

## Department of the Interior Departmental Manual

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**Series:** Environmental Quality Programs

**Part 515:** Environmental Management

**Chapter 4:** Environmental Management Systems

**Originating Office:** Office of Environmental Policy and Compliance

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### 515 DM 4

**4.1 Purpose.** This chapter sets forth the Department of the Interior's (Department) requirements for an environmental management system (EMS) which shall function as a performance management system to implement, track, and achieve the Federal Government's environmental and sustainability goals and targets as adopted by the Department's Sustainability Council. The EMS will serve as the operating framework to implement and monitor progress and manage and communicate environmental, sustainability, and other related program goals to internal and external stakeholders and drive continual improvement of environmental and sustainability performance.

**4.2 Scope.** This policy applies to the Department Bureaus and Offices, as defined below, at all appropriate organizational levels.

A. This Chapter in its entirety applies to 10 Bureaus and the Office of Facilities and Administrative Services (OFAS). "Bureau" refers to Bureau of Indian Affairs, Bureau of Indian Education, Bureau of Land Management, Bureau of Ocean Energy Management, Bureau of Reclamation, Bureau of Safety and Environmental Enforcement, U.S. Fish and Wildlife Service, National Park Service, Office of Surface Mining Reclamation and Enforcement, and U.S. Geological Survey.

B. All other "Offices" under the Office of the Secretary's Office of Policy, Management and Budget shall contribute to the objectives of the Department's EMS as defined in 4.6 Objectives and support the EMS as described 4.7 Roles and Responsibilities, but are not subject to requirements listed in 4.9 Requirements.

**4.3 Authority.**

A. 42 U.S. Code § 17144 - *OMB Government efficiency reports and scorecards*, December 2007.

B. The White House Council on Environmental Quality, *Implementing Instructions for Executive Order 14057, Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*, August 2022.

#### 4.4 Definitions.

A. Appropriate Organizational Level. As determined by a Chief Sustainability Officer (CSO), the organization or facility level(s) with management functions appropriate for EMS implementation and maintenance.

B. Chief Sustainability Officer. Designated Bureau and OFAS environmental leader in charge of environmental programs and responsible for the organization's sustainability objectives and initiatives, including communication, reporting, and performance evaluation.

C. Compliance Obligations. Requirements that are directly attributable to the environmental aspects of an organization's activities, operations, products, and services. Requirements include, but are not limited to, laws and regulations promulgated and enforced by Federal, state, tribal, or local government authorities, Executive Orders, court orders, and other requirements to which the organization subscribes. Also known as "legal and other requirements."

D. Continual Improvement. Recurring activity to enhance environmental performance.

E. Corrective Action. An action to address and eliminate the root cause of a detected non-conformity or non-compliance and prevent recurrence.

F. Environmental Aspect. An element of an organization's activities, operations, products, and services that does or could interact with the environment that the organization can control or influence. Environmental aspects often result from the use of resources, releases to the environment, or the generation of waste.

G. Environmental Compliance. The act of complying with environmental laws, regulations, standards, and other requirements governing Department and Bureau activities and operations.

H. Environmental Impact. Any change to the environment, whether adverse or beneficial, wholly, or partially resulting from environmental aspects.

I. Environmental Justice. The fair treatment and meaningful involvement of all people regardless of income, race, color, gender, national origin, Tribal affiliation, or disability, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

J. Environmental Management System (EMS). A management approach and planning tool to address the environmental aspects of an organization's activities, operations, products, and services that have potential environmental impacts. Following a recognized best management practice, an organization's EMS may be based on the International Organization for Standardization (ISO) 14001, *Environmental management systems – Requirements with guidance for use* and ISO 14004, *Environmental management systems – General guidelines on*

*implementation.* These standards help organizations manage and improve environmental performance and regulatory compliance through an iterative ‘Plan, Do, Check, Act’ (PDCA) model that incorporates the concept of continual improvement. Full conformance with ISO 14001 and 14004 is not required.

K. Environmental Objective. A statement of an environmental goal consistent with the environmental policy that Department Bureaus and OFAS commit to achieve. It is expressed as a desired outcome or accomplishment.

L. Environmental Target. A detailed performance requirement that needs to be met to achieve an objective. Targets are specific and measurable requirements with due dates assigned. Targets include those set by Bureaus and OFAS to achieve their specific objectives (i.e., to implement operational controls to prevent or mitigate negative environmental impacts), those originating with Federal sustainability requirements, and Department sustainability goals as established by Secretarial Order and the Department’s Sustainability Advisory Group.

M. Office of Management and Budget (OMB) Scorecard. A report issued by OMB for Federal agencies to complete, indicating the status of government energy efficiency and other Federal sustainability goals. By statute, the Director of OMB is required to publish agency progress and scorecards on Federal agency performance on energy efficiency and sustainability. The OMB issues the scorecard to agencies, which is completed at the Department level.

