

Sustainability Management System Five-Year Plan



Sustainability Management System

Sustainability means using resources to support the current goals of our organization, without compromising the ability to accomplish future goals and impair future generations.

The purpose of an Environmental Management Statement is to help a company achieve and demonstrate improved environmental performance. The EMS must incorporate three basic elements: a commitment to environmental compliance; prevention of pollution, and; continuous improvement. Image 4 intends to implement an ISO 14001-guided EMS (incorporating sustainability).

Image 4 convened a sustainability work group in Q1 2007. The purposes of the workgroup are:

- to determine the sustainability impacts of operating our business research
- to craft and implement goals and objectives
- to publish work guidelines to ensure long-term environmental viability of Image 4.

Members of the sustainability workgroup include staff from project management (external resource management), production (internal resource management), & HR/Administration.

Image 4 has committed to developing sustainability goals and is in the process of developing and adopting a Sustainability Management System (SMS) to ensure success.

The SMS adopted by the workgroup integrates the elements of an EMS and the principles of The Natural Step (TNS)¹. TNS provides a framework² of basic scientific principles to articulate the minimum conditions necessary to achieve a sustainable society using a systems approach. It provides a compass against which an organization may analyze its impacts and prioritize options for continual improvement. The benefits of combining ISO 14001 and The Natural Step are beginning to be understood and documented in current management system literature.

Achievement of the goals and objectives will move Image 4 into alignment with the TNS system conditions.

¹ The Natural Step for Business, Brian Nattrass and Mary Altomare, New Society Publishers, Gabriola Island, British Columbia, Canada, 1999

² An Integrated Framework for Sustainability Management Systems (SMS), Jamie MacDonald, Dalhousie University, School for Resource and Environmental Studies, Halifax, Nova Scotia, November 4, 2001

The Natural Step System Conditions

- Nature is not subject to systematically increasing concentrations of substances extracted from the earth's crust.
- Nature is not subject to systematically increasing concentrations of substances produced by society.
- Nature is not subject to increasing degradation by physical means.
- Human needs are met worldwide.

Image 4 Sustainability Vision

We envision Image 4, 5 years from now as:

- Financially and Environmentally Self-sustaining
- Inspiring as a model of sustainability
- Honoring the environment
- Returning Value to the community

Sustainability Management System Vision

Every staff member, contractor, and business partner involved with Image 4 engages in daily decision-making that models and fosters a sustainable company, through shared vision, mission, and values aligned with personal passions while meeting the needs of the our company and community.

Sustainability Management System Goal

Advance a sustainable mission by adopting an SMS/EMS and by imparting a personal commitment and enthusiasm for sustainability.

Challenges and Barriers

- **The Potential for Conflicting Priorities**
Data suggests that until sustainability programs are financially self-supporting, sustainability initiatives cost more than operating in a traditional manner, thus creating the potential conflict between economic challenge and required investment in SMS activities.
- **Integration and Alignment**
The Sustainability Management System and Goals must be integrated and aligned with the strategic plan and operating goals. There are many ways to integrate and align the SMS, but the challenge will be to create the most logical and viable method.
- **Infrequent Management Review**
Sustainability goals and the SMS require frequent review and improvement. Management reviews may need to take place more than twice per year, which is the current Senior Management Staff schedule.
- **Responsibility**
Meeting goals for sustainable activities needs to be the responsibility of the staff and resources with the authority and expertise to accomplish them. Several goals have remained unassigned and must be integrated into the SMS program.
- **Buy-In and Perception**
Some staff view sustainability as a responsibility exclusive to the Sustainability staff. Sustainability goals have low priority with these staff members.
- **Funding Strategies**
Fortunately, our management embraces "Life Cycle Costing" strategies. Investments in sustainability initiatives and life-cycle costing must become standard practice in order to reach Image 4's Sustainability goals.
- **Legal Requirements**
Some legal requirements conflict and impede with sustainability goals. These requirements include those set forth by federal, state and local regulations.
- **Education and Turnover**
With a typical turnover of three years, junior staff need to be constantly trained.
- **Understanding of TNS**
TNS and sustainability can be difficult concepts to understand; thus the goals may seem unnecessary or incomprehensible to those not well versed in TNS and sustainability principles.
- **Communication and Deployment**
The challenge lies in communicating the goals and purposes of sustainability management in a manner that creates willingness to take responsibility for sustainability at Image 4.
- **Culture and Attitude**
A culture of sustainability will be needed so that every individual supports and contributes to implementing the concepts of TNS and sustainability.

