ESMS Procedure

ESMS 4.4.3-1 EP_Communication Procedure

<table>
<thead>
<tr>
<th>Activity</th>
<th>Responsibility</th>
<th>Frequency</th>
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</thead>
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<tr>
<td>1. Review the thoroughness, effectiveness, availability and accessibility of both internal and external ESMS communication.</td>
<td>Sr. Manager of Risk &amp; Environmental Safety and ESMS Core Team</td>
<td>Annually, or As Needed</td>
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<tr>
<td>2. Ensure ESMS contact information for inquiry and complaint protocols from employees and general public are accessible and available.</td>
<td>Sr. Manager of Risk &amp; Environmental Safety and ESMS Coordinator</td>
<td>As Needed</td>
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<tr>
<td>3. Ensure communication procedure for directing external communication is followed and information is provided to the ESMS Management Representative.</td>
<td>Sr. Manager of Risk &amp; Environmental Safety</td>
<td>Annually or as needed</td>
</tr>
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</table>
6.0 References / Related Documents
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1.0 Purpose

1.1 The purpose of this procedure is to establish internal and external communication practices related to environmental issues for the Hillsborough Transit Authority.

2.0 Scope

2.1 This procedure is responsive to element 4.4.3 Communication, of the ISO 14001:2004 Standard, and covers operations of the Hillsborough Transit Authority;

2.2 This procedure has been written to facilitate two-way communication between the ESMS Core Team, all external key stakeholders, and HART employees. As well as to establish and maintain communication channels between the various management levels and departments; and

2.3 This procedure will document the decision whether to communicate externally about the significant environmental aspects for the Hillsborough Transit Authority and establish a method for this external communication.

3.0 Responsibility

3.1 Sr. Manager of Risk & Environmental Safety is responsible for:

3.1.1 Notifying public authorities regarding compliance issues, emergency planning, compliance violations and emergencies. He/she will contact the Public Information Officer on public emergencies, if required;

3.1.2 Maintaining external communication and internal communication folders within HART Connect ESMS. (In conjunction with the ESMS Coordinator);

3.1.3 Documenting and maintaining ESMS 4.4.3-5 (F)_Environmental Communication Occurrence Forms from interested parties. (In conjunction with the ESMS Coordinator);

3.1.4 Overseeing the notification of regulatory agencies regarding emergencies, emergency planning, compliance issues and compliance violations; and

3.1.5 Overseeing the environmental comments, inquiries and complaints communicated by Customer Service and other external interested parties.

3.2 ESMS Management Representative is responsible for:

3.2.1 Ensuring future methods for communicating and promoting the ESMS for Hillsborough Transit Authority will be considered and recommended to Executive Management by the ESMS Management Representative.

3.3 ESMS Core Team is responsible for:

3.3.1 