

# 2022 INTERNAL AUDIT REPORT

## ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)

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*ISO 14001:2015 Standard  
Elmira and Woodstock*

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**Prepared for:**

Toyota Boshoku Canada, Inc.  
45 Southfield Drive,  
Elmira, Ontario N3B 3L6

**Project No.:** 22ELC048

ENVIROLUM CONSULTING INC.  
KITCHENER, ON  
October 30, 2022

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## 1.0 Overview

EnviroLum Consulting Inc. (*EnviroLum*) was retained by Toyota Boshoku Canada (*TBCA*) to conduct an internal audit of TBCA's Environmental Management System (*EMS*) on October 20 & 21, 2022. The purpose of the internal audit is to determine whether it conforms to the requirements of the ISO 14001:2015 standard and to assess whether the EMS is effectively implemented.

This report summarizes the internal audit results, categorizing positive findings, issues of non-conformity and opportunities for improvement.

## 2.0 Audit Scope

The internal audit was performed at Toyota Boshoku Canada's two Canadian locations:

- 45 Southfield Drive in Elmira, Ontario; and
- 230 Universal Road in Woodstock, Ontario.

This audit reviewed TBCA's planned processes and programs to evaluate how well EMS requirements are integrated into them.

Process audits examine the resources (equipment, materials, and people) used to transform the inputs into outputs, the methods (procedures and instructions) followed and the measures collected to determine process performance. Process audits check the adequacy and effectiveness of the process controls established by procedures, work instructions, training and process specifications. Objective evidence is reviewed to confirm conformity.

Table A in this report summarizes the scope of the internal audit.

**TABLE A: Scope of 2022 Internal Audit**

<b>Organization name:</b>	Toyota Boshoku Canada		
<b>Location description:</b>	45 Southfield Dr, Elmira and 230 Universal Road, Woodstock, Ontario		
<b>Processes/Programs:</b>	Toyota Boshoku – Environmental Management System		
<b>Auditor:</b>	Connie Lum, EP(CEA); Brigitte Roth, BES, EP(EMSLA)	<b>Audit dates:</b>	October 20 & 21, 2022
<b>Audit period:</b>	September 30, 2020 to October 21, 2022		

## 3.0 Audit Objectives

The objective of this audit is to identify areas where the existing EMS does not meet or satisfy the ISO 14001:2015 Standard requirements. After identification of the EMS gaps, TBCA will address the items found to be in non-conformance (*NC*) or noted as opportunities for improvement (*OPI*).

## 4.0 Methodology

The audit was conducted in accordance with CAN/CSA-ISO 19011:2018 – Guidelines for auditing management systems.

The list of auditing criteria covered is included in Appendix “A” – Audit Plan. Appendix “B” – Staff Interviews lists persons interviewed. Appendix “C” – Audit Checklists includes the checklists used to conduct the audit. The checklist includes notes of and identifies the documents and records that were reviewed.

In order to conduct audits within scope, time and budgetary constraints, audit evidence is based on a sampling of processes, programs, and information available. Not every single document, operation, system, process or piece of information relating to the EMS performance is reviewed. The size of the sample selected is appropriate to the size and scale of the operation and information available. Objective evidence collected is based upon the sampling.

The conclusions presented in this report are based on information presented during the internal audit.

### 4.1 Risks and Opportunities

The risk-based approach was used in conducting this audit; which considers risks and opportunities to ensure that the audit focuses on matters that are significant for the auditee and for achieving the audit program objectives.

Potential risks can include those related to *ineffective*: planning / identification of external and internal issues; resources; audit team; communication; audit program implementation / monitoring / improvement; control of documented information; and availability of auditee and/or evidence.

Opportunities can include *efficiencies* such as: allowing multiple audits to be conducted in a single visit; minimizing time and distances travelling to sites; matching competencies of audit team to competencies needed; and aligning audit dates with the availability of auditee’s staff.

### 4.2 Audit Program Monitoring and Reviewing

The implementation of the audit program was monitored and, at appropriate intervals, reviewed to assess whether the objectives have been met and to identify opportunities for improvement. The results of this review will be included in this report, if applicable.

Performance indicators were used to monitor characteristics such as:

- conformity with the audit program, schedules and audit objectives,
- the ability to implement the audit plan, and
- feedback from top management, auditees, auditors and other interested parties.

The audit program review considered:

- a) results and trends from monitoring,
- b) conformity with procedures,
- c) evolving needs and expectations of relevant interested parties,
- d) audit program records,
- e) alternative or new auditing methods / practices,

- f) effectiveness of the actions to address the risks and opportunities, and internal and external issues associated with the audit program, and
- g) confidentiality and information security issues relating to the audit program.

Corrective actions and opportunities for improvement from the results of audit program reviews, if any, are included in the Tables section of this audit report.

### 4.3 Opening and Closing Meetings

The internal audit was opened with a hybrid in-person and virtual meeting attended by Jason Psutka representing TBCA and Connie Lum and Brigitte Roth, both representing EnviroLum Consulting Inc.

## 5.0 Audit Findings

The audit findings are based on review of records, staff interviews, and site inspections of both Elmira and Woodstock sites. A total of 18 audit findings including 3 non-conformities, and 15 opportunities for improvement.

The findings are summarized at the end of this report under the following Tables:

**TABLE 1: Non-conformities** – listing areas identified that “*do not meet*” requirements.

**TABLE 2: Opportunities for improvement** – listing areas that “*partially meet*” requirements.

### 5.1 Audit Findings from Site Inspections

A site inspection was conducted at both Elmira and Woodstock sites during the on-site audit. Table B in this report summarizes the findings from the site inspections.

**TABLE B: Site Inspection Findings**

<b>Elmira:</b>	<ul style="list-style-type: none"> <li>• Hazardous waste labels available for use, which includes prompt for accumulation date, but not completed.</li> <li>• Glue spray booth: Marzena and Andrew confirmed weekly filter changed – reviewed Team Leader Daily Check Sheet EL-PR-MAN128-FM2-E, rev8</li> <li>• Notice Sign about sink at IMM area “Do not pour unauthorized fluid down sink/drain”.</li> <li>• Spill kits are consistently checked on a monthly basis by member of Green Team.</li> </ul>
<b>Woodstock:</b>	<ul style="list-style-type: none"> <li>• Environmental Policy posted on Display Board</li> <li>• Floor drain near IMM connected to floor trench appears to not be sealed from draining to outside environment.</li> <li>• Hazardous waste labels available for use in Hazardous Waste Storage Room</li> <li>• Security camera set up in Hazardous Waste Storage Room and monitored by Environmental Dept.</li> <li>• Green Team meets once per month</li> <li>• Spill kits are not inspected regularly (monthly).</li> </ul>

## 6.0 Confidentiality

The information gathered by EnviroLum Consulting Inc. is the property of the organization only and will not be transmitted to any third party without the prior written consent of an authorized representative.

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All documents provided by the organization prior to and during the audit are kept only for the purpose of audit review and audit report preparation.

## TABLES

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Table 1: Non-Conformances

Table 2: Opportunities for Improvement

## Internal Audit Findings Summary

**TABLE 1: Non-Conformities**

#	ISO Section	Element	Audit Finding / Comments	Type	Actions Required/Recommended
1	7.5.2.	Documented Information - Creating and Updating	a new Procedure titled Material & Waste Management posted in Hazardous Waste Storage Room in Woodstock, showing List of Materials.	NC	Procedure is missing procedure number.
2	8.2	Emergency Preparedness and Response	Inspection of Spill Kits during site audit. Elmira: Maintain monthly inspections of Spill Kits.	NC	Woodstock: Recurring issue of tamper tape on kits need to be resealed. Not inspected monthly as it should be.
3	8.2	Emergency Preparedness and Response	Spill stain located outside Waste Storage Room in past year, was identified as a minor spill, but no incident report was completed as per procedure.	NC	Prepare an incident report for the recent minor spill which had already been cleaned up.

