

SGP CERTIFICATION ROADMAP

JUNE 2017 | VERSION I



YOU ARE NOT WALKING THIS JOURNEY ALONE!

You have requested clear and concise implementation instructions for each element of the Sustainability Management System and Best Practice.

To meet this request, SGP offers this certification manual that walks you through the SMS Template.

The company manual template contains procedures for an SMS that is designed to meet SGP's 2016 Certification Criteria.

WELCOME SECTION

Congratulations! Through submission of your application to the SGP program, you have taken the first step towards achieving the ONLY holistic certification program for the printing industry. SGP sets the benchmark and establishes the bright line of differentiation for sustainability within the print market space.

SGP is a certification program and requires a third-party audit. The question of how to document the system itself can be challenging, and we recognize this fact. Great news – we have developed this certification manual to guide you through the process! We also have assembled a set of implementation tools that are provided for your use.

Please keep the following points in mind as you make use of this guideline and company manual template:

- **ADAPT, ADAPT, ADAPT. It is vital that you adapt this manual template to your company and SMS.** This manual template presents a generic Sustainability Management System (SMS). The procedures follow the SGP certification criteria, and it is critical that you add, eliminate, and/or modify the procedures and other manual elements to fit your company's SMS.
- **If it won't be useful, it's not worth your time.** As you are adapting this company manual template, design it so that it will be used (and further adapted) over time. It is much more important to have a living manual than a perfect manual that just sits on the shelf.
- **Pick an appropriate level of detail for your company.** In general, the larger a company is, the more detailed its procedures are—but even this may vary per your company's culture. Again, it is very important that you use the template as the starting point – remember it is easier to edit than to create!
- **If you already have a system for documentation and document control, develop your SMS manual to fit that system.** As you go through the criteria, remember, if you have a program already in place that you can adapt, such as ISO 14001 or 9000 you are encouraged to do so. It is not necessary to recreate the wheel. Look at how you can use your existing systems to integrate sustainable business practices into your operation.
- **Your manual should reference formats or records, where applicable.** This manual refers to records and to numbered formats that directly follow the corresponding procedures. When developing your company's manual, consider including completed formats in the body of the manual. If you use additional formats or worksheets (i.e., such as the supporting worksheets presented in the SMS Implementation Guide), include those as well.

SGP CERTIFICATION PROCESS: 10,000 FOOT VIEW

Submit Application for Certification:

Upon submission of the SGP application, facilities will receive all program guidance materials and will have 12 months to achieve certification.

Develop and Implement Sustainability Management System (SMS):

The SGP Certification Criteria requires facilities to development and implementation a Sustainability Management System, the backbone of the SGP certification program. The SMS will outline the management of a company's sustainability program and describe how the program is implemented in a systematic and documented manner. SGP follows the plan-do-check-act model that creates a self-sufficient management system. If you have no existing management system to use as a starting point, we have provided a template for you. The SMS can take up to 9 months to develop and implement.

Implement Best Practices:

The SGP Certification Criteria identifies Best Practices that must be implemented into your SMS where applicable. Each Best Practice is connected to one or more of the required criteria elements. For ease of reference, each Best Practice has been included with the relevant criteria element.

Prepare Documentation:

The SGP Certification Criteria requires facilities to provide documentation as evidence that the series of Best Practices found in the certification criteria have been implemented.

Schedule SGP Audit:

Once the facility is ready for audit, they contact the SGP Lead Auditor to schedule the in-plant audit. The audit process is conducted over two days, and the auditor will request to walk around the facility as well as interact with members of the Sustainability Committee.

Recertification Audit:

Certification is valid for a two-year period.

SGP certifies the entire facility and does not focus on the product going out the door.

SGP ascribes to the three pillars of sustainability: environmental, social and economic.

SGP is an audit based program so there is a requirement to maintain documentation.

HOW TO USE SGP'S TOOLS

As you go through the SGP Certification Roadmap, SGP provides the direct links to the SGP Certification item discussed, required documentation forms, the relevant section of the [SMS Template](#), as well as any other tools and information available to you. And, if you can't find something – ASK US!

After this program, you should have your own complete binder, virtual or otherwise and ready for your audit!

SGP Certification Road Map:

This SGP Certification Roadmap forms the pathway for you to walk through and develop your own program. Each section will provide information, tutorials, as well as what the auditor will be expecting to find for each individual element. Use the [Cross-Reference Chart](#) to see where you might have gaps between your current operations and SGP.

SGP Certification Criteria:

Sections may reference different elements of the [SGP Certification Criteria](#). Here is an example of how the SGP Certification Criteria will be referenced throughout this document:

Sustainability Management System (SMS) Template:

The [SMS Template](#) is the document that you can use to create your own management system. As you walk through a section of this guidance document it is HIGHLY recommended that you work through the corresponding procedural element of the [SMS template](#).

