TIER II – ENVIRONMENTAL ACHIEVER

The groundwork for Tier II is laid out in Tier I. Many of the activities that are incorporated in Tier II are expansions of Tier I components. Refer back to Tier I as necessary.

Expanding the EMS Team

Core Team

In Tier I the core EMS team was developed. Now that the EMS is growing more complex and encompassing more work, the core EMS team should be expanded. In this Tier it is important that the core team include a broad array of representatives from each key management functions, such as engineering, finance, human resources, production and/or service. Also consider those employees who have shown an interest in environmental performance and/or those employees who have time to learn and act. A cross-functional team can help to ensure that procedures are practical and effective, and can build commitment to and "ownership" of the EMS.

Team Leader

With a larger team in place, it is time to choose a team leader. From the core team of employees, choose the EMS team leader. Choosing an EMS team leader is critical. The leader should have the necessary authority, an understanding of the facility, and project management skills. The leader should be a "systems thinker", should have the time to commit to the EMS-building process, and must have top management support. The team leader serves as a leader for the EMS within the facility. Often in smaller organizations, this leader, among their many duties, is also the EMS management representative.

Management Representative

In addition, an effective management system needs an advocate. Thus, top management should appoint a management representative. This representative:

- Ensures that the EMS is established and implemented;
- Reports on its performance over time; and
- Works with others to modify the EMS as needed.

The management representative can be the same person who serves as the team leader, but this is not necessary. A business owner, facility or shop manager, or any number of other people might serve as an effective EMS management representative.

Once the team, team leader and management representative have been selected, hold a kick-off meeting to discuss the facility's objectives in implementing the next phase of the EMS, the steps that need to be taken, and the roles of team members among other

topics. If possible, get top management to describe its commitment to the EMS at this meeting. The kick-off meeting also is a good opportunity to provide some EMS training for team members. The team will need to meet regularly, especially in the early stages of the project. Communicate progress of meetings to all employees.

Gap Analysis

Knowing what parts of the system the facility already has in place will help in understanding the building blocks that need to be added. The facility may have many parts of an EMS already in place. An EMS implementation program starts with identifying where the gaps are between the facility's existing approaches to dealing with environmental issues and a fully functional EMS. This process of assessing the state of the facility's existing environmental program(s) relative to a set of criteria is called a Gap Assessment. Once the gaps are identified, a plan and approach for filling in the gaps can be formulated.

A checklist is provided that can be used to gauge the current state of a facility's approach to environmental affairs (Appendix H). Use the checklist not only to identify gaps now, but also to gauge the facility's progress over time in implementing its EMS (Appendix H). Many of the terms in the checklist may be unfamiliar now, but will become clear through the EMS implementation process.

After conducting a gap analysis for the facility, develop an action plan to tackle the gaps that have been identified. Based on a review of the results of the gap assessment, the team should develop a plan and budget based on their understanding of the different business units of the facility. The plan should describe in detail what key actions are needed, who will be responsible, what resources are needed, and when the work will be completed. Keep the plan flexible, but set goals. Think about how to maintain project focus and momentum over time. Look for potential "early successes" that can help to build momentum and reinforce the benefits of the EMS.

The plan and budget should be reviewed and approved by top management. In some cases, there may be outside funding or other types of assistance that can be used (trade association, a state technical assistance office, etc.). Next, think about *how* to put commitments into action. For example, the commitment to reduce solid waste may be achieved through a pollution prevention program and/or a program to design products or services that result in minimal waste generated by the consumer. Also, these programs may be implemented one at a time over a several-year period, as part of the commitment to continual improvement.

Environmental Aspects and Impacts

To plan for and control its environmental impacts, an organization must know what these impacts are. But knowing what the impacts are is only part of the challenge - a facility must also know where these impacts come from.

Terminology

As an initial matter, it is important to understand the definition of *aspect* and *impact.* An environmental aspect refers to an element of a facility's activities, products or services that can have an impact with the environment. Interaction is often described as having a beneficial or adverse effect. These interactions and the resulting effects may be continuous in nature, or periodic or only be associated with special events such as emergencies.

