United States Department of the Interior

OFFICE OF THE SECRETARY
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PEP – ENVIRONMENTAL COMPLIANCE MEMORANDUM NO. ECM08-2

To: Heads of Bureaus and Offices

From: Willie R. Taylor, Director
Office of Environmental Policy and Compliance

Subject: Interpretive Guidance on the Department's Environmental Management Systems Policy (515 DM 4)

The Office of Environmental Policy and Compliance issues this Environmental Compliance Memorandum (ECM) under the authority provided by 381 Departmental Manual Chapter 4.5B to convey instructions and guidance through the Environmental Memoranda Series.

Executive Order (EO) 13423, "*Strengthening Federal Environmental, Energy, and Transportation Management*," January 26, 2007, reinforces the requirement for more widespread use of Environmental Management Systems as the framework in which to prevent pollution, manage environmental compliance, and to continually improve sustainable practices. The Council on Environmental Quality "*Implementing Instructions and Requirements for EO 13423*," March 29, 2007, directs Federal agencies to implement EMS at appropriate organizational levels and to ensure the use of an EMS as the primary management approach to address environmental impacts of internal agency operations and activities.

This ECM provides guidance and information to departmental bureaus and offices on EMS implementation and was approved by the Department's EMS Council. It is meant to help improve environmental compliance and performance throughout the Department as set forth by the requirements of 515 Departmental Manual Chapter 4, *"Environmental Management Systems,"* August 13, 2008.

Attachment

cc: Deputy Secretary
Associate Deputy Secretary
Deputy Assistant Secretary – Policy and Program Management

U. S. Department of the Interior
Office of Environmental Policy and Compliance

Interpretive Guidance on the Department's Environmental Management Systems Policy (515DM4)

December 2008

Interpretive Guidance

Series: Environmental Quality Programs
Part 515: Environmental Management
Chapter 4: Environmental Management Systems

Origination Office: Office of Environmental Policy and Compliance

The purpose of this document is to help ensure accuracy and consistency in interpreting U.S. Department of the Interior (DOI, Department or Departmental) policy on Environmental Management Systems (EMS).

The current wording of the DOI EMS Policy is in the left column and clarifying notes, references or explanations are in the right column.

Current Wording	Interpretation
4.1 Purpose.	
This chapter	This is one chapter in a series on environmental quality.
sets forth Departmental policy,	Departmental policy is established by this chapter. This is the highest level statement on the subject offered by the Department.
responsibilities,	Specific responsibilities of the Department are presented in this document. The Department includes all organizational units including bureaus and offices.
and functions	Specific functions of the Department are presented in this document.
for implementing environmental management systems (EMS)	This chapter outlines EMS and the approach for developing and implementing EMS.
as a means to promote environmental compliance and	EMS is a tool which, at a minimum, can be used to improve, achieve and maintain compliance.
sound environmental stewardship throughout the Department.	EMS is a tool which can be used to ensure that the natural resources entrusted to bureaus or offices are sustainably managed.
4.2 Scope.	
The responsibilities and requirements apply to all bureaus and offices.	Each bureau or office within the Department is subject to the