SGP Criteria Element: 3.1.3.1 Regulations

The facility must establish, implement and maintain a written procedure(s) to identify, achieve, and comply with applicable Federal, State/Provincial, and/or local:

- 3.1.3.1.1 Environmental laws
- 3.1.3.1.2 Safety and health laws
- 3.1.3.1.3 Employment labor laws

Best Practices:

Each [Best Practice](#) has been identified to control an environmental impact or safety and health risk and flows from a specific criteria element found within the SMS. As appropriate, the Best Practices have been identified and will be discussed as we talk about each SMS criteria element. All Best Practices will be marked in **RED** throughout this document.

SGP Metrics Tool:

This [excel spreadsheet](#) can help you collect, organize and maintain all required metrics.

Air Emissions Reductions Options Form:

[Use this form](#) to document the Best Practice found at 4.5.1

WRITTEN PROCEDURE OR DOCUMENTATION?

Why is this important?

Your SGP auditor needs to verify that you are achieving all applicable elements. And, this verification requires a review of written procedures and documentation that meet the intent of the certification criteria.

The SMS Template provided to you contains all required written procedures that you, repeat after me, need to adapt to your own facility!

There are elements that require both a written procedure and documentation; and there are elements that only require documentation. This manual will let you know which way to go!

Before we embark on this journey, it is important to understand the difference between written procedures and documentation. Each plays a significant role in the development of your Sustainability Program.

Written Procedure

Similar to a Standard Operating Procedure, a written procedure is meant to outline the steps that you will be taking to accomplish a specific task. A caution here – do not make them overly ambitious as the auditor will hold you to what you wrote. And, while there is no one set format for a written procedure, each must include the following elements:

- Purpose
- Scope
- Background and Information
- Associated Reference Documents
- Responsibilities
- Procedural Steps
- Frequency
- Identification of Records to be Kept
- Revision history/Document Control

Documentation

Documentation is written proof that a task has been accomplished. And, there is no set format or elements.

As you go through this guide and create your own SMS remember to use the [Cross Reference Chart](#) to see if you already have established procedures or documentation that might work. No need to reinvent the wheel.

This will become clearer as we start with our first tutorial section on Sustainability Committees. There you can begin to see how the procedure works and how documentation fits in.

FIRST STEP: SUSTAINABILITY COMMITTEE

SGP Criteria Element 3.1.2 Sustainability Committee

The facility must develop and maintain a formal Sustainability Committee whose scope includes all areas of environment, health, and safety (EHS).

- 3.1.2.1** Include members that are representative of the facility's departments including management and employees.
- 3.1.2.2** Identify a Sustainability Chair/Coordinator
- 3.1.2.3** Develop a regular meeting schedule and meet at least four times per year.
- 3.1.2.4** Develop and disseminate agendas and meeting minutes.
- 3.1.2.5** Develop communication channels for stakeholder input and feedback.
- 3.1.2.6** Identify and document potential continuous improvement projects.
- 3.1.2.7** Monitor Sustainability Management System activities including audits and assessments

What is a sustainability committee?

Creating a Sustainability Committee is a key requirement for SGP certification and key to the success with your new sustainability program. Simply put, it is a cross-functional team comprised of representatives from various operating departments committed to improving triple bottom line sustainability.

Remember our don't reinvent the wheel mantra? It applies here.

If you have a safety committee, you are encouraged to expand the scope of this committee to include the sustainability program. This committee is already meeting on a regular basis and has a core group of people from all departments.

Committee Function

The function of your committee is to help guide your organization's sustainability efforts and develop your institutional capacity around sustainability. The committee assesses the current state of the organization, brainstorms possibilities, may set goals and create action plans and monitors key activities of the SMS. This will help your organization make process and integrate sustainability into its culture.

Beyond being a great tool for developing a more sustainable organization, your committee engages employees in sustainability, which has been linked to greater employee productivity, satisfaction, and innovation in many organizations.

SGP lists specific tasks that the [Sustainability Committee](#) must meet and carry out. To help you with this, the [SMS Template](#) contains a written procedure that you can edit to fit your company's organization.

Designate and document, as soon as possible the members of the Committee who will be responsible for promoting and developing the SMS, which is the backbone of SGP certification efforts.

One person should be identified as the Sustainability Coordinator with the responsibility of maintaining the working documents for your SMS. This would include all the documentation required under each element of the SGP certification program.

NEXT STEP: SUSTAINABILITY POLICY

SGP Criteria Element 3.1.1 Sustainability Policy

The facility must make available a written Sustainability Policy. This policy must be signed and dated by a member of top management and made publicly available. This policy must set out the organization's commitment towards adoption of sustainable business practices. The Policy must be reviewed and reissued every two years. It must include, as a minimum, commitments to the following:

- 3.1.1.1** Identifying and monitoring applicable EHS regulations and maintaining compliance.
- 3.1.1.2** Identifying and monitoring applicable Federal, State/Provincial, and/or local employment labor laws and maintaining compliance.
- 3.1.1.3** Continuous improvement of the facility's sustainability performance that emphasizes source reduction, reuse and recycling
- 3.1.1.4** Sharing information on sustainability performance with all stakeholders.