An environmental impact refers to any change in the environment whether adverse or beneficial, wholly or partially resulting from a facility's activities, products or services. Therefore, the aspect is the cause and the impact is the effect.

For example, a curing operation at a facility is an activity. The air emissions that result from the burning of wood to cure or smoke the meat are the environmental aspect, since the air emissions interact with the environment. One of the environmental impacts associated with (or caused by) that operation is air pollution, e.g., the air pollution from emission of particulates (dust). In a sense, an environmental aspect lies between an activity, product, or service and an impact. A facility's "operations" drive the environmental aspects, which in turn drive the environmental impacts.

A generalized approach to environmental aspect identification and evaluation involves the following tasks:

- Define the scope within which the environmental aspects and impacts will be identified i.e., the scope of the EMS (Tier I);
- Identify all activities, products, and services within the scope;
- Identify the environmental aspects associated with the activities, products, and services;
- Affirm that the facility's management has control and influence over aspects and determine the significance of the aspects and prioritize them accordingly; and
- Group the aspects according to some criteria to ensure that the number of aspects is manageable.

It is important to not get overly detailed in the process of identifying the aspects and impacts. Do this to a level appropriate for the business. Periodically take a step back while proceeding through the aspect and impact identification process to determine if

what's been identified is at the level of detail that would be needed to make a decision now or in the future to change how that aspect is managed.

Activities, products, and services may have one or more environmental aspects associated with them. Each aspect, in turn, may result in one or more environmental impacts (actual changes in the environment).

In understanding environmental aspects and impacts, it helps to understand the processes by which the facility generates products and services. The use of process flow diagrams that have been developed specifically for the facility is encouraged. Appendix J provides sample templates, which may be used for the identification of environmental aspects and impacts.

The general steps involved in this procedure include the following:

- Establish the boundaries within which the environmental aspects and impacts will be identified.

  This task should have been largely completed when the scope of the EMS was defined. The boundaries of the environmental aspect procedure must include all of the operations that are included within the EMS scope. This may be an important first step, especially for facilities which are engaged in multiple activities, like slaughtering, specialized meat processing, rendering or have their own water treatment and wastewater disposal operations.

- Identify the activities, products and services specific to the facility.
  'Activities, Products and Services' is a catchall phrase that was developed to capture all of the 'things" done at a facility. When trying to identify activities, products or services there probably will be issues found that do not obviously fall into any of these three categories. It is fairly common for an organization to identify aspects that are not activities it carries out, nor products it manufactures, nor services that it conducts. The important thing is that it can be determined if there are any associated known or potential environmental impacts that require consideration for those that have been identified.

Knowing these common environmental aspects, determine which activities, products or services at the facility, have a specific aspect associated with them. For example, for the aspect of generation of wastewater, identify all activities/products/services that result in wastewater being generated and those which also contribute to contaminant levels in the wastewater stream.

Then for each aspect, identify all impacts and potential impacts. This means whether the impacts happen continuously, once in a while or only on special occasions (Example: there is a process upset).

Sources in which to identify aspects for the facility may include some of the following:

- Employees;
- HACCP;
- Process Flow Chart;
- Process Hazard Analysis;
- Emission Inventory / Risk Assessment;
- Safety and Hazard Reviews; and
- Compliance and Pollution Prevention Audits.

The following listing identifies a number of possible sources of useful information for identifying and evaluating environmental impacts:

- HACCP Hazard Analysis: The Hazard Analysis and Critical Control Point process for identification of hazards requires detailed understanding of the process through the generation of flow diagrams and the development of a detailed understanding of all associated materials flows. Also the process of identification of hazards can be adapted and expanded for the purpose of considering environmental aspects and impacts.
- Process Hazard Analyses: Used to identify and assess potential impacts associated with unplanned releases of hazardous materials. This methodology is commonly used in OSHA Process Safety Management regulations. It typically employs team approach to identify and rank hazards.
- Failure Mode and Effects Analyses: Commonly used in quality field to identify and prioritize potential equipment and process failures as well as to identify potential corrective actions. Often used as a precursor to formal root cause analyses.
- Process Mapping is a process of identification of the various processes that are the core functions of an organization. By mapping the processes in detail and in inflows and outflows of materials, products and byproducts and noted. The HACCP process maps will provide an excellent starting point from which to identify related aspects and impacts.
- Life Cycle Assessments: Used to assess full range of impacts from products, from raw material procurement through product disposal. These methodologies are somewhat subjective and can be resource intensive.
- Risk Assessments: Used to assess potential health and/or environment risks typically associated with chemical exposure. Varieties of qualitative and quantitative methodologies are commonly used.

