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Policies and Procedures

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This P&P describes:

- The definition and purpose of the Research, Education, and Economics (REE) Safety, Health, and Environmental Management (SHEM) Program,
- Procedures and responsibilities for the SHEM Program, and
- Organizational and Communication Structures, Program Authorities, Education and Training Requirements, and Program Elements.

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1. Purpose

The United States Department of Agriculture (USDA) Departmental Regulation (DR) 4410-004 Safety Management Program and DR 5600-005 Environmental Management establish the requirements for Safety Management Programs and Environmental Management Programs at USDA agencies. These regulations prevent, eliminate, or minimize incidents incurred by the agencies, individual workers, and members of the public resulting in or involving injury, illness, or property damage in agency workplaces, protect human health and the environment through pollution prevention, control, and abatement measures, and minimize each agency's potential liability by ensuring environmental cleanup and compliance with applicable Federal, State, and local laws. This document provides the REE Mission Area Policies and Procedures (P&P) to develop, maintain, and operate Safety, Health, and Environmental Management (SHEM) programs utilizing appropriate management systems to accomplish the requirements of the DRs indicated above.

2. Background

Management systems are recognized, sound business practices designed to increase effectiveness and efficiency of processes by providing a framework for managing risks and creating opportunities for continuous improvement in those processes. These systems provide a proactive approach to administer comprehensive safety, health, and environmental protection programs and represent an advancement over reactive programs that only address safety, health, and environmental issues after they occur. By focusing on identifying, communicating, and mitigating risks, REE Agencies can reduce work-related injuries, illnesses, and environmental harm. Our goal is for every worker to leave each day in the same or better health than they arrived. Protecting worker safety, health and the environment are integral to advancing the Agency's missions. Additionally, identifying, communicating, and mitigating risks will allow REE Agencies to avoid the direct and indirect costs of those risks, such as loss of a worker's ability to return to work or loss of life, lost productivity, environmental cleanup, and regulatory actions. In turn, this will lead to opportunities to improve the SHEM program, and ultimately, benefit the Agency mission through increased efficiency and performance.

Management systems generally follow a phased Plan – Do – Check – Act model to identify risks and hazards, develop processes and procedures to mitigate them, and promote continuous improvement of those processes and procedures.

- Plan Phase – Determines and assesses hazards, risks, and improvement opportunities and establishes objectives and processes to measure progress towards Agency or Mission Area policies and goals.
- Do Phase – Implements the processes as planned, includes both supporting and operating processes to meet the planning phase objectives.
- Check Phase – Monitors and measures activities and processes to compare against the established objectives and policy goals and reports on the results.

- Act Phase – Identifies and analyzes issues in the procedures causing departures from the expected outcomes, provides corrective actions through process modifications that drive continuous improvement, and sets the next annual baseline for measuring outcomes.

Involvement and commitment of Senior Management Officials (SMO) at each level of an agency is a key component to successfully implementing a management system.

3. Changes from the Previous Version

This version of P&P 160.0 revises Manual 160.0M as follows:

- Replaces and changes the format from a manual to a P&P,
- Separates guidance from the former manual into individual documents posted on ARS web-based system (e.g., [Axon](#) or successor systems),
- Establishes the REE Safety and Occupational Health Management System (SMS) and Environmental Management System (EMS) requirements, and
- Allows development and operation of a combined Safety and Environmental Management System (SEMS) at appropriate levels of each REE agency.

4. Policy

It is REE policy to provide safe, healthful, and environmentally responsible workplaces for all workers, contractors, and visitors, and for the public. REE Agencies will accomplish this by:

- Complying with or conforming to the most stringent applicable requirements of federal, state, and local safety, health, and environmental laws, regulations and related standards, executive orders (EO), and relevant USDA departmental regulations and manuals,
- Developing and operating SMS and/or EMS at appropriate organizational levels to implement the Departmental SHEM program requirements,
- Adopting SHEM goals applicable to the federal government, setting appropriate SHEM goals for the organizational level, and setting and tracking annual objectives completed towards meeting the goals,
- Committing to identify SHEM risks and hazards, reducing SHEM risks and hazards to the extent practicable, and increasing SHEM protections,
- Identifying and providing training and resources for managers, supervisors, and workers to recognize and address safety, health, and environmental requirements and hazards in the work processes they conduct or oversee,
- Implementing a management system auditing and inspection process to regularly evaluate progress of SMS and EMS and drive continuous system improvement,

- Developing, tracking, and reporting appropriate metrics for indicators of SHEM program effectiveness and success,
- Encouraging participation in Department of Labor (DOL) Occupational Safety and Health Administration (OSHA) Field Federal Safety and Health Councils, where feasible,
- Providing workers and worker representatives, where present, the opportunity to participate in and give input on the SMS and EMS,
- Appointing and training workers at appropriate organizational levels to operate safety and health committees, environmental management committees, or combined safety, health, and environmental management committees to provide oversight and reporting on the SMS and EMS, and
- Prohibiting restraint, interference, coercion, discrimination, or reprisal for filing a report of an unsafe or unhealthy working condition or from participating in any agency SHEM program activities.