Your sustainability policy is critical to your overall program.

Think of it as your voice to the world regarding the position you are taking as you become a more sustainable organization.

What do you want people – such as your customers, employees, community members – to know about what you are doing

SGP certification element [3.1.1. Sustainability Policy](#) sets forth the four basic elements that must be contained in your policy. How you say them is up to you. There is no set format or length requirement. This is your formal public statement regarding your sustainability actions. And, most importantly, it is meant to be a living document that must reviewed every two years.

Remember, the policy must be signed by a senior manager, preferably the President/CEO of the company and must be made publicly available. And, it must be written. In fact, the policy itself is your documentation for this element. The [SMS Template](#) includes a written procedure for this element that you can adjust accordingly.

Let's look at the 4 required Sustainability Policy elements

SGP certification element [3.1.1 Sustainability Policy](#) sets forth the four basic elements that must be contained in your policy. How you say them is up to you. There is no set format or length requirement. This is your formal public statement regarding your sustainability actions. And, most importantly, it is meant to be a living document.

- **3.1.1.1** Identifying and monitoring applicable EHS regulations and maintaining compliance: You need to include a statement indicating that you will both be in compliance and maintain your compliance status.
- **3.1.1.2** Identifying and monitoring applicable Federal, State/Provincial and/or local employment laws and maintaining compliance: Similar to the requirement above, you need to include a statement that you will both be in compliance with and maintain compliance with applicable employment laws.
- **3.1.1.3** Continuous Improvement of the facility's sustainability performance that emphasizes source reduction, reuse and recycling: A statement regarding how your facility seeks to engage in continuous improvement activities as well as a strategy statement regarding incorporation of pollution prevention and source reduction into your facility is needed.
- **3.1.1.4** Sharing information on sustainability performance with all stakeholders: A strategy statement on how your facility will communicate your sustainability efforts to all stakeholder groups – your employees, customers, vendors and community members.

Use of strong words that convey conviction help you tell your story. Your policy is the public voice of your sustainability program.

Here are a few examples from your colleagues:

To **Global Packaging**, social responsibility includes providing a workplace with equal employment and business opportunities for applicants, employees, customers and visitors; while complying with applicable local, state and federal laws, including but not limited to employment, safety and environmental requirements.

Modernistic: We will endeavor to lead by example within our industry and community as we seek opportunities, beyond regulatory compliance, to diminish the impact Modernistic has on the environment. With persistence and rigor, we will demonstrate and document our ongoing efforts through system reviews conducted a minimum of twice per year; and by performing regular audits to ensure sustainable results.

Image Options: Initiate and maintain a pollution reduction and active recycling program that focuses on source reduction, reuse and measurement in our manufacturing and office environment.

Berman: An important part of this commitment is our willingness to communicate with our employees, vendors, and customers to help them understand the long-term environmental impact of their product choices. We are committed to helping Customers make sustainable material and design choices whenever possible and we encourage you to communicate with us about sustainability so that we may inform and assist you in any way you need. By communicating with our customers, employees, and vendors, we hope to spread this commitment to the rest of our community, our industry, and our planet.

COMMUNICATION

SGP Criteria Element 3.1.3.3 Communications

The facility must create awareness of the facility's sustainability program by communicating, at least annually, relevant information to appropriate stakeholders, including employees, community, customers, and vendors. Relevant information includes the following elements:

- Sustainability policy
- Role of the sustainability committee
- Current Continuous Improvement Project

Facility must develop a written procedure documenting how communication with each identified stakeholder group is achieved.

Communicating to your Employees

It is recommended that you conduct general sustainability awareness training. A [draft presentation](#) is provided for your customization. It is important that all in your facility understand that you are seeking SGP certification and what this means. A suggested time line for conducting this training is included in the section of [SGP Timeline and Progress Measurement](#).

In addition to this training, it is recommended that the Committee consider ongoing communication channels. Facilities have used bulletin boards to post copies of minutes and other relevant information as well as company newsletters. Remember – your Committee is responsible for overseeing the development and continuation of these communication programs!

Stakeholder Communications Procedure

Your [SMS Template](#) includes a draft procedure - Stakeholder Communication Procedure. Review this template so that you can begin to consider how to make it your own. This element covers the tools that you will use to communicate to your employees, customers, vendors, as well as your community. There is no set format as to how to do this, and remember, you will need to ensure that you have documentation of the process you use for these conversations.

Onsite Contractors

This is a group specifically referenced in the Stakeholder Communication Procedure. So, once again you have your written procedure. You need to provide documentation that the communication strategy with this stakeholder group is ongoing. Options include development of a simple fact sheet outlining your policy elements and sustainability program that is used in tandem with a sign in sheet for all visitors. Once the sheet is read, they sign to indicate doing so. General awareness is key!