**Internal Audit Findings Summary**

**TABLE 2: Opportunities for Improvement**

#	ISO Section	Element	Audit Finding / Comments	Type	Actions Required/Recommended
1	4.2	Understanding the needs and expectations of interested parties	Reviewed during Management Review. List of interested parties: contractors, customers, suppliers, employees. Meeting minute identifies parties' expectations.	OFI	What do parties expect from TBCA? Not all expectations have been identified for listed parties on latest Management Review presentation/meeting minutes.
2	5.2	Environmental Policy	Posted on bulletin board outside of washrooms. Posted in board rooms. Posted in production area. Bulletin board at South entrance.	OFI	Should also be posted on bulletin board outside lunchroom. Re-Post on info screen in Lobby.
3	6.1.2	Environmental Aspects	CA-EN-PR-06-12 – Identifying and Ranking Environmental Aspects, dated March 1, 2017 states that within the scope of the EMS: - all areas of the facility including production, production support and admin areas, considering: transportation, storage, use / mists, disposal / storage - At least once a year, aspects must be performed and whenever major changes are made to production processes and updated as necessary. - aspects are determined under normal operations, shutdown and start-up and/or emergencies. - The rating criteria is described - Seven environmental impacts identified by TBCA include: a) air emissions, b) water / sewer discharges, c) solid wastes (reduction, reuse, recycling or disposal), d) land contamination, e) resource use, f) emissions (of thermal E, noise, odour, dust, vibration, visual impacts), g) misc. impacts  Related to the determination of environmental aspects, EMS Manual s.6.1.2 links to: - CA-EN-FM-06-12 – Appendix A, Working Aspects Identification & Evaluation Form, - CA-EN-FM-06-12-1 – Appendix B, Environmental Aspects Summary List, and - CA-EN-FM-06-12-2 – Appendix C, Visual Posting of Significant Aspects.  Significant environmental aspects are identified as use of electricity and natural gas.	OFI	Related to Appendix C, Visual Posting of Significant Aspects – an opportunity is identified to make the communication relevant to the various work areas' activities. For example, communicate about the benefits of reduced energy use and reducing natural gas use and ways in which each person can make a difference (specific to each work area).
4	6.1.2	Environmental Aspects	Site inspection noted some aspects not identified on Environmental Aspects List. i.e. Compressor Room has oil/water separator prior to discharging water to sanitary sewer; floor wash water collected as hazardous liquid disposal; water jet cutting at Headliner	OFI	Review Environmental Aspects List to ensure up-to-date and accurate.
5	7.3	Awareness	Chemical Procurement and Environmental Awareness training conducted. Jason has received emails confirming TMs participation and completion of training.	OFI	Training should be completed for staff responsible for Haz Waste, Maintenance emergency however, not conducted. Training documents available and ready for training.
6			No specific training record. Jason checking with Corporate for document. Training conducted through Halogen online training platform.	OFI	Refresher/new training related to EMS/Environmental Awareness for current staff is necessary.
7	7.4.2	Internal Communications	Company has an app myTBapp – for communication. Work with Sustainable Waterloo Region? J.P would like to see communication within Production weekly/daily meetings.	OFI	Incorporate environmental communications into Production weekly/daily meetings. As well as daily communications from HR to everyone with an email address.
8			Track communication including communication methods to tracking sheet. Added Method of communication, frequency)		
9	7.4.3	External Communications	Jason has a tracking document for communication, but used as a complaint log. Already identified as an action item.  Communication Tracking CA-EN-FM-07-40, currently blank.	OFI	Track communication with external parties (positive/negative) outcomes.
10	7.5.1	Documented Information - General	Reviewed selected operational procedures and compared against activities during site visit.	OFI	Update/review of procedures required: Operational Control - frequency of filter replacements; Waste Management - S.5: Labeling and Marking (image of wrong label); Spill Control Response Plan (in process).
11	7.5.3	Control of Documented Information	EMS Manual s.7.5 references the Document Control Specialist who holds the original version of the document and who is responsible for maintaining and controlling the document.  CA-EN-PR-07-50 Documented Information describes types of documentation (e.g. Environmental Manual, procedures, forms), the templates to be used, file naming convention, approvals, accessibility, printing, control, storage & retention, disposal / destruction of records, electronic records, revisions and archiving.	OFI	Consider describing in the CA-EN-PR-07-50 Documented Information procedure how documented information of external origin determined by TBCA as being necessary for the planning and operation of the EMS is identified and controlled. Examples: approvals, legislative references, stakeholder requirements. Add section for documentation/location of external origins. (ECA's, HVAC manufacturer's specs, etc)
12	8.2	Emergency Response Plan	No periodic test completed. Requirement for periodic testing of planned response actions not included in procedures.	OFI	Plan to conduct test/drill of Emergency Plan of Action and Spill Control Response Plan. Retain records of test/drill.
13	9.1	Monitoring, Measurement, Analysis and Evaluation	Use of materials such as glues and plastic resins currently not being tracked.	OFI	Consider monitoring/measuring plastic resins recycled and reused back into process. Also improve tracking of glue usage.
14	9.3	Management Review	Consider including prompts at the end of the CA-EN-FM-09-30 Management Review Minutes template to ensure the "outputs" of management review requirements are fulfilled (e.g. conclusion on the continuing suitability, adequacy and effectiveness of the EMS, decisions on opportunities, decisions re: any need for changes, including resources, etc.)	OFI	Update template of Management Review Minutes with prompt to ensure "outputs" of management review are fulfilled.
15	10.1	Improvement - General	Internal Audit and its findings. Suggestion box – KY(Kiken Yoshi – Risk Forecast) – can identify a risk before a problem occurs. - Electronic suggestion box. Jason receives suggestions as they come in. - Tracking sheet (Kaizen Suggestion 2022.xls – includes suggestions from April, June, Aug – indicates name, shift, dept, if implemented, impact, notes, description kaizen/suggestion including energy reduction, sustainability improvement, reduce rainwater runoff).	OFI	Install a carbon neutral message sign/poster to inform TMs and visitors. - TM referral program for making suggestions. Post about new idea implementation on Display boards by TMs. To show other TMs what they can do.

## APPENDIX A

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### Audit Plan

# Internal Audit Plan

## 1.0 INTRODUCTION

Toyota Boshoku Canada, Inc. (TBCA) retained EnviroLUM Consulting Inc. (*EnviroLUM*) to facilitate the TBCA team to conduct an internal audit of their environmental management system (EMS). The audit program is based on a sampling of the EMS elements of the facilities located in Ontario, in accordance with a sampling strategy and an annual assessment of environmental performance, changes in legal requirements and previous audit findings.

The Auditees (TBCA facilities) included as part of the 2022 internal audit program are:

- Elmira
- Woodstock

The internal audit will be conducted by Audit Team Leader, Connie Lum, MA, B.Sc., EP(CEA) of EnviroLUM in support of the TBCA team.

## 2.0 OBJECTIVES AND AUDIT SCOPE

The objectives of the EMS internal audit are to:

- determine whether TBCA is effective in achieving its intended EMS outcomes;
- verify that TBCA’s operations conform to requirements of the ISO 14001:2015 environmental management systems international standard;
- Verify that the EMS has been properly implemented and maintained; and
- Provide the audit findings to TBCA management team.

The EMS internal audit will be conducted by a trained and certified auditor through the use of site inspection observations, review of available related records and documents, and interviews with key staff.

The scope of the 2022 internal audit program is from approximately one (1) year prior to the date of the current audit, unless older documents are still current and demonstrate conformance to the EMS. Past non-conformances and corrective actions related to the areas being assessed will be reviewed and followed up with. Due to the limitation in audit time available, a random sample of ISO 14001:2015 Standard elements will be chosen for auditing.

The audit results will be summarized in the internal audit report.

The following table summarizes the audit scope:

Location description:	Toyota Boshoku Canada – Elmira & Woodstock Plants
EnviroLUM’s Audit Team:	Connie Lum, MA, B.SC., EP(CEA); Brigitte Roth, BES, EP(EMSLA)
Audit period:	Past year and/or since previous internal audit, as applicable
On-site audit dates:	Elmira – Thursday, October 20, 2022 Woodstock – Friday, October 21, 2022

External agencies will not be contacted as part of this internal audit. Objective information and evidence provided by the TBCA team will be relied upon by the auditor.

Cameras may be used to take photographs to assist the auditor with details from the site inspection observations.

### **3.0 AUDIT CRITERIA & PRIORITIES**

The criteria that will be used to conduct the EMS audit include:

- TBCA's environmental management documentation
- *ISO 14001:2015, Environmental management systems – Requirements with guidance for use*

The auditor will customize audit checklists based on the above criteria to ensure that applicable requirements are assessed. The list of auditing criteria covered during this internal audit is included in Appendix "A1" Audit Plan – Elmira and Appendix "A2" Audit Plan - Woodstock.

### **4.0 AUDIT METHODOLOGY**

The audit will be conducted in accordance with *ISO 19011:2018 – Guidelines for auditing management systems*. The auditor will also abide by the Canadian Environmental Certification Approval Board (CECAB) Environmental Professional (EP) Code of Ethics. These principles and practices will be employed to ensure auditor objectivity, professional competence and due care and that well-defined and systematic procedures are being used during the audit.

The opening and closing meetings will be conducted as a conference call with top management and department managers. Company safety protocols will be reviewed and considered for the audit process.

#### **4.1 Opening Meeting**

An opening meeting will be held with key site personnel prior to the start of each on-site audit. The audit plan and schedule will be reviewed, and any questions or concerns can be addressed at this time. The facility being audited will also provide the auditor with general information concerning the facility and its operations, safety requirements, and other administrative details such as dedicated working room for the auditor.

#### **4.2 Conducting the Audit**

During the site visit, information relevant to the audit will be collected through review of documents and records, observation of site activities and interviews with relevant site personnel. Audit checklists for the EMS will be utilized.

##### **4.2.1 Document Review**

During the on-site audit, the document review will focus on reviewing records including, but not limited to:

- Compliance monitoring records
- Training Records
- Environmental Policy
- Maintenance records & preventative maintenance schedules
- Waste Manifests
- Incident Reports related to Spills

An off-site document review will consist of a review of documentation pertaining to the environmental management system. The documents will include, but not be limited to:

- Corporate of facility environmental policies and procedures
- Organizational charts
- Job descriptions
- Environmental files and reports
- Emergency response plans
- Regulatory tracking records
- ISO 14001 procedures and manual
- Management meeting minutes

#### *4.2.2 Observations & Staff Interviews*

On-site observations shall be conducted by the lead auditor. This process will include a site tour at both Elmira and Woodstock facilities to review the operations and the physical conditions against randomly selected existing EMS procedures and records. Staff will be interviewed on the production floor regarding their activities related to environmental aspects. An audit checklist shall be used when conducting interviews to record the information gathered which will be used to corroborate with the information found in the document review and observation phases.