5. Procedures

REE agencies manage safety, occupational health, and environmental responsibilities at multiple organizational levels. Each REE agency is responsible for developing safety and environmental management systems at appropriate agency levels based on the relative hazards and opportunities available to improve their safety, health, and/or environmental activities. For instance, in ARS, the ARS Facilities Division (FD) Safety, Health, and Environmental Management Branch (SHEMB) will develop and post the REE SMS and EMS on the ARS intranet site (e.g., Axon), along with additional guidance for developing management systems and operating key safety, health, and environmental programs. Each Area Office may use the Agency-level documents to develop SMS and/or EMS that apply to some or all locations within that Area and include some or all activities at those locations. Further, ARS locations may then incorporate higher organizational level SMS and/or EMS by reference in their SMS and/or EMS, adding additional information and procedures to address their location hazards, opportunities, and activities. All REE establishments (e.g., ARS locations) must conform to the REE SMS and EMS to the extent that their mission requirements allow.

SMS and EMS share a common framework and requirements based on the subject matter covered. Key components for each of these management systems include:

- A scope indicating what that management system covers,
- Management commitment to operating, promoting, and continuously improving applicable safety, health, and/or environmental activity performance,
- Delegation of responsibility and authority for operating and maintaining the SMS and EMS and reporting on the outcomes of the management systems,
- Worker commitment to participating in and consulting on the development and operation

of applicable management systems,

- Identifying hazards, opportunities, and applicable SHEM compliance obligations,
- Developing SHEM objectives and planning to achieve them,
- Providing appropriate resources, competence, awareness, communications, and recordkeeping,
- Eliminating or controlling hazards and preparing for emergency situations,
- Evaluating management system performance through monitoring, audits, and analysis,
- Preparing reports for management review and action, and
- Continually improving management systems by addressing incidents, system gaps, and corrective actions.

This document provides an overview of how to develop appropriate safety and environmental management systems and what each organizational level management system must contain. Each REE organizational level should incorporate existing SHEM procedures into the appropriate SMS or EMS. When necessary, each section below will indicate if there are differences between SMS and EMS requirements.

Note, there are numerous other departmental, mission area, or agency programs that are managed outside of SHEMB but are closely related to a robust safety, health, and environmental management program. Examples of these programs include, but are not limited to, the Worker's Compensation Program, the Occupational Medical Surveillance Program, the Biosafety Program, the Radiation Safety Program, the Sustainability and Energy Management Program, the Pesticide Management Program, the Occupant Emergency Plan Program, and the Employee Assistance Program. While this P&P only sets out the requirements for safety and environmental management systems, the senior management official at each organizational level has discretion to incorporate these and other related programs or selected elements of programs into appropriate safety or environmental management systems following the processes described below.

5.1 Scope

The scope of each management system must clarify the physical and organizational boundaries to which that management system applies and what requirements of higher-level management systems it adopts and follows. It must indicate relevant internal and external factors that impact that management system's ability to control safety and environmental issues at that organizational level. It must also consider and account for the needs of both internal and external stakeholders that the management systems involve or affect. The scope may not be used to exclude activities, products, services, processes, or facilities that have safety or environmental compliance obligations. At a minimum, the scope of each management system must include the following information:

- Geographic coverage,
- Processes included in the management systems and those that are excluded,
- Significant stakeholders that the management systems involve or affect and the relevant requirements of those stakeholders,
- Capabilities of the management systems in terms of resources, knowledge, and competence,
- Considerations of organizational culture and changes needed to improve system management, and
- Information systems, information flows, and decision-making processes.

5.2 Management Commitment

Management systems will not work without the commitment of senior managers in REE. Therefore, the senior management official at each appropriate REE Agency level must demonstrate leadership and commitment to developing and operating viable safety and environmental management systems at their level of authority by:

- Taking overall responsibility and accountability for the prevention of work-related injuries and illnesses, provision of safe and healthy workplaces, and ensuring SMS and EMS effectiveness,
- Ensuring that SMS and EMS procedures, goals and objectives set at their level of the organization are compatible with REE and USDA strategic direction,
- Ensuring that SMS and EMS requirements are integrated into existing operational processes,
- Ensuring that the resources needed to establish, implement, maintain, and improve the SMS and EMS are available,
- Communicating the importance of effective SMS and EMS and of following or meeting the SMS and EMS requirements,
- Ensuring that the SMS and EMS meet their intended outcomes,
- Directing and supporting workers in contributing to the effectiveness of the SMS and EMS,
- Ensuring and promoting continual improvement of the SMS and EMS,
- Developing, leading, and promoting an organizational culture that supports the intended outcomes of the SMS and EMS,

- Protecting workers from reprisal when reporting safety, health, and environmental incidents, hazards, risks, and opportunities, and
- Supporting the establishment and functioning of safety committees and environmental committees at appropriate organizational levels.