	responsibilities and requirements associated with implementing and maintaining an EMS.
Bureaus and offices may structure their respective EMS in accordance with Section 4.5 to meet their missions.	Each bureau or office of the Department can customize its EMS to fulfill their mission, and to meet the requirements presented in Section 4.5, or the Policy section, of this document.
4.3 Authorities.	
Executive Order (E.O.) 13423, "Strengthening Federal Environmental, Energy, and Transportation Management," January 26, 2007;	E.O. 13423 sets goals in the areas of energy efficiency, acquisition, renewable energy, toxics reductions, recycling, renewable energy, sustainable buildings, electronics stewardship, fleets, and water conservation. In addition, E.O 13423 requires the use of EMS as the framework in which to manage and continually improve these sustainability practices.
and Council on Environmental Quality (CEQ) Implementing Instructions and Requirements for E.O. 13423, March 29, 2007.	This document outlines the specific requirements and procedures for properly implementing E.O. 13423.
E.O. 13423 reinforces the requirement for more widespread use of EMS as the framework to use in planning to prevent pollution, manage environmental compliance, and to continually improve sustainable practices.	E.O. 13423 requires that federal agencies implement EMS at all appropriate organizational levels to ensure the use of EMS as a primary framework for managing environmental aspects of operations and activities.
The CEQ Implementing Instructions and Requirements for E.O. 13423 directs Federal agencies to implement EMS	Federal agencies must use an EMS which is designed in accordance with the Council on Environmental Quality (CEQ) Implementing Instructions and Requirements for E.O. 13423.
at all appropriate organizational levels	Within each Federal agency there are several organizational levels, or layers of management, including Department or higher tier, agency, sub-agency, bureau, region, service, command and/or individual facilities.
and to ensure the use of an EMS as the primary management approach to address environmental impacts of internal agency operations and activities.	EMS is a tool used to proactively manage environmental aspects and potential impacts, or changes to the environment, which occur as a result of activities or operations performed at the several organizational levels, including

	environmental aspects associated with energy and transportation.
4.4 Definitions.	
For purposes of this chapter, the following definitions shall apply:	
A. Appropriate Facility or Organization.	
Any Federal facility or organization that is subject to compliance with environmental regulation or conducts activities that can have a significant impact on the environment, either directly or indirectly individually or cumulatively, due to the operations of that facility's or organization's mission, processes, or functions.	
B. Environmental Aspect.	
An element of a bureau or office activity, operation, product, or service that does or could create an environmental impact.	
C. Environmental Impact.	
Any change to the environment, whether adverse or beneficial, resulting from a bureau or office activity, operation, product, or service wholly or partially resulting from bureau or office environmental aspects.	
D. Environmental Objective.	
An overall environmental goal, consistent with the environmental policy and mission, that a bureau or office commits to achieve.	
E. Environmental Management Systems.	
An EMS is a planning tool that helps an organization achieve its environmental compliance obligations and broaden its environmental performance goals, by properly managing its operations and activities. It is not a stand-alone environmental program or a data management program, but links existing and new organizational responsibilities, programs, and activities. The EMS model of "Plan, Do, Check, Act," reflects accepted quality management principles and provides rigor to existing operations and programs to further ensure continual improvement, as found in the ISO 14001:2004(E) standard. The true benefit of the EMS model is that it ensures existing or new programs closely link an organization's environmental and energy footprint with legal and other requirements. Activities include	

planning, training, monitoring and measuring, and reporting. In addition, senior management plays an active role in evaluating status and progress and making decisions towards continual improvement. An EMS does not guarantee environmental compliance, but it provides the framework and tools to achieve and sustain compliance, thereby reducing liability.	
F. Facility.	
Any building, installation, structure, land, and other property owned or operated by, or constructed or manufactured and leased to, the Federal Government. This term includes a group of facilities at a single or multiple locations(s) managed as an integrated operation, as well as government-owned contractor-operated facilities.	
G. Qualified Independent Auditor.	
An auditor who is outside the control of or scope of the facility or organizational EMS to be audited. Bureaus and offices will be responsible for determining the minimum qualifications for the independent auditors they utilize.	
H. Sustainability.	
Means to create and maintain conditions, under which humans and nature can exist in productive harmony, that permit fulfilling the social, economic, and other requirements of present and future generations of Americans.	
I. Sustainable Practices.	
Actions contributing to the condition of being "sustainable." Examples of sustainable practices can include sustainability such as but not limited to environmental purchasing, resource conservation, pollution prevention, toxics reduction, practices to reduce or control emissions of greenhouse gases, electronic and other product stewardship, sustainable construction and buildings, water and energy conservation, renewable energy and resources, and recycling.	
4.5 Policy.	
All bureaus and offices will, at all appropriate organizational levels and/or facilities, develop, implement, and maintain an EMS.	Bureaus and offices may determine at what levels an EMS is applicable (facility, Multi-Site, and/or Higher Tier) in order to manage the environmental aspects and