- Project Safety / Hazard Reviews: Used to assess and mitigate potential safety hazards associated with new or modified projects. This methodology typically does not focus on environmental issues.
- Emission Inventories: Used to quantify emissions of pollutants to the air. Some data may already be available to the organization, based on EPCRA requirements and CAA Title V permitting program.
- Pollution Prevention or Waste Minimization Audits: Used to identify opportunities to reduce or eliminate pollution at the source and to identify recycling options. Requires fairly rigorous assessment of facility operations. Does not usually examine off-site impacts.
- Environmental Property Assessments: Used to assess potential environmental liabilities associated with facility or business acquisitions or divestitures. Scope and level of detail is variable. This does not assess impacts associated with products or services.

Identify and assess environmental aspects that the organization can control and over which it can have an influence. An organization is not expected to manage issues outside its sphere of influence or control.

To identify and assess aspects that the facility can control, first determine if it is within the 'scope' of the EMS implementation. Then determine if the facility has 'management control' over it. If the facility does not have management control over it, determine the level of 'influence' it does have over it. Determinations of 'control' and 'influence' will affect the objectives set in relation to a given aspect.

The process of identifying and setting priorities among environmental aspects is one of the key drivers of an EMS. Most organizations find the process of identifying aspects and impacts time consuming if they have not previously developed the methodologies and expertise needed to understand all of the environmental impacts associated with all facets of their operations.

Ensure that the number of aspects carried forward for further analysis is manageable. A grouping scheme is commonly used to accomplish this. Grouping of aspects is conducted before the determination of significance.

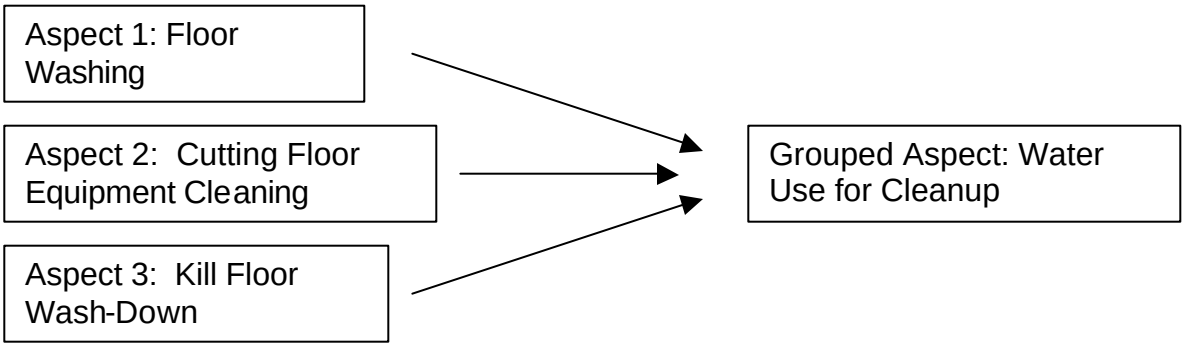
The first level of organization of aspects should be the categories defined on a practical level for the facility. Use categories that fit with the way the facility works. All aspects should be placed in one of these categories, which can accommodate any number of individual aspects. Match the categories with the way the facility is operated, and where possible, use terminology the majority of staff are familiar with.

Examples:

A facility that has different operating areas (kill floor, processing, and storage) might wish to first categorize aspects along these lines so that when it comes time for programs they are aligned with the operating areas, or where work is performed by various trades or job skill categories; aspects categorized by cleanup crew activities versus production may be appropriate.

