of and scheduling the Registrar need to be done concurrently with other tasks. Also, note that certification is not the final task, although it is the last action item in this workbook.

In order for an EMS to be viable long-term, certain operation and maintenance tasks **must** be performed regularly for the life of the system. More information about these operation and maintenance tasks is provided in the discussion of Task 6.
Task 1 covers preparatory steps up to and including the first management briefing with the plant manager. Note that additional management briefings may be helpful. Ideally they should be scheduled regularly throughout the development and implementation process, although they are not specifically included as action items in this workbook.

All meetings and briefings should be recorded with a sign-in sheet for those in attendance. Electronic meeting notes may be maintained for the implementation process, but are not necessary.
Task 1.1

Decide on Environmental Management Representative and the Facility Environmental Coordinator

Select an EMS Management Representative and at least one assistant (Facility Environmental Coordinator). The most logical choice of the EMS Management Representative is a person with a Quality Systems background. Together, this team is defined as the “Core Group.” The EMS Representative and the Facility Environmental Coordinator are jointly responsible for completing Tasks 1.2 - 1.6, and for presentation of the implementation plan, responsibility matrix, and timeline to The Plant Manager as in Task 1.7.

**Action Items:**

1) Who is the facility EMS Representative?  

2) Who is the Facility Environmental Coordinator?  

**NOTE: FOR THIS AND ALL OF THE FOLLOWING ACTION ITEMS, PLEASE CHECK OFF THE APPROPRIATE TASKS ON THE ISO 14001 IMPLEMENTATION ACTION CHECKLIST AS THEY ARE COMPLETED.**
Task 1.2

Obtain ISO 14001 off-site training
- Environmental Management Representative
- Facility Environmental Coordinator

Send at least one of these two individuals (EMS Management Representative and the Facility Environmental Coordinator) to an ISO 14001, 36-hour Lead Auditor Course. It is preferable to send both individuals to Lead Auditor Training, but the other may be provided general awareness training for ISO 14001 during the Plant ISO 14001 rollout or during the internal audit process. Please note that training organizations may offer group discounts to Lear Corporation and their suppliers.

**Action Item:**

1) Has the off-site Lead Auditor training been scheduled for either the EMS Representative and the Facility Environmental Coordinator?

Dates for EMS Representative Training ___________________
Result of Training Passed ☐ Failed ☐
Attach copy of certificate of training, with copy in the employee Personnel file

Dates for Facility Environmental Coordinator Training ___________________
Result of Training Passed ☐ Failed ☐
Attach copy of certificate of training, with copy in the employee Personnel file
Now is the time to discuss the scope of the EMS and document this decision. For example: Will this EMS include all buildings and operations, including warehouses?

Next discuss how the Environmental Management System relates to other existing management systems, such as the Quality Management System, and the Health and Safety Management System. There are various ways of doing the integration. As you implement ISO 14001, it may be better to set up the system as a stand alone system and integrate at a later date as the system matures.

**Action Items:**

1) What is the Scope of the EMS?

________________________________________________________________
________________________________________________________________
________________________________________________________________
________________________________________________________________

2) Is the facility going to develop an EMS that also includes Health and Safety?

   Yes       No   (circle one)

3) How will the facility approach integration with other management systems (circle one)?

   Separate Systems        Partially Integrated        Fully Integrated

Comments:
________________________________________________________________
Task 1.4

Draft the Environmental Policy

NOTE: Lear plants must use the Lear Corporate E,H&S Policy

The Environmental Policy must:

- Be within the scope of the EMS
- Be formally documented, communicated, and maintained
- Be appropriate to nature and scale
- Set a framework for objectives and targets
- Include a commitment to comply with applicable and legal requirements (related aspects), and continual improvement, prevention of pollution
- Available to the public
- Must be available to persons that work on behalf of the organization

Note: Lear Corporation facilities are required to use the Corporate Environmental, Health & Safety Policy.

Action Items:

1) Attach a copy of the Policy
2) Ensure that the Policy is posted, at the minimum, in the plant and foyer, so that it is available to Visitors, Contractors and Employees
Task 1.5

Draft roles and responsibilities per attached EMS Implementation Action Checklist

1. Develop draft membership list for the Steering Committee
2. Develop draft membership list for the Working Group
   - Note: See pages 12 and 13 for suggestions as to make up of these two teams.

Development and implementation of an effective EMS requires participation from everyone at the facility. It’s important to have a clear understanding of who is responsible for accomplishing the various implementation tasks. The Implementation Action Checklist can be used to develop this program.

The Implementation Action Checklist and draft membership lists for the Steering Committee and Working Group should be prepared by the EMS Core Group, and presented to the Plant Manager for approval as in Task 1.7. Note that for the implementation process the Steering Committee may act as Management (as defined in the ISO 14001 standard), but when it is time for Management Review, the Plant Manager must be involved to provide full support to the system.