5.3 Organizational Roles, Responsibilities, and Authorities

Senior management officials at each REE organizational level will ensure that the responsibility and authority for relevant roles within their management systems are assigned, documented and communicated appropriately. Workers at each level of the organization will assume responsibility for those aspects of the management systems over which they have control.

Senior management officials at each REE organizational level will assign the responsibility and authority for:

- Ensuring that the management systems conform to the requirements of the DRs and this P&P, and
- Reporting on the performance of the management systems to the senior management official for that organizational level.

While responsibility and authority can be assigned, ultimately it is the senior management official at each level who is accountable for the functioning of the management systems.

5.4 Worker Participation

Workers and worker representatives, where present, will participate in the development, planning, implementation, performance evaluation, and corrective actions to improve their management systems. Each management system must:

- Indicate the mechanisms, time, training, and resources that are available for workers to participate,
- Provide timely access to clear, understandable, and relevant information about the SMS and EMS,
- Determine and remove obstacles or participation barriers and minimize those that cannot be eliminated, and
- Include non-managerial and non-supervisory workers in consultation on and participation in operation of the management systems.

5.5 Plan

5.5.1 Planning – General

Each REE organizational level must determine the risks and opportunities within the scope of

their management systems that they need to address to:

- Give assurance that the management system can achieve its intended outcomes,
- Prevent, or reduce, undesired effects, and
- Achieve continual improvement.

When determining risks and opportunities, each REE organizational level must account for:

- Safety and health hazards (SMS) or environmental aspects (EMS),
- Risks identified within the control of each management system and risks from outside that could impact the management system operation,
- Opportunities discovered within the control of the management system that could improve outcomes and opportunities from outside that could impact the management system operation, and
- Legal requirements, including compliance obligations, or other requirements that could impact the management system operations.

During the planning process, each REE organizational level must determine and assess the risks and opportunities relevant to the intended outcomes of the management systems associated with any planned organizational changes, process changes at that organizational level, or changes to the management system prior to implementing the changes. Each REE organizational level must also maintain documented information on:

- Risks and opportunities, and
- The processes and actions needed to determine and address its risks and opportunities to the extent necessary to have confidence that they are carried out as planned.

5.5.2 Identifying Safety and Health Hazards and Environmental Aspects

Each REE organizational level must include a procedure to identify safety and health hazards (SMS) and environmental aspects (EMS) that is both proactive and ongoing.

The procedure to identify safety and health hazards must account for, at a minimum:

- How work is organized, social factors (e.g., workload, telework or remote work, etc.), leadership, and organizational culture,
- Routine and non-routine activities and situations, including hazards from:
 - Infrastructure, equipment, materials, substances, and the physical conditions of the workplace,

- Product and service design, research, development, testing, production, assembly, construction, service delivery, maintenance, and disposal,
- Human factors, and
- How the work is performed.
- Past relevant incidents, within or outside of REE, including emergencies, and their causes,
- Potential emergency situations,
- People, including:
 - Those with access to the workplace and their activities, including workers, contractors, visitors, or others,
 - Those in the vicinity of the workplace who can be affected by REE activities, and
 - Workers at locations not under direct REE control (e.g., at universities).
- Other issues, including:
 - The design of work areas, processes, installations, machinery/equipment, operating procedures, and work organization, including their adaptation to the needs and capabilities of the workers involved,
 - Situations occurring in the vicinity of the workplace caused by work-related activities under REE control,
 - Situations not under REE control and occurring in the vicinity of the workplace that can cause injury and illness to persons in the workplace.
- Actual or proposed changes in organizational structure, operations, processes, activities, and the SMS,
- Changes in knowledge of, and information about, hazards.

The EMS for each REE organizational level must contain a procedure to identify environmental aspects within the scope of its EMS, considering the activities, products, and services that EMS can control and those that it can influence, and their associated environmental impacts, utilizing a life cycle perspective. Each EMS, when determining environmental aspects, must also evaluate:

- Changes, including planned or new developments, and new or modified activities, products, and services, and
- Abnormal conditions and reasonably foreseeable emergency situations.

The EMS for each REE organizational level must also contain a procedure to determine which aspects can have a significant environmental impact, whether they are adverse environmental impacts (threats) or beneficial environmental impacts (opportunities), including the criteria that EMS uses to determine significance, and procedures to maintain documentation of its:

- Environmental aspects and associated environmental impacts,
- The criteria used to determine its significant environmental aspects, and
- What those significant environmental aspects are.

5.5.3 Assessing Safety, Health, and Environmental Risks

Each REE management system must maintain a proactive and systematic process to regularly:

- Assess safety, health, and environmental risks from the safety and health hazards and environmental aspects identified within each SMS and EMS, accounting for effectiveness of existing controls,
- Determine and assess risks related to the management system coming from issues outside the control of that management system, and
- Document the methods and criteria used to evaluate the internal and external risks.

Each REE organizational level will maintain appropriate records of these assessments, risks, methods, and criteria.