	potential impacts of their activities and operations.
An EMS serves as the management framework under which bureaus and offices and their appropriate organizational levels and/or facilities	An EMS should act as a management tool for all activities and programs for each appropriate organizational level and/or facility identified within a bureau or office. Facility-level EMSs are where activities, products and services can have an "end of the pipe" impact through direct discharges to air, water and land which are specifically regulated by local, state and federal authorities. The facility-level and any higher appropriate organizational level EMS should adopt or make reference to Departmental requirements. The purpose of a facility-level EMS is to provide a consistent framework for environmental management at an individual facility or program, and will include practices and policies customized for an individual facility or program. The purpose of a higher tier organizational-level EMS is to provide a consistent framework for environmental management throughout several layers of an organization, including programs and facilities. A higher-tier organizational-level EMS may specify objectives, practices, policies and guidelines for all levels of the organization including individual facilities.
identify, manage, and improve environmental performance	An EMS includes formal practices such as operational controls (e.g., Standard Operating Procedures) and designated roles and responsibilities that ensure their proper execution and fulfillment.
including compliance,	An EMS includes procedures to track legal and other requirements, facilitate communications, provide training, prepare for emergencies, and evaluate compliance.
and sustainable practices.	An EMS includes procedures outlining policies and procedures for a bureau or office to conduct their operations in a

	sustainable manner, consistent with E.O. 13423.
Bureaus and offices may determine and select the type of EMS best suited for their missions;	Each bureau or office of the Department can customize its EMS to support their mission.
however, an EMS must reflect the elements and framework equivalent to those found in the ISO 14001:2004(E) standard.	The EMS that an agency develops and implements must meet the terms of or be equivalent to the ISO 14001:2004(E) standard.
Bureaus and offices will, where appropriate, and at all appropriate organizational levels and/or facilities, include in EMS objectives, the goals as identified in Section 2 of E.O. 13423.	All Higher-Tier, appropriate organizational levels, and/or facilities must incorporate specific objectives into their EMSs that are consistent with the goals outlined in Section 2 of E.O. 13423. E.O. 13423 sets sustainability goals in the areas of energy efficiency, acquisition, renewable energy, toxics reductions, recycling, renewable energy, sustainable buildings, electronics stewardship, fleets, and water conservation.
Each bureau or office must define and identify the appropriate organizational levels and/or facilities where EMS will be developed,	Each bureau or office must determine their approach by defining which organizational levels and/or facilities within their specific bureau or office will require an EMS.
implemented, and maintained in accordance with this chapter.	Each bureau or office must ensure that EMSs at appropriate organizational levels and/or facilities meet this chapter's requirements.
Bureaus and offices must have documented procedures to systematically and objectively determine appropriate organizational levels and/or facilities based on variables such as scope, span of control or influence, functions, operations, and services.	The method by which a bureau or office determines appropriate organizational levels and/or facilities, must be clearly defined and documented according to consistent methods. These methods should consider internal influence and practices. The Office of Environmental Policy and Compliance (OEPC) encourages bureaus and offices to share their documented procedures Department-wide.
4.6 Accountability and Responsibilities.	
A. Office of the Solicitor.	
The Office of the Solicitor is responsible for providing legal review and guidance in implementing and complying with 515 DM 4.	
B. Assistant Secretary - Policy, Management	