**Action Items:**

1) Using the attached Implementation Action Checklist as a guide, develop your responsibility guide. Use this as a tool to educate and inform participants during the EMS development and implementation process. Note any changes made during the presentation to the Plant Manager (Task 1.7).

2) Develop a draft membership list (name, title/function) for the Steering Committee and insert it into the workbook. Note any changes made during the presentation to the Plant Manager (Task 1.7).

3) Develop a draft membership list (name, title/function) for the Working Group and insert it into the workbook. Note any changes made during the presentation to the Plant Manager (Task 1.7).
The Plant Manager must be involved in the implementation and maintenance of the EMS, but due to business needs, it is understood that they may not be able to be actively involved at all times and thus may delegate this responsibility as they see fit.

At the minimum he/she must be involved in each Management Review.
Role of the Steering Committee

- Cross-functional Team representation, and may include the Plant Manager as a member
- Act as the Management Team in the absence of the Plant Manager
- Establish timeline for certification
- Review and approve EMS Documentation
- Acts in the “Management” during the implementation process and provide support during system maintenance

The Steering Committee **must** be represented by the leaders of all departments at the plant including but not limited to: Purchasing, Quality, Maintenance, Production, Engineering, Shipping/Receiving. The Steering Committee may also include the Plant Manager, and will act as the Management team, if the Plant Manager is not present for meetings that require approval actions to be documented.

The Steering Committee should approve the timeline developed by the Core Group to achieve certification.

The development of an Environmental Management System (EMS) through to certification should take between 4-9 months. Written Procedures, Aspects/Impacts, Objectives and Targets and related ISO 14001 information must be reviewed and approved by the Steering Committee. Finalized procedures and ISO 14001 information must be fully disseminated to all affected persons at the facility.

The Steering Committee is not necessarily the working group that will generate the required documentation. They approve the documentation that will become the Environmental Management System (EMS). Additionally, they and the people that report to them must fully understand their role in the ongoing operation and implementation of the EMS.
Depending on plant size, establish a Working Group of people to perform some of the larger tasks. This working group may range in size from 4 to 16 people and is usually divided into sub-groups of 4 persons. Working Group Activities include at a minimum the following (see Task 2.2):

- Introduce the Working Group activities; discuss ground rules, responsibilities, and timelines.
- Establish and define the Activities, Products and Services at the facility. This is simply a comprehensive listing of “what” the facility does.
- Evaluate the Aspects and related Impacts of each one of the Activities, Products, and Services. This Aspects/Impacts evaluation should be documented as the record of the Aspects review.
- Develop the methodology for determining which Impacts are Significant. Present the method and the identified Significant Impacts and their related Aspects to the Steering Committee for approval. Note: The actual determination of Significance for each identified Aspect may be performed by the Working Group or a designated individual or Core Group.
- Develop the listing of potential Objective and Targets and present to the Steering Committee for approval.
- Develop a list of Operational Control Procedures and Monitoring and Measurement requirements for each Significant Impact identified. These are necessary to meet policy commitments including compliance and prevention of pollution, and to accomplish the Objectives and Targets.
- Identify record keeping requirements, and develop a list of records indicating responsible party, location, and retention periods.
- Review, develop, and finalize any Emergency Procedures, Spill Response Procedures, and provide an implementation schedule. Review all EMS documentation developed and present it to the Steering Committee for approval. Note: This activity typically occurs in a later Working Group meeting, following the completion of Task 3.1.

A draft membership list of the Working Group is prepared by the Core Group and presented for approval by the Plant Manager as discussed in Task 1.7.
In order to keep the implementation process on track, it is extremely important to develop and follow an agreed upon schedule or timeline. Use the attached example as a starting point to customize a timeline for your facility, noting the major milestones. This should be reviewed and approved by the Plant Manager as in Task 1.7.

**Action Item:**

1) Customize the attached implementation timeline to fit your specific facility goals, and insert a copy in the workbook.
Task 1.7

Plant Manager Meeting

- Brief overview of ISO 14001 and implementation process
- Appoint EMS Representative and Facility Environmental Coordinator
- Designate Representatives
  - Steering Committee
  - Working Group
- Review and approve output from Tasks 1.3-1.6

This Plant Manager meeting is the first critical task in EMS implementation.

**Full and complete buy-in from the plant manager is crucial to effective accomplishment of your goals.**

As noted before, commitment from the plant manager is not a one-time action, but requires on-going participation throughout the life of the EMS.

On-going management meetings are also strongly recommended, and may be delegated to the Steering Committee.