Strategies

- Awareness, education, and training
- Well-communicated, well-deployed sustainability/environmental policy
- SMS/EMS Implementation Plan
- Accomplish integration into existing processes (strategic planning, Executive Steering Committee (ESC) management review process, etc) while full development of the SMS/EMS is in process
- Clear assignment of roles and responsibilities
- Process established and followed for programming, budgeting and funding sustainability initiatives and projects at all levels
- Identify, plan, prioritize, and implement sustainability solutions at process level
- Align Company activities with TNS System Conditions
- Execute sustainability initiatives contained in this Five-Year Sustainability Plan

Areas of Overlap

- Awareness, education and training
- Outreach and external communication
- Partnering

The Natural Step System Conditions

The SMS goal aligns with TNS System Conditions one through four by:

- Providing a set of guiding sustainability principles to act as a compass to guide management systems toward a sustainable state.
- Emulate the administrative tool of ISO 14001 with sustainability principles.
- Elevating EMS and sustainability to a more strategic level.

Objectives, Initiatives, Steps, and Resources

Objective 0.1: Demonstrate (make clear) top management commitment to sustainability and environmental stewardship.

The aim of this objective is to demonstrate and reinforce top management's commitment towards sustainability and environmental stewardship. It calls for the establishment and periodic review of a clear and compelling policy that is understood by and is available to all stakeholders. Furthermore, it begins to integrate and align sustainability with other management systems and processes.

Initiative 0.1.1: Sustainability/Environmental Policy established by 10 May, 2007, will be reviewed at least semi-annually and validated/updated as needed by top management [ISO Std 4.2 and SMS Framework 3.3].

Lead: President

Action Agents: Sustainability Committee Lead, HR Lead

The SMS Framework and ISO standard require a policy articulated by top management that serves as a guiding statement about what the organization stands for and where it is going in regards to its sustainability journey and environmental stewardship, respectively. The policy provides a framework for action and setting objectives and targets.

Steps	Resources Needed	Time/Cost
SMS Team draft policy for presentation to the President	Time for SMS Team to draft policy	4 hours
GC obtain President's signature on policy by 10 May 2007.	Time for Leads and staff to schedule and brief the President	2 hours
Continually assess mission changing conditions that may influence the policy statement	Staff time to review and assess changes Staff time to make proposed changes to the policy for decision	On-going 3 hours
Review/Validate/Revise/Rewrite policy at Off-Site meeting	Staff time to revise or rewrite policy and submit to top management for approval	4 hours
Publish changes on E-mail and I4 Knowledgebase	Time to publish	4 hours
Continuously communicate policy in existing meetings and in special presentations	Time to prepare presentations Time to present	8 hours 10 hours

Measures: Combined sustainability and environmental policy in place and deployed by top management by 10 May 2007; policy reviewed/validated twice per year.

Initiative 0.1.2: Integrate sustainability objectives into the company's strategic planning, programming, budgeting, funding, contracting and management review processes.

Leads – For Strategic Planning, the Management Team; for funding, Finance and President; for contracting, Client Services Lead; for Management Review Process, Executive Review Committee.

A policy and plan must have follow through in order to achieve alignment with the system conditions and for Image 4 to become environmentally sustainable. Integration of objectives and targets into the company's strategic planning, implementation, and review process will ensure continuous management awareness of progress in achieving desired results and avoiding concurrent or duplicate systems.

Financial resources will need to be linked to strategic sustainability initiatives and projects or the plan will lack the means to be accomplished. Life-cycle costing and other sustainability considerations will somehow need be factored into funding decisions because at times, "sustainable" costs more at the outset, but less in the long-term.