and Budget.	
The Assistant Secretary - Policy, Management and Budget is responsible for policy and oversight of Departmental compliance with 515 DM 4.	The Assistant Secretary-Policy, Management and Budget is the Department's Senior Civilian Officer responsible for compliance with E.O. 13423, and each bureau and office has a designated senior-level bureau and/or office Official responsible for compliance with E.O. 13423. These officials will report to the Assistant Secretary-Policy, Management and Budget on this issue.
C. Program Assistant Secretaries.	
Program Assistant Secretaries are responsible for ensuring adequate program support, resources, and funding for the development and implementation of EMS.	The Program Assistant Secretaries must provide assistance, supplies, and financial support as necessary to maintain the Department's EMS. Bureaus and offices are required to identify in their annual budget submission, the funding necessary to meet the requirements of E.O. 13423. The bureaus and offices must report the funding required for energy management, transportation management, and other management, annually on Office of Management and Budget (OMB) Circular A-11, Section 25 to the OEPC and Office of Acquisition and Property Management.
D. Office of Environmental Policy and Compliance.	
The Office of Environmental Policy and Compliance is responsible for overseeing, producing, and coordinating policy guidance and instructions to implement 515 DM 4.	
E. The Department's EMS Council.	
The EMS Council	The EMS Council is a group of individuals who represent DOI bureaus and offices. The EMS Council meets regularly to discuss new or emerging EMS issues or policies and to share "lessons learned."
is authorized under Environmental Compliance Memorandum 03-02, dated February 3, 2003,	
and consists of representatives from bureaus and offices.	
It is chaired by the Office of Environmental Policy and Compliance and assists in the implementation of the policy in this chapter.	OEPC chairs the EMS Council meetings and provides guidance and support as appropriate, to ensure that EMS is

	developed and implemented at all bureaus and offices.
F. Heads of Bureaus and Offices.	
Heads of bureaus and offices	Bureaus and offices include the Bureau of Indian Affairs (BIA)/Bureau of Indian Education (BIE), National Park Service (NPS), NPS Concessions Program (NPSCP), United States Fish and Wildlife Service (FWS), Bureau of Land Management (BLM), Minerals Management Service (MMS), Bureau of Reclamation (BOR), Office of Surface Mining (OSM), United States Geological Survey (USGS), and the National Business Center (NBC).
have primary responsibility for implementing and executing EMS in accordance with the policy in this chapter.	Heads of bureaus and offices must ensure that an EMS meets the requirements listed in this chapter.
Heads of bureaus and offices will ensure that resources and funding are identified and requested	Heads of bureaus and offices must also guarantee that financial and other needs are recognized and reported.
in their budgets for environmental compliance and the implementation of EMS programs.	Each bureau or office must determine a budget and request funding for implementing and maintaining their EMS (including compliance). Bureaus and offices will be required to identify in their annual budget submission the funding necessary to meet the requirements of E.O. 13423. Bureaus and offices must report the funding required for energy management, transportation management, and other management, annually on OMB Circular A-11, Section 25 to OEPC and Office of Acquisition and Property Management.
They must ensure that the requirements in this chapter are communicated to all management levels	Heads of bureaus or offices must make sure that leadership and managers from all appropriate organizational levels are aware of the EMS and other requirements outlined in this chapter.
and that the requirements are reflected in their programs.	Requirements set forth in this chapter should be clearly and explicitly integrated into a bureau or office's EMS.
They must also determine appropriate organizational levels and/or facilities for EMS implementation.	Heads of bureaus or offices are responsible for deciding which appropriate organizational levels and/or

	facilities should implement EMSs.
They must ensure that the EMS program as a whole is reviewed and updated at least annually.	Heads of bureaus or offices must make sure that their EMS is reviewed and updated as needed at least once a year as part of their EMS management review. This should also be done in conjunction with all EMS evaluations of appropriate organizational levels and/or facilities.
Heads of bureaus and offices must appoint a senior leadership official who is responsible for all matters pertaining to implementation of EMS as well as the provisions of E.O. 13423 and the CEQ Implementing Instructions and Requirements for E.O. 13423.	Heads of bureaus or offices are required to appoint a Senior-level Official to oversee, supervise, and ensure development, implementation and maintenance of EMSs, as well as the requirements of E.O. 13423. The designated bureau or office Senior-level Officials report E.O. 13423 progress to the Agency designated E.O. 13423 Senior Civilian Officer.
G. Managers of Appropriate Organizational Levels and/or Facilities.	
It is the responsibility of managers of appropriate organizational levels and/or facilities	
as determined in Section 4.5	Section 4.5 defines appropriate organizational levels and/or facilities.
(e.g., headquarters/ region/ area/ field office managers, district managers, refuge/hatchery managers, park superintendents)	These are examples of management levels from appropriate organizational levels and/or facilities
to ensure that an EMS is implemented at their appropriate organizational level and/or facility.	Managers of an appropriate organizational level and/or facility are responsible for implementing an operational EMS at their organization and/or facility. They must ensure that their EMS conforms with the policy at the level above their organization/facility.
Also, managers of appropriate organizational levels and/or facilities are responsible for review and confirmation of the Declaration of Conformance as specified in Section 4.8 of this chapter.	Managers of appropriate organizational levels and/or facilities must ensure that their sites meet the terms of the Declaration of Conformance. The Declaration of Conformance is defined in Section 4.8 of this chapter.
4.7 Compliance.	
Compliance	Compliance is acting in accordance with all applicable local, state, or federal laws, regulations, statutes, and other requirements (i.e., E.O.'s).
is a key function of EMS.	EMS is a tool which, at a minimum, can be used to achieve and maintain