The minutes from this meeting must be documented, and become important objective evidence, along with the workbook tasks 1.1 through 1.6.

**Action Item:**

1) Insert minutes from the first plant manager meeting. Be sure that they reflect approval (in the form of signatures) of the designated EMS Representative, the Facility Environmental Coordinator, the Scope of the EMS, the Steering Committee, the Working Group, the Responsibility Matrix and the Major Milestones Timeline. Include an attendance list as part of the minutes.
Once the initial preparation is complete, it's time to launch into the planning process, which includes the tasks listed above.
Task 2.1.

Provide 2-4 hour training for Steering Committee and Working Group

Conduct a two to four hour comprehensive ISO 14001 training session for all members of the Steering Committee and the Working Group as defined below. A power point presentation reviewing the ISO 14001:2004 standard is part of this Tool Kit.

The facility EMS Representative and Facility Environmental Coordinator, following their attendance of an ISO 14001 Lead Auditor course, will ideally provide this training.

Training should be accomplished prior to the initial Steering Committee/ Working Group implementation meeting to ensure familiarity with EMS terminology and structure.

At a minimum, the training should include a review of the ISO 14001:2004 standard, with an overview its specific requirements including:

- aspects and impacts
- how to identify significant impacts and related aspects
- legal and other requirements
- objectives and targets
- EMS program
- communication
- operational controls
- emergency preparedness and response

**Action Items:**

1) Who is (are) the trainer(s) for this session? ____________________________

2) When is the training scheduled? ______(date) Accomplished?______(date)
Task 2.2.

Determine Significant Impacts and Aspects
- Read the instruction for Significant Impact and Aspect Determination
- Use the Guide for Impact Scoring with the associated excel sheet
- After determining the significant impact of the operation score the related significant aspects

The EMS Working Group activity can be an effective tool in accomplishing some of the larger (group type) and ongoing activities that are a part of the development of an ISO 14001 based EMS.

For the implementation phase of the ISO 14001:2004 program, the facilitator of the Working Group plays an important role in keeping the group on task and on time. The facilitator could be the EMS Representative, the Facility Environmental Coordinator, or for Lear Corporation facilities, a Corporate Environmental staff member, if available, to lead the group.

Note: This tool is not appropriate for use in developing written procedures. Writing procedures is a task more effectively performed outside of the Working Group. For example, the EMR and Facility Environmental Coordinator (designated Core Group) could be responsible for writing procedures.

Use as many Working Group sessions as necessary to accomplish the following activities:
1. Determine Significant Impacts
2. Determine which aspects are significant within each Significant Impact Group
3. Develop Objectives and Targets
4. Develop list of Operational Control Procedures
5. Develop list of Monitoring & Measurement Requirements
6. Develop list of Records and Retention Times
7. Perform review of final EMS Documentation (after completing Task 3.1)

Note: All of the work products generated by the Working Group are DRAFT documents until approved and finalized by the Steering Committee in Task 2.10.

Action Item:

1) What are the scheduled dates for the Working Group meeting(s)? _________
Task 2.3 Develop Objectives, Targets and Programs

Go through the list of significant aspects and identify opportunities for reducing the score
Get help from your Corporate EMS Coordinator
Determine what projects are going to be considered and enter onto the objectives and targets tracking sheet – the program

The next step is to consider whether you can do anything to reduce each identified significant aspect. Go through the significant aspects list, and brainstorm possible approaches you could take. If you need help with this process, contact a member of the Corporate Environmental staff. List each project on the Example Objectives and Targets Tracking Sheet. This sheet is also set up to remind you to consider the following in setting your program:

- Legal and other requirements
- Technological Options
- Views of interested parties
- Financial

Once you have identified the objective, consider what target(s) should be set. The target should be measurable, and should include a time frame for completion (Note: refer to the definitions within the standard for both objectives and targets). Note that a target may be to complete a study of alternatives by a certain deadline. For example, if your objective is to reduce energy use, you may need to perform an energy audit of the facility (with a target date for completion of the audit) before you can develop projects with reasonable completion dates. Identify who is responsible as lead and support for each objective and target you set.

Don’t set too many objectives and targets on the initial pass. The EMS is designed to achieve continual improvement, so you can always add more later on as you achieve your initial objectives and targets. Also, consider setting some objectives and targets that you can achieve relatively quickly without a lot of resources. This gives additional momentum to your overall environmental management program.

The list of objectives and targets will be reviewed by the Steering Committee as indicated in Task 2.10.

Action Item:
Identify selected projects and put each one on a separate objectives and targets tracking sheet. For each target, identify the responsible person(s) and target date. If no target is set, indicate the reason in the comment column.
Task 2.4 Develop a list of Operational Control Procedures

For each significant aspect, list by name the relevant operational control procedures and/or work instructions.