5.5.4 Assessing Safety, Health, and Environmental Opportunities

Each REE management system must maintain a process to assess:

- Opportunities to enhance safety, health, and environmental performance while considering planned changes to REE, its policies, its processes, or its activities and:
 - Opportunities to adapt work, work organization, and work environment to workers, and
 - Opportunities to eliminate safety and health hazards and environmental aspects and reduce safety, health, and environmental risks.

5.5.5 Determining Legal and Other Requirements

Each REE management system must maintain a process to:

- Determine and have access to current safety and environmental legal requirements (e.g., OSHA and Environmental Protection Agency (EPA) regulations) and other requirements that apply to activities conducted under the control of that management system,

- Determine how these legal requirements and other requirements apply at the organizational level of the management system and what needs to be communicated to workers at each level,
- Take legal requirements and other requirements into account when establishing, implementing, maintaining, and continually improving the management systems at each organizational level, and
- Maintain and retain documented information on the management systems' legal requirements and other requirements, and
- Update the management systems to reflect any changes in the legal and other requirements.

5.5.6 *Planning Action*

Each REE management system must plan:

- Actions to:
 - Address risks and opportunities identified in the management systems,
 - Address legal requirements and other requirements, and
 - Prepare for and respond to emergency situations.
- How to:
 - Integrate and implement the planning actions identified above into its management system processes or other operational processes, and
 - Evaluate the effectiveness of these actions.

Each REE organizational level will follow the hierarchy of controls and outputs from the management systems for addressing hazards and planning other actions and should consider best practices, technological options, and financial, operational, and business requirements.

5.5.7 *Setting Objectives*

Each REE organizational level must establish safety, health, and environmental objectives for relevant functions at that level, account for significant environmental aspects and associated compliance obligations at that organizational level, and considering its risks and opportunities, maintain and continually improve the management systems and management system performance.

The safety, health, and environmental objectives must:

- Be consistent with the policies in this document and USDA DRs,

- Be measurable (if practicable) or capable of performance evaluation,
- Account for:
 - Applicable requirements (e.g., regulatory requirements),
 - The results of the risk and opportunity assessments, and
 - The results of consultation with workers, and where they exist, workers' representatives.
- Be monitored,
- Be communicated, and
- Be reviewed and updated as appropriate, but no less than annually.

5.5.8 Planning to Achieve Objectives

Each REE organizational level must plan how to achieve its safety, health, and environmental objectives, including:

- What will be done,
- What resources will be required,
- Who will be responsible,
- When each objective should be complete,
- How the results will be evaluated, including indicators for monitoring; and
- How the actions to achieve the objectives will be integrated into the business processes at the organizational level of the management system.

Each REE organizational level management system must maintain and retain documented information on the objectives and plans to achieve them.

5.6 Do (Part 1) – Support

5.6.1 Resources

Each REE organizational level must determine and provide the resources needed to establish, implement, maintain, and continually improve its SMS and EMS.

5.6.2 Competence

Each REE organizational level must:

- Determine the necessary competence of workers that affects or can affect its management system performance and ability to fulfil its compliance obligations,
- Ensure that workers are competent (including the ability to identify safety and health hazards and environmental aspects) based on appropriate education, training, or experience,
- Determine training needs and, where applicable, provide training or take other actions to acquire and maintain the necessary competence and evaluate the effectiveness of the actions taken, and
- Retain and maintain appropriate documented information as evidence of competence.

5.6.3 Awareness

Each REE organizational level will ensure that workers and other persons doing work under the control of their management systems are aware of:

- The safety, health, and environmental policies in this document,
- The safety and health hazards, risks, and actions, and significant environmental aspects and related actual or potential environmental impacts, associated with their work,
- Their contribution to the effectiveness of the management systems, including the benefits of improved management system performance,
- The implications and potential consequences of not conforming to the management system requirements, including not fulfilling the management system compliance obligations,
- Incidents and the outcomes of safety and health investigations that are relevant to them, and
- The ability to remove themselves from work situations that they consider present an imminent and significant danger to their life or health, as well as the procedures protecting them from undue consequences for doing so.

5.6.4 Communications Requirements

Each REE organizational level will include in their management systems process needed for internal and external communications relevant to their management systems, including determining:

- On what it will communicate,
- When to communicate,
- With whom to communicate:

- Internally among the various organizational levels and functions covered by those management systems,
- Among contractors, visitors, or others present in the workplace, and
- Among other interested parties.
- How to communicate.

When establishing its communication processes, each REE organizational level will:

- Account for diversity, equity, inclusion, and accessibility (e.g., gender, language, culture, literacy, disability, etc.)
- Consider the views of external interested parties,
- Account for its legal and other requirements,
- Ensure that information communicated is consistent with information generated from its management systems, and
- Retain and maintain documented information as evidence of its communications, as appropriate.

5.6.5 Internal Communication

Each REE organizational level must:

- Internally communicate information relevant to their management systems among the various levels and functions of their Agency, including changes to the management systems, as appropriate, and
- Ensure its communications processes enable workers to contribute to continual improvement.