Similar aspects arising from several distinct activities, products, or services should be grouped into one aspect. In cases in which one existing system is used to manage impacts arising from a number of aspects or functional areas yielding similar aspects, the aspects should be combined into one group (See Figure 4).

Figure 4: Grouping of Aspects



Be sure that when aspects are grouped, areas where impacts occur and the sources of the impacts are not lost. If, for example, all hazardous wastes at the facility are collected and disposed of the same way, then these aspects should be combined into one group. In this example, it is important to first identify all of the sources of hazardous waste generation, so that when it comes time to manage them, they are not missed. It is not advisable (or acceptable from an EMS perspective) to assume that just because such a program exists that it was designed to include all of the hazardous waste streams.

Energy use is a good candidate for aspect grouping. It might be effective in some circumstances to combine all the process steps having energy aspects, and develop a facility-wide strategy and program for achieving improvement. Understand, however, that the energy aspect should be ranked in each process step to determine its relative importance in that step. For example, energy use in office work might be a different priority than energy use in a manufacturing step. In addition, standards and procedures developed to reduce energy use would possibly be different for each process step. Consequently, although certain efficiencies might be achieved through a facility-wide effort, the actual environmental improvement will be attained through objectives set for each process step.

Once the facility's environmental aspects are fully identified and placed into manageable categories, the next step is to identify those that are significant and which therefore need to be managed. An aspect is considered significant if it has or may have a significant impact on the environment. Since the aspect is the cause and the impact is the effect, focus on reducing the effects by ranking and prioritizing which causes to focus efforts on. For example: If five separate processes were identified around the facility (aspects) with air pollution impacts and ten that have water pollution impacts, the facility needs a process to decide on which of the aspects that result in these impacts, will be focus of the efforts at prevention of pollution. The management will want to spend its limited resources in the most effective way.

Managing the environmental aspects consists of plans to achieve prevention of pollution, compliance and continual improvement, which will often be as unique as the operation. The ranking and prioritization process, which is called determination of significance, is intended to identify significant environmental aspects associated with activities, products, or services, and is not intended to require a detailed life-cycle assessment. Evaluating each product, component, or raw material input is not necessary. You may instead select categories of activities, products or services to identify those aspects most likely to have a significant impact.

Every facility is unique and therefore the rationale behind where to put the greatest emphasis in environmental management programs is also unique. Depending on how the facility has defined its process for identification of HACCP critical control points, may provide building blocks and ideas on approaches for determining the facility's significant aspects.

The following is an example of a procedure that can be used to identify significant environmental aspects. It is recommended that the EMS Team consider this procedure as a starting point to develop its own customized procedure.

Example Significance Procedure 1

The significance of environmental aspects is determined by subjecting each grouped aspect to a screening process (yes/no filters) in the sequence given below. When determining significance consider whether the impacts of concern happen continuously, once in a while or only on special occasions (Example: there is a process upset).

Screen 1: Regulatory Requirements

This screen identifies those environmental aspects that are subject to legislation and regulation (including permit requirements and regulatory agreements), but are not being met. [Not being met being defined in this case as the existence of a known non-compliance (continuous or intermittent) or the organization is currently unable to confirm

if it is or is not in compliance]. These aspects are considered significant. If the environmental aspect is not subject to any regulatory requirements, it may still be considered significant at Screen 2.

Many existing environmental programs keep the facility in compliance with regulatory requirements. This first screen is based on the state of the facility at the time of the assessment of significance. When determining significant aspects look for areas where a new program might be needed or additions to an existing one to ensure compliance.

Screen 2: Unique Value System of the Company

This screen identifies those environmental aspects deemed a priority based upon the value system of the company. The value system is unique to the facility and may include:

- Corporate commitments and requirements,
- Financial operational and business requirements,
- Aspirations and initiatives that are designed to move the organization towards a "triple bottom line" approach (economic prosperity + social well being + healthy environment); and
- Views of interested parties such as stockholders, community groups, regulatory agencies, environmental groups, etc.

Environmental aspects, which are considered a priority based upon the facility's value system, would be considered significant. If the aspect is not considered to be significant at this stage, it may still be at Screen 3.