- Each facility must have a minimum set of standard procedures.
- Check to be sure that you include maintenance activities.

Written procedures are required only if their absence could create or contribute to environmental problems - such as regulatory non-compliance, accidents or emergency situations, deviations from environmental policy, or failure to meet your objectives and targets.

Note that the Working Group is NOT tasked with writing the operational control procedures, but is simply developing a preliminary list of required operational procedures. Development of procedures is covered in Task 3.1.

At a minimum, each facility must include the following operational procedures as they relate to identified significant aspects:

- Monitoring and Measurement
- Regulatory Compliance Auditing
- Management of Maintenance Activities

Note that the facilities existing Standard Operating Procedures or Preventive Maintenance Programs could already include the necessary language. These should simply be referenced by name in the list of operational procedures associated with the significant aspects.

This list will be reviewed by the Steering Committee as in Task 2.10.

**Action Item:**

For each significant aspect identify the name of the existing or proposed procedure or work instruction.
Task 2.5 Identify Monitoring and Measurement requirements

- Review the Significant Aspects and related Objectives, Targets and Programs
- List required monitoring and measurement criteria
- Development of procedures and work instructions for Monitoring and Measurement is covered in Task 3.1 and checked in Task 3.2

Review the Significant Aspects, noting especially any related Objectives, Targets and Programs. Do any of these aspects require monitoring and measurement? Identify the criteria to be measured and monitored.

Note that the Working Group is simply charged with developing a preliminary list of monitoring and measurement criteria that will be reported to the Steering Committee as in Task 2.10. The final monitoring and measurement criteria cannot be identified until the EMS documentation is near completion in Task 3.1. Task 3.2 details the completion of this activity.

Action Item:

For each significant aspect identify the name, indicate relevant monitoring and measurement criteria for each significant aspect.

Insert each Objectives and Target Tracking Sheet in this Workbook.
Task 2.6 Develop a list of Records and Retention times

- Records provide evidence that your EMS is working
- Records are:
  - legible, identifiable, traceable
  - appropriately stored and protected
  - kept for defined periods of time

Records provide evidence of how well your EMS is functioning. They must be legible, and easily identified by name or form number. They have to be kept in such a way that they can be readily retrieved.

Identify who is responsible for keeping records, and where they are kept. You should make sure that your record storage areas are secure and protected, so that records don’t become lost or damaged over time.

Establish an appropriate retention period for each type of record. Also note the location and person(s) responsible for keeping Level 4 referenced documents, such as regulatory permits and emergency plans. This list will be reviewed by the Steering Committee as noted in Task 2.10.

**Action Items:**

1) Develop a Master Document List and insert into the workbook.
**Task 2.7**

- Legal and Other Requirements Assessment
- Develop Compliance Calendar
- Send out vendor/contractor notifications to those that may impact the identified Significant Aspects of your operation and provide training as required

Make arrangements to periodically evaluate compliance with applicable environmental statutory and regulatory requirements, and other applicable environmental requirements, which are applicable to the identified significant aspects of facility operations. These requirements may include:
- National and international legal requirements
- State/provincial legal requirements
- Local governmental legal requirements
- Corporate/company requirements
- Customer product requirements

From this listing, develop an environmental compliance calendar, an example is attached. This task is best handled by the facility Environmental Coordinator.

For those suppliers and contractors that have the potential to affect your significant aspects and resulting impacts, communication of your relevant procedures must be made. This communication can be in the form of a letter with a request for their sign off and return. Keep a list of these companies in your files, and maintain the returned documents as indicated in your record keeping procedure.

**Action Items:**

1) What is the scheduled date for the facility compliance audit and/or legal and other requirements assessment? ____________(date)

2) What mechanism has been chosen to assess the legal and other requirements for the facility?

3) Have you developed a facility compliance calendar, and is it up to date? See the attached example as a starting point.
   - Yes  
   - No  
   (circle one)

4) Have you sent out your contractors and/or suppliers which may impact your significant aspects a notification letter? (See attached sample copy), and are you maintaining the records appropriately?
   - Yes  
   - No  
   (circle one)
Facility Emergency Preparedness and Response Plan requirements vary given applicable environmental rules and requirements.

The ISO 14001 element for Emergency Preparedness and Response:
- Requires procedures for identifying the potential for accidents and emergency situations, and how to respond
- Includes the requirement to respond to actual emergency situations and accidents and taking action to prevent or mitigate the associated adverse environmental impacts

Additionally the plan must be:
- Periodically reviewed and revised, particularly after events
- Periodically tested where practicable. It is recommended that training for emergency preparedness is given and practiced annually.