5.6.6 External Communication

Each REE organizational level will establish a process to communicate relevant information from their management systems to external parties, accounting for that organizational level's legal and other requirements.

5.6.7 General Documentation

Each REE organizational level must indicate in its management systems what documented information they must keep, including documented information this P&P requires, information to meet regulatory requirements, and other information deemed necessary in each management system.

5.6.8 *Creating and Updating Documentation*

Each REE organizational level management system must contain procedures for creating and updating documentation, and must ensure appropriate:

- Identification and description (e.g., title, date, author, or reference number),
- Format (e.g., software, software version) and media (e.g., paper, electronic), and
- Review and approval for suitability and adequacy.

5.6.9 *Document Control*

Each REE organizational level must establish a document control system to ensure that documentation is:

- Available and suitable for use when and where it is needed, and
- Protected and controlled, including indicating:
 - Who may distribute, access, retrieve, and use the documents,
 - How and where to store documents, (including how to preserve legibility),
 - Version control methods, and
 - Retention and disposition.

5.7 Do (Part 2) – Operations

5.7.1 *General*

Each REE organizational level must plan, implement, control, and maintain the processes it needs to meet the requirements of its management plans and to implement the actions it determined in the Planning and Objectives sections above, by:

- Establishing criteria for the processes,
- Implementing control of the processes in accordance with the criteria,
- Maintaining and retaining documentation to the extent necessary to have confidence that the processes in the management plans are carried out as planned, and
- Adapting work to workers.

Note: at multi-employer workplaces (e.g., interagency workplaces, workplaces collocated with universities, etc.), the REE agency must coordinate the relevant parts of their management systems with the organization to the extent practical.

5.7.2 Eliminating Hazards and Reducing Risks

Each REE organizational level must establish, implement, and maintain a process for the elimination or mitigation of safety and health hazards and environmental aspects (considering a life cycle perspective, when relevant) and reducing risks using the following hierarchy of controls:

- Eliminate the hazard,
- Substitute with less hazardous processes, operations, materials, or equipment,
- Use engineering controls and reorganization of work,
- Use administrative controls, including training, and
- Use adequate personal protective equipment.

5.7.3 Change Management

Each REE organizational level must establish a process or procedure for implementing and controlling temporary or permanent operational changes that impact management system performance, including:

- New products, services, and processes, or changes to existing products, services, and processes, including:
 - Workplace locations and surrounding,
 - Work organization,
 - Working conditions,
 - Equipment, and
 - Work force,
- Changes to legal or other requirements,
- Changes in knowledge or information about hazards, environmental aspects, or risks, and
- Developments in knowledge and technology.

Each REE organizational level must review the consequences of unintended changes and mitigate any adverse effects, as necessary.

5.7.4 Procurement and Contractors

Each REE organizational level must establish, implement, and maintain a process to control the procurement of products and services to ensure that the contractor and their workers meet the

requirements of its management systems. This process will include coordinating its procurement procedures with contractors to identify and control hazards, risks, and environmental aspects arising from:

- The contractor's activities and operations impacting REE facilities,
- REE activities and operations that impact the contractor's workers, and
- The contractor's activities and operations that impact other interested parties in the workplace (e.g., at collocated university or interagency facilities).

The procurement process must define and apply safety, health, and environmental management criteria as a selection factor for contractors, where applicable.

5.7.5 Emergency Preparedness and Response

Each REE organizational level must establish, implement, and maintain a process to prepare for and respond to potential emergency situations identified in Section 5.5.2 (Identifying Safety and Health Hazards and Environmental Aspects) above, including:

- Establishing a planned response to emergency situations, including providing first aid and preventing or mitigating adverse environmental impacts,
- Providing training for the planned response,
- Periodically testing and exercising the planned response capability,
- Evaluating performance and, as necessary, revising the planned response, including after testing and occurrence of actual emergency situations,
- Communicating and providing relevant information to all workers on their duties and responsibilities,
- Communicating relevant information to contractors, visitors, emergency response services, governmental authorities, and as appropriate, the local community, and
- Accounting for the needs and capabilities of all relevant interested parties and stakeholders and ensuring their involvement, as appropriate, in the development of the planned response.

Each REE organizational level is responsible for maintaining and retaining documented information on the processes and the plans for responding to potential emergency situations.

5.8 Check – Performance Evaluation

5.8.1 Monitoring, Measurement, Analysis, and Performance Evaluation

5.8.1.1 GENERAL

Each REE organizational level must establish, implement, and maintain a process for monitoring, measurement, analysis, and performance of its management systems. This method must include:

- What to monitor and measure, including:
 - The extent to which legal requirements and other requirements are fulfilled,
 - Its activities and operations related to identified hazards, risks, environmental aspects, and opportunities,
 - Progress towards meeting the management system objectives,
 - Effectiveness of operational and other controls,
- The methods for monitoring, measuring, analyzing, and evaluating performance of the management systems at that organizational level, as applicable, to ensure valid results,
- The methods and schedule ensuring that monitoring and measuring equipment is calibrated or verified, as applicable, and is used and maintained appropriately,
- The criteria to measure performance against,
- The schedule to monitor and measure performance, and
- The schedule to analyze, evaluate, and communicate the results from the monitoring and measuring process.