N. Preventive Action. An action taken to prevent the occurrence of a non-conformance or non-compliance.

O. Shall. Indicates a requirement.

P. Significant Environmental Aspect. Aspects that have or can have significant impacts on the environment as defined by the appropriate organizational level. For example, there are Federal sustainability goals and targets established for significant environmental aspects including energy use, water use, fleet management, etc.

Q. Sustainable Practices. Activities implemented to reduce or eliminate negative impacts to the environment and ensure use of resources in a manner that does not deplete or damage them. Sustainable practices contribute to sustainable development by meeting the needs of the present without compromising the ability of future generations to meet their needs. Examples of sustainable practices can include (but are not limited to): purchasing environmentally friendly products; conserving water, energy, and other resources; using renewable energy and other renewable resources; pollution prevention; reducing toxic substances; reducing and controlling the emissions of greenhouse gases; electronic stewardship; constructing energy-efficient facilities or retrofitting existing facilities; addressing legacy pollution and including “green remediation” technology in contaminated site cleanup responses; and recycling.

R. Sustainability Organizational Assessment (SOA). An annual performance measurement tool issued by the Department to evaluate Bureau and OFAS progress towards

sustainability goals. The tool, completed by Bureaus and OFAS, includes scoring based on Bureau and OFAS inputs to indicate progress and status of Federal sustainability goals and Department sustainability goals as established by Secretarial Orders and the Department's Sustainability Advisory Group.

#### 4.5 **Policy.**

A. It is the Department's policy that Bureaus, as defined in 4.2, and OFAS are to implement an EMS as the primary management framework for planning, implementing, and monitoring progress on the environmental aspects, programs, and compliance obligations associated with the sustainability goals of relevant Executive Orders, the environmental priorities of the Secretary and requirements unique to their missions.

1) Bureaus and OFAS shall incorporate environmental justice principles into sustainability and climate adaptation planning, decision making, and implementation as required per applicable Executive Orders.

2) Bureaus and OFAS shall ensure that communities with environmental justice concerns are considered external stakeholders and that their needs and expectations are addressed through EMS planning and implementation.

B. An EMS shall be implemented and maintained by Bureaus and OFAS to support compliance obligations, implementation of environmental and sustainability goals, tracking and reporting of associated targets and metrics, and continual improvement of performance associated with environmental priorities and sustainability goals of the Secretary and Chief Sustainability Officers and requirements unique to each Bureau and OFAS.

C. An EMS shall be consistent with:

- 1) The Department Sustainability Council Operating Plan,
- 2) The Department Sustainability and Environmental Policy, and
- 3) Requirements approved and adopted by the Department's Sustainability Advisory Group.

D. The Bureaus and OFAS shall use ISO 14001 and its overarching intent as the framework for an EMS that serves as a performance management system and ISO 14004 for implementation guidelines to meet compliance and performance requirements, goals, and targets; however, full conformance with ISO 14001 and ISO 14004 is not required.

4.6 **Objectives.** Successful implementation of the EMS will increase operational efficiency, achieve regulatory compliance, manage and reduce environmental impacts, promote and implement sustainable practices, secure a transition to sustainable technologies, address environmental justice through sustainability planning, and continually improve overall environmental and sustainability performance.

#### 4.7 Roles and Responsibilities.

A. Assistant Secretary – Policy, Management and Budget (AS-PMB). The AS-PMB is responsible for:

- 1) Serving as the Department's Chief Sustainability Officer.
- 2) Chairing the Department's Sustainability Advisory Group.
- 3) Overseeing implementation and maintenance of EMS in the Department.

B. The Department's Sustainability Advisory Group. The Department's Sustainability Advisory Group includes Bureau and OFAS Chief Sustainability Officers (CSOs) and is responsible for:

- 1) Advising the AS-PMB on implementing EMS in the Department.
- 2) Recommending changes and improvements to the AS-PMB based on review of the Department objectives and performance.
- 3) Facilitating communication and awareness of Bureau/Office needs to achieve the Department objectives and performance.

C. Bureau and OFAS Chief Sustainability Officers. The CSOs serve on the Department's Sustainability Advisory Group and within their Bureaus and OFAS and are responsible for:

- 1) Providing feedback on the suitability and effectiveness of the EMS in the Internal EMS Management Reviews described in 4.9 B. CSOs will review their environmental performance, including sustainability objectives and environmental compliance, and provide direction in conjunction with Heads of Bureaus and OFAS.
- 2) Completing Management Reviews (MR) with the Department's CSO, or delegate at least annually via completion of an EMS management review, in accordance with the requirements listed in 4.9 C.
- 3) Monitoring EMS performance and ensuring implementation and maintenance at the appropriate organizational level.
- 4) Ensuring that EMS is implemented and maintained within their respective organizations to address the sustainability and environmental goals, objectives, targets, and compliance obligations unique to their missions.