Since many Image 4's products, services and construction are provided by sub-contractors, it will be imperative to begin to require that statements of work (SOW) to be in alignment with sustainability principles and to consider a potential provider with a systematic approach to sustainability as a key competitor in new offerings.

Steps	Resources Needed	Time/Cost
Top management align objectives with Image 4's strategic plan	Time for staff to review sustainability goals and develop method to integrate	12 hours
Top management align funding with sustainability/strategic plan	Time for management to understand goals and activities and incorporate funding.	12 hours
Top management document a management review process that incorporates sustainability at defined intervals, taking into account audit results and the extent to which objectives & targets have been met; continued suitability of the SMS/EMS to changing conditions and information; and concerns/input of stakeholders.	Time for management to develop process Meetings to ensure agreement by all	20 hours 4 hours
Purchasing and Project Coordinators incorporate sustainability into acquisition and contracting statements of work and past performance evaluations (see also procurement goal)	Time for process owners to research, incorporate changes and obtain review	See Sustainable Procurement Goal

Measures: Sustainability integrated and documented within key Image 4 management, acquisition and contracting processes by mid-2008; Percentage of objectives and targets achieved by EOY 2008.

Objective 0.2: Integrate sustainability principles into daily operations and decision - making using a systemic approach on a continuous basis.

This objective serves to ensure that action in support of this plan and sustainability as a whole takes place, bottom to top. Policy and management review may provide a framework for action, but managers and individuals at all levels will drive success.

The first initiative in support of this objective provides for the routine review of our sustainability aspects and the determination of where we deviate the most from the TNS principles. The last two initiatives provide a framework for focusing specifically on the processes most "out of sync" with the system conditions.

Image 4 may then begin to develop and implement strategies that will bring operating activities into alignment with the TNS principles and ensure achievement of objectives and targets.

Initiative 0.2.1: Refine Image 4 self-assessment to validate baseline analysis by 30 May 2008, including environmental aspects; 2009 review and update annually [ISO std 4.3.1; SMS Framework 2.0]

Lead: Sustainability Committee

Action Agents: Process Owners

The ISO standard requires an organization develop procedures to identify its environmental aspects. Aspects are defined as "elements of an organization's activities, products or services that can interact with the environment". Once the aspects are identified, the organization must establish which of them are significant. The organization must then ensure that the significant aspects and impacts are used to establish environmental objectives and targets.

The SMS Framework expands the traditional ISO guideline by adding a baseline analysis section so that the organization has a clear understanding where it stands in relation to the system conditions of TNS framework. "This section ensures an organization has a clear basis from which to systematically begin developing strategies to move toward sustainability."

Identification of environmental aspects within the SMS framework incorporates the TNS system conditions 1, 2 and 3. The SMS adds the 4th system condition aimed at integrating and employing the social aspects of an organization. We define the "social aspects" as *aspects of the organization that impede or prohibit the ability of local to global communities and stakeholders to meet their current and future needs.*

An initial baseline document was finalized in Sep 2008 in anticipation of the sustainability workshop. The baseline analysis highlighted significant sustainability and environmental aspects for Image 4 operations.

The Image 4 self-assessment will re-examine the aspects and impacts using The Natural Step system conditions to clarify environmental and social aspects, significance, priorities and organizational roles and responsibilities for goal achievement.

Steps	Resources Needed	Time/Cost
Determine best method to determine environmental and social aspects, significance and priorities	Time to meet with team(s) Planning time Time to create Implementation Plan	10 hours 20 hours 30 hours
Use the SMS Framework and system conditions to identify and list where the company significantly "violates" the system conditions; identify key leverage areas and priorities and communicate these to the company	Time to analyze the SMS Framework and system conditions Time to list and identify leverage points	10 hours 20 hours
Determine roles and responsibilities for addressing priorities and strategies	Time to determine and assign responsibility and accountability	4 hours
Prioritize strategy development based on significance (or degree, extent, and magnitude of violation of the system conditions)	Time to plan and prioritize strategies	8 hours
Report and document, integrate into SMS/EMS as appropriate	Time to gather information for reporting and documenting Time to coordinate integration in SMS/EMS	20 hours 20 hours

Measure: Corporate sustainability and environmental aspects defined and validated in accordance with the SMS Framework and ISO 14001 by Mar 2009.