Each REE organizational level must evaluate its management systems performance and determine the effectiveness of its management systems. Each REE organizational level must also retain documented information of the monitoring and measuring results, analysis, and performance evaluation and on the maintenance, calibration, or verification of measuring equipment.

5.8.1.2 COMPLIANCE EVALUATION

Each REE organizational level will establish, implement, and maintain a process to evaluate fulfillment of its compliance obligations. This process must:

- Determine the frequency and methods to evaluate compliance,
- Evaluate compliance and take corrective actions if needed,

- Maintain knowledge and understanding of its compliance status with legal and other requirements, and
- Retain documented information of the compliance evaluation results.

5.8.2 Internal Auditing

5.8.2.1 GENERAL

Each REE organizational level must conduct internal audits at planned intervals to provide information on whether the management systems:

- Conform to this P & P, and
- Are effectively implemented and maintained.

5.8.2.2 INTERNAL AUDITING PROGRAM

REE will:

- Plan, establish, implement, and maintain an auditing program, including the frequency, methods, responsibilities, consultation, planning requirements, and reporting, considering the importance of the processes audited and the results of previous audits,
- Define the auditing criteria and scope for each audit,
- Select auditors and conduct audits to ensure objectivity and the impartiality of the audit process,
- Ensure that the results of the audits are reported to relevant managers, ensure that relevant audit results are reported to workers, and where they exist, workers' representatives, and other relevant stakeholders,
- Take action to address nonconformities and continually improve its management systems performance as required below in section 5.9.2 (Incident, Nonconformity, and Corrective Action), and
- Retain documented information as evidence of the implementation of the audit program and the audit results.

5.8.3 Management Review

Senior management officials at each REE organizational level will review the management systems at their level on an annual basis to ensure their continuing suitability, adequacy, and effectiveness. This management review must consider:

- The status of actions from previous management reviews,

- Changes in external and internal issues that are relevant to the management systems, including:
 - The needs and expectations of stakeholders and interested parties,
 - Legal requirements and other requirements,
 - Its significant environmental aspects,
 - Risks and opportunities,
- The extent to which the policy in this document and the planned objectives have been achieved,
- Information on the management systems' performance, including trends in:
 - Incidents, nonconformities, corrective actions, and continual improvement,
 - Monitoring and measurement results,
 - Results of evaluation of compliance with legal and other requirements,
 - Audit results,
 - Consultation and participation of workers, when required,
 - Risks and opportunities,
- Adequacy of resources,
- Relevant communications with stakeholders and other interested parties, including complaints, and
- Opportunities for continual improvement.

As a result of these management reviews, senior management officials must make decisions related to:

- The continuing suitability, adequacy, and effectiveness of the management systems in achieving their intended outcomes,
- Continual improvement opportunities,
- The need for any changes to the management systems,
- Resources required,
- Actions, if needed, when planned objectives are not met,

- Opportunities to improve integration of the management systems with other business processes, and
- Implications to the strategic direction of the organizational level they oversee.

Senior management officials must communicate the relevant decisions of their reviews to workers, and where they exist, workers' representatives, and document and retain evidence of their management reviews.

5.9 Act – Management System Improvement

5.9.1 General

Each REE organizational level will determine opportunities for improvement based on the annual management review and implement necessary actions to achieve the intended outcomes of their management systems.

5.9.2 Incident, Nonconformity, and Corrective Action

Each REE organizational level will establish, implement, and maintain a process, including reporting, investigating, and acting, to determine and manage incidents and nonconformities. When an incident or nonconformity occurs, appropriate personnel will:

- React in a timely manner to the incident or nonconformity and, as applicable:
 - Act to control and correct it,
 - Address any consequences,
- Evaluate, with the participation of workers, workers' representatives (where they exist), and other stakeholders or interested parties, the need for corrective action to eliminate the root cause(s) of the incident or nonconformity so that it does not recur or occur elsewhere by:
 - Investigating the incident or reviewing the nonconformity,
 - Determining the cause(s) of the incident or nonconformity,
 - Determining occurrence of similar incidents, existing nonconformities, or potential nonconformities,
- Review existing assessments of safety, health, and environmental risks or other risks, as appropriate, as determined in Section 5.5.3 (Assessing Safety, Health, and Environmental Risks) above,
- Determine and implement actions needed, including corrective actions, following the hierarchy of controls (see Section 5.7.2 Eliminating Hazards and Reducing Risks) and change management (see Section 5.7.3 Change Management),

- Assess safety, health, and environmental risks that relate to new or changed hazards and environmental aspects prior to acting,
- Review the effectiveness of any actions taken, including corrective actions,
- Make changes to the management systems, if necessary.

Corrective actions must be appropriate to the effects or potential effects of the incidents or nonconformities identified. Each REE organizational level must retain documented information on:

- The nature of the incidents or nonconformities,
- Subsequent actions taken to remedy the incidents or nonconformities,
- The results of the actions taken, and
- The effectiveness of actions taken.