This type of screen allows the determination that regardless of other factors the aspect is significant. For example, if recycling wooden pallets is important to the facility and they want an environmental management program for it, make it significant although the other screens (regulatory and risk) would not make it significant. However, it does not allow for over-riding a finding of significance indicated by the other screens.

Screen 3: Risk Ranking

Aspects that have not been identified as significant by Screens 1 or 2 undergo risk ranking to determine if they pose a risk unaccounted for in previous screens, and are significant aspects on this basis. In the risk ranking process, a single, numerical risk rating (between 1 and 25) is calculated for each aspect at this stage.

Based on this rating, an aspect is classified as either significant (equal to or more than N points) or non-significant (less than N points). Again, the value of N must be selected by the facility in advance of applying the risk ranking. For this ranking scheme consider a minimum value of 9 and a maximum value of 15. For the first analysis of significance

it is recommended that you start with a value 12 for N and evaluate all of the aspects with this level of screening.

Over time a facility can drive continuous improvement into its EMS by decreasing the risk ranking score (the value of N) at which it defines an aspect as significant.

The risk rating for the aspect is the product of the two variables Consequence and Relative Probability, where Consequence (assigned a value of 1 to 5) refers to the consequence of the aspect in terms of the magnitude of the associated impact, and Relative Probability (assigned a value of 1 to 5) refers to the likelihood of occurrence of the impact associated with the aspect. To add consistency into the risk ranking process, use a committee and keep records of the reasoning behind the consequence and probability rankings you assign.

Consequence Rating: Two impact attributes are considered for the assignment of Consequence values.

- Impact intensity, and
- Geographic extent and duration.

Impact intensity is considered the more important of these two and is assigned values of: 1 for low; 2 for moderate; 3 for high or 4 for very high. The intensity of the impact is a measure of the severity of the damage. Using air pollution as an example, a low intensity impact would be visible emissions with perceived public nuisance, moderate intensity would be some reduced visibility with air pollution, and high intensity would be excessive reduced visibility and/or public nuisance and very high intensity would be exceedance of regulatory and/or other standards.

Geographic extent and duration are considered together and are assigned values of: 0 if low or 1 if high. Low geographic extent and duration would be an impact in the immediate vicinity or neighborhood of the facility or one that does not have a lasting effect. For example: noise. A high extent might be water contamination that travels downstream in a river (e.g., an oil spill will leave the soil contaminated for years).

The intensity and geographic extent and duration values are added to obtain the overall Consequence rating as shown below:

1 - Negligible impact (Low intensity, Low extent and duration: 1 + 0 = 1)
2 - Minor impact (Low intensity, High extent and/or duration: 1 + 1 = 2), or
(Moderate intensity, Low extent and duration: 2 + 0 = 2)
3 - Moderate impact (Moderate intensity, High extent and/or duration: 2 + 1 = 3), or
(High intensity, Low extent and duration: 3 + 0 = 3)

4 - Major impact (High intensity, High extent and/or duration: 3 + 1 = 4), or
(Very high intensity, Low extent and duration: 4 + 0 = 4)

5 - Massive impact (Very High intensity, High extent and/or duration: 4 + 1 = 5)

Relative Probability Rating

The Relative Probability rating of a specific aspect is based on the frequency of occurrence rather than on the duration of the associated impact. The rating is assigned using the scale shown below:

1 - Unheard of in the meat processing sector

2 - Suspected or known to occur in the sector

3 - Incident has occurred at the facility

4 - Occurs several times per year at the facility (For example: up to 3 times a year historically)

5 - Occurs regularly at the facility (For example: once a month or more)

The overall risk rating of an aspect is determined by multiplying the Consequence rating by the Relative Probability rating. Table 2 illustrates all possible risk ratings and, for illustrative purposes, highlights those that are greater than or equal to 12. In this example, aspects with a rating of 12 or more are considered significant, and aspects that have a rating of less than 12 are considered to be non-significant.