	compliance.
Where EMS exists at the appropriate organizational level and/or facility, environmental compliance reviews and audits, along with the elements of any environmental compliance management plan, will be incorporated into an EMS.	An EMS must include procedures which outline an approach for a bureau or office to periodically review their compliance status through audits. This procedure should also include a compliance review of all sub-agencies.
However, when no EMS exists, bureaus and offices must develop and implement environmental compliance management plans as defined in Section III of the CEQ Implementing Instructions and Requirements for E.O. 13423.	Where EMSs have not yet been implemented, bureaus or offices must establish an environmental compliance management plan that specifies how that bureau or office will maintain compliance. The required content of environmental compliance management plans are defined on page 9, Section III, Part B of the CEQ Implementing Instructions and Requirements for E.O. 13423. If organizational levels and/or facilities have an EMS, the elements of an environmental compliance management plan are incorporated as part of the EMS, and a separate plan is not required.
4.8 Declaration of Conformance.	
A declaration of conformance indicates that the EMS has been successfully developed and implemented.	A declaration of conformance is a written document which ensures that an EMS has been developed and implemented and is fully operational at the appropriate facility and/or organizational level.
The goal is to ensure that EMS implementation requirements under E.O. 13423 are based on credible evidence and findings regarding proper development and effective implementation of an EMS and that individuals declaring conformance are accountable for that statement.	The declaration of conformance must ensure that the EMS meets the requirements outlined in the "Clarification of Declaration of Conformance Requirements in Instructions to E.O. 13423, dated January 15, 2008, of Section II, Part C of the CEQ Implementing Instructions and Requirements for E.O. 13423, and as stated in this policy. Upon declaring conformance, a bureau and/or office must ensure that its determination of conformance is based on reliable, recorded data.
A fully implemented EMS must be maintained and improved on a continuing basis.	Despite a declaration of conformance, a bureau or office must continue to consistently review, maintain and improve its EMS.
If an EMS is no longer actively being	A declaration of conformance is no longer

implemented, then the facility or organization is no longer in conformance.	valid if an EMS is not consistently reviewed, maintained, implemented, and improved on at least an annual basis.
A. For the purpose of conformance to E.O. 13423, the EMS will be considered fully implemented upon completion of all of the following steps:	In accordance with E.O. 13423, the following three requirements must be met for an EMS to be deemed operational for purposes of conformance.
(1) The EMS has been the subject of a formal audit performed by a qualified independent auditor outside the scope or control of the EMS.	A qualified independent auditor must formally evaluate the EMS and document the resulting findings. The purpose of a formal audit by a qualified auditor outside the scope and control of the EMS is to allow an unbiased and objective review of the EMS to determine if it conforms to the appropriate/selected EMS framework and reflects the EMS as planned. To ensure that the audit is independent and objective, those conducting the audit should not have been involved in the development of the facility EMS or the day-to-day implementation of that 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. These audits may be conducted by other units in the same organization as the unit that is undergoing the audit. For example, a qualified headquarters audit team may review the EMS of a facility within that bureau or office, or qualified auditors from one facility may audit the EMS of another facility or region within that bureau or office. Others outside the control or scope of the EMS may include a qualified consultant/contractor or some other qualified unbiased party such as individuals from a state or voluntary program or from another Federal agency. [NOTE: A higher-tier EMS should be audited periodically by a qualified party from within the organization (also called an *internal* or *first-party* audit) to ensure