Initiative 0.2.2: Execute sustainability initiatives and activities at the corporate level in accordance with the Five-Year Sustainability Plan [ISO Std 4.4.6 and SMS Framework 3.6 through 3.14].

Leads: Sustainability Committee/Process Owners

Action Agents: Process Owners/Teams

Sustainability success will require leadership followed by action (e.g. planning, doing, checking, acting and repeating that pattern). This particular initiative recognizes the need to integrate or establish responsibility and accountability across the Company in order to meet the Five-Year plan objectives and targets.

Some initiatives within the plan will be led and implemented by a single entity. Most will require a cross-functional, cross-organizational structure, and cooperative action and oversight, to be achieved. Integration of the actions and initiatives, which require the involvement of more than one organization, will be incorporated into the existing continuous improvement structure as much as possible.

New teams, working groups and the like involving both internal and external stakeholders will likely be needed as well. This process will need to be established as a continual and ongoing process.

Steps	Resources Needed	Time/Cost
Owner/Lead reviews the Five-Year Company Sustainability Plan especially objectives, measures, targets, initiatives	Review time	2 hours
Owner/Lead plans how to accomplish the initiatives, (e.g. in-house, contract, department tasking, or Process Action Team); the plan provides a proposed outline of strategies, tasks and resources, but the plan is a guide not a directive	Plan creation time	20 hours
Owner/Lead tracks, documents and reports progress to management	Time to develop tracking schedule/system Time to report	10 hours 2 hours
Owner/Lead makes adjustments, changes, documents procedures for incorporation into SMS/EMS, re-evaluates as needed according to management needs	Time to develop procedures and revise as needed	40 hours

Measure: Percentage of objectives and targets from Five-Year Plans that are accomplished by EOY 2009.

Initiative 0.2.3: Execute sustainability initiatives and activities at the process owner level in accordance with the Five-Year Sustainability Plan [ISO Std 4.4.6 and SMS Framework 3.6 through 3.14].

Lead: Sustainability Committee

Action Agents: Process Owners/Teams

Achieving the objectives and targets described in the Five-Year Sustainability Plan also requires action at process level (or lowest levels of the Company) where the discrepancies with the system conditions exist within the processes themselves. This initiative defines steps for assisting employees to develop the most appropriate and concrete actions to align their product and service delivery with the system conditions and the Company priorities and strategies established in the plan.

Different departments and staff will require emphasis on different strategies and not all will apply or be necessary in order for the organization to meet the conditions for sustainability. Other factors such as timeliness, cost, availability will also be valid considerations when making decisions about process change. Gradual and systematic alignment with system conditions at the lowest levels will achieve overall Company sustainability.

Steps	Resources Needed	Time/Cost
Establish a Sustainability Assistance Team	Time to establish team	3 hours
Train team in The Natural Step and process improvement	Training time	16 hours
Team reviews Five-Year Company Sustainability Plan and baseline document to determine aspects, impacts, and long-term sustainability goals	Plan review time Time to determine aspects, impacts, and goals	4 hours 40 hours
Team analyzes and documents processes using sustainability goals and system conditions to determine the extent, degree and magnitude of departure from sustainability principles within four departments	Analysis and documentation time	80 hours
Team prioritizes and documents processes with highest impact for review (upstream - in stream - downstream) and coordinate review with department lead (process owner)	Prioritization time Review time	20 hours 8 hours
Team and process owner set and document objectives and targets aligned with Company sustainability goals and system conditions	Time to work together to set and document objectives and alignment	50 hours
Team and process owner develop and document solutions and strategies (projects/initiatives/activities) including operational, procedural and administrative improvements	Documentation time	20 hours
Team and process owner link solutions and	Planning/budgeting time	50 hours

strategies with planning, programming, budgeting, funding and execution processes		
Process owner makes changes, documents procedures for incorporation into SMS/EMS, re-evaluates as needed according to management needs	Frequent evaluation and change time	40 hours

Measures: Organizational/Process Owner sustainability and environmental aspects defined, objectives and targets established, and internal management review processes, documented and operational by EOY 2009; Percentage of organizational/process owner objectives and targets met by EOY 2009.

