

APPENDIX D

Approved EMS Manual for Starkist Samoa Co.

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TITLE: Environmental Management System Manual**1. INTRODUCTION**

Starkist Samoa Co. (Starkist) has developed an Environmental Management System (EMS) to systematically manage its environmental compliance programs at its facility in American Samoa (Facility). The following EMS Manual provides the framework for the EMS and follows the general principal of a continual improvement cycle. This Manual also was developed to be consistent with the Compliance Focused EMS Elements developed by the U.S. Environmental Protection Agency (EPA).

The following manual follows a Plan, Do, Check, Act format and identifies the steps Starkist is committed to taking to develop, implement and maintain its environmental compliance programs.

2. ENVIRONMENTAL MANAGEMENT SYSTEM

This EMS Manual describes the core elements of the EMS and the general methods used to manage environmental programs at the Facility. Specific procedures and other EMS documents are referenced throughout the manual.

2.1 Leadership

Top management of Starkist demonstrates its commitment to the success of this EMS by maintaining an environmental policy (SMP-ES-2.1.0), committing necessary resources to develop, implement and maintain this EMS, and ensuring that the responsibilities and authorities for relevant EMS roles are assigned and communicated within the organization.

Starkist has established an environmental policy (SMP-ES-2.1.0), which serves as a declaration of top management's commitment to pollution prevention and minimizing risks to the environment, to compliance with applicable environmental laws and regulations, and to continual improvement of its EMS. A copy of the policy (SMP-ES-2.1.0) is communicated to employees and the public by various methods including postings throughout the Facility.

Starkist has a Director of Quality and Environmental Management Systems. This role provides corporate direction to the Facility on this EMS and serves as the liaison between the Facility and top management. The Director of Quality and Environmental Management Systems has appointed a Quality & Environmental (Q&E) Management Systems Representative who works at the Facility and is responsible for the day to day implementation and maintenance of the Q&E Systems.

2.2 Planning

The following sections describe the programs for identifying environmental compliance activities, identifying applicable legal requirements and other obligations (i.e.,

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compliance obligations), and establishing environmental compliance objectives that are documented in written management plans.

2.2.1 Identifying Compliance Obligations

A written Compliance Obligations Procedure (SMD-ES-2.1.1.1) has been developed. This procedure describes the methods used to identify, and communicate the potentially applicable environmental compliance obligations associated with the activities, products, and services related to Facility operations and the activities, products, and services related to Facility operations that are associated with environmental compliance obligations. The procedure includes identifying those activities that have or can have an environmental compliance obligation.

Compliance obligations consist of federal, state and local laws, rules and regulations, permits, registrations, consent decrees, etc. and other obligations such as corporate mandates, trade organization initiatives, industry standards, international initiatives, and other management directives.

Compliance obligations are considered when developing and implementing operational controls, identifying roles and responsibilities associated with compliance obligations and developing training and employee awareness programs.

For those activities, products or services that are identified as having a compliance obligation, operational controls are developed, which include administrative controls such as standard operating procedures (SOPs) and/or engineered controls such as pollution control equipment. Operational controls are used to enhance environmental performance and reduce the risk of non-compliance. Activities, products and services that have an identified compliance obligation are considered when setting environmental compliance objectives and developing training and employee awareness programs.

2.2.2 Environmental Compliance Objectives

A written Compliance Objectives Procedure (SMD-ES-2.1.1.2) has been developed that describes how objectives are established, implemented, and maintained with the goal of achieving and maintaining environmental compliance. Compliance objectives are measurable, where practicable, and are consistent with the environmental policy.

The following criteria are considered when establishing environmental compliance objectives and targets.

- Activities, products and services with environmental compliance obligation(s);
- Available technology;

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- Financial considerations;
- Operational considerations;
- Business needs; and
- Views of interested parties, including employees and the community.

A written action plan is developed for the list of environmental compliance objectives set to achieve compliance, which includes identification of a responsible party and a schedule for implementation.

2.3 Support and Operation

The following sections describe the programs for support and operation of the EMS. These programs include resources, competence, awareness, communication, documented information, operational planning and control, and emergency planning and response.

2.3.1 Resources

Starkist considers and provides the resources, including human resources and capital resources, needed for the Facility to develop, implement, and maintain its EMS. Roles and responsibilities around EMS development, implementation, and maintenance and environmental compliance obligations are documented in accordance with the Roles and Responsibilities Procedure (SMD-ES-2.1.1.3).

2.3.2 Competence

A written Competence Assurance and Training Procedure (SMD-ES-2.1.1.4) has been developed that describes how Starkist:

- a) determines the necessary competence of person(s) doing work under its control that affects its environmental performance and its ability to fulfill its compliance obligations;
- b) ensures that these persons are competent on the basis of appropriate education, training and/or experience;
- c) determines training needs associated with its environmental compliance obligations and its EMS; and
- d) where applicable, takes action(s) to acquire the necessary competence, and evaluate the effectiveness of the actions taken.

