One of the three eligibility requirements of ESP requires members to have a fully implemented environmental management system (EMS) and commitment to maintaining it. If your EMS includes the following elements, then your EMS meets requirements for ESP membership.

**Environmental Policy**

- Written environmental policy that has been defined by senior facility management and communicated internally to all employees
- Policy commits facility to compliance with your legal requirements and attainment of your voluntary commitments
- Policy commits facility to preventing pollution at its source
- Policy commits facility to continuously improve your environmental performance, even in areas where you do not have regulatory requirements

**Planning**

- Established procedure for conducting an analysis of facility aspects, both regulated and unregulated
- Established procedure for determining significant aspects
- Includes an inventory of all legal requirements at the Federal, State, tribal, and local level
- Established procedures for integrating changes due to management, budget, staffing, regulatory, or voluntary commitments, product design, and equipment into the EMS
- Includes measurable objectives and targets, and procedures to meet policy commitments

**Implementing and Operation**

- Senior management commitment to EMS (e.g., top manager with responsibility and authority for implementing EMS)
- Established roles and responsibilities for meeting the objectives and targets of the EMS, including compliance with legal requirements
- Established procedures for achieving and maintaining compliance with legal requirements and meeting performance objectives
- Established procedures for communicating EMS information throughout organization, including information about facility’s environmental performance
- Established procedures for controlling EMS documents and records that include who will maintain the documents and records, and where they will be stored
- Includes a general environmental training program for all employees
- Includes specific training for those who have direct responsibility for achieving and maintaining legal compliance or the objectives and targets in the EMS
Documents all of the following:

- Environmental policy
- Significant environmental aspects
- Objectives and targets
- Roles, responsibilities, and authorities for the EMS
- Compliance audit program
- EMS audit program
- Overall authority for the EMS

- Includes operation and maintenance programs for equipment related to legal compliance, significant environmental aspects, and achieving the objectives and targets in the EMS
- Includes an emergency-preparedness program

Checking and Corrective Action

- Includes an ongoing program for assessing facility performance and for detecting and preventing nonconformance with EMS
- Includes an EMS audit program
- Includes an ongoing program for preventing and detecting noncompliance with legal requirements
- Includes a compliance audit program
- Includes an active program for prompt corrective action of noncompliance with legal requirements and of nonconformance with EMS requirements
- Includes a procedure to confirm that there are no ongoing citizen suits related to environmental issues against your facility

Management Review

- Senior management reviews the effectiveness of the EMS and evaluates its performance against established objectives and targets at defined intervals

Public Outreach

- Includes a procedure to identify and respond to community concerns
- Includes a procedure to inform community members of important matters that affect them
- Includes a procedure to make the ESP Annual Performance Report available to the public
- Established programs and procedures to share information with your community and respond to community concerns