COMMUNICATION – BEST PRACTICES

SGP Best Practice 4.2 Internal Stakeholder Communications

[Element 4.2](#) asks you how you will be providing information to employees who are not competent to read or understand the English language. As this is a safety requirement, you may already have addressed this concern. If you have, simply indicate in a short paragraph how you address this issue. For example, you may provide an interpreter for all meetings. No need to reinvent the wheel if you are already meeting this requirement.

SGP Best Practice 4.3 External Stakeholder Communications

[Item 4.3.1](#) requires you to open dialogues with your customer base regarding the use of new materials or processes that can be used to improve the sustainability profile of either the finished product or process. Items to discuss may include design elements that reduce amount of substrate used; shipping logistics; and the final use and deposition of the product. SGP does not MANDATE the use of only alternative substrates, but does require you to talk to your customers about available options.

[Items 4.3.2](#) and [4.3.3](#) require you to talk to your vendors of substrates and chemicals to look for products that can help you reduce the impact of materials used. You only need to provide documentation of the process used to conduct these communications whether emails, notes, substrate data sheets, safety data sheets or other means.

Remember, it is key that you have a process that includes all the different characteristics as outlined in these Best Practices, such as biodegradability, recyclability, to mention a few. For your chemical products, as required under [4.3.3](#), you are looking for products that could help reduce your volatile organic compounds (VOCs) or the toxicity of the chemical.

Item [4.3.4](#) asks you to investigate the availability of take back programs with your suppliers. Ask your suppliers about any take back programs for unused materials and document these discussions by a note, letter or email of the request and response

IMPLEMENTATION AND OPERATION

SGP Criteria Element 3.1.3 Implementation and Operation

3.1.3.1 Regulations

The facility must establish, implement and maintain a written procedure(s) to identify, achieve, and comply with applicable Federal, State/Provincial, and/or local:

3.1.3.1.1 Environmental laws

3.1.3.1.2 Safety and health laws

3.1.3.1.3 Employment labor laws

For Elements 3.1.3.1.1, Environmental laws, and 3.1.3.1.2, Safety and Health laws, your [SMS template](#) contains one written procedure, Environmental and Safety Compliance Procedure. (NOTE: There is a version for facilities operating in the US and one for those operating in Canada.)

Your first step is to identify all relevant environment, safety and health regulations. If you have a robust environmental, safety and health compliance program – Congratulations. You simply need to provide a list of all these regulations. This list will become the scope of your regulatory compliance audit required under section 3.1.4.2

Your [SMS Template](#) contains a written procedure, Employment Compliance Procedure, that covers element 3.1.3.1.3, Employment Labor laws. Take a moment to review this

procedure. It is recommended that the person responsible for maintaining compliance with these issues be identified as the responsible party. Even though you are the coordinator of this effort, you do not need to be responsible for all procedures.

If you have an HR Department, it makes sense that you delegate this responsibility. You only need to ask them to fill out and document how they find out information ([FORM SMS-06](#)) and to record if they attend webinars or training ([FORM SMS-07](#)). You only need to ensure that you have access to the information on these two forms.

Once you have determined your obligations, you can now assign a name to who will be responsible for maintaining compliance as stated in Item 2 of the Environmental and Safety Compliance Procedure.

Take a deep breath, there are resources to help you!

Contact the trade association that works with your industry sector:

These representatives have information on your regulatory obligations and can save you many steps in the process! And best of all – your contacting them can be listed in [FORM SMS-03](#) as resources for both environmental and safety and health! Bonus!

Flexographic

Doreen Monteleone

dmonteleone@flexography.org

Screen and Digital

Marci Kinter

marcik@sgia.org

Commercial Printing

Gary Jones

gjones@printing.org

IMPLEMENTATION AND OPERATION: BEST PRACTICES

As with the criteria element for Communications, there are Best Practices associated with this specific criteria element. Only documentation is needed to ensure that your facility meets the following requirements:

➤ **SGP Best Practice 4.5 Checking and Corrective Actions**

- [4.5.1](#) requires you to conduct an [Air Emission Reduction Assessment](#). Using the template provided, follow the steps outlined and you will have achieved documentation for this element. This best practice is to control the environmental impact of air emissions by looking for ways to reduce emissions. **SGP DOES NOT** require you to reduce your emissions, only to identify if there are possibilities to do so and assess if they are technically and economically feasible. The goal is to find ways to reduce emissions while also saving money via reduced material usage, increased efficiency or a new process for example.
- [4.5.2](#) requires you to demonstrate acceptable Indoor Air Quality. This best practice is to control the health risk to your employees from exposure to hazardous substances. As you read through this requirement, you will notice that often the items listed correlate to a regulation. For instance, this element requires you to prepare a written inventory of all products used. This is also a requirement under OSHA's Hazard Communication Program. So, once again, no need to recreate the wheel, simply pull that list into this criteria element for documentation purposes. There are several options regarding determination of indoor air quality. One, based on usage to calculate if your indoor air quality is below the threshold limits. And, two, to conduct testing. SGP has developed the [IAQ DETERMINATION TOOL](#) for your use.