Each REE organizational level must alert workers, workers' representatives, where they exist, and other relevant interested parties of this information.

5.9.3 *Continual Improvement*

Each REE organizational level will continually improve the suitability, adequacy, and effectiveness of their management systems by:

- Enhancing safety and environmental management performance,
- Promoting a culture that supports their management systems,
- Promoting the participation of workers in implementing actions for the continual improvement of the management systems,
- Communicating the relevant results of continual improvement to workers, and where they exist, workers' representatives, and
- Maintaining and retaining documented information as evidence of continual improvement.

6 Responsibilities

6.1 Agency Administrators

Each REE administrator is responsible for providing safe and healthful workplaces to all their workers, ensuring that their agency complies with pollution control laws, regulations, and policies, establishing safety, health, and environmental management programs, and providing

resources to operate their agency safety, health, and environmental management programs. Additional duties are enumerated in DR 4410-004 and DR 5600-005. The ARS administrator will appoint and designate, in writing, the REE Designated Agency Safety and Health Official (DASHO) and the REE Designated Agency Environmental Program Lead (DAEPL).

6.2 REE Designated Agency Safety and Health Official

The REE DASHO represents the interests of the Agency Administrators in carrying out the responsibility to maintain safe and healthful working conditions and effective program management. The DASHO is responsible for:

- Developing and monitoring a comprehensive safety and health program to ensure all REE workers work in a safe environment,
- Providing executive leadership in the development, promulgation, and implementation of SHEM policies and procedures,
- Ensuring adequate staff and resources are available to implement the Agency SHEM programs at all operational levels consistent with agency priorities, and
- Exercising final authority in all safety and health matters that involve the jurisdiction of more than one program or Agency.

6.3 REE Designated Environmental Program Lead

The REE DAEPL supports the REE Agency Administrators in carrying out the responsibility of managing the Agency Environmental Management Program and will fulfill the duties enumerated in DR 5600-005.

6.4 ARS Facilities Division, SHEM Branch Chief

The ARS SHEM Branch Chief is the in-house authority on SHEM issues and manages the REE SHEM program on behalf of the REE DASHO. The SHEM Branch Chief, in conjunction with the SHEM staff, is responsible for:

- Establishing and interpreting REE policy and procedures for the safety, health, and environmental management program,
- Developing and implementing strategies to improve REE SHEM program performance,
- Consulting with appropriate USDA and ARS Administrative and Financial Management (AFM) Program Managers or other officials to ensure that SHEM Program procedures align with allied program priorities and requirements,
- Consulting with the FD Director and other FD Branch Chiefs on SHEM matters affecting other functional areas in the Division,

- Developing and managing the REE safety management system and environmental management system,
- Providing guidance on SHEM program implementation,
- Communicating with the USDA Office of General Counsel to assist REE establishments in responding to regulatory matters,
- Developing and tracking key performance indicators for SHEM functions, and
- Communicating SHEM information across all levels of agency management and workers, as appropriate.

6.5 REE Senior Management Officials

Senior management officials at each REE organizational level (e.g., Area Directors, Center Directors, Location Coordinators, etc. in ARS) are responsible for fulfilling the duties and requirements outlined above in this P&P for the part of the Agency that they oversee. These responsibilities include:

- Ensuring the subordinates they manage or supervise carry out the duties and responsibilities of the safety and environmental management program and conform to the requirements of this P&P,
- Providing leadership in the performance of the safety and environmental management programs,
- Providing direction and resources, including funding, equipment, and appointing appropriately trained staff (e.g., safety and health managers or specialists, environmental protection specialists, collateral duty safety officers, etc.) with authority to function as subject matter experts and operate the SHEM program at their level of the organization, and
- Providing information in a timely manner to higher organizational levels when required or requested to respond to Agency or Department data calls or for other requirements.

6.6 Managers and Supervisors

Safety and health of workers is of paramount importance. The appointment of a safety specialist, collateral duty safety officer, or other safety position does not relieve managers and supervisors of their responsibilities for the safety and health of workers under their supervision. Managers and supervisors are also the front line for protecting the environment from harm. Managers and supervisors will:

- Furnish workers a workplace that is free from recognized hazards that are causing or are likely to cause death or physical harm,

- Identify and promptly take corrective action to eliminate hazardous safety and health conditions in the workplace and potential or actual releases of hazardous substances to the environment,
- Take immediate abatement actions for situations causing or likely to cause imminent serious harm or death and withdraw all workers not necessary for abatement action,
- Encourage and grant reasonable worker requests to participate in SHEM activities related to the management systems developed in accordance with this P&P,
- Participate in the operation of the management systems,
- Ensure that workers receive new worker orientation as well as initial and recurring specialized job training appropriate to the work performed and they are proficient in conducting the work,
- Ensure that workers are provided an opportunity to participate in the Occupational Medical Surveillance Program (OMSP), when necessary or appropriate,
- Monitor worker performance and hold workers accountable to accomplish work in a manner conducive to the health and safety of themselves, their fellow workers, and the environment, and
- Investigate, and report as necessary, accidents, injuries, illnesses, known exposures, near misses, and environmental releases to identify root causes and determine corrective actions to prevent recurrence.