Table 2: Risk Rating Matrix

	Relative Probability				
Consequence	Unheard of in sector	Suspected or known to occur in sector	Has happened at facility	Occurs several times/ year at facility	Occurs regularly at facility
Negligible	1	2	3	4	5
Minor	2	4	6	8	10
Moderate	3	6	9	12	15
Major	4	8	12	16	20
Massive	5	10	15	20	25

Some organizations might decide to have additional screens before an aspect is considered to be non-significant. Organizations may have as many as 6 or 7 "triggers" where if any of the present conditions are met with respect to a particular aspect then it

is automatically considered significant. Adding more screens has the effect of potentially a greater number of aspects being considered as significant.

The consequence rating is derived based on subjective assessments of intensity and extent or duration of the impact (High, Moderate, etc. are terms that mean different things to different people). As a result, it is wise to consider a team approach to determining scores in risk ranking. In addition, retain records of how the analysis was conducted. If the scores determined for the aspects were recorded along with rationale/comments for choosing these scores, this process may be duplicated in the future with a greater degree of consistency.

A template form for significance determination can be found in Appendix K.

Legal and Other Requirements

Once the activities, products, and services and associated environmental aspects and impacts have been identified, consider legal and other requirements related to these aspects and impacts. It is recommended that a listing of activities, products, services and environmental aspects and impacts first be developed and then examine legal and other requirements related to these, rather than first assessing the legal/other requirements and then coming up with a listing of environmental aspects and impacts.

Legal requirements:

Do environmental rules of the legal jurisdiction(s) in which the facility operates apply to the facility's activities, products and services, aspects and impacts?

- Federal statues and regulations;
- State and local regulations;
- Standards in locations where the company sells products/services; and
- Permit conditions.

Other requirements might include, for example:

- Company-specific codes, and
- Other industry codes or programs to which the facility voluntarily subscribes

The facility's EMS should include a procedure for identifying, having access to, and analyzing applicable legal and other requirements. Appendix B provides a good starting list of Federal requirements to consider.

The first step will be to obtain information about applicable laws and regulations, their interpretation, and how they impact the operations. These tasks however can be very time-consuming. Fortunately, there are many methods to obtain information, including:

- Information from corporate headquarters;
- Commercial services (with updates offered on-line, on CD-ROM or in paper form);
- Regulatory agencies (federal, state and local);
- Trade groups/associations;
- The Internet;
- Public libraries;
- Seminars and courses;
- Newsletters / magazines;
- Consultants and attorneys; and
- Customers, vendors and other companies.

In order to consult and analyze these requirements on a regular basis, either obtain a physical copy of the requirements or have an alternative method to access them. Alternative methods of access could include a subscription to an electronic service that sends you updated regulatory information on a regular basis, Internet access, or any other method that allows such consultation.

Once the requirements that apply to the facility have been established, the environmental programs should identify what tasks need to be performed to ensure compliance with those requirements. There is a practical reason for such programs—the knowledge that a requirement exists is of little use unless it is translated into a specific action that can be assigned to an individual to accomplish.

Once applicable requirements have been identified and analyzed for potential impacts, communicate these requirements (and plans for complying with them) to employees, on-site contractors and others, as needed. Communicating "other applicable requirements" (as well as their impacts on the facility) is an important but often overlooked step. Communications programs are discussed in other sections of the document. As with many EMS elements, this is not a "one time" activity. Since legal and other requirements change over time, the process should ensure that information is up-to-date.

9 Possible Environmental Practices

In an effort to help facilities begin to reduce their environmental impacts, a list of environmental practice categories has been developed. Facilities should consider adopting these environmental practices as part of their Tier II EMS development.

1. Adopt water conservation activities
2. Adopt energy conservation activities

3. Adopt activities to reduce wastewater discharges
4. Adopt activities to reduce air emissions
5. Adopt activities to reduce odor
6. Adopt activities to reduce hazardous waste generation
7. Adopt activities to reduce solid waste generation
8. Adopt toxic materials reduction goals
9. Adopt additional pollution reduction activities (e.g. noise, land use, transportation, dust)

External Communication

In Tier I an internal communication plan was developed. In this tier develop an external communications plan. It is particularly important to communicate with the community in which you operate. Effective environmental management requires effective communications externally.