Specifically, the observations shall include, but not limited to:

- Hazardous waste generation, storage, and handling;
- Storage tanks and secondary containment measures;
- Heating and cooling systems;
- Site drainage;
- Mechanical equipment (i.e. equipment using hydraulic oils, solvents or chemicals);
- Sewage disposal systems including water discharges; and
- Sources of air emissions.

The interview portion of the audit process will typically involve personnel from various departments and levels within the organization. The questions will address an understanding of environmental issues, accountability, responsibility and communications.

### **4.3 Closing Meeting**

A closing meeting will be held at the end of the audit with the TBCA EMS team. At this meeting, a summary of the preliminary audit findings will be reported and discussed to ensure concurrence with the auditor's assessment.

## **5.0 AUDIT REPORTS**

A single draft report will be prepared and will summarize the results of the audit. The report will contain at a minimum, the following information:

- Executive summary;
- Objectives and scope;
- Audit time period;
- Audit team members;
- Audit criteria;

- Audit findings (a separate section for each facility audited that summarizes the EMS findings);
- Audit conclusions.

An electronic copy of the draft report will be provided to TBCA for review and comments within 3 weeks of completing the on-site audit. The final report (electronic signed PDF file) will be provided within 2 weeks of receipt of comments from TBCA.

In addition, electronic PDF files of all completed checklists and working field notes will be provided as evidence to demonstrate conformance with the audit plan and to identify and provide rationale for any deviations from the plan.

## 6.0 INTERNAL AUDIT SCHEDULE

The following is a tentative schedule of the milestones associated with the 2022 internal audit.

TASKS	DATES
<i>Submission of draft audit plan</i>	<i>October 3, 2022</i>
<i>Off-site Document Review</i>	<i>October 4-19, 2022</i>
<i>On-site Audit activities – Elmira</i>	<i>Thursday, October 20, 2022</i>
<i>On-site Audit activities - Woodstock</i>	<i>Friday, October 21, 2022</i>
<i>Draft Audit Report</i>	<i>Friday, November 4, 2022</i>
<i>Final Audit Report</i>	<i>Within 2 weeks of receipt of TBCA comments.</i>

## Appendix “A1” Audit Plan - Elmira

Date	Time	Auditee	Auditor	Process / Program	EMS Audit Elements
Oct. 19	-	Doc info	Brigitte R.	Desktop Review	<b>Document review</b> related to the following sections: <b>4.3, 5.3, 6.1.1, 6.1.2, 6.1.3, 6.1.4, 6.2, 7.5, 8.1, 8.2, 9.1.1, 9.1.2, 9.2, 9.3, 10.2, 10.3</b>
Oct 20	08:30	ALL	Connie L., Brigitte R.	Opening Meeting	Introductions, audit plan review; confirmation of audit objectives.
Oct 20	08:45	Jason P.	Connie L.	Previous Audit Findings, Corrective Actions Report	<b>Previous Internal Audit Report; CAR/Records review</b> related to the following sections: <b>7.5, 7.5.3, 9.2, 10.2, 10.3</b>
Oct 20	09:30	ALL	Connie L.	Communications	<b>Records review</b> related to the following sections: <b>7.4, 7.5</b>
Oct 20	09:30	Jason P.	Connie L.	Plant Tour - Emergency & Spill Preparedness and Response; Operational Planning & Control	<b>Records review</b> related to sections: <b>8.2, 9.1.1</b> <i>SOPs related to environmental aspects (Spills)</i>
Oct 20	10:30	Jason P.	Connie L.	Plant Tour - Operational Planning & Control – Waste management	<b>Records review</b> related to the following sections: <b>6.1.4, 6.2, 8.1</b> <i>SOPs related to environmental aspects (Waste management – storage, manifests)</i>
Oct 20	11:00	Jason P., Maintenance, Manufacturing	Connie L.	Plant Tour - Operational Planning & Control – Air Emissions	<b>Records review</b> related to the following sections: <b>6.1.4, 6.2, 8.1</b> <i>SOPs related to environmental aspects (Maintenance, Manufacturing)</i>
Oct 20	12:00	ALL	-	<b>LUNCH</b>	
Oct 20	13:00	Jason P.	Connie L.	Environmental Policy	<b>Document/Record review</b> related to the following sections: <b>5.2</b>
Oct 20	13:30- 15:30	Management Team	Connie L.	Leadership, Competence and Awareness	<b>Staff Interviews</b> related to the following sections: <b>5.1, 5.2, 5.3, 7.1, 7.2, 7.3, 7.4, 9.3</b>
Oct 20	15:30	-	Connie L.	Audit Summary Preparation	Audit Summary Preparation for Day 1 by Lead Auditor

**Legend for EMS Sections:**

4.1-Context of Organization, 4.2-Needs & Expectations of Interested parties, 4.3-EMS Scope, 4.4-EMS, 5.1-Leadership, 5.2-Policy, 5.3-Roles, Responsibilities & Authorities, 6.1.1-General Risks & Opportunities, 6.1.2-Aspects, 6.1.3-Compliance Obligations, 6.1.4-Planning Actions, 6.2-Env.Objectives, 7.1-Resources, 7.2-Competence, 7.3-Awareness, 7.4-Communication, 7.5-Documented Info, 8.1-Operational Planning/Control, 8.2-Emergency Preparedness/Response, 9.1.1-General Monitoring / Measuring / Evaluation, 9.1.2-Evaluation of Compliance, 9.2-Internal Audit, 9.3-Management Review, 10.2-Nonconformities/Corrective Actions, 10.3-Continual Improvement

## Appendix “A2” Audit Plan – Woodstock

Date	Time	Auditee	Auditor	Process / Program	EMS Audit Elements
Oct 21	08:30	Jason P.	Connie L.	EMS Objectives; General Monitoring & Measuring	<b>Records review</b> related to the following sections: <b>6.1.4, 6.2, 8.1, 9.1.1</b> <i>Plans to meet objectives</i>
Oct 21	09:30	Jason P.	Connie L.	Plant Tour - Emergency & Spill Preparedness and Response; Operational Planning & Control	<b>Records review</b> related to sections: <b>8.2, 9.1.1</b> <i>SOPs related to environmental aspects (Spills)</i>
Oct 21	10:30	Jason P.	Connie L.	Plant Tour - Operational Planning & Control – Waste management	<b>Records review</b> related to the following sections: <b>6.1.4, 6.2, 8.1</b> <i>SOPs related to environmental aspects (Waste management – storage, manifests)</i>
Oct 21	11:00	Jason P., Maintenance, Manufacturing	Connie L.	Plant Tour - Operational Planning & Control – Air Emissions	<b>Records review</b> related to the following sections: <b>6.1.4, 6.2, 8.1</b> <i>SOPs related to environmental aspects (Maintenance, Manufacturing)</i>
Oct 21	12:00	ALL	-	<b>LUNCH</b>	
Oct 21	13:00	Management Team	Connie L.	Leadership, Competence and Awareness	<b>Staff Interviews</b> related to the following sections: <b>5.1, 5.2, 5.3, 7.1, 7.2, 7.3, 7.4, 9.3</b>
Oct 21	15:00	-	Connie L.	Audit Summary Preparation	Audit Summary Preparation for Day 2 by Lead Auditor
Oct 21	16:00	ALL	Connie L.	Closing Meeting	Evaluation of whether s. <b>4.4</b> – EMS is achieved: intended outcomes with enhanced performance.

**Legend for EMS Sections:**

4.1-Context of Organization, 4.2-Needs & Expectations of Interested parties, 4.3-EMS Scope, 4.4-EMS, 5.1-Leadership, 5.2-Policy, 5.3-Roles, Responsibilities & Authorities, 6.1.1-General Risks & Opportunities, 6.1.2-Aspects, 6.1.3-Compliance Obligations, 6.1.4-Planning Actions, 6.2-Env.Objectives, 7.1-Resources, 7.2-Competence, 7.3-Awareness, 7.4-Communication, 7.5-Documented Info, 8.1-Operational Planning/Control, 8.2-Emergency Preparedness/Response, 9.1.1-General Monitoring / Measuring / Evaluation, 9.1.2-Evaluation of Compliance, 9.2-Internal Audit, 9.3-Management Review, 10.2-Nonconformities/Corrective Actions, 10.3-Continual Improvement

## APPENDIX B

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### Staff Interviews

**ISO14001:2015 EMS Audit - Staff Interviews**

**Auditee Name:** Toyota Boshoku Canada

**Date:** Oct. 20-21, 2022

<b>TEAM MEMBER</b>		Name of Interviewee/Position			
#	Questions	Joe Medeiros	Tim	Graham	Wes Huizinga
	<b>Location:</b>	Woodstock	Woodstock	Elmira	Elmira
	<b>JOB TITLE:</b>	Molding Maintenance	Ornamental TL	Maintenance	Group Lead - IMM
	<i>For Glue/Paint Booths</i>				
	<b>How frequently are filters changed?</b>		every Friday afternoon		changed 1x per week
	<b>Are there documentation to show that filters were checked/changed?</b>		No, not listed on checksheet		No tracking of filter change for Paint booth (except Glue Spray Booth has Team Leader Daily Check Sheet)
	<i>General Questions</i>				
1	<b>What is one of the commitments on the Environmental Policy?</b>	No familiar; Commitment to not pour liquids down drain.	NO		Committed to net-zero, reduce emissions. Has policy posted at his desk.
2	<b>What do you do in the case of a spill emergency?</b>	- trained at previous job, but not at TBCA. - was able to describe procedure in response to a spill.	- use spill kit (prefers oil dry aka kitty litter) - notify Group Lead upon discovery of major spill	Use spill kit and notify supervisor.	Contain as best as possible; clean up into disposal bins Report small/large spills to AM or H&S
3	<b>Do you handle hazardous/liquid waste as part of your job? IF yes, describe the process.</b>	- not often. Understands not to pour liquids down drain - PC responsible for new tank/emptying tank.			