If insufficient resources exist to eliminate hazardous safety and health conditions or actual or potential environmental releases or regulatory violations, supervisors and managers must request needed resources from successively higher organizational levels until adequate resources are available.

6.7 Workers

Workers must follow all safety, health, and environmental management policies and procedures, observe, and practice all safe and healthful work procedures for the tasks they are assigned, including the use of personal protective equipment, in a manner conducive to the safety and health of the individual, their fellow workers, the public, and the environment. Workers will:

- To the extent of their authority, ensure safe and healthful workplaces and environmental stewardship in the work they do,
- Assume responsibility for those aspects of the management systems over which they have control,
- Participate in the development, planning, implementation, performance evaluation, and corrective actions to improve their SHEM program performance and management

systems,

- Report any accidents, injuries, illnesses, known exposures, near misses, environmental releases, or unsafe conditions to their supervisors at the time the incident happened or as soon as possible thereafter, and
- Attend appropriate SHEM training to perform assigned duties in a safe and environmentally responsible manner.

7 Authorities

This P&P adopts by reference the authorities of DR 4410-004 Appendix C and DR 5600-005 Appendix C, and more stringent requirements in State or Local codes, regulations, etc. in the jurisdictions where they apply, in addition to the following:

- Federal Acquisition Regulation – Part 23, Environment, Energy and Water Efficiency, Renewable Energy Technologies, Occupational Safety, and Drug-Free Workplace, as applicable, and
- REE P&P 134.2 Energy, Water, and Sustainability Policy.
- Note: Because some requirements are included in EOs that change frequently, SHEMB will track the applicable EOs through annual updates to the Agency-level SMS and EMS.

Signature Block

Signature for approval:

Date of approval:

Joon S. Park
Acting Associate Administrator,
Research Operations & Management

Appendix A – Acronyms and Abbreviations

This P&P adopts by reference the Acronyms and Abbreviations of DR 4410-004 Appendix A and DR 5600-005 Appendix A and adds or restates (for clarity) the following:

- AFM – Administrative and Financial Management
- ARS – Agricultural Research Service
- DAEPL – Designated Agency Environmental Program Lead
- DASHO – Designated Agency Safety and Health Official
- DR – Departmental Regulation
- EMS – Environmental Management System
- EO – Executive Order
- EPA – Environmental Protection Agency
- FD – Facilities Division
- OSHA – Occupational Safety and Health Administration
- P&P – Policies and Procedures
- REE – Research, Education, and Economics
- SEMS – Safety and Environmental Management System
- SHEM – Safety, Health, and Environmental Management
- SHEMB – Safety, Health, and Environmental Management Branch
- SMO – Senior Management Official
- SMS – Safety and Occupational Health Management System
- USDA – United States Department of Agriculture

Appendix B – Definitions

This P&P adopts by reference the Definitions of DR 4410-004 Appendix B and DR 5600-005 Appendix B and adds or modifies the following definitions:

Establishment – This P&P provides further clarification on this term for ARS only. In ARS, an establishment refers to a location, including any associated worksites, serviced by a single Administrative Officer. The SMO designates the appropriate address for the entire Establishment. In addition, an Area Office is also its own separate establishment, even if collocated with a location. ARS National Capitol Region offices will follow USDA guidance for Establishments. Note: teleworkers and remote workers are included in the Establishment for the office or location they work for. The other REE agencies follow the Establishment definition in DR 4410-004.

REE organizational level – An agency level where a management system is developed and operated, generally corresponding to significant organizational chart divisions. For instance, in ARS, there are three distinct organizational levels – Agency, Area, and Location/Establishment. Other REE Agencies have different organizational charts and therefore, different organizational levels that they set for their management systems.

Senior Management Official – The top management official on the organizational chart at each organizational level, or their designee. The SMO directs and controls the agency functions at that level of the organization. The SMO has the power to delegate authority and provide resources within the Agency but retains ultimate responsibility for the management system at that organizational level. For example, in ARS, the Agency Administrator controls the management systems at the Agency level, the Area Directors control the management systems at the Area level, and Center Directors, Location Coordinators, or Research Leaders control the management systems at locations.

Worker – A person performing work or work-related activities that are under control of the Agency. This includes, but is not limited to, employees, cooperators, students, interns, volunteers, and others that Agency employees supervise or otherwise directly control.

Workplace – A place under control of the Agency where a person needs to be or go to for work purposes. Note: The Agency's responsibility under a management system for the workplace depends on the degree of control over the workplace. Worker's residences are not considered a workplace under the control of the Agency when teleworking or remote working. However, teleworkers and remote workers are encouraged to implement as many of the management systems goals and requirements as practicable at their residence, and some OSHA regulations still apply, even when working from home.