	its elements are carried out as planned, but need not be audited by a qualified party outside of the control or scope of the EMS as otherwise required by E.O. 13423 for facility and multi-site organizational EMSs. This exemption applies as long as the higher-tier EMS is designed to address a limited number of elements that support the implementation of complete, lower-level facility and/or multi-site organizational EMSs.] [NOTE: If a facility did not have the audit conducted by an auditor outside the scope of the EMS, that facility may state that the system was internally audited and findings shared with management as an indication of progress. However, that facility cannot formally declare conformance until the external audit has been conducted and recognized by the appropriate level of management in that facility.]
(2) Each audit finding has been identified and acknowledged along with a corrective action plan established by the appropriate managers of organizational levels and/or facilities responsible for implementation of the EMS.	Results of the audit must be reviewed and plans for correcting negative findings must be proposed by those in the bureau or office who are designated as responsible for maintaining the EMS.
(3) The appropriate managers of organizational levels and/or facilities responsible for implementation of the EMS has formally declared in writing conformance with all EMS requirements	Bureau or office managers must affirm in writing that their site meets all EMS requirements.
listed in Section 4.5 of this Departmental Manual Chapter,	EMS requirements were previously described in Section 4.5 of this chapter.
and Section II of the CEQ Implementing Instructions and Requirements for E.O. 13423.	EMS requirements are also outlined in Section II of the mandatory CEQ Implementing Instructions and Requirements for E.O. 13423.
B. Once conformance is declared, the EMS must be audited by a qualified independent auditor at least every three years from the date of the initial declaration.	The EMS must be evaluated by an auditor at least once every three years. This evaluation is not a determination of environmental compliance; rather, it is a process for obtaining audit evidence and objectively evaluating an EMS to determine the extent to which the EMS

	audit criteria set by the bureau and/or office is fulfilled.
Conformance declarations will be reviewed and reaffirmed annually by the manager responsible for the implementation of EMS at each appropriate organizational level and/or facility	Each year, conformance declarations will be reviewed, assessed and confirmed by managers of appropriate organizational levels and/or facilities to ensure that the conditions of conformance are continuing to be upheld at the bureau or office.
to confirm that an EMS is fully implemented and functional.	These yearly conformance declaration reviews are meant to ensure that the EMS continues to be formally evaluated, that resulting findings are being addressed appropriately, and that the EMS is being continually improved. [NOTE: Conformance declarations are not required for Higher-Tier EMSs since the scope of the Higher-Tier EMS does not necessarily encompass all of the EMS elements of the lowest level under it, just those best addressed and/or implemented at that higher level of the organization.]
4.9 Tenant, Contractor, and Concession Activities.	
A. Where tenant,	Tenants are individuals who pay rent to use or occupy land, a building, or other property owned by another.
contractor,	Contractors are individuals who work under a contractual agreement enforced by law.
and concession activities	Concession activities are contracted commercial services which are provided in order to assist a bureau or office in fulfilling its mission.
affect bureau or office environmental aspects or sustainable practices of its operations, those activities will be addressed in the development, implementation, and maintenance of the EMS at the appropriate organizational level and/or facility.	Any activities which contribute to a bureau or office's potential environmental impact and footprint will be considered when developing EMSs.
B. Where bureau or office units are located as tenants within a General Services Administration (GSA) owned facility,	Bureaus or offices can occupy sites owned by the General Services Administration (GSA).
the bureau or office will address coordination with the GSA as appropriate to control significant environmental aspects and further sustainable	If a bureau or office occupies a GSA owned site it must work cooperatively with GSA to decrease any potential

