



# United States Department of the Interior

OFFICE OF THE SECRETARY  
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## PEP – ENVIRONMENTAL COMPLIANCE MEMORANDUM NO. ECM04-2

To: Heads of Bureaus and Offices

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

Subject: Department of the Interior Environmental Management Systems Self-Declaration Protocol for Appropriate Facilities

The requirements of this Environmental Compliance Memorandum (ECM) are issued under the authority provided to the Office of Environmental Policy and Compliance (OEPC) by 381 Departmental Manual (DM) Chapter 4.5B, to convey instructions and guidance through its Environmental Memoranda Series; 515 DM 4, "Environmental Management Systems" and ECM03-02, "Department Environmental Management Systems (EMS) Council."

Self-declaration protocols outline procedures for ensuring the credibility of Bureau and office EMS's for their appropriate facilities as set forth by the EMS Self-Declaration Protocol memorandum issued by the Office of the Federal Environmental Executive (OFEE) on January 27, 2004, and under the authority of Executive Order 13148, Greening the Government Through Leadership in Environmental Management. EMS self-declaration is more than an internal EMS evaluation. It is the declaration made to outside parties verifying that a facility's EMS is in place and current. Self-declaration protocols are designed to satisfy the following principles:

- Result in accurate and reliable information on Bureau and office facilities' progress as they adopt improved practices associated with EMS implementation.

Focus responsibility for initial EMS verification and on-going quality assurance at the Bureau and office level.

- Provide Bureaus and offices with sufficient flexibility to implement EMS in ways that support their missions.
- Provide a means for verifying the status of a facility EMS, and appropriately communicating that status to internal and external entities.
- Ensure that EMS verification is more than a documentation review, and that the effectiveness of EMS implementation is reviewed.

- Use existing EMS elements where possible so that self-declaration becomes an integral part of the bureau or office EMS.

Examples of self-declaration protocols may be found on the OFEE website at:  
<<http://www.ofee.gov>>.

Regardless of the EMS model (e.g., Code of Environmental Management Principles, ISO 14000, etc.) that Bureaus and offices use, the following requirements for EMS self-declaration must be met:

- At a minimum, internal EMS reviews will be conducted annually.
2. Bureaus and offices shall establish qualifications and training requirements for internal and external EMS reviewers.
  3. External reviewers shall mean reviewers from outside the scope of the EMS in question (e.g. reviewers from another bureau/office). However, for purposes of this ECM, reviewers may still be from inside the same Bureau or office but must be outside the covered EMS.
  4. External reviews will be conducted, at a minimum and where appropriate, every 3 years to determine the effectiveness of EMS implementation.
  5. Bureaus and offices shall include appropriate guidance to ensure that facilities desiring to participate in a federal or state EMS recognition program (e.g., National Environmental Performance track, Oregon Green Permits Program, New Jersey Silver Environmental Performance track, etc.) reflect the respective requirements in their self-declaration procedures. Bureaus and offices may also adopt other EMS recognition programs (e.g., International Standards Organization, National Sanitary Foundation, etc.). Such EMS recognition obtained by a facility will be considered as fulfilling the requirements of EMS self-declaration so long as the EMS recognition remains current.
  6. Bureaus and offices must establish a means to ensure how Bureau/office facilities will proclaim their EMS status to the Head of the Bureau/office. Furthermore, Bureaus and offices must transmit to OEPC the following statement signed by the Head of the Bureau/office:

“As the (Head of Bureau/office), I certify that the following list of Bureau/office facilities have environmental management systems in place. Furthermore, I certify that all provisions of the Bureau/office EMS criteria have been completed and were reviewed by me and Bureau/office senior level management.”

This statement will become part of the submission of the Bureau and office annual Calendar Year Executive Order 13148 Report. The Department EMS Council will periodically review the progress of Bureaus and offices on their EMS implementation.