➤ **SGP Best Practice 4.7 Equipment/Material**

- Item [4.7.1](#) asks for documentation of your preventative maintenance program. For Item 4.7.2 it is recommended that you develop a program of maintenance with defined intervals and tasks for each piece of equipment. There may be written records or electronic records kept of completed tasks. For third party contractors, the work contract and invoice will suffice for documentation.

This best practice is to prevent waste and injuries caused by equipment failure. Again, no need to reinvent the wheel. Simply evaluate your current program against the criteria element. Some equipment's maintenance is built in to the operation of the equipment, and if so, you do not need to generate additional paperwork. A simple discussion with the auditor will suffice.

➤ **SGP Best Practice 4.8 Chemical Management – Applicable to All Print Processes**

- Regardless of print process, all these items apply to you. They are intended to reduce the impact on the environment from hazardous chemicals by ensuring proper disposal and choosing less hazardous materials where they are available. Take time, as a committee, to review each element and record what is being done. This serves as your documentation. If an element does not apply to you, such as [4.8.3](#), silver recovery, simply indicate Not Applicable.
- The first three items [4.8.1](#) to [4.8.3](#) are all regulatory requirements so should be verified during the regulatory compliance audit required in section [3.1.4.1](#).
- Items [4.8.4](#) and [4.8.5](#) are indoor air quality issues and should also be assessed in the indoor air quality assessment required by section [4.5.2](#).
- Item [4.8.8](#) requires that you contact each of your suppliers for the material listed in this section and obtain written confirmation.

[4.11](#) Chemical Management – Screen Printing Specific

[4.12](#) Chemical Management – Digital Printing Specific

[4.10](#) Chemical Management – Flexographic Specific

[4.9](#) Chemical Management – Lithographic Specific

Based on the print process(es) used at your facility, take time, as a committee, to review and document each relevant item. Again, look at your current work procedures to determine if you are already doing what is asked. No need to reinvent the wheel!

➤ **SGP Best Practice 4.13 Waste Management – Applicable to All Print Processes**

- For criteria element [4.13.1](#), you will need to document these informal programs with a Standard Operating Procedure. For criteria elements [4.13.2](#), [4.13.3](#), [4.13.4](#), [4.13.7](#), [4.13.8](#) the auditor will collect evidence by observation during a tour of your facility as part of the certification audit. Please read each element to determine applicability to your facility.

These best practices are intended to control the environmental and economic impact from both renewable and non-renewable resources. Waste represents lost revenue and the handling and disposition has a negative environmental impact. Most facilities have adopted informal programs to reduce waste from both make ready and production operations.

SELECT YOUR CONTINUOUS IMPROVEMENT PROJECT

Adoption and implementation of an annual Continuous Improvement Project is what sets SGP certification apart from a traditional Environmental Management System. These projects are to help you as a facility maintain that forward momentum on your journey. A few things to know:

1. As with other elements, there is a requirement for a written procedure.
2. The project can focus on any element in your operation EXCEPT for any project directly related to sales or that is required for regulatory compliance.
3. The project can be underway at the time of your audit as the auditor is looking at the process by which you identified, developed and implemented the program.

Starting with the written procedure, the Continuous Improvement Procedure found in your [SMS template](#) provides you with a version that you can edit. This procedure requires you to do the following:

1. Track and document all metrics using the [SGP Metrics Form](#). This will be discussed in the next section.
2. Develop a SMART Goal and Action Plan

SMART stands for

- **S**pecific
- **M**easurable
- **A**ttainable
- **R**elevant
- **T**ime-Bound

Here is an example of a goal statement that does **NOT** meet the SMART goal requirements:

“Reduce the amount of solid waste going to the landfill by increasing in house recycling programs.”

- **Specific** refers to the inclusion of a focus, well defined action statement that includes the desired outcome.
- **Measurable** refers to the ability to measure progress. How much; how many; and how will I know the goal is accomplished.
- **Attainable** means that you have identified and can provide the resources to meet your stated goal. The information on resources should be included in your action plan.
- **Relevant** asks that you consider whether pursuing this project makes overall business sense to the organization.
- **Time-Bound** requires you to set a realistic goal for completion. This too will be supported by your action plan. The SGP Program office requests that all projects be completed within 12 months.

Now, with all this in mind, let’s look at the statement again, this time in the SMART Format.

In 2017, reduce the amount of plastics, cardboard and other identified recyclable items going to the solid waste landfill by 15% by increasing the amount of product recycled.”

Can you see the difference? This goal statement would be acceptable to the SGP auditor.

Next up, development of the [Continuous Improvement Project Workplan \(FORM SMS-08\)](#).