To reiterate the definition used in Tier I, external communication consists of written or electronic correspondence, complaints or regulatory inquiries about environmental practices. Telephone conversations and oral discussions or meetings (relating to facility environmental practices) with anyone not directly employed by the company (including regulatory agencies, environmental groups, and neighbors). This includes, soliciting, receiving, documenting and responding to external communications; and working with stakeholders.

External stakeholders are anyone who has an interest in the company's environmental performance. External stakeholders can play an important role in helping the facility develop an EMS. Customers, suppliers, and neighbors can provide useful input. In addition, establishing partnerships with trade associations, suppliers, professional associations, and community colleges can be very helpful in developing parts of the EMS.

Almost every organization will have a wide array of internal and external groups that may be interested in and helpful partners to that organization. These groups will not be homogenous. Each will have its own priorities and perspectives, and each will have something different to contribute in support of the EMS. Start with those stakeholders who have expressed interest in the operations. Find additional input by contacting the following sources in the effort to locate suitable stakeholders. Ask the facility's own employees, including facility/site managers and public relations personnel or contact local officials for suggestions. Contact local schools, community colleges, or universities; or contact a national advocacy group to elicit suggestions as to which local or national groups may be interested/suitable.

Forming partnerships with customers and suppliers can help to identify shared concerns and ways to cooperate to resolve them. There may be ways that the company can help

the customers meet their environmental management needs. Forming partnerships with suppliers can help the company obtain important information and may help meet the EMS goals.

The following list provides types of external stakeholders:

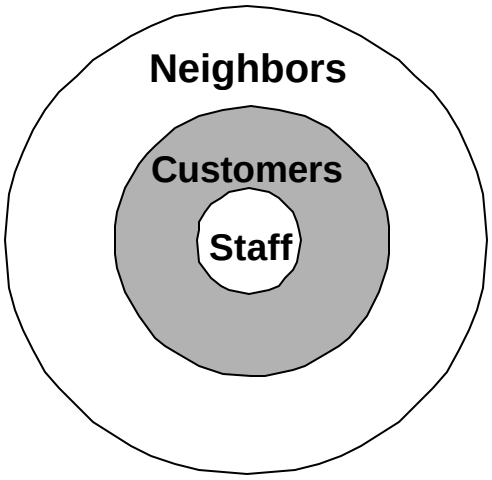
- Neighbors
- Community organizations
- Environmental Groups
- Larger Companies
- The Media
- Local government
- Regulator
- Shareholders
- Customers
- Suppliers
- Investors & Insurers
- Trading Partners
- Corporate HQ

The next stage of the process is to establish dialogue with stakeholders. This can be viewed as an opportunity to further refine the understanding of the various interests of the groups. Start by sharing the environmental policy statement with the public. Develop stakeholder participation in stages and learn along the way. Think about the different kinds of stakeholders as forming ever-broader circles around the business (Figure 5). Begin with the innermost circle and work outward.

Point of Contact

In dealing with and managing feedback from these external parties, each facility should also designate a point of contact who has direct assess to facility management and who can effectively response and react to an inquiry from the public. When any form of communication is received from the facility regarding environmental performance or management from an external party member, that communication should be immediately forwarded to the contact person. This individual will then consider the nature of the communication and make a decision on whether and how to respond to the communication.

Figure 5: Levels of Stakeholder Interest



Examples of methods for communicating externally are given below.

- Open houses
- Focus or advisory groups
- Web site or e-mail list
- Press releases
- Annual Reports
- Advertising
- Informal discussions
- Attending community meetings

This concludes Tier II – Environmental Achiever in the Environmental MAPS program. Facilities that have completed Tier II should now have an expanded EMS team, have conducted a gap analysis, identified and prioritized environmental aspects and impacts and developed and external communication plan. Tier II facilities should also have adopted five to nine of the recommended environmental practices from the provided list. Once a facility is comfortable that they have understood all the components of Tier II, that facility is encouraged to begin work on Tier III – Environmental Pioneer.