**Action Items:**

1) List all of the applicable facility Emergency Preparedness and Response Plans, the date of last revision, and location of plan. Note: It is recommended that plans be integrated, where practical, into one “contingency plan.”

2) Are all of the plans up to date? (Note that all plans must be kept up-to-date to reflect personnel and operational changes, and it is recommended that plans must be reviewed at least annually). Put your emergency plan review on the Compliance Calendar

Yes  No  (circle one)
Communication to interested parties is an important item for the EMS.

Set up a procedure for how to receive, document, and respond to relevant communication from external interested parties. A log book with the receptionist is sufficient, but must be reviewed at Management Review, including the follow-up.

And, discuss voluntary communication on significant environmental aspects to outside interested parties. For example this may include your customer(s) and the local community.

See also Task 4.3 for other Communication discussion.

**Action Items:**

1) Record your decision regarding external communication about the facility’s significant environmental aspects

   Yes  No  (circle one)

2) Have you set up the Communication Log?

   Yes  No  (circle one)
Task 2.10

Environmental Management Program Review by Steering Committee

- Review output from Tasks 2.2-2.5
- Review Significant Aspects and related Impacts
- Record decision regarding external communication about the Significant Aspects
- Finalize Objectives and Targets and establish Environmental Management Program(s)
- Review Operational Control listing
- Review Monitoring and Measurement criteria
- Review Record Keeping requirements
- Resolve outstanding action items

This EMS review is required to ensure that all developmental requirements for the EMS are being met, and are communicated to and approved by the Steering Committee. Minutes from the meeting (including attendance listing) must be documented and maintained as objective evidence that this requirement was met. These minutes must demonstrate that a clear decision was reached on each item discussed. If the Steering Committee is unable to reach a decision, subsequent meetings should be scheduled and documented.

**Action Items:**

1) The Steering Committee meeting was held on __________(date).

2) Insert minutes from the meeting, including:

   - the attendance list
   - the list of significant aspects and their related impacts
   - a record of the decision regarding external communication about the facility’s significant environmental aspects
   - the list of objectives and targets for the facility
   - a description of the Environmental Management Program(s) that will accomplish the objectives and targets, including designation of responsibilities, and resources
   - the list of operational control procedures
   - the list of monitoring and measurement criteria
   - the list of record keeping requirements
Task 3: Development

- Define and Develop System Documentation
- Identify Monitoring & Measurement requirements
- Develop Training Matrix
- Revise Structure & Responsibility for EMS Operation and Maintenance
- Develop Internal Audit Checklists & Auditing Schedule
- Steering Committee Meeting #2
Task 3.1.

Define and Develop System Documentation
- Level 1: Corporate EMS Policy Manual
- Level 2: EMS Procedures
- Level 3: Work Instructions and Referenced Documents
- Level 4: Forms and Records

Develop the written documentation that will define the EMS and all associated procedures. The QS-9000 systems person with the active assistance of the facility environmental coordinator or the EMS Management Representative may be the logical choice to accomplish this task. Lear Corporation facilities may choose to use the Sample Corporate Level 2 document as a starting point, and must use the Corporate EMS Policy Manual as the foundation for their Environmental Management System.

Particular attention should be paid to the Lear Corporate EMS Requirements (EPM 7.0) as this procedure identifies "other" requirements the facility will be audited on in addition to those requirements of ISO 14001.

The final EMS documentation should be reviewed by the Working Group, and must be presented to the Steering Committee for their approval (see Task 3.6). According to the ISO 14001 Standard, the following elements of the Environmental Management System Operational Control 4.4.6 MUST have written procedures, but other elements, such as Monitoring and Measurement 4.5.1 and Evaluation of Compliance 4.5.2, must to have written records.

**Action Item:**
Update the Master Document Index, using the following example as a starting point. Insert the completed index into the workbook.
Task 3.2.

Identify Monitoring and Measurement Requirements

- Include Applicable Corporate Metrics (water use, by product/waste generation & recycling, waste recycling, energy use)
- Significant Aspect/Impact monitoring
- Compliance requirements
- Tracking for Objectives and Targets
- Calibration of utility meters

Action Items:

1) Do your written operating procedures cover the collection and review of monitoring and measurement requirements listed above? Note: these must include the recording of information to track performance, relevant operational controls, and conformance with environmental objectives and targets.

- Significant Aspect/Impact: Yes No (circle one)
- Compliance Requirements: Yes No
- Tracking Objectives & Targets: Yes No

2) Is any monitoring equipment used that requires calibration?

   Yes No (circle one)

If “No” calibration guidelines are available – please document verification if no calibration guidelines and verify the operating condition by using best practices.

If “Yes” insert a page listing the equipment name, the calibration frequency, and the location of calibration records.