Take a moment to think about the steps you will need to take, the resources you will need, training of employees if needed, and then you are ready to fill out the action plan.

Remember to include:

- Project objective statement(s)
- Baseline metric - progress will be measured against
- Resources (e.g., employees, time, capital costs, outside contractors, etc.) needed to accomplish project.
- Employee roles and responsibilities
- Method and schedule for periodic review of ongoing progress

This action plan provides the documentation you need for this SGP certification criteria element.

TRAINING

To be truly successful all employees must understand the journey upon which you are embarking, and the role that they play. In addition, you need to ensure that your suppliers, onsite contractors and/or service providers understand your facility's direction. SGP certification element 3.1.3.4, Training, requires you to develop a written procedure outlining your training program.

SGP Criteria Element 3.1.3 Implementation and Operation

3.1.3.4 Training

The facility must have a written procedure on how training will be conducted within the facility.

Procedure must reference the training elements required for employees, onsite service providers/contractors and suppliers.

The [SMS Template](#) includes a procedure for you to review and edit. The [Personnel Training Procedure](#) includes all training elements. [FORM SMS-09](#) should be used to document each training element. For example, training under the Continuous Improvement Project will be listed in the specific action plan, however, any training would be recorded using Form SMS-09. This helps provide an element of consistency for both the facility and the auditor.

Training required for specific environmental and safety/health regulations, such as the Hazard Communication Standard, would be included with the specific regulatory program. The training

referenced here applies only to the training as required by the Sustainability Management System.

Again, don't reinvent the wheel! Add sustainability training to your existing training program. For example, you could add general SMS awareness to your new employee orientation process and add a checkbox to your checklist so the training is documented. You could add SMS procedures into your training matrix or electronic training program. And you could add SMS topics into general plant or department meetings. Just remember to capture the training with a sign in sheet.

TRAINING: BEST PRACTICES

The SGP Program did identify specific training elements and included those in the Best Practices:

➤ **SGP Best Practice 4.4 Employee Training**

- Item [4.4.1](#), [4.4.3](#) and [4.4.4](#), requires you to provide training on specific functions. The documentation for the training is FORM SMS-09 for each specific element. [4.4.5](#), references the required use of FORM SMS-09 when documenting training activities.

CHECKING AND CORRECTIVE ACTION

SGP Criteria Element 3.1.4 Checking and Corrective Action

The facility must establish, implement and maintain a single written procedure on the facility's process to conduct and document:

3.1.4.1 Environmental compliance audit every two years, including documentation of prompt corrective actions for any non-conformances.

3.1.4.2 Safety and Health compliance audit every two years, including documentation of prompt corrective actions for any non-conformances.

3.1.4.3 Sustainability Management System (SMS) conformance audit every year including documentation of prompt corrective actions for any non-conformances.

Certification element [3.1.4, Checking and Corrective Action](#), requires you to develop a written procedure for conducting a comprehensive environmental regulatory compliance audit; comprehensive regulatory compliance safety and health audit; and an annual conformance audit of your sustainability management system.

The written requirement for your comprehensive environmental and safety and health audit is found in Item 3 of the Environmental Health and Safety Compliance Procedure. The cornerstone of a sustainable business operation is compliance. The SGP Program requires a full audit for both environmental and safety and health every two years. In the earlier discussion we discussed the need to identify your regulatory requirements. This list of regulatory requirements will drive both the environmental and safety/health audits.

Both audits must be conducted by a "qualified person." This would be someone in your facility who is knowledgeable about the applicability of these regulatory programs to the facility's operations. Often, this will be the same person who is responsible for the day to day compliance obligations. Or, you can choose to contract with an outside party to perform the audits and establish a compliance program for you. A recommendation – the day to day compliance should still be done by an internal employee.

The documentation for the element is the audit report itself. For each report, a summary of the findings should be presented, and if you found anything missing, the process to correct the action must be noted.

A STRONG WORD AT THIS POINT: SGP is NOT a regulatory agency or program. The auditor will NOT be conducting an Environmental or Safety/Health Audit. They are seeking to ensure that you have a process in place that identifies the regulations; recognizes if there are compliance issues; and puts a plan in place to correct the problem.

The audit of the Sustainability Management System is just that – looking at how the Management System is working, and identifying opportunities for improvement. And, it is fine if changes are needed!! A thorough audit should be able to identify suggestions for doing things more easily, comprehensively or even differently. Your SMS should be an organic process changing over time. It too requires a written procedure, and the one in your [SMS Template](#), SMS Audit Procedure, is available. This audit can be completed by anyone knowledgeable in the SGP criteria, should look at every element in the SGP certification criteria and utilize a checklist. [FORM SMS-10](#) provides a framework for your audit. The intent is to look at each element of the system and determine if:

- Acceptable: all is working fine, and the element is comprehensively addressed
- Acceptable with Recommendations: part of the criteria is being addressed but there are gaps or missing information
- Corrective Action Needed: the element is substantially not being addressed and immediate action is required.