4	<p>Did you receive any EMS training? When was the last time you were trained?</p>	Not at TBCA	No	No	
5	<p>Can you identify an environmental aspect related to your job? What is its impact?</p>	Parts washer anything hazardous	No		
6	<p>What wastes are generated by the operation that you are responsible for?</p>				910 liquid for purging, plastic resins (reuse), glues
7	<p>Give an example of an environmental aspect and impact that relates to your tasks/activities.</p>				<p>Expecting to see more hazardous liquid waste with anticipation of increased purging required. Think grease is used more than necessary. Glues expires after 72 hrs of opening. Becomes waste after expiry. Can be sent to Vacuum Forming to use up near-expired glues to reduce waste.</p>
8	<p>Is there anything you would like to see changed/improved regarding the EMS?</p>	Communication; identifying environmental responsibilities	more venting at spray booth; new staff complains of smell.		<p>Waste plastics reuse by granulating back into process. Would like to see set max. amount allowed for purging to reduce waste.</p> <ul style="list-style-type: none"> <li>• Would like to reduce reservoir clean-out (filled with water at bottom of equipment and calls safety kleen to clean out).</li> </ul>

## APPENDIX C

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### Audit Checklists

ISO14001:2015 EMS Internal Audit

Client Name: Toyota Boshoku Canada

Date: October 20 & 21, 2022

Locations: Elmira and Woodstock

Auditor(s): Connie Lum & Brigitte Roth

Element Number	Question	Audit Finding			Reference Document (Title / Rev.#) OR Records	Comments
		Conforms	OFI	N/C		
<b>4.0 CONTEXT OF THE ORGANIZATION</b>						
<b>4.1</b>	<b>Understanding the organization and its context</b>					
	Has the organization determined external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended outcomes of its environmental management system? Such issues shall include environmental conditions being affected by or capable of affecting the organization.	X			EMS Management Review Presentation Meeting Minutes – Sept. 22, 2022.	External and internal issues listed on EMS Management Review presentation: External: sanitary/sewer exceedances, neighbourhood water quality issues, slow response from govt with ECA; impact of supply of defect parts Internal: Green Team participation is low, requirement to review new contracts with legal dept slow. Lost opportunities for communication due to internal approvals, environmental near miss.
<b>4.2</b>	<b>Understanding the needs and expectations of interested parties</b>					
	Has the organization determined:					
	a) the interested parties that are relevant to the environmental management system? (Internal and External parties)				Management Review Presentation and Meeting Minutes	Reviewed during Management Review. List of interested parties: contractors, customers, suppliers, employees. Meeting minute identifies parties' expectations.  <b>OFI:</b> What do parties expect from TBCA? Not all expectations have been identified for listed parties on latest Management Review presentation/meeting minutes.
	b) the relevant needs and expectations (i.e. requirements) of these interested parties?		X			
	c) which of these needs and expectations become its compliance obligations?					
<b>4.3</b>	<b>Determining the scope of the environmental management system</b>					
	Has the organization determined the boundaries and applicability of the environmental management system to establish its scope?	X			Environmental Management System Manual, #CA-EN-PR-04-00 REV6, Section 4.3  Toyota Boshoku Canada, Inc.'s (TBCA's) Environmental Management System Manual, dated March 4, 2022 (EMS Manual).	Scope of registration: "For the manufacturing of interior automotive parts, door panels (incl. door trim), seat frame assembly, seat frame welding, carpet and headliner, including the supply and shipping of materials".
	When determining this scope, has the organization considered:					The scope of EMS includes receiving, manufacturing, supplying automotive parts and all activities, including those of suppliers, customers and stakeholders for both Woodstock and Elmira facilities. Stakeholders include regulators.
	a) the external and internal issues referred to in 4.1?	X				
	b) the compliance obligations referred to in 4.2?	X				
	c) its organizational units, functions and physical boundaries?	X				
	d) its activities, products and services?	X				"we aim to influence our impact on the environment not only of our business but of all businesses and organizations that we use or interact with. This is made available to the public through approved TBCA management."
	e) its authority and ability to exercise control and influence?	X				TBCA pursues a strategy that not only encompasses its activities, but that of its: - suppliers - customers - stakeholders - businesses and organizations that TBCA interacts with at Woodstock and Elmira facilities
	Once the scope is defined, have all activities, products and services of the organization within that scope been included in the environmental management system?	X			Environmental Aspects List	Yes, on environmental aspects list (i.e. air bags, adhesives, cardboard, electricity, fabric, food, natural gas, paper, etc.)
	Has the scope been maintained as documented information and available to interested parties?	X			Environmental Management System Manual, #CA-EN-PR-04-00 REV6, Section 4.3	Stated in EMS Manual

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Element Number	Question	Audit Finding			Reference Document (Title / Rev.#) OR Records	Comments
<b>4.4</b>	<b>Environmental management system</b>					
	To achieve the intended outcomes, including enhancing the environmental performance, has the organization established, implemented, maintained and continuously improved an environmental management system, including the processes needed and their interactions, in accordance with the requirements of this International Standard?	X			Environmental Management System Manual, #CA-EN-PR-04-00 REV6	Environmental Action Plan
	Has the organization considered the knowledge gained in 4.1 and 4.2 when establishing and maintaining the environmental management system?	X				
	Are EMS requirements integrated into other parts of business processes (i.e. design and development, procurement, human resources, sales and marketing)?	X			TM Orientation Checklist (15203_0) KPI Report w/ Production Supervisor FMDS (floor management development system) (daily meetings every morning on the floor)	Training incorporated into HR. However more integration can be improved. FMDS helps integrate EMS into daily production operations. Design and development is conducted at corporate (Japan) who would look at environmental issues for this area. Procurement for purchasing components is corporate responsibility, not Boshoku's, although localize vendors and materials that are outsourced.
<b>5.0 LEADERSHIP</b>						
<b>5.1</b>	<b>Leadership and commitment</b>					
	Has top management demonstrated leadership and commitment with respect to the environmental management system by:	X			Management Review Minutes - Sept 22, 2022	
	a) taking accountability for the effectiveness of the environmental management system?	X				
	b) ensuring that the environmental policy and environmental objectives are established and are compatible with the strategic direction and the context of the organization?	X				
	d) ensuring that the resources needed for the environmental management system are available?	X				
	c) ensuring the integration of the environmental management system requirements into the organization's business processes?	X				
	e) communicating the importance of effective environmental management and of conforming to the environmental management system requirements?	X				
	f) ensuring that the environmental management system achieves its intended outcomes?	X				
	h) promoting continual improvement?	X				
	g) directing and supporting persons to contribute to the effectiveness of the environmental management system?	X				
	i) supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility?	X				
<b>5.2</b>	<b>Environmental policy</b>					
	Has top management established, implemented and maintained an environmental policy that, within the defined scope of its environmental management system:	X			Environmental Policy, #CA-EN-FM-05-20, REV2.	"through the application of the TB Way and the Toyota Production System..."
	a) is appropriate to the purpose and context of the organization, including the nature, scale and environmental impacts of its activities, products and services?	X				
	b) provides a framework for setting environmental objectives?	X			Environmental Management System Manual, #CA-EN-PR-04-00 REV6	"Manage and periodically review environmental targets utilizing the PDCA cycle."
	c) includes a commitment to the protection of the environment, including prevention of pollution and other specific commitment(s) relevant to the context of the organization?	X			Environmental Policy, #CA-EN-FM-05-20, REV2.	"Minimize pollution by challenging our plants to meet CO2 reduction targets and "zero landfill" initiatives."

