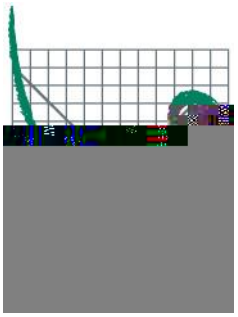
Keeping it Fresh

By: Mary Arndtsen, ERM



Most large companies would say they have a mature Environmental Health and Safety (EHS) program or governance structure. Yet no matter how developed we think our EHS programs or governance structures have become, the world is constantly changing, and so are our organizations. To keep our EHS governance programs effective and relevant, we have to keep them fresh.

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and expectations, how we communicate them, and how we assess and verify compliance with them.

Updating Your Risk Profile

Have you reassessed your organizations biggest risks lately? To keep EHS governance programs relevant, changes to your *Risk Profile*, including business, operational, compliance, and reputation risks, should prompt you to modify standards/expectations as well as your audit/verification program.

All types of change, regulatory, operational, organizational, warrant a fresh look at your Risk Profile.

1. Regulatory Change

This is a classic risk - have the regulations changed and how do we need to adjust to comply with those changes? But what about regulations that are in a gray area between EHS and some other function that bounce around because nobody wants to claim them?

A few examples of such regulatory structures to consider include:

- *Homeland Security*: Homeland Security regulations could apply to Security, Logistics, Shipping/Receiving, Facilities, or EHS. These regulations Ř 2 y˘ Ω ú Ŧ ƛ ú fy Ŝ ĭ ú ŝ ú r è ƛ y˘ ú 2 may be treated like regulatory parias - nobody wants them. Customs Trade Partnership Against Terrorism (C-TPAT) requires companies to identify security gaps and secure their supply chain. Chemical Facility Anti-Terrorism Standards (CFATS) requires facilities handling listed chemicals at defined thresholds to complete a Security Vulnerability Assessment (SVA) and implement a Site Security Plan (SSP) including relevant elements of the C-TPAT and CFATS requirements in the standards and expectations as well as the audit/verification process may not be in the scope of the EHS governance program.

- *DOT/IATA*: Department of Transportation (DOT) and International Air Transport Association (IATA) requirements are often included in EHS programs, but are typically delegated to the Shipping/Receiving Department. Expectations and standards as well as audit/verification programs may overlook training requirements and/or awareness for Sales or R&D personnel that want to package materials themselves, or someone else that wants to bypass the longer wait time that the S/R Department anticipates in order to meet DOT/IATA requirements.