D. Heads of Bureaus and OFAS. The Bureau and OFAS Heads are responsible for:

- 1) Designating a CSO. Bureau and OFAS CSOs are responsible for the EMS

at the Bureau/OFAS, but Heads of Bureaus and OFAS maintain the ultimate accountability for the implementation and maintenance of the EMS.

2) Providing staff support to the Department's Sustainability Advisory Group, Implementation Committee, and Technical Workgroups.

3) Overseeing and ensuring allocation of technical and programmatic resources, which may include funding in alignment with approved budgets, as appropriate, for development, implementation, and maintenance of Department's EMS and achievement of Department's environmental and sustainability objectives and targets.

E. Heads of Offices. The Office Heads under the Office of the Secretary's Office of Policy, Management and Budget are responsible for:

1) Contributing to the objectives of the Department's EMS.

2) Providing staff support to the Department's Sustainability Advisory Group, Implementation Committee, and Technical Workgroups.

3) Overseeing and ensuring allocation of technical and programmatic resources, which may include funding in alignment with approved budgets, as appropriate, for development, implementation, and maintenance of Department's EMS and achievement of Department's environmental and sustainability objectives and targets.

F. Director, Office of Environmental Policy and Compliance (OEPC). The OEPC Director is responsible for:

1) Serving as Co-Chair of the Department's Sustainability Advisory Group.

2) Providing staff support to the Department's Sustainability Advisory Group, Implementation Committee, and Technical Workgroups.

3) Coordinating with the Office of Acquisition and Property Management (PAM) to develop and recommend the Department's EMS policy.

G. Director, Office of Acquisition and Property Management (PAM). The PAM Director is responsible for:

1) Serving as Co-Chair of the Department's Sustainability Advisory Group.

2) Providing staff support to the Department's Sustainability Advisory Group, Implementation Committee, and Technical Workgroups.

3) Coordinating with OEPC to develop and recommend the Department's EMS policy.

H. Managers of Appropriate Organizational Levels. These managers are responsible for:

- 1) Implementing and maintaining EMS in accordance with the requirements in this chapter and Bureau/OFAS policies and procedures.
- 2) Conducting annual internal EMS management review and addressing actions to achieve continual improvement.

**4.8 The Department's Sustainability Council.** A multi-level, consensus-based forum responsible for overseeing the Department's sustainability and environmental management strategies and performance (see attached Chart). It includes the following:

- A. Chief Sustainability Officer, AS-PMB.
- B. Bureau and OFAS CSOs.
- C. Department's Sustainability Advisory Group.
- D. Implementation Committee.
- E. Technical Workgroups.

**4.9 EMS Requirements.**

A. Implement and Maintain an EMS. The structure of the EMS is up to each Bureau and OFAS; however, the EMS must be suitable, adequate, and effective in achieving regulatory compliance and supporting the Department in meeting the goals and targets identified by the Department's CSO (i.e., Executive Order requirements and other Department-specific initiatives).

B. Conduct Internal EMS Management Review(s). Maintain a process for and conduct an internal EMS Management Review with Bureau/OFAS Leadership at least annually. Internal management review topics will be determined by each Bureau and OFAS but will include at a minimum review of the organization's EMS to ensure its continuing suitability and effectiveness and information on the organization's environmental performance, including sustainability objectives and environmental compliance.

C. Conduct EMS Management Review(s). The Department's CSO or delegate shall conduct a Bureau/OFAS EMS management review with each CSO or delegate and their leadership at least annually and more frequently as requested by the Department's CSO, using the MR Briefing. MRs shall include:

- 1) Review of environmental regulatory compliance and audits completed per the requirements of 515 DM 2 to include discussion of audit findings, enforcement actions, observations from data analysis, and recommendations for improved performance.

2) Review of progress against sustainability goals and metrics as identified by the Department's Sustainability Council. Review progress measured in environmental and sustainability performance indicators as appropriate, such as the Department's SOA.

3) Discussion with Department's CSO or delegate based on the management review on whether the Bureau/OFAS EMS is suitable, adequate, and effective (i.e., are the policies, procedures, and activities achieving environmental and sustainability objectives, goals and targets and in conformance with environmental justice policy) or if changes need to be implemented to meet performance requirements.

4) Identification of corrective actions and opportunities for continual improvement.

#### **4.10 Tenant, Contractor, and Concession Activities.**

A. Bureaus and OFAS shall consider tenants, contractors and concessions or equivalent activities and their impacts to achievement of EMS objectives.

B. EMS shall be included as a contractual requirement of tenants, contractors and concessions or equivalent activities, and others, as applicable.

#### **4.11 Reporting.**

A. Bureaus and OFAS shall submit the MR Briefing to Department's CSO or delegate on an annual basis, at a minimum.

B. Specific instructions on how to prepare and submit the MR Briefing to Department's CSO or delegate will be generated and distributed as appropriate.

C. Additional, non-recurring, reporting requirements may be identified from time-to-time. Specific guidance and reporting timelines will be generated and distributed in these instances.



## Organizational Chart – Department Sustainability Council Structure