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Element Number	Question	Audit Finding			Reference Document (Title / Rev.#) OR Records	Comments
	d) includes a commitment to fulfil its compliance obligations?	X			same as above	"Operate in compliance with all applicable governmental regulations, customer requirements, and stakeholder expectations."
	e) includes a commitment to continual improvement of the environmental management system to enhance environmental performance?	x			same as above	"Kaizen (continually improve) our products, processes, facilities and equipment by eliminating "muda" (waste)".
	<b>Has the environmental policy:</b>					
	been maintained as documented information?	X			Site Inspection Environmental Management System Manual, #CA-EN-PR-04-00	included in EMS Manual and posted within public areas of facility. Noted during Woodstock site inspection.
	been communicated within the organization?			X	Staff Interviews	Team member refresher training/awareness is recommended. See 7.5 Awareness.
	available to interested parties?		X		Environmental Management System Manual, #CA-EN-PR-04-00.	Posted on bulletin board outside of washrooms. Posted in board rooms. Posted in production area. Bulletin board at South entrance. <b>OPI:</b> Should also be posted on bulletin board outside lunchroom. Re-Post on info screen in Lobby.
<b>5.3</b>	<b>Organizational roles, responsibilities and authorities</b>					
	Has top management ensured that the responsibilities and authorities for relevant roles have been assigned and communicated within the organization?	X			EMS Manual's s.13	The EMS Manual's s.5.3 identifies the EMS Coordinators as responsible to ensure the EMS is implemented and maintained in accordance with ISO 14001:2015 and the EMS Manual. Team members are obliged to play their parts in minimizing and separating waste as well as using raw materials and energy as sparingly as possible.
	Has top management assigned responsibility and authority for:					
	a) ensuring that the environmental management system meets Standard Requirement to the requirements of this International Standard?	X			Contract agreement with consultant, including scope of services.	The EMS Manual's s.5.3 also links to TBCA's responsibility matrix (RCI chart included in the EMS Manual's s.12) for various EMS tasks identifying positions responsible / authorized, cooperating and informed including: the president, GM / plant manager, EMS Coord., production control, production engineering, quality control, finance department, team members and regional coordinators.
	b) reporting on the performance of the environmental management system, including environmental performance, to top management?	X			same as above	The organizational structures for TBCA – Woodstock and TBCA – Elmira are described in the EMS
<b>6.0 PLANNING</b>						
<b>6.1</b>	<b>Actions to address risks and opportunities</b>					
<b>6.1.1</b>	<b>General</b>					
	Has the organization established, implemented and maintained the process(es) needed to meet the requirements in 6.1.1 to 6.1.4?	X				Processes for each of the items required by this section are described in:
	When planning for the environmental management system, has the organization considered:					
	a) the issues referred to in 4.1?	X				
	b) the requirements referred to in 4.2?	X			Environmental Systems Manual, #CA-EN-PR-04-00, S. 6.1.2	EMS Manual s.6.1.2 Environmental aspects assigns responsibility for the evaluation of environmental aspects and impacts to the EMS Coordinator. Results of evaluations must be taken into account when environmental objectives are defined.
	c) the scope of its environmental management system?	X			Environmental Aspects	
	Has the organization determined the risks and opportunities, related to its environmental aspects (see 6.1.2), compliance obligations (see 6.1.3) and other issues and requirements, identified in 4.1 and 4.2, that need to be addressed to:	X			CA-EN-PR-06-12 -- Identifying and Ranking Environmental Aspects, dated Mar. 1, 2017	CA-EN-PR-06-12 – Identifying and Ranking Environmental Aspects, dated March 1, 2017 states the EMS Coordinator approves Aspect Identification & Evaluation Forms completed by each area, communicates major revisions to the Management Team, proposes environmental programs.
	— give assurance that the environmental management system can achieve its intended outcomes?	X			CA-EN-PR-06-13 -- Compliance Obligations, dated Jan. 3, 2020.	
	— prevent or reduce undesired effects, including the potential for external environmental conditions to affect the organization?	X				CA-EN-PR-06-13 – Compliance Obligations, dated January 3, 2020 states the EMS Coordinator ensures an updated list of all laws and regulations pertinent to TBCA activities are available. The process to ensure this is described.
	— achieve continual improvement?	X				
	Within the scope of the environmental management system, has the organization determined potential emergency situations, including those that can have an environmental impact?	X				

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Element Number	Question	Audit Finding			Reference Document (Title / Rev.#) OR Records	Comments
	Has the organization maintained documented information of its:					
	— risks and opportunities that need to be addressed?	X			Environmental Management System Manual, #CA-EN-PR-04-00 REV6  Identifying and Ranking Environmental Aspects, #CA-EN-PR-06-12	
	— process(es) needed in 6.1.1 to 6.1.4, to the extent necessary to have confidence they are carried out as planned?	X			Working Aspects Identification & Evaluation Form (App A) #CA-EN-FM-43-10	
<b>6.1.2</b>	<b>Environmental aspects</b>					
	Within the defined scope of the environmental management system, has the organization determined the environmental aspects of its activities, products and services that it can control and those that it can influence, and their associated environmental impacts, considering a life cycle perspective?	X			CA-EN-PR-06-12 – Identifying and Ranking Environmental Aspects, dated March 1, 2017	CA-EN-PR-06-12 – Identifying and Ranking Environmental Aspects, dated March 1, 2017 states that within the scope of the EMS: - all areas of the facility including production, production support and admin areas, considering: transportation, storage, use / mists, disposal / storage - At least once a year, aspects must be performed and whenever major changes are made to production processes and updated as necessary. - aspects are determined under normal operations, shutdown and start-up and/or emergencies. - The rating criteria is described - Seven environmental impacts identified by TBCA include: a) air emissions, b) water / sewer discharges, c) solid wastes (reduction, reuse, recycling or disposal), d) land contamination, e) resource use, f) emissions (of thermal E, noise, odour, dust, vibration, visual impacts), g) misc. impacts
	When determining environmental aspects, has the organization taken into account:					
	a) change, including planned or new developments, and new or modified activities, products and services?	X			Working Aspects Identification & Evaluation Form (App A) #CA-EN-FM-43-10	
	b) abnormal conditions and reasonably foreseeable emergency situations?	X			Identifying and Ranking Environmental Aspects, #CA-EN-PR-06-12, Section 2.2 and 10  Working Aspects Identification & Evaluation Form, App A	Related to the determination of environmental aspects, EMS Manual s.6.1.2 links to: - CA-EN-FM-06-12 – Appendix A, Working Aspects Identification & Evaluation Form, - CA-EN-FM-06-12-1 – Appendix B, Environmental Aspects Summary List, and - CA-EN-FM-06-12-2 – Appendix C, Visual Posting of Significant Aspects.
	Has the organization determined those aspects that have or can have a significant environmental impact, i.e. significant environmental aspects, by using established criteria?	X			Working Aspects Identification & Evaluation Form (App A) #CA-EN-FM-43-10	
	Has the organization maintained documented information of its:					Significant environmental aspects are identified as use of electricity and natural gas.
	— environmental aspects and associated environmental impacts?	X			Appendix A: Working Aspects Identification & Evaluation Form #CA-EN-FM-06-12	<b>OFI:</b> Related to Appendix C, Visual Posting of Significant Aspects – an opportunity is identified to make the communication relevant to the various work areas' activities. For example, communicate about the benefits of reduced energy use and reducing natural gas use and ways in which each person can make a difference (specific to each work area).
	— criteria used to determine its significant environmental aspects?	X			CA-EN-FM-06-12 – Appendix A, Working Aspects Identification & Evaluation Form, CA-EN-FM-06-12-1 – Appendix B, Environmental Aspects Summary List, and CA-EN-FM-06-12-2 – Appendix C, Visual Posting of Significant Aspects	<b>OFI:</b> Review to ensure list is accurate and complete. Site inspection noted some aspects were not identified on list. i.e. compressor room oil/water separator.
	— significant environmental aspects?	X			Appendix B	
<b>6.1.3</b>	<b>Compliance obligations</b>					
	Has the organization:					
	a) determined and has access to the compliance obligations related to its environmental aspects?	X			2022 Environmental Compliance Obligations List (formerly Environmental Compliance Calendar)	CA-EN-PR-06-13 – Compliance Obligations, dated January 3, 2020 states the EMS Coordinator ensures an updated list of all laws and regulations pertinent to TBCA activities are available. The process to ensure this is described. Note: Links to CA-EN-FM-06-13 – Compliance Calendar (replaced w/ ref below: )
	b) determined how these compliance obligations apply to the organization?	X				
	c) taken these compliance obligations into account when establishing, implementing, maintaining and continually improving its environmental management system?	X			CA-EN-PR-06-13 – Compliance Obligations, dated January 3, 2020	2022 Environmental Compliance Obligations List (formerly Environmental Compliance Calendar) provides a listing of federal, provincial, municipal and other requirements (such as through approvals' terms & conditions) – the list provides a description on how the compliance obligations apply.
	Has the organization maintained documented information of its compliance obligations?	X				