For example: Under SGP criteria, the Sustainability Committee is required to meet four times a year. They met four times, but did not feel it was sufficient. The element was met; however, the committee is recommending that 6 meetings a year be held. This would be indicated on the audit form as Acceptable with Recommendations.

All audit programs covered under [3.1.4, Checking and Corrective Actions](#), must use the following written procedure to report any corrective actions. The SMS Corrective Action Procedure in your [SMS Template](#) provides you with the framework for reporting the action as well as the pathway forward. [FORM SMS-12](#) requires you to identify the issue; identify the solution; identify the responsible party for fixing; as well as the date the action was completed.

For example: Under the SGP criteria for communications 3.1.3.3 the facility must create awareness of the sustainability program by communicating annually with internal and external stakeholders. A letter was developed and sent to three customers. Part of the element has been met but not all customers received the communication. If employees and vendors had all received awareness communication, this would be acceptable with a recommendation to include more customers.

***Are you noticing how each
section feeds into another?***

***The entire management system should
be an organic living document.***

No one section truly stands alone!

INTERNAL CHECK: MANAGEMENT REVIEW

The SMS Management System criteria is built on the Plan, Do, Check, Act model.

We are at the module that looks at Check!

SGP Criteria Element 3.1.5 Management's Commitment, Participation and Review

3.1.5.1 Establish, implement and maintain a written procedure documenting the senior management review of all elements of the sustainability management program. The review must include the following:

- SGP Metrics,
- results of the annual continuous improvement project,
- results of the SMS Audit and
- any corrective actions for non-conformances identified by the audits conducted under 3.1.4

3.1.5.2 Annually conduct and document the senior management review. Any recommendations for improvement or modifications must be documented.

The SGP certification criteria element [3.1.5, Management's Commitment, Participation and Review](#), requires an annual senior management review. The review includes consideration of the [SGP Metrics](#), results of the annual continuous improvement project; results of the SMS Audit; and any non-conformances identified by any of the audits conducted under [3.1.4, Checking and Corrective Action](#).

Your [SMS Template](#) contains a written procedure, SMS Management Review, to help guide you and organize your thoughts. [FORM SMS-13](#) can be used to document any findings and recommended actions.

Management review is key to continual improvement. This program review ensures that ongoing and practical input is received from top management and that sufficient resources are provided to maintain the system. If the management system is not providing the expected results, management can decide how to allocate personnel and resources to improve performance.

Now, if this is your first certification cycle, it is not expected that this process would be completed. However, you are still required to have a written procedure detailing the process that will take place.

TRACKING YOUR DOCUMENTS: DOCUMENT CONTROL

SGP Criteria Element 3.1.6 Document Control

3.1.6.1 Establish, implement, and maintain a written procedure for document control. The facility must establish a process for the creation, review, revision, removal, and distribution of documents that describe and control the Sustainability Management System.

3.1.6.2 To ensure that SMS documents are current and complete, the facility must ensure that the following elements are included within each written procedure:

- Purpose
- Scope
- Background and definitions
- Associated reference documents
- Responsibilities
- Procedural steps
- Frequency
- Identification of records that will be kept
- Revision history/document control

3.1.6.3 All required documents and records must be kept for 3 years. Records include meeting minutes; agendas; and all required written audit reports and assessments.

The SGP certification criteria, [3.1.6, Document Control](#), requires you to develop and maintain a system that allows you to track the creation and revisions made to documents critical to your management system.

There is a 3-year document retention requirement so the dating of your documents is critical to maintaining a system.

In your [SMS Template](#), the Document Control Procedure, provides you with the needed direction. Further, [FORM SMS-I4](#) provides a template for you to use to track the revision history.

As you embark on the development of your manual, it is required to have this procedure in place, however, it is recommended that you do not start tracking revisions made until after your first certification audit –otherwise you might have pages of revisions!

ANNUAL REPORT

[3.2 Annual Report](#)

The facility must complete the SGP Partnership Annual Report using the SGP Annual Report Template and submit to SGP for approval.

Note: The first annual report is due one year and two months from initial certification date.

SMS element [3.2, Annual Report](#), requires all facilities to submit an annual report to the SGP office.

The submission of the report is based on the certification month. SGP provides all facilities with the [Annual Report](#) form to use.

Facilities that do not submit the Annual Report in a timely manner can be subject to receiving a corrective action on their next certification audit.

AND, A BIT MORE BEST PRACTICES....

Remember way back at the beginning where we talked about the three pillars of sustainability – social, economic and environmental? The SGP Program has identified a series of Best Practices that relate to these three elements that are not necessarily covered by a specific element in the program’s SMS certification criteria. **All only require documentation!** Let’s look...