Initiative 0.2.4: Support, assure and monitor progress of awareness level training by 30 Mar 2009 (ODEP) [ISO Std 4.4.2; SMS Framework 4.1].

Leads: SMS Team

Action Agent: Sustainability Committee

The ISO standard requires that all personnel whose work may create a significant impact on the environment must receive appropriate training, including a) the importance of conformance with the environmental policy and procedures; b) the significant environmental impacts of their activities (actual or potential) and the benefits of improved personal performance; c) their roles and responsibilities in the successful functioning of the EMS, and; d) the consequences of departing from operating procedures. Personnel performing tasks that can cause significant environmental impacts must be competent through education, training and/or experience.

The SMS expands on the ISO standard in that the entire organization must understand sustainability and be able to communicate with a common vocabulary. In the case of Image 4, this would include furthering the knowledge of all personnel who work for the Company about the minimum requirements for a sustainable society based on the four system conditions, and how these apply to the organization.

Tasks	Resources Needed	Time/Cost
Meet regularly with the Sustainability Committee	Time to attend meetings and take care of action items	10 hours
Provide Sustainability Committee with data on indicators and progress	Time to summarize data for presentation at training	10 hours
Develop new or modify existing training courses to incorporate sustainability	Time to analyze programs	10 hours
	Time to modify training and add where needed	20 hours

Measure: Percentage of Image 4 personnel attending sustainability and environmental awareness training per year.

Objective 0.3: SMS/EMS in full conformance with ISO 14001 and fully integrated into Company management systems by 31 Dec 2010.

The aim of this objective will be to have all aspects of a fully conforming SMS/EMS by 31 Dec 2010. The achievement of the Environmental Protection Agency's (EPA) Self Declaration and the State of New Hampshire's Environmental Leader declaration will ensure Image 4 is progressing towards full conformance with ISO and the SMS Framework by Dec 2010.

Initiative 0.3.1: Complete an SMS/EMS Implementation Plan by 31 Dec 2009.

Lead: Sustainability Committee/CEO

Action Agent: Sustainability Committee

The Plan will outline the process of developing and implementing an SMS/EMS through to completion. The SMS/EMS Implementation Plan will consist of a guiding document and agreed-upon scope that serves as a project management roadmap to ensure timely and systematic completion of the SMS/EMS.

Tasks Time/Cost	Resources Needed	
Responsibility for preparing the plan delegated	Time for CEO to analyze and delegate	2 hours
Hold EMS training session for all interested and affected individuals to attend	Time to find best trainer Time to contract for training. Funding for training Time to attend training	5 hours 10 hours \$10,000/3 days 8 hours X 20 attendees = 120 hours
Determine the best course of action for completing the plan (e.g. in-house, contract, other) determined	Time to analyze course of action and discuss	4 hours
Resources requested, programmed and budgeted by top management to meet timeline	Funding for contract to prepare the plan	\$15,000
Performance Work Statement (PWS) prepared/Request for Proposal (RFP) reviewed & accepted	Time to prepare and review PWS Time to prepare and review RFP	10 hours 5 hours
Contract awarded		
Initial implementation plan drafted	Contractor	Within contract costs
Draft plan reviewed and revised	Time to coordinate and review plan. Revise plan	20 hours Built within contract costs
Draft plan staffed for comment	Time to coordinate and review	20 hours
Comments considered and final draft	Time for discussion and	5 hours

staffed for approval by top management	coordination Final comment preparation	2 hours
Publish and implement plan	Printing (minimal copies) the plan	\$1,000
Top management receiving regular, documented progress reports on completion of the implementation plan	Time during ESC	20 minutes

Measure: SMS/EMS Implementation Plan approved by the CEO and Management Team by NLT 31 Dec 2009.