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Element Number	Question	Audit Finding			Reference Document (Title / Rev.#) OR Records	Comments
<b>6.1.4</b>	<b>Planning action</b>					
	Has the organization planned:					
	a) to take actions to address its:					
	1) significant environmental aspects?	X			CA-EN-PR-06-00 Planning, Objective and Targets Program Management, dated September 15, 2022	CA-EN-PR-06-00 Planning, Objective and Targets Program Management, dated September 15, 2022 states compliance obligations, significant environmental targets, technological options in coordination with financial, operational and business requirements, views of interested parties and risk and opportunities when objectives and targets are being established and reviewed.
	2) compliance obligations?	X				
	3) risks and opportunities identified in 6.1.1	X				
	b) how to:					
	1) integrate and implement the actions into its environmental management system processes (see 6.2, Clause 7, Clause 8 and 9.1), or other business processes?	X				
	2) evaluate the effectiveness of these actions (see 9.1)?	X				
	When planning these actions, has the organization considered its technological options and its financial, operational and business requirements?	X				Selected objectives and targets are communicated through KPI monthly reports by the EMS Coordinator.
<b>6.2</b>	<b>Environmental objectives and planning to achieve them</b>					
<b>6.2.1</b>	<b>Environmental objectives</b>					
	Has the organization established environmental objectives at relevant functions and levels, taking into account the organization's significant environmental aspects and associated compliance obligations, and considering its risks and opportunities?	X			Environmental Management System Manual, #CA-EN-PR-04-00 REV6, S. 6.2	
	Are the environmental objectives:					
	a) consistent? with the environmental policy	X			EMS Manual s.6.2 Objectives and targets Note: Links to CA-EN-FM-06-10 Environmental Action Plan (replaced w/ ref's below: )	"improved environmental performance" sections reflect the significant environmental aspects (i.e. energy use and natural gas use), regulatory compliance reflects compliance obligations and additional environmental protection measures (e.g. reductions in waste and water) are included in "improved environmental performance" sections. The objectives are: consistent with the environmental policy, measurable, monitored, updated, communicated w/ Green Team & maintenance
	b) measurable? (if practicable)	X				
	c) monitored?	X				
	d) communicated?	X				
	e) updated as appropriate?	X				
	Has the organization maintained documented information on the environmental objectives?	X			FY2022 Environmental Action Plan – TBCA Woodstock, dated September 7, 2022 and FY2022 Environmental Action Plan – TBCA Elmira, dated September 22, 2022 –	
<b>6.2.2</b>	<b>Planning actions to achieve environmental objectives</b>					
	When planning how to achieve its environmental objectives, has the organization determined:	X			FY2019 Environmental Action Plan, Created Apr. 18, 2019, revised: Nov. 20, 2019. #CA-EN-FM-06-10	The FY2022 files referenced above describe what will be done, responsibility assigned, when it's targeted, how results are evaluated / monitored and measured for achievement of objectives.
	a) what will be done?	X				
	b) what resources will be required?	X				
	c) who will be responsible?	X				
	d) when it will be completed?	X				
	e) how the results will be evaluated, including indicators for monitoring progress toward achievement of its measurable environmental objectives (see 9.1.1)?	X				
	Has the organization considered how actions to achieve its environmental objectives can be integrated into the organization's business processes?	X				
<b>7.0 SUPPORT</b>						
<b>7.1</b>	<b>Resources</b>					
	Has the organization determined and provided the resources needed for the establishment, implementation, maintenance and continual improvement of the environmental management system?	X			Staff Interviews	Yes. J.P. feels he has all the resources necessary to maintain EMS. Has the ability to ask for support from contractors, etc.

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Element Number	Question	Audit Finding			Reference Document (Title / Rev.#) OR Records	Comments
<b>7.2</b>	<b>Competence</b>					
	Has the organization:					
	a) determined the necessary competence of person(s) doing work under its control that affects its environmental performance and its ability to fulfil its compliance obligations?	X				
	b) ensured that these persons are competent on the basis of appropriate education, training or experience?	X			ISO 14001 Lead Auditor training, trained by OMNEX Engineering & Management, Inc. Sept. 8, 2021. Jason Psutka - #30176 David Canarte – #30175 Shanna Hartman - #30243	Covers both location.
	c) determined training needs associated with its environmental aspects and its environmental management system?	X				
	d) where applicable, taken actions to acquire the necessary competence, and evaluate the effectiveness of the actions taken?	X				Reviewed certificates.
	Has the organization retained appropriate documented information as evidence of competence?	x			Omnex Invoice – May 2021	Omnex Invoice – May 2021 shows list of attendees. Electronic documents on J drive.
<b>7.3</b>	<b>Awareness</b>					
	Has the organization ensured that persons doing work under the organization’s control are aware of:					Environmental Awareness Training required. No improvement since previous audit.
	a) the environmental policy?					
	b) the significant environmental aspects and related actual or potential environmental impacts associated with their work?					Chemical Procurement and Environmental Awareness training conducted. Jason has received emails confirming TMs participation and completion of training.
	c) their contribution to the effectiveness of the environmental management system, including the benefits of enhanced environmental performance?		X		Staff interviews Halogen Training Report for TBCA Environmental Awareness Training, Nov. 15, 2021. J:Engineering/Public/Env/Training	No specific training record. Jason checking with Corporate for document. Training conducted through Halogen online training platform.
	d) the implications of not conforming with the environmental management system requirements, including not fulfilling the organization’s compliance obligations?					OFI: training for Haz Waste, Maintenance emergency, not conducted but training documents available and ready for training. OFI: Refresher/new training related to EMS/Environmental Awareness for current staff
<b>7.4</b>	<b>Communication</b>					
<b>7.4.1</b>	<b>General</b>					
	Has the organization established, implemented and maintained the process(es) needed for internal and external communications relevant to the environmental management system, including:					
	a) on what it will communicate?	X				
	b) when to communicate?	X				
	c) with whom to communicate?	X				
	d) how to communicate?	X				
	When establishing its communication process(es), has the organization:					
	— ensured that environmental information communicated is consistent with information generated within the environmental management system and is reliable?	X			Bulletin/Display Boards located in front of cafeteria, washrooms and back entrance at Elmira.	Use of display boards to all TMs (2 in front, 1 at south end). Monthly environmental management minutes – displayed on bulletin boards. Reviewed August 2022 minutes – electronic. Includes list of who was communicated to, what was communicated (ISO, Environmental Month, new processes/equipment/chemicals, etc), who is responsible.
	— taken into account its compliance obligations?	X				
	Has the organization responded to relevant communications on its environmental management system?	X				
	Has the organization retained documented information as evidence of its communications, as appropriate?	X				

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Element Number	Question	Audit Finding			Reference Document (Title / Rev.#) OR Records	Comments
<b>7.4.2</b>	<b>Internal communication</b>					
	Has the organization:					
	a) internally communicated information relevant to the environmental management system among the various levels and functions of the organization, including changes to the environmental management system, as appropriate?		x		Bulletin/Display Boards located in front of cafeteria, washrooms and back entrance at Elmira.	Company has an app myTBapp – for communication. Work with Sustainable Waterloo Region.  OFI: J.P would like to see communication within Production weekly/daily meetings. Daily communications from HR to everyone with an email address. OFI: Track communication including above communication methods to tracking sheet. Added Method of communication, frequency)
	b) ensured its communication process(es) enable(s) persons doing work under the organization’s control to contribute to continual improvement?		x			
<b>7.4.3</b>	<b>External communication</b>					
	Has the organization externally communicated information relevant to the environmental management system, as established by the organization’s communication process(es) and as required by its compliance obligations?		x		Communication Procedure #CA-EN-PR-07-40, Section 6 & 7 Communication Tracking CA-EN-FM-07-40  Environmental Management System Manual, #CA-EN-PR-04-00 REV6	Jason has a tracking document for communication, but used as a complaint log. Already identified as an action item.  Communication Tracking CA-EN-FM-07-40, currently blank. OFI: Track communication with external parties (positive/negative) outcomes.
<b>7.5</b>	<b>Documented information</b>					
<b>7.5.1</b>	<b>General</b>					
	Has the organization’s environmental management system included:					
	a) documented information required by this International Standard?	x				Scope is included in EMS Manual, as well as the description of the main elements of the EMS. Separate procedures are in place for each element.
	b) documented information determined by the organization as being necessary for the effectiveness of the environmental management system?		x		EMS Manual s.7.5 Documented Information Operational Control CA-EN-PR-08-10 Waste Management CA-EN-PR-08-12, February 2, 2022 rev:5	Describes that all documents and records must be correctly identified, distributed, collected and maintained. OFI: Update/review of procedures required: Operational Control - frequency of filter replacements; Waste Management - S.5: Labeling and Marking (image of wrong label); Spill Control Response Plan (in process).
<b>7.5.2</b>	<b>Creating and updating</b>					
	When creating and updating documented information, has the organization ensured appropriate:	x				
	a) identification and description (e.g. a title, date, author, or reference number)?	x			EMS Manual s.7.5 Documented Information	EMS Manual s.7.5 states measures must be taken to ensure documents can be retrieved quickly and reliably, are evaluated on a regular basis, are available in their valid versions, are legible, dated, easy to identify, are archived for a defined period of time.
	b) format (e.g. language, software version, graphics) and media (e.g. paper, electronic)?	x			Documented information are electronic on J: drive.	EMS documents for both facilities is consolidated onto one drive.
	c) review and approval for suitability and adequacy?	x			Use of PolicyTech web-based system to securely control and update procedures.	
<b>7.5.3</b>	<b>Control of documented information</b>					
	Documented information required by the environmental management system and by this International Standard is controlled to ensure:					
	a) it is available and suitable for use, where and when it is needed?	x				EMS Manual s.7.5 references the Document Control Specialist who holds the original version of the document and who is responsible for maintaining and controlling the document.
	b) it is adequately protected (e.g. from loss of confidentiality, improper use, or loss of integrity)?	x			Use of PolicyTech web-based system to securely control and update procedures.	
	For the control of documented information, has the organization addressed the following activities as applicable:					CA-EN-PR-07-50 Documented Information describes types of documentation (e.g. Environmental Manual, procedures, forms), the templates to be used, file naming convention, approvals, accessibility, printing, control, storage & retention, disposal / destruction of records, electronic records, revisions and archiving.
	— distribution, access, retrieval and use?	x			Documented Information # CA-EN-PR-07-50, Section 2.1	
	— storage and preservation, including preservation of legibility?	x			Documented Information # CA-EN-PR-07-50, Section 5.1	
	— control of changes (e.g. version control)?	x				OFI: Consider describing in the CA-EN-PR-07-50 Documented Information procedure how documented information of external origin determined by TBCA as being necessary for the planning and operation of the EMS is identified and controlled. Examples: approvals, legislative references, stakeholder
	— retention and disposition?	x			Documented Information # CA-EN-PR-07-50, Section 5.1 & 5.2	