Starkist retains appropriate documented information as evidence of competence, including but not limited to job descriptions for individuals with environmental

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compliance and EMS responsibilities and an organization chart to show the reporting function for environmental programs.

Competence is assessed based on level of education, training (both formal and informal), and work experience.

2.3.3 Awareness

Starkist ensures that persons doing work under its control are aware of:

- a) the environmental policy (SMP-ES-2.1.0);
- b) the environmental compliance obligations associated with their work;
- c) their contribution to the effectiveness of the EMS; and
- d) the implications of not conforming with the EMS requirements, including not fulfilling the Facility's compliance obligations.

Starkist maintains a training program through which such awareness is assured. Through the program, the training needs of individuals whose job functions have the potential to impact the environment are identified. Training needs are documented and include those associated with activities, products and services with environmental compliance obligations, and required by the EMS. Details on the training program are described in a written Environmental Competence Assurance and Training Procedure (SMD-ES-2.1.1.4).

2.3.4 Communication

Starkist has established, implements and maintains a written Communication Procedure (SMD-ES-2.1.1.5) for internal and external communications relevant to the EMS, including:

- a) what will be communicated;
- b) when it will be communicated;
- c) with whom it will communicate; and
- d) how it will communicate.

Starkist ensures that environmental information communicated is reliable and consistent with information generated within the EMS.

Starkist internally communicates information relevant to the EMS among the various levels and functions of the organization, including changes to the EMS, as appropriate, and ensures its communication process(es) enable(s) persons doing work under the its control to contribute to continual improvement.

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Starkist externally communicates information relevant to the EMS, as established by its communication process(es) and as required by its compliance obligations.

Starkist responds to relevant communications on its EMS and retains documented information as evidence of its communications, as appropriate.

2.3.5 EMS Documentation

Starkist's EMS includes documented information necessary for the effectiveness of the EMS, such as:

- The environmental policy (SMP-ES-2.1.0);
- The EMS Manual (SMD-ES-2.1.1);
- Specific Management System Procedures (MSPs) that detail the core elements of the EMS (SMD-ES-2.1.1.1 through 2.1.1.9), where necessary;
- Standard Operating Procedures and Work Instructions; and
- Documents and records needed to demonstrate compliance with environmental regulatory requirements and conformance to the EMS.

When creating and updating documented information, Starkist ensures appropriate:

- a) identification and description (e.g. a title, date, author, or reference number);
- b) format (e.g. language, software version, graphics) and media (e.g. paper, electronic);
- c) review and approval for suitability and adequacy.

Documented information required by the EMS is controlled to ensure it is available and suitable for use, where and when it is needed, and it is adequately protected (e.g. from loss of confidentiality, improper use, or loss of integrity).

For the control of documented information, Starkist addresses the following activities as applicable:

- distribution, access, retrieval and use;
- storage and preservation, including preservation of legibility;
- control of changes (e.g. version control);
- retention and disposition.

Documented information of external origin determined to be necessary for the planning and operation of the EMS is identified, as appropriate, and controlled.

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Details on EMS document control are described in a written Documented Information Procedure (SMD-ES-2.1.1.6).

2.3.6 Operational Planning and Control

Starkist establishes, implements, controls and maintains the processes needed to meet EMS requirements, and to implement the action plans described in Section 2.2.2, by establishing operating criteria for the process(es) and implementing control of the process(es), in accordance with the operating criteria.

Starkist controls planned changes and reviews the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary. A Management of Change Procedure (SMD-ES-2.1.1.7) is maintained to document these controls.

Starkist ensures that outsourced processes are controlled or influenced. The type and extent of control or influence to be applied to the process(es) is defined within the contract documents (see also Communication Procedure, SMD-ES-2.1.1.5).

Starkist maintains documented information to the extent necessary to have confidence that the processes have been carried out as planned.

Details on operational planning and control are described in written Standard Operating Procedures and Work Instructions.

2.3.7 Emergency Preparedness and Response

Starkist establishes, implements and maintains the certain written procedures needed to prepare for and respond to potential emergency situations. Specifically, Starkist:

- a) prepares to respond to potential emergency situations by planning actions to prevent or mitigate adverse environmental impacts from emergency situations;
- b) responds to actual emergency situations;
- c) takes action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impact;
- d) periodically tests the planned response actions, where practicable;
- e) periodically reviews and revises the process(es) and planned response actions, in particular after the occurrence of emergency situations or tests; and
- f) provides relevant information and training related to emergency preparedness and response, as appropriate, to persons working under its control.

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Starkist maintains documented information to the extent necessary to have confidence that the process(es) is (are) carried out as planned.

