

1.0 Purpose

The purpose of this procedure is to identify how the significant environmental aspects of Sustain Winona's Environmental Management System are determined. Sustain Winona designates an environmental aspect as "significant" when it is determined that it has a significant potential impact on the environment or on the operations of member organizations. Sustain Winona considers all legal and other requirements for its activities when determining significant aspects. Activities that are regulated by legislation are automatically determined to be significant.

2.0 Scope

This procedure applies to all activities, products and services that are within the stated scope of the Sustain Winona Environmental Management System. Sustain Winona member organizations will set objectives and targets in the EMS for all environmental aspects that are deemed significant.

3.0 Definitions

Activity/Product/Service - An activity is a natural or normal function of an organization. A product is what the organizations produce. A service is performing any of the business functions auxiliary to production or distribution

EMS Representative – An individual who has been appointed by their management to represent their organization within the Sustain Winona partnership.

Environment - is defined as the physical surroundings in which the Sustain Winona member organizations operate, including air, water, land, natural resources, flora, fauna, humans and their interrelation.

Environmental Aspect – Any element of an organization's activities, products and services that can interact, positively or negatively, with the environment.

Environmental Impact – any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects, activities, products or services.

Significant Aspects – Any environmental aspect that has been assessed and identified as being significant within the stated scope of the Sustain Winona EMS.

Sustain Winona Collaboration Team – The collaboration of EMS Representative's from each organization that will act as the EMS Champion for Sustain Winona.

4.0 Responsibilities

4.1 The EMS Representative is responsible for maintaining a current list of activities, products and services for their organization that fall within the scope of the Sustain Winona EMS and also communicating that list to the Collaboration Team when determining significance.

4.2 The Sustain Winona Collaboration Team will, at a minimum, meet annually to

establish and/or review the activities, products and services of Sustain Winona member organizations; identify environmental impacts of those activities, products and services and assess environmental significance.

5.0 Procedure

5.1 Sustain Winona identifies environmental aspects of its operations by analyzing inputs and outputs related to, and/or the cause and effect of current and past, activities, products and services. We also consider the potential regulatory, legal, and business exposure of these activities, products and services.

5.2 To identify the significant environmental aspects associated with activities, products and services, the Sustain Winona EMS considers, where relevant: a) releases to water, b) emissions to air, c) waste management, d) contamination of land, e) use of raw materials and natural resources, and f) local environmental and community issues.

Normal, abnormal and emergency operating conditions, as well as shut-down and start-up conditions and the potential significant impacts associated with reasonable foreseeable situations are also considered.

5.3 Once the environmental aspects and their associated impacts are identified and put in a comprehensive list, the Sustain Winona Collaboration Team evaluates the environmental and business significance of each of the impacts in order to determine which aspects to address in the EMS. A matrix is used to evaluate and score a list of activities, products and services and their aspects and impacts. A diverse group of representatives from the Sustain Winona member organizations with expertise in various professional disciplines meet to score the aspects and impacts by consensus. These scores are combined and averaged and evaluated to determine and select a smaller number of **significant** aspects for approval by management.

5.4 Sustain Winona takes the following steps in evaluating aspects and determining significance:

1. The comprehensive list of each member organizations activities, products, and service and the aspects and impacts associated with them is entered into a spreadsheet.
2. Significance is determined by evaluating both the environmental and business significance of each item on the list.
3. The following criteria are used to determine environmental significance:
 - Scale of impact – how big is it? (L, ML, M, MH, H)
 - Severity of impact – how bad is it? (L, ML, M, MH, H)
 - Probability of impact – how likely is it to occur? (L, ML, M, MH, H)
 - Duration of impact – how long will it persist? (L, ML, M, MH, H)
4. The following criteria are used to determine business significance:
 - Potential for legal exposure – how much risk does it pose? (L, ML, M, MH, H)

Identifying Significant Environmental Aspects

- Public concern or effect on image – how much does the public care about this? (L, ML, M, MH, H)
 - Ease of changing the impact – can it be stopped or changed economically? (Y or N)
 - Minimal change of process – do we control the process and can it be changed to lessen significance? (Y or N)
5. Using their best professional judgment, the Sustain Winona Collaboration Team rates the aspects and uses a spreadsheet to combine and average the individual ratings to determine a composite rating for each aspect for environmental and business significance.
 6. The resulting combined rating is calculated by the spreadsheet for each environmental aspect.
 7. The list of proposed significant aspects is reviewed and approved by Senior Management, posted on the Sustain Winona website and entered as records according to the Sustain Winona EMS document control procedure.
 8. Steps 1 through 7 are repeated before the due date of the current EMS objectives so that new objectives can be established for EMS revisions.
 9. Annual Maintenance - Steps 1 through 7 may also be repeated if, during the annual Management Review, a determination is made that there is a need to re-evaluate significant aspects or if any planned or new developments or programs are added that would affect Sustain Winona's activities, products, and services. EMS Representatives can also use employee input, team input from scheduled meetings and the annual Legal and Other Requirements review, to determine and recommend the need for adding new significant environmental aspects.
- 5.5** The EMS Representative will be responsible for ensuring that the affected staff members within their organization are appropriately trained on the determination of significant environmental aspects. This should be done in accordance with EMS Training Procedures.

6.0 Frequency

The determination of significant environmental aspects will be made annually or as needed due to the addition of new developments and/or programs by Sustain Winona member organizations.