Initiative 0.3.2: Environmental Protection Agency's Self Declaration by 31 Dec 2010.

Lead: Sustainability Committee

Action Agents: Process Owners

The purpose of self-declaration for EMS is to provide an objective evaluation of the system in lieu of more expensive third-party certification of the EMS system. The EPA has recommended three methods by which self-declaration may be established; thereby allowing a facility to objectively demonstrate that the requirements of ISO 14001 have been met.

Third party registration is commonly used by organizations that deal directly with customers with competitive pressures. Self-declaration is a way to provide verification of the EMS to the EPA and stakeholders, instill stewardship and responsibility for the EMS with Image 4 personnel, give the Company flexibility to implement the EMS in a way that best supports its mission, and ensure continuation of the EMS process through making self-declaration a part of that process.

The EPA recommends three evaluation guides that may be used to self-declare:

- The Global Environmental Management Initiative (GEMI) National Aeronautics and Space Administration "ISO 14001 Environmental Management System Self-Assessment Checklist"
(<http://www.ofee.gov/ems/training/GEMI%20Self%20Assessment%20Checklist.pdf>)
- "Oregon Green Permits Program Guide – Attachment B: EMS Description and References"
(<http://www.ofee.gov/ems/training/Oregon%20Green%20Permits%20Program%20EMS%20Verification%20Worksheet.rtf>)
- The National Aeronautics and Space Administration's "Environmental Functional Review Checklist"
(<http://www.ofee.gov/ems/training/NASA%20EMS%20Audit%20Checklist.doc>)

The following steps must be achieved to determine if the SMS/EMS is in compliance with ISO 14001 without an external audit.

Steps	Resources Needed	Time/Cost
Determine evaluation guide for use (e.g. [CEMP], ISO 14001, etc.)	Time to review guides, make recommendations, and plan for use	20 hours
Establish procedure for use of evaluation guide (frequency of review, qualification of reviewers, etc.	Time to determine details of use.	20 hours
Establish procedure for documentation and use of results	Time to research best methods, train for use, and establish procedure	40 hours
Establish procedure and schedule to review self-declaration procedures	Time to write procedure Time to develop schedule	10 hours 10 hours
Communicate choice of guide and procedure	Time to develop presentation for Sr. Mgmt,, process owners, directors, and stakeholders	20 hours

Measure: EPA Self Declaration achieved by 31 Dec 2010.

Initiative 0.3.3: Initiate the SMS/EMS Implementation Plan in order to achieve a conforming SMS/EMS by 31 Dec 2010.

Lead: Sustainability Committee

Action Agents: To be determined

Once the SMS/EMS Implementation Plan has been approved, it will need to be executed with responsibility delegated for oversight, leadership, and accomplishing various aspects of the plan. Resources - time, money, facilities and equipment - will need to be allocated as well. Management will need to track the implementation process in order to ensure the Dec 2010 deadline is achieved.

Steps Time/Cost	Resources Needed	
Responsibility delegated	Time for SC to draft, sign and distribute memo	5 hours
TBD within the SMS/EMS Implementation Plan	Time and costs as appropriate	Five-year plans and SMS

Measures: SMS/EMS Implementation Plan in process by Feb 2009; conforming SMS/EMS achieved by Dec 2010.

Objective 0.4: Continually improve overall Company sustainability using a 2001 baseline.

The purpose of this objective is to provide Image 4 with a set of performance indicators that will tell how well the Company is doing in achieving alignment with the system conditions and general sustainability over time. The indicators will exhibit trends that can be used to determine whether the sustainability profile is improving, or whether adjustments are needed to remain on track towards the ultimate vision and goals. Indicators will also help identify where the risks and barriers towards sustainability may be, resulting in the development and implementation of effective strategies to minimize or eliminate them. Lastly, it provides for an outside assessment or look at achievements as a means of identifying Company status and areas for improvement.

Initiative 0.4.1: Create management indicators that focus on evaluating how actions comply with the overall plan; Sustainability Index or Performance Indicators by 2009 [SMS Framework 3.11].