4) Have you included correspondence regarding calibration (or evidence of calibration) of water and energy utility meters, waste scales at vendor?

   Yes No (circle one)

Note: Utility companies typically will not calibrate meters, they will offer to change – but at your cost. In any case please verify and document your efforts.
Task 3.3.

- Develop Training Matrix and schedule specific training as necessary
  - EMS work instructions and procedures
  - Training required by rules and regulations
  - Internal auditor training

The training element is the glue that holds the EMS together. It is vitally important to long-term maintenance of the program. In order to ensure that all training needs are identified and met, it is helpful to develop and maintain a training matrix as a tool (similar to a compliance calendar).

Most facilities designate a core training group that carries the EMS training responsibility, consisting of the EMS Representative, the Environmental Coordinator and/or the QS9000 Coordinator, with input from other Departments such as HR as necessary.

**Action Item:**

1) Develop a training matrix for your facility consistent with the example provided, and insert it into the workbook. Also include internal auditor training. Lear Corporation has an available internal auditor training program for Lear Corporation facility use by the EMR.
Task 3.4.

- Develop an Ongoing Responsibility Matrix

The function of this task is to ensure element-to-element continuity in the EMS during on-going operation. Each procedure and work instruction carries a section entitled responsibility, which should be consistent with the actual operation of the EMS. A chart may be made for ease of implementation, such as the Responsibility Matrix example attached.

**Action Item:**

Review and finalize the structure & responsibility for EMS Operation and Maintenance for your facility using the Ongoing Responsibility Matrix.
Task 3.5.

- Develop Internal Audit Checklists and Schedule

This task could be performed by your trained internal auditors with input from the Environmental Management Representative, Facility Environmental Coordinator and by the Working Group. Internal audit check sheets should be developed to evaluate on-going Operation and Maintenance of the facility’s documented EMS, including the Level 1-4 documentation. Note that checklists should not simply be a checklist listing the required elements of the ISO 14001 standard, but should reflect the requirements of the facility’s EMS documentation (say what you do, and check to be sure that you’re doing what you say).

Also, examples of acceptable objective evidence are required to be identified on each check sheet, and space should be provided for auditors to note the evidence collected. For example, note reviews of required records, interviews with employees, and visual observations from a walk-through of the facility.

NOTE: The internal audit process must be independent. In other words, people in HR can not audit HR and so on.

Action Items:

1) Develop an auditing schedule for your facility. The elements of the EMS must be audited based on their importance and on the results of previous audits. All elements of your EMS must be audited at least annually. Include the schedule in this workbook. Add to your Compliance Calendar.

2) Develop auditing checklists for the various areas or elements of the EMS. Clearly identify the area or element(s) being audited, and include examples of acceptable objective evidence to demonstrate conformance to the ISO 14001 standard. For Lear Corporation facilities a sample checklist can be found on the Environmental Department web site on LearNet.
Task 3.6.

- Environmental Management Systems review by Steering Committee
- Review output from tasks 3.1-3.5
- Resolve outstanding action items

A meeting of the Steering Committee should be convened at this point. This will be the final action taken by the Steering Committee for the implementation of the EMS.

As before, document the meeting by providing an attendance sheet and detailed minutes from the meeting including the following actions:

- Review and approve all EMS Documents for final distribution, including Monitoring and Measurement criteria
- Review and approve training matrix and schedule
- Revise Structure & Responsibility for EMS Operation and Maintenance
- Review and approve audit program and schedule
- Resolve outstanding action items

**Action Item:**

1) Insert minutes from the meeting in the workbook. Include an attendance sheet and discussion from the items listed above, at a minimum.
Task 4: Implementation

- Specific training on procedures and work instructions
- Awareness training
- System start-up
- Initial internal audit
- Initial management review

The following tasks are important to starting the process of running your system and ensuring that it is adequate to meet the intent of the ISO 14001:2004 standard.
Task 4.1

- Provide specific training on work instructions and procedures
- Check to be sure that training required by rules and regulations is up-to-date
- Check to see that the auditing program includes elements designed to test the effectiveness of the training and that the auditors are independent of the area being audited

Based on your training matrix, specific training sessions should be scheduled. This could include training on procedures and work instructions required at the shop floor level, or for specific skilled trades such as maintenance, pipe fitters, or environmental staff.

Training records need to be maintained per the ISO 14001 standard. Additionally, the auditing program should include elements designed to test the effectiveness of the training on an on-going basis.

**Action Items:**

1) Has all of the specific training required by the training matrix been provided?

   Yes               No              (circle one)

2) Has all required regulatory training been provided and is it up to date?

   Yes               No              (circle one)

3) Does the auditing program include questions designed to test the effectiveness of the training program and to determine the competency of those trained?