Details on emergency preparedness and response are described in several different emergency response plans.

2.4 Performance Evaluation

The following sections describe the programs in place to ensure that the EMS is functioning and that adequate progress is being made toward environmental compliance objectives. These programs include monitoring, measurement, analysis, and evaluation, audits, and management review.

2.4.1 Monitoring, Measurement, Analysis, and Evaluation

Starkist monitors, measures, analyzes and evaluates its environmental performance and the effectiveness of this EMS. In doing so, it determines:

- a) what needs to be monitored and measured;
- b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;
- c) the criteria against which the Facility will evaluate its environmental performance, and appropriate indicators;
- d) when the monitoring and measuring will be performed; and
- e) when the results from monitoring and measurement will be analyzed, evaluated, and reported.

Starkist ensures that calibrated or verified monitoring and measurement equipment is used and maintained, as appropriate.

Starkist reports on environmental performance both internally and externally, as identified in its Communication Procedure (SMD-ES-2.1.1.5) and as required by its compliance obligations.

Starkist establishes, implements and maintains the process(es) needed to evaluate fulfilment of its compliance obligations and:

- a) identifies and communicates the frequency that compliance will be evaluated;
- b) evaluates compliance and takes action if needed;
- c) maintains knowledge and understanding of its compliance status.

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Starkist retains appropriate documented information as evidence of the monitoring, measurement, analysis and evaluation results including the evaluation of compliance.

2.4.2 Audits

Starkist conducts audits at planned intervals to provide information on whether the EMS conforms to its own requirements and is being effectively implemented and maintained.

Details of the audit programs are provided in a written Audit Procedure (SMD-ES-2.1.1.8) that includes the frequency, methods, responsibilities, planning requirements and reporting of its audits.

In establishing the audit programs, Starkist has taken into consideration the environmental importance of the processes concerned, changes affecting the Facility and the results of previous audits.

Starkist:

- a) identifies the audit criteria and scope for each audit;
- b) selects auditors and conducts audits to ensure objectivity and the impartiality of the audit process;
- c) ensures that the results of the audits are reported to relevant management.

Starkist retains documented information as evidence of the implementation of the audit programs and the audit results.

2.4.3 Management Review

Top management reviews this EMS, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. Management review is assured using a Management Review Tracking Log (SMF-ES-2.1.1) and includes consideration of:

- a) the status of actions from previous management reviews;
- b) changes in:
 - 1) external and internal issues that are relevant to the EMS;
 - 2) the needs and expectations of interested parties, including compliance obligations;
 - 3) its environmental compliance programs;
 - 4) risks and opportunities;
- c) the extent to which environmental compliance objectives have been achieved;

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d) information on the Facility's environmental performance, including trends in:

- 1) nonconformities and corrective actions;
- 2) monitoring and measurement results;
- 3) audit results;

e) adequacy of resources;

f) relevant communication(s) from interested parties, including complaints;

g) opportunities for continual improvement.

Outcomes of the management review include:

- conclusions on the continuing suitability, adequacy and effectiveness of the EMS;
- decisions related to continual improvement opportunities;
- decisions related to the need for changes to the EMS, including decisions on resource allocation;
- actions, if needed, when environmental compliance objectives have not been achieved;
- opportunities to improve integration of the EMS with other business processes, if needed;
- implications for the strategic direction of the organization.

Starkist retains documented information as evidence of the results of management reviews.

2.5 Improvement

Starkist identifies opportunities for improvement and implements necessary actions to achieve the intended outcomes of its EMS.

When a nonconformity occurs, Starkist:

- a) reacts to the nonconformity and, as applicable:
 - 1) takes action to control and correct it;
 - 2) deals with the consequences, including mitigating adverse environmental impacts;
- b) evaluates the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:

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- 1) reviewing the nonconformity;
- 2) determining the causes of the nonconformity;
- 3) determining if similar nonconformities exist, or could potentially occur;
- c) implements any action needed;
- d) reviews the effectiveness of any corrective action taken;
- e) makes changes to the environmental management system, if necessary.

Corrective actions are appropriate to the significance of the effects of the nonconformities identified, including the environmental impact(s).

Starkist retains documented information as evidence of the nature of the nonconformities and any subsequent actions taken and the results of any corrective action.

Starkist continually improves the suitability, adequacy and effectiveness of the EMS to enhance environmental performance.

Details of the corrective action process(es) are provided in the Corrective Action Procedure (SMD-ES-2.1.1.9).

3. REVISION HISTORY

EMS documents shall be reviewed at planned intervals prior to management review of the EMS (see Section 2.4.3 of the EMS Manual, SMD-ES-2.1.1).

Reviewer (title and initials): Environmental Compliance Manager 

Plant Director (initials): 

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