➤ **SGP BEST PRACTICE 4.6 SOCIAL**

- [Item 4.6](#) - Document your investigation into possible opportunities to work with outside stakeholders on sustainability projects by showing any committee notes, letters or emails of the effort and any discovered opportunities as well as any decisions regarding the discoveries (if any). This program will probably expand as your SMS matures. Once you have completed a number of annual improvement projects, it may become challenging to identify meaningful new ones. This is when community programs tend to increase.

➤ **SGP BEST PRACTICE 4.8 CHEMICAL MANAGEMENT – APPLICABLE TO ALL PRINT PROCESSES**

- [Item 4.8.6](#) Document that you have asked your cleaning companies to investigate and consider using third party certified products by using a letter, email, or note you have sent and ideally the company’s response.
- [Item 4.8.7](#) Document that you consider continuous improvement, environmental impact, and employee protection when selecting and using janitorial supplies by preparing written questions to ask vendors or providing written specification that you require from your vendors.

➤ **SGP BEST PRACTICE 4.13 WASTE MANAGEMENT – APPLICABLE TO ALL PRINT PROCESSES**

This element invokes the reduce, reuse, recycle hierarchy whereby it is better to reuse than recycle but if there is no further beneficial use then recycling is better than disposal.

- [Item 4.13.5](#) Document that you have investigated options to recycle and reuse packaging materials and what decisions you have made
- [Item 4.13.6](#) Document your office recycling program by describing the recycling program and methods you have created for office areas

➤ **SGP BEST PRACTICE 4.14 TRANSPORTATION MANAGEMENT – APPLICABLE TO ALL PRINT PROCESSES**

All transportation has an environmental impact due to use of non-renewable resources (fossil fuels) and emissions to air (tailpipe exhaust). This section seeks to minimize the environmental impact of transportation by maximizing trailer loads, minimizing miles travelled and using the most efficient engines.

- [Item 4.14.1](#) Document your investigation into ways to optimize the movement of goods, including internal product movement and offsite shipments using owned, leased or third-party transportation services.
- [Item 4.14.2](#) Document your investigation regarding participation in the SmartWay program and/or work with transportation companies that are participating in SmartWay.
- [Item 4.14.3](#) Document options you investigated to encourage cleaner commuting by employees such as bike racks, lockers and shower facilities; enrollment programs for discounted bus passes; establishment of car pools; installation of outlets for electric vehicles; and preferred parking for hybrid and electric vehicles.
- [Item 4.14.4](#) Document that you have investigated implementation of a no idle policy in all loading docks.

➤ **SGP BEST PRACTICE 4.15 UTILITIES/ENERGY MANAGEMENT – APPLICABLE TO ALL PRINT PROCESSES**

This is a win-win situation as reduced energy demands saves the company money and also reduces environmental impact by reducing the use of non-renewable resources and reducing air emissions. Freshwater is also a finite resource, often being consumed faster than it is replenished in the local watershed.

(If you lease your property, documentation can be provided via a letter and/or response from the property owner)

- [Item 4.15.1](#) Document that when replacing equipment, you consider Energy-Star compliant (or equivalent, based on country of manufacture) equipment such as computers, monitors, servers, and appliances where available to meet the specifications of use.
- [Item 4.15.2](#) Conduct and document a comprehensive energy audit, review the audit every two years, and implement appropriate energy reduction projects. Your documentation should be a summary of your findings. You can ask your energy company to conduct your audit. The SGP program does have a sample [energy audit](#) for your use.
- [Item 4.15.3](#) Document that you have investigated options to reduce water usage, such as use of the Water Sense Program
- [Item 4.15.4](#) Document that when remodeling or replacing fixtures that you evaluated the use of low-flow toilets, double flush toilets, motion activated faucets and toilets, and other water reducing items.
- [Item 4.15.5](#) - Document that you have investigated green buying and/or green pricing for renewable energy options.

➤ **SGP BEST PRACTICE 4.16 GROUNDS MANAGEMENT – APPLICABLE TO ALL PRINT PROCESSES**

- [Item 4.16.1](#) If you own your property each of the following must be addressed. If you lease the property, then the following must be recommended to the property owner. Email, letters, etc., from the property owner would be considered appropriate documentation.
- [Item 4.16.2](#) Document that, if applicable, appropriate fertilizers, insecticides and pesticides are chosen. Elements to be considered include continuous improvement, environmental impact, and employee protection.
- [Item 4.16.3](#) Document that, if applicable, appropriate environmentally safer ice melting materials are chosen. Elements to be considered include continuous improvement, environmental impact, and employee protection.
- [Item 4.16.4](#) Document your investigation into a system for capturing rainwater for irrigation purposes.
- [Item 4.16.5](#) Document that when replacing landscaping, native and low water use plants are used when possible
- [Item 4.16.6](#) Document that, when possible, yard waste can be turned into mulch or composting.
- [Item 4.16.7](#) Consider if practical to use part of your grounds as a source of habitat protection.
- [Item 4.16.8](#) Maintain your grounds and property to prevent degradation or environmental contamination.