   Yes               No              (circle one)
Now it is time to schedule EMS awareness training for the entire plant population. Appropriate facility personnel must be aware of:

- the policy,
- the identified significant environmental aspects and impacts,
- their role and responsibilities within the Environmental Management System,
- facility objectives, targets and programs
- the consequences of departure from written Environmental Procedures, and
- what to do in an emergency situation

Lear has prepared an ISO 14001 video that is available which covers some of these topics and can be ordered through LearNet.

**Action Item:**

1) Include copies of the sign-up sheets indicating the attendance of facility personnel at the awareness training sessions.
Task 4.3

Start up Environmental Management System
Use appropriate visual aids as reminders
COMMUNICATE, COMMUNICATE, COMMUNICATE

It can be very helpful to hold one or more special events to mark the start-up of the EMS. This could be done at the same time as the awareness training, provided the training doesn't take too long to complete. Some facilities use special visual aids (banners, pocket cards, posters, etc.) and hold celebrations (pizza parties, bagels and doughnuts, etc.) to mark the occasion.

Visual aids can also serve as reminders reinforcing the awareness training. Visual aids may include:
- Handouts for visitors and contractors
- Notice boards with ISO 14001 information and tracking of objectives and targets
- E-mails and plant floor meetings

**Action Items:**

1) Are you planning any special events to mark the start-up of the EMS?
   Yes   No   (circle one)

2) Will you be using any visual aids in the facility to reinforce the training?
   Yes   No   (circle one)
Following the awareness training and system start-up, train an Internal Audit Team and then complete one full internal audit of the system and make revisions as necessary.

An Internal Auditor Training program is available from Lear Environmental staff for Lear Corporation facilities for this purpose. The training must be supervised by the EMR or the Facility Environmental Coordinator, who must have had ISO 14001 Lead Auditor Training.

This must be completed prior to the initial or registration audit. Revise the EMS as required based on the findings from the audit, using the facility’s nonconformity, corrective action and preventive action procedure. Records must be maintained of any revisions to documents, and revised versions should be distributed per the facility’s document control procedure. Issue the approved CONTROLLED copies of the EMS or ensure access to electronic versions (following the facility document control procedure). Make sure that all departments are covered and all areas have access as required. Maintenance manuals from outside sources also must be controlled, for equipment that could impact significant aspects. Also, auditor impartibility is important. For example: The maintenance staff may not audit themselves.

**IMPORTANT NOTE**: This internal audit must also include an audit of the internal audit process itself, and of the management review process, by the plant manager. These typically follow the first management review meeting (see Task 4.5). Findings from these audits must also be communicated to the plant manager, either in a separate management review meeting, or by memo.

**Action Item:**
1) Summarize findings from the initial audit of the system. List any non-conformances found and note the resolution of each item, noting any revisions made to the system documentation. Insert this in the workbook.
Task 4.5

- Hold Initial Management Review meeting (#1)
- Must be by the Plant Manager
  - Review Implementation (Tasks 1-4)
  - Review final documentation
  - Review results from the initial internal audit
  - Plan for the registration audit (Task 5)
  - Review on-going EMS operation and maintenance actions (Task 6)

Management Review must be very specific. The ISO 14001:2004 standard requires that: “The EMS be reviewed at planned intervals determined by the organization. This review must be documented and must address the need to change the EMS in light of changing circumstances and the commitment to continual improvement.”

Management review must include:
- Results of internal audits and evaluation of compliance
- Communication (external), especially complaints
- Environmental performance and meeting objectives and targets
- Status of corrective and preventative actions
- Follow-up items from previous management reviews
- Recommendations for improvement

This meeting is the first full review of the EMS by the Plant Manager. The EMR is expected to present the Management Review, together with recommendations for improvement to the Plant Manager with input from the Steering Committee and Working Group. As before (with the Steering Committee meetings), document the meeting by providing an attendance sheet and detailed minutes from the meeting including the following actions:
- review of the completed EMS implementation tasks (Tasks 1-4), using the Workbook, Implementation Action Checklist, and Implementation Timeline as reference documents
- review of final EMS documentation including Operational Control elements and on-going Monitoring and Measurement requirements
- results from the document review and the initial internal audit
- progress on achieving Objectives and Targets
- plan for the Initial and Registration audits (Task 5)
- review on-going EMS Operation and Maintenance tasks (Task 6)

**Action Item:**
1) Insert minutes from the meeting in the workbook. Include an attendance sheet and discussion from the items listed above, at a minimum.
Task 5: System Certification

1. Registration to the ISO 14001 Standard
   - Contact Registrar and schedule audits
   - Initial Audit and on site Document Review by Registrar
   - Corrective action
   - Registration Audit by Registrar
   - Corrective action
   - Registration

All Lear Corporation facilities pursuing the development of an Environmental Management System consistent with the requirements of ISO 14001 must use an approved third party certification by an accredited Registrar (Intertek or TUV Rheinland). Lear Corporation requires that all their suppliers attain ISO 14001:2004.