Lead: Sustainability Committee

Action Agents: SMS Team with support as required

Performance indicators will be used to determine trends and areas of improvement. Indicators will be aligned with regional or community indicators as much as possible. Performance will be reviewed periodically by top management for tracking purposes.

Steps	Resources Needed	Time/Cost
Review management objectives, measures and targets	Time for research and review	10 hours
Review regional or community sustainability indicators	Time for review of existing indicators.	10 hours
Create a set of performance indicators	Time to create indicators	80 hours
Top management review indicators at defined intervals	Time to review	20 hours
Document process(es) and results	Time to establish document template Time to insert initial data Time to update	8 hours 8 hours 4 hours

Measure: Management indicators established by 2009 and used to determine improvement or decrement of Sustainability Index year by year.

Initiative 0.4.2: Document a whole system risk assessment process [Revised SMS Framework 2.4; FC Process Improvement Model].

Lead: Sustainability Committee
Action Agents: Process Owners

Image 4 must identify and understand the risks that may cause the Company to miss its objectives and targets. Once identified, strategies will be developed and action taken to overcome the risks.

Steps	Resources Needed	Time/Cost
Identify and understand risk (legal, safety & well-being, nature & environmental, social, economic, other)	Time to identify risk	10 hours
Determine how to accept, minimize or eliminate risk toward achieving objectives	Time to determine how to manage risk	20 hours
Document process(es) and results	Time to document processes and results	30 hours

Measure: Process(es) to evaluate sustainability, environmental and other risk documented and operational by 2009.

Initiative 0.4.3: Identify barriers and develop a process and strategies to overcome [internal and external] barriers preventing the organization from moving into alignment with the system conditions. [SMS Framework 3.7 and 3.8].

Lead: Sustainability Committee, Management Team
Action Agents: Process Owners

We must identify and understand the internal and external barriers that may cause the Company to miss its objectives and targets or prevent it from moving into alignment with the system conditions. Some of the primary barriers to be overcome include

investment/reinvestment strategies and organizational culture within Image 4. Once they are identified, strategies will be developed and action taken to overcome them.

Steps	Resources Needed	Time/Cost
Responsibility delegated	Time to identify responsible parties Time to brief CEO Time to write memo and obtain CEO signature	20 hours 2 hours 3 hours
Identify and understand barriers	Time to review and list barriers.	40 hours
Improve communication to overcome barriers.	Time to analyze and communicate barriers to sustainability in existing laws and regulations.	50 hours
Establish, document and communicate an Image 4 process to present barriers through the company's systems	Time to develop process Time to present to Mgmt Team	20 hours 5 hours
Work with partners to create strategies to overcome barriers	Time to develop strategies – team meetings and follow up	40 hours
Incorporate strategies into strategic and action plans	Time to meet with plan "owners" and obtain agreement to incorporate strategies. Time to format strategies	20 hours 10 hours
Use recent survey results to determine needs for culture changes	Analysis time Time to record and distribute results	20 hours 10 hours
Examine investment and reinvestment strategies for lifecycle costing potential	Analysis time Time to write up and distribute results	30 hours 10 hours

Measure: Documented process(es) in place by 2010 for continual identification of barriers and strategies to overcome them.

Initiative 0.4.4: Improve sustainability and environmental management by using the Environmental Performance Assessment System (EPAS), Organizational Self-Assessment (OSA) and other processes to assess sustainability performance.

Lead: Sustainability Committee

Action Agents: to Be Defined

Existing internal and external program assessments will be used to determine our point-in-time status and areas for improvement. This information will be communicated to leaders and process owners. Strategies will be developed where improvement is needed and initiatives formulated for action.

Steps	Resources Needed	Time/Cost
SC to coordinate	Time to coordinate and submit	40 hours
SC coordinate EPAS review (Aug 2009)	Time to coordinate EPAS review	30 hours
Incorporate results into the SMS/EMS	Time to analyze and appropriately incorporate results	10 hours
SC coordinate OSA (April 2010)	Time to coordinate and create awareness	30 hours

Measure: Assessments documented annually; preventive and corrective action and continual improvement plans result to improve sustainability and environmental performance.