practices in support of the goals of E.O. 13423.	environmental impacts. However, it is the ultimate responsibility of the bureau or office to manage their own activities and to control their significant environmental aspects.
4.10 Training.	
Each bureau and office must ensure that personnel (including contractors and concession operators) who are responsible for, or who impact the environmental, receive the appropriate level of EMS training, as determined by the bureau or office,	Each bureau or office is responsible for conveying environmental information, including EMS, to its personnel, including contractors and concession operators. All personnel who may impact the environment must be trained on EMS according to their role, as per Section 3(c)(i) of E.O. 13423.
as well as any necessary refresher training	In addition to initial EMS training, personnel should receive annual refresher training.
on the goals of E.O. 13423.	All training should outline the goals of E.O. 13423.
4.11 EMS Implementation.	
A. Bureaus and offices that previously identified "appropriate facilities,"	
under the former E.O. 13148, "Greening the Government through Leadership in Environmental Management,"	E.O. 13148 required Federal agencies to develop EMS to ensure compliance with environmental requirements and laws. E.O. 13148 was revoked and replaced by E.O. 13423.
and were underway with EMS implementation, shall ensure that their EMS is fully implemented and maintained	If bureaus or offices already implemented or were in the process of implementing an EMS under E.O. 13148, then they should continue implementation and maintain their EMS.
in accordance with the provisions of Section II of the CEQ Implementing Instructions and Requirements for E.O. 13423.	However, a pre-existing EMS must meet the terms outlined in Section II of the mandatory CEQ Implementing Instructions and Requirements for E.O. 13423.
Any revision to EMS implementation for previously identified appropriate facilities requires the head of the bureau or office to submit an updated plan and schedule for EMS implementation to the Director, Office of Environmental Policy and Compliance for review and approval.	If a pre-existing EMS implementation plan is revised, the head of the bureau or office must submit an updated plan or report and schedule to the Director of OEPC. The Director of OEPC must review and approve the revisions and/or updates submitted.
B. Heads of bureaus and offices that had not identified "appropriate facilities" as described	

above	
shall ensure their EMS is fully implemented according to a plan and schedule submitted by the head of the bureau or office to the Director, Office of Environmental Policy and Compliance, for review and approval.	The heads of these bureaus or offices must propose plans and schedules to implement EMSs at their respective bureaus or offices and have them approved by the Director of OEPC.
The Director, Office of Environmental Policy and Compliance will then consult with the Office of the Federal Environmental Executive on any changes to schedules.	The Director of OEPC will discuss the proposal with the OFEE if any changes are needed to the overall DOI proposed EMS implementation schedule.
4.12 Performance Measures and Reporting.	
Bureau and office EMS implementation will be measured through the Office of Management and Budget Environmental Stewardship Scorecard,	A bureau or office's EMS implementation will be assessed through the DOI Internal Environmental Stewardship Scorecard. The DOI Internal Environmental Stewardship Scorecard is also used to report DOI-wide EMS information for the Federal Agency Environmental Stewardship Scorecard issued by the OMB during January and July of each year.
the Department's internal management review process,	The Department will use the Internal Environmental Stewardship Scorecard to do its own evaluation of EMS status and progress.
and the agency EMS report, requested annually by the Office of the Federal Environmental Executive and the Environmental Protection Agency.	Each year the OFEE and the Environmental Protection Agency require an update on implemented EMSs. All bureaus and offices will use FedCenter to centrally report required EMS data.

References:

Council on Environmental Quality, *Instructions for Implementing Executive Order 13423.* Federal Register, Volume 72, No. 116, Page 33504, June 18, 2007.

Executive Order 13423, *Strengthening Federal Environment, Energy, and Transportation Management.* Federal Register, Volume 72, No. 17, January 26, 2007.

International Standard ISO 14001:2004 (E), *Environmental management systems- Requirements with guidance for use.*

Office of the Federal Environmental Executive, *ESHMS Templates: <http://www.fedcenter.gov/programs/ems/eshms_guidance>*