Contact the Registrar to set up the dates for the following:

- Initial Audit (including document review)
- Registration Audit

A full internal audit should be completed prior to the Registrar visiting the plant. The results of the initial Internal Audit must be reviewed by the Plant Manager to ensure that the proper corrective action has been taken and that the system is performing as desired prior to the final Registration Audit.

This review must be documented (see Task 4.5). Always complete all paperwork to document that any non-conformances have been fixed. Record all revisions to any procedures that where changed as a result any audits.

Note that Registrars are currently booking audits from 3 to 6 months in advance. Keeping an open line of communication with your Registrar is a must.

**Action Item:**
1) When are your audits scheduled?
   - Initial Audit ______________________ (date)
   - Registration Audit ______________________ (date)
The facility’s work is not complete at this point. An effective EMS requires regular attention to the on-going activities listed in the next 3 slides.

- **Internal Audits**: The facility needs to ensure that the entire EMS is audited internally at least annually, following the auditing schedule. This is the bottom line of defense to ensure that the EMS changes as the organization changes.

- **Nonconformity, Corrective Action and Preventative Action**: When problems are noted either as a result of the audits, or as a result of accident or emergency situations it is important that in addition to solving the immediate problem, the facility also works to fully resolve the underlying root cause(s) to prevent future occurrences whenever possible. The approach may be similar to that taken when the facility needs to respond to a quality issue using the QS 9000 procedures.

- **Tracking and Improving Performance**: The facility should regularly assess whether the system is accomplishing the desired level of performance. Monitoring and measurement information must be collected regularly, but it is equally important that this information be processed and reported. The information should be presented (tracked) in such a way as to clearly indicate the system’s on-going level of performance and to provide early identification of potential problems so they can be corrected. This type of oversight also allows the facility management to make adjustments to objectives and targets based on actual performance.

- **Training New Hires and Replacements**: While the systems auditing procedures should eventually pick up on problems with training, it is much better to be proactive in this area as well. As such, new hires and contractors should receive appropriate orientation training (see the training matrix Task 3.3). Training programs for replacements, temps, and covering job-rotation programs can be more difficult to maintain. An EMS that is fully integrated into shop floor level standard operating procedures and work instructions is more likely to be included in on-going training programs.

- **Surveillance audits**: Surveillance audits are periodic audits of the EMS by an outside group - as opposed to the internal audit. If the facility is registered to the ISO 14001 Standard, the Registrar will determine the frequency of the required surveillance audits (generally semi-annual or annual).
Task 6: Operation and Maintenance (cont)

Management Reviews

The EMS must be reviewed at planned intervals, at a minimum annually, and is required prior to any surveillance audits.

This review must be documented and must address the need to change the EMS in light of changing circumstances and the commitment to continual improvement. Management Review should be completed by the Plant Manager and must address the following:

- Results of internal audits and evaluation of compliance
- Communication (external), especially complaints
- Environmental performance and meeting objectives and targets
- Status of corrective and preventative actions
- Follow-up items from previous management reviews
- Recommendations for improvement

Finally, top management should ensure that the facility’s commitment to continual improvement is met by setting new objectives and targets as the prior ones are attained.
Task 6: Operation and Maintenance (cont)

- Assess Aspects/Impacts of new or modified:
  - processes and activities
  - products and services provided by the facility
  - goods and services supplied by contractors and vendors

Plant operations are continually changing, and this can create changes (for better or worse) in the environmental impacts that are created. It is important to identify a means of continually reviewing all such changes, in order to make appropriate revisions to the facility EMS.

This can be accomplished by following a specific operational control procedure, such as a “Management of Change Procedure.” Alternatively, a review of all proposed changes to facility activities, products and services could be held on an ongoing basis by a designated person or group (such as the Core Group).
Attachments

Attachment Cover Sheets follow and can be used in assembling a complete Workbook.

Separate files for the individual documents are provided to facilitate downloading.
Attachment A

Implementation
Action
Item
Checklist
Attachment B

Implementation Timeline Example
Attachment C

Instructions for Significant Impact and Aspect Determination
Attachment D

Significant Impact Scoring

Worksheet Guide
Attachment E

Significant Impact Scoring

Worksheet
Attachment F

Significant Aspects Worksheet
Attachment H

Master Document
Index

Example
Attachment I

Compliance Calendar
Attachment J

Ongoing Responsibility Matrix

Example
Attachment K

Vendor Certification Letter Example
Attachment L

EMS Training Log

Example