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	Has documented information of external origin determined by the organization to be necessary for the planning and operation of the environmental management system been identified, as appropriate, and controlled?		x		Record Retention Log, CA-EN-FM-07-50 REV2 Environmental Compliance Calendar, Reports and Permits.	requirements. Add section for documentation/location of external origins. (ECA's, HVAC manufacturer's specs, etc)
<b>8.0 OPERATION</b>						
<b>8.1</b>	<b>Operational planning and control</b>					
	Has the organization established, implemented, controlled and maintained the processes needed to meet environmental management system requirements, and to implement the actions identified in 6.1 and 6.2, by:					EMS Manual s.8 Operational Control links to CA-EN-PR-08-10 – Operational Control, dated September 12, 2019 which identifies the EMS Coordinator as responsible for assisting in the development of operational controls and TBCA TM's are accountable for the development, documentation, and maintenance of applicable operational controls.
	— establishing operating criteria for the process(es)?	x			EMS Manual s.8 Operational Control links to CA-EN-PR-08-10 – Operational Control, dated September 12, 2019	Operational controls for the following processes are described: - Vacuum form and glue booth - HVAC - Weld - Generator - Glue Booth
	— implementing control of the process(es), in accordance with the operating criteria? <i>Controls can be engineering controls and procedures. Controls can be implemented following a hierarchy (i.e. elimination, substitution, administrative) and can be used individually or in combination.</i>	x				TM's involved in the purchase of goods and services are responsible to communicate relevant procedures and requirements to the suppliers / contractors and ensure they are followed.
	Has the organization controlled planned changes and reviewed the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary?	x			Revision Change Form #CA-GA-ADMIN001-FM-E	Contractors are required to complete the contractor package and all suppliers / vendors / visitors / TB TM must sign in the Contractor Visitor Log upon arrival and sign-out
	Has the organization ensured that outsourced processes are controlled or influenced. Has the type and extent of control or influence to be applied to the process(es) been defined within the environmental management system?	x			Raw Material Approval Form (CA-EN-FM-08-11)	EMS Manual s.8.2 Emergency Preparedness and Response refers to CA-EN-PR-08-20 Emergency Preparedness & Response, dated April 23, 2019 and CA-EN-PR-08-21 Emergency Plan of Action
	Consistent with a life cycle perspective, has the organization:					CA-EN-PR-08-20 describes the methods for determining potential emergency situations (e.g. walkthroughs, historical occurrences, incidents at similar facilities, recommendations by stakeholders, local fire department or utilities).
	a) established controls, as appropriate, to ensure that its environmental requirement(s) is (are) addressed in the design and development process for the product or service, considering each life cycle stage?	x				CA-EN-PR-08-21 Emergency Plan of Action dated August 29, 2017 (found in archives), describes the possible emergencies (e.g. explosion, major fire, minor fire, structural failure, natural gas leak or heavy smoke, major chemical spill or leaks outside, minor chemical spills, employee entrapment, severe weather, bomb threat, workplace violence, power outage, external threats). General guidelines are described along with roles and responsibilities of various employee groups.
	b) determined its environmental requirement(s) for the procurement of products and services, as appropriate?	x				
	c) communicated its relevant environmental requirement(s) to external providers, including contractors?	x			Visitor/Contractor Sign In Kiosk Screen	EMS Manual s.9.1 Monitoring, Measurement, Analysis and Evaluation states TBCA is responsible for overseeing the legally-stipulated measurements and monitoring activities carried out by TBCA TM's or by external companies.
	d) considered the need to provide information about potential significant environmental impacts associated with the transportation or delivery, use, end-of-life treatment and final disposal of its products and services?	x			Chemical Contingency Plan (CA-EN-PR-08-11) Waste Management (CA-EN-PR-08-12)  Raw Material Approval Form (CA-EN-FM-08-11)  TBA Banned Substances List	EMS Manual s.9.1 references CA-EN-PR-08-10 Operational Control (as reviewed under section 8) and CA-EN-PR-09-10 Monitoring and Measurement, dated January 20, 2017 links to the CA-EN-PR-06-13 Compliance Obligations and CA-EN-FM-06-12-1 Appendix B Environmental Aspects Summary List – both documents summarizing what needs to be monitored and measured, the methods, the criteria, the environmental performance indicators, when monitoring and measuring shall be performed, when results are analyzed and evaluated.
	Has the organization maintained documented information to the extent necessary to have confidence that the information processes have been carried out as planned?	x			Raw Material Approval Form (CA-EN-FM-08-11)	Environmental performance is reviewed at Management Review where monitoring and measurement decisions (incl. effectiveness of EMS) are discussed and approved.

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<b>8.2</b>	<b>Emergency preparedness and response</b>					
	Has the organization established, implemented and maintained the process(es) needed to prepare for and respond to potential emergency situations identified in 6.1.1?	x			EMS Manual s.8.2 Emergency Preparedness and Response refers to CA-EN-PR-08-20 Emergency Preparedness & Response, dated April 23, 2019 and CA-EN-PR-08-21 Emergency Plan of Action	CA-EN-PR-08-20 describes the methods for determining potential emergency situations (e.g. walkthroughs, historical occurrences, incidents at similar facilities, recommendations by stakeholders, local fire department or utilities).  CA-EN-PR-08-21 Emergency Plan of Action dated August 29, 2017 (found in archives), describes the possible emergencies (e.g. explosion, major fire, minor fire, structural failure, natural gas leak or heavy smoke, major chemical spill or leaks outside, minor chemical spills, employee entrapment, severe weather, bomb threat, workplace violence, power outage, external threats). General guidelines are described along with roles and responsibilities of various employee groups.
	Is/Has the organization:					
	a) prepared to respond by planning actions to prevent or mitigate adverse environmental impacts from emergency situations?			x	Inspection of spill kits during site walkthrough.	Elmira: Maintain monthly inspections of Spill Kits. <b>NC1:</b> Woodstock: Recurring issue of tamper tape on kits need to be resealed. Not inspected monthly as it should be.
	b) responded to actual emergency situations?	x				
	c) taken action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impact?	x				
	d) periodically tested the planned response actions, where practicable?			x	Spill Control Response Plan, #CA-HR-HR041-PR-E, Aug. 13, 19 Emergency Plan of Action, #CA-EN-PR-08-21, dated Aug. 29, 2017	<b>OFI:</b> No periodic test completed. Requirement for periodic testing of planned response actions not included in procedures
	e) periodically reviewed and revised the process(es) and planned response actions, in particular after the occurrence of emergency situations or tests?			x	Section 2.2 of Spill Control Response Plan	<b>NC2:</b> Woodstock: Spill stain located outside Waste Storage Room in past year, was identified as a minor spill, but no incident report was completed as per Spill Control Response Plan procedure.
	f) provided relevant information and training related to emergency preparedness and response, as appropriate, to relevant interested parties, including persons working under its control?	x			Staff interviews	Staff are aware of notification procedures upon discovery of a spill.
	Has the organization maintained documented information to the extent necessary to have confidence that the process(es) is (are) carried out as planned?	x			Emergency Plan of Action, #CA-EN-PR-08-21, dated Aug. 29, 2017	
<b>9.0 PERFORMANCE EVALUATION</b>						
<b>9.1</b>	<b>Monitoring, measurement, analysis and evaluation</b>					
<b>9.1.1</b>	<b>General</b>					
	Has the organization monitored, measured, analysed and evaluated its environmental performance?	x			EMS Manual s.9.1 Monitoring, Measurement, Analysis and Evaluation	
	Has the organization determined:					EMS Manual s.9.1 Monitoring, Measurement, Analysis and Evaluation states TBCA is responsible for overseeing the legally-stipulated measurements and monitoring activities carried out by TBCA TM's or by external companies.
	a) what needs to be monitored and measured?					
	b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results?					
	c) the criteria against which the organization will evaluate its environmental performance, and appropriate indicators?			x		EMS Manual s.9.1 references CA-EN-PR-08-10 Operational Control (as reviewed under section 8) and CA-EN-PR-09-10 Monitoring and Measurement, dated January 20, 2017 links to the CA-EN-PR-06-13 Compliance Obligations and CA-EN-FM-06-12-1 Appendix B Environmental Aspects Summary List – both documents summarizing what needs to be monitored and measured, the methods, the criteria, the environmental performance indicators, when monitoring and measuring shall be performed, when results are analyzed and evaluated.
	d) when the monitoring and measuring shall be performed?					
	e) when the results from monitoring and measurement shall be analysed and evaluated?					
	Has the organization ensured that calibrated or verified monitoring and measurement equipment is used and maintained, as appropriate?	x			CA-EN-PR-09-10 Monitoring and Measurement, dated January 20, 2017	Environmental performance is reviewed at Management Review where monitoring and measurement decisions (incl. effectiveness of EMS) are discussed and approved.
	Has the organization evaluated its environmental performance and the effectiveness of the environmental management system?	x			Management Review meeting minutes	

