

US EPA ARCHIVE DOCUMENT

## **MANAGEMENT REVIEW**

### **Background and Exhibits**

Just as a person should have periodic physical exams, your EMS must be reviewed periodically to stay “healthy.” Management reviews are critical to continual improvement and to ensure that the EMS will continue to meet your facility’s needs over time.

The goal of the review should be to allow management to bring about overall improvements. The scope and frequency of the review should depend upon the size and complexity of the facility and other factors that are determined relevant in each organization.

### **Establish a Senior Management Review Process**

To maintain continual improvement, suitability, and effectiveness of your EMS, and thereby its performance, your facility’s top management should review and evaluate your EMS at defined intervals, such as quarterly.

The scope of the review should be comprehensive, though not all elements of your EMS need to be reviewed at once. The review process may take place over a period of time. Review of the policy, objectives, and procedures should be carried out by the level of management that defines them. Some items to include in the management review include:

- Results from assessments;
- The extent to which objectives and targets have been met;
- The continuing suitability of the EMS in relation to changing conditions and information; and
- Concerns among relevant interested parties.

Questions for management to consider include:

- Is our environmental policy still relevant to what we do?
- Are roles and responsibilities clear and do they make sense?
- Are we applying resources appropriately?
- Are we meeting our regulatory obligations?
- Are the procedures clear and adequate? Do we need others? Should we eliminate some?
- What effects have changes in materials, products, or services had on our EMS and its effectiveness?
- How effective are our measurement and assessment systems?
- Can we set new measurable performance objectives?
- Do changes in laws or regulations require us to change some of our approaches?
- What stakeholder concerns have been raised since our last review?
- Is there a better way? What else can we do to improve?

Create a continual improvement plan and check progress. Document observations, conclusions, and recommendations for necessary action. Assign action items for follow-up and schedule the next regular review. The Management Review Record

(EF-006.01) provided in ***Exhibit 18-2: Procedure for Environmental Management System Management Review (EP-006)*** can be used to document your management review and assign action items for follow up.

Management reviews also offer a great opportunity to keep your EMS efficient and cost effective. For example, some facilities have found that certain procedures and processes initially put in place were not needed to achieve their environmental objectives or to control key processes. If EMS procedures and other activities don't add value, eliminate them. The key question that a management review seeks to answer is, "Is the system working (i.e., is it suitable, adequate, and effective, given our needs)?"

Here are some things to think about to expedite the development of your facility's management review process:

- Involve two kinds of people in the management review process: people who have the right information/knowledge about the EMS; and people who can make decisions about the organization and its resources (top management).
- Determine a management review frequency that will work best for your facility. Some facilities combine these reviews with other meetings (such as director meetings). Other facilities hold "stand-alone" reviews. At a minimum, consider conducting management reviews at least once per year.
- Make sure that someone records what issues were discussed, what decisions were made, and what action items were selected during management review meetings. Results of management reviews should be documented. Use the Management Review Record (EF-006.01) to document management reviews.
- Use management reviews to assess how changing circumstances might influence the suitability, effectiveness, or adequacy of your EMS. Changing circumstances might be internal to your facility (such as new raw materials, changes in products or services, new customers, etc.) or might be external factors (such as new laws, new scientific information, or changes in adjacent land use).
- Ensure that someone follows up after documenting the action items arising from your management review. Progress on action items should be tracked to completion.
- Consider other organizational plans and goals as you assess potential changes to your EMS. In this way, environmental decision-making can be integrated into your overall management and strategy.

Refer to ***Exhibit 18-1: Summary Checklist*** for a set of steps that can help you develop and maintain your management review process. ***Exhibit 18-2: Procedure for Environmental Management System Management Review (EP-006)*** and its supporting form defines the process for the periodic review and evaluation of the environmental management system by top management.

**Exhibit 18-1: Summary Checklist****MANAGEMENT REVIEW**

Step 1: Top management must review the EMS at regular intervals to ensure its continuing suitability, adequacy, and effectiveness. The management review addresses the possible need for changes to the policy, objectives, and other elements of the EMS in light of EMS audit results, changing circumstances, and the commitment to continual improvement. This review must be documented. Capture your approach to periodic review and evaluation of your facility's EMS by top management in a written procedure. *Exhibit 18-2: Procedure for Environmental Management System Management Review (EP-006)* and associated Form EF-006.01, Management Review Record, provide templates. This optional procedure should define: responsibilities and authorities for preparing for and conducting reviews; frequency; and processes used to capture and track actions that result from the review. Include this customized procedure in your EMS manual (see *Exhibit 10-3: EMS Manual*).

**Exhibit 18-2: Procedure for Environmental Management System Management Review (EP-006)****1.0 Purpose/Scope**

This procedure defines the process for the periodic review and evaluation of the [Facility's Name] environmental management system by top management to ensure its continuing suitability, adequacy, and effectiveness.

**2.0 Activities Affected**

All areas and departments

**3.0 Forms Used**

3.1 Management Review Record (EF-006.01)

**4.0 References**

- 4.1 Procedure for Environmental Aspects, Objectives and Targets, and Programs (EP-003)
- 4.2 Procedure for EMS and Regulatory Compliance Audits (EP-017)
- 4.3 Procedure for Corrective and Preventive Action (EP-015)
- 4.4 Procedure for Identification of Legal and Other Requirements (EP-001)
- 4.3 Procedure for Monitoring and Measurement (EP-009)
- 4.5 ISO 14001:1996, Element 4.6

**5.0 Definitions**

None

**6.0 Exclusions**

None

**7.0 Procedure**

- 7.1 The Facility Manager and top management shall conduct a review of the environmental management system at least once each year.
- 7.2 Management review meetings shall be scheduled in advance by the Environmental Management Representative (EMR) and an agenda issued to ensure appropriate preparation and attendance.
- 7.3 The meeting shall review all applicable components of the [Facility's Name] EMS. The EMR shall present information for review and concurrence, which may include, but not be limited to:
  - Environmental Policy
  - Environmental Aspects
  - Objectives and Targets and Programs
  - Legal and Other Requirements
  - Training, Awareness, and Competence
  - Operational Control
  - Emergency Preparedness and Response
  - Monitoring and Measurement
  - Nonconformance and Corrective and Preventive Action
  - Environmental System and Regulatory Compliance Audits

- 7.4 The Facility Manager and top management shall review and confirm their approval and the continual suitability, adequacy and effectiveness of the environmental policy, environmental objectives and targets, environmental management programs, and other elements of the system as well as confirm that regulatory compliance requirements are met.
- 7.5 The EMR, or designee, will publish and maintain meeting minutes identifying issues discussed and corrective and preventive actions to be taken. Required actions will be assigned to the responsibility of process, area, and functional management.
- 7.6 Timely decisions will be made.

**8.0 General Rules**

None

**9.0 Records**

Records shall be retained consistent with the Procedure for Environmental Records (EP-005).

**Record of Revisions**

Revision	Date	Description	Sections Affected

EMS Management Review Record	
Date of review meeting:	
People present at meeting:	
Name:	Position:
Conclusions:	
Actions to be taken:	Person(s) responsible:

Environmental Management Representative

Facility Manager