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	Has the organization communicated relevant environmental performance information both internally and externally, as identified in its communication process(es) and as required by its compliance obligations?	x				Communication requirements for environmental performance information is documented within the compliance obligations and environmental action plan documents referenced earlier in section 6.2.1 of this checklist.  <b>OFI:</b> Consider monitoring/measuring plastic resins recycled and reused back into process. Also improve tracking of glue usage.	
	Has the organization retained appropriate documented information as evidence of the monitoring, measurement, analysis and evaluation results?	x					
	Has the organization maintained documented information to the extent necessary to have confidence that the process(es) is (are) carried out as planned?	x					
<b>9.1.2</b>	<b>Evaluation of compliance</b>						
	Has the organization established, implemented and maintained the process(es) needed to evaluate fulfilment of its compliance obligations?	X			EMS Manual s.9.1.2 Evaluation of Compliance refers to CA-EN-PR-06-13 Compliance Obligations (reviewed earlier in this checklist) and CA-EN-PR-09-30 Management Review	Corporate Compliance Audit - conducted by US Corporate Office conducted annually and monthly internal audit. Last audit was in October 2019.	
	Has the organization:						
	a) determined the frequency that compliance will be evaluated?	X					Section 3 of procedure #CA-EN-PR-06-13 states frequency of evaluation as periodic for internal and external compliance audits.
	b) evaluated compliance and take action if needed?	X					Compliance Calendar linked to EAP which is reviewed monthly
	c) maintained knowledge and understanding of its compliance status?	x				EMS Manual s.9.1.2 Evaluation of Compliance refers to CA-EN-PR-06-13 Compliance Obligations (reviewed earlier in this checklist) and CA-EN-PR-09-30 Management Review for EMS and CA-EN-FM-09-30 Management Review Minutes (both of which are reviewed later in this checklist).  Noted in the environmental action plans reviewed earlier as part of section 6.2.1 of this checklist – environmental compliance audits are planned in early 2023.	
<b>9.2</b>	<b>Internal audit</b>						
<b>9.2.1</b>	<b>General</b>						
	Has the organization conducted internal audits at planned intervals to provide information on whether the environmental management system:	x			EMS Manual s.9.2 Internal Audit	EMS Manual s.9.2 Internal Audit describes that internal audits are completed annually, external certification audits are every three years with one surveillance audit in between. Audits help confirm conformity (or identify non-conformities), identify opportunities for improvement, and report providing information to management on the performance of the EMS.	
	a) Meets Standard Requirement to:						
	1) the organization's own requirements for its environmental management system?	x					
	2) the requirements of this International Standard?	x					
	b) is effectively implemented and maintained?	x					
<b>9.2.2</b>	<b>Internal audit programme</b>						
	Has the organization established, implemented and maintained (an) internal audit programme(s), including the frequency, methods, responsibilities, planning requirements and reporting of its internal audits?	x			EMS Manual s.9.2 links to CA-EN-PR-09-20 Internal Audit, dated January 20, 2017 and CA-EN-FM-09-20 Internal Audit Form.	CA-EN-PR-09-20 describes the audit process, including the frequency, methods, responsibilities, planning and reporting requirements.	
	When establishing the internal audit programme, has the organization taken into consideration the environmental importance of the processes concerned, changes affecting the organization and the results of previous audits?	x					Audit criteria, scope, auditors, objectivity and impartiality ensured are covered by the procedure.
	Has the organization:				2022 Internal Audit Plan and Internal Audit Report		
	a) defined the audit criteria and scope for each audit?	X					
	b) selected auditors and conducted audits to ensure objectivity and the impartiality of the audit process?	x					
	c) ensured that the results of the audits are reported to relevant management?	x					A report summarizing audit results provided for management to review.
	Has the organization retained documented information as evidence of the implementation of the audit programme and the audit results?	x					

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<b>9.3</b>	<b>Management review</b>					
	Has top management reviewed the organization’s environmental management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness:				EMS Manual s.9.3 Management Review CA-EN-PR-09-30 Management Review procedure, dated September 15, 2022 and CA-EN-FM-09-30 Management Review Minute	EMS Manual s.9.3 Management Review states Management Reviews are completed at least once per year. At minimum, the Plant Manger and Senior Manager of HR is present as well as the EMS Coordinator. Other Management Team members who are not present for the meeting may have documentation circulated to them to ensure they are made aware of the EMS status.  Links to CA-EN-PR-09-30 Management Review procedure, dated September 15, 2022 and CA-EN-FM-09-30 Management Review Minutes.  CA-EN-FM-09-30 reflects the contents of management reviews as outlined in this section of the standard, including items a) to g).
	a) the status of actions from previous management reviews?	x				
	b) changes in:					
	1) external and internal issues that are relevant to the environmental management system?	x				
	2) the needs and expectations of interested parties, including compliance obligations?	x				
	3) its significant environmental aspects?	x				
	4) risks and opportunities?	x				
	c) the extent to which environmental objectives have been achieved?	x				
	d) information on the organization’s environmental performance, including trends in:					
	1) nonconformities and corrective actions?	x				
	2) monitoring and measurement results?	x				
	3) fulfillment of its compliance obligations?	x				
	4) audit results?	x				
	e) adequacy of resources?	x				
	f) relevant communication(s) from interested parties, including complaints?	x				
	g) opportunities for continual improvement?	x				
	The outputs of the management review includes:					
	— conclusions on the continuing suitability, adequacy and effectiveness of the environmental management system?				Management Review meeting minute	OFI: Consider including prompts at the end of the CA-EN-FM-09-30 Management Review Minutes template to ensure the “outputs” of management review requirements are fulfilled (e.g. conclusion on the continuing suitability, adequacy and effectiveness of the EMS, decisions on opportunities, decisions re: any need for changes, including resources, etc.)
	— decisions related to continual improvement opportunities?					
	— decisions related to any need for changes to the environmental management system, including resources?					
	— opportunities to improve integration of the environmental management system with other business processes, if needed?					
	— any implications for the strategic direction of the organization?					
	Has the organization retained documented information as evidence of the results of management reviews?					
			X			
<b>10.0 IMPROVEMENT</b>						
<b>10.1</b>	<b>General</b>					
	Has the organization determined opportunities for improvement (see 9.1, 9.2 and 9.3) and implemented necessary actions to achieve the intended outcomes of its environmental management system?			x	Staff interview	Internal Audit and its findings. Suggestion box – KY(Kiken Yoshi – Risk Forecast) – can identify a risk before a problem occurs. - Electronic suggestion box. Jason receives suggestions as they come in. - Tracking sheet (Kaizen Suggestion 2022.xls – includes suggestions from April, June, Aug – indicates name, shift, dept, if implemented, impact, notes, description kaizen/suggestion including energy reduction, sustainability improvement, reduce rainwater runoff). OFI: Carbon neutral message sign/poster to inform TMs and visitors. - TM referral program for making suggestions. Post about new idea implementation on Display boards by TMs. To show other TMs what they can do.

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<b>10.2</b>	<b>Nonconformity and corrective action</b>					
	When a nonconformity occurs, has the organization:					
	a) reacted to the nonconformity and, as applicable?	X			EMS Manual s.10.2 Nonconformity and Corrective Action links to CA-EN-PR-10-20 Nonconformity, Corrective Action and Preventive Action, dated March 11, 2020 and the CA-EN-FM-10-20 CAR Log.	CA-EN-PR-10-20 states the audit team will issue NC's noted during an audit, and these are e-mailed to the dept. mgr. to whom the NC was linked. A two-week timeline is given for the dept. / TM to report to top management on the progress of mitigating actions and presenting a CA/PA plan with 30 days to implement countermeasures.
	1) taken action to control and correct it?	X				
	2) dealt with the consequences, including mitigating adverse environmental impacts?	X				
	b) evaluated the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:					
	1) reviewing the nonconformity?	x				
	2) determining the causes of the nonconformity?	x				
	3) determining if similar nonconformities exist, or could potentially occur?	x				
	c) implemented any action needed?	x				
	d) reviewed the effectiveness of any corrective action taken?	x				
	e) made changes to the environmental management system, if necessary?	x				
	Are corrective actions appropriate to the significance of the effects of the nonconformities encountered, including the environmental impact(s)?	x				
	Has the organization retained documented information as evidence of:					
	— the nature of the nonconformities and any subsequent actions taken?	x				
	— the results of any corrective action?	x				
<b>10.3</b>	<b>Continual improvement</b>					
	Has the organization continually improved the suitability, adequacy and effectiveness of the environmental management system to enhance environmental performance?	x			EMS Manual s.10.3 Continual improvement	Opportunities for Continual Improvement identified on Management Review meeting minutes are listed in EAP. EMS Manual s.10.3 Continual improvement includes a statement that it is an ongoing effort to improve products, services and processes.
Completed by: Connie Lum & Brigitte Roth						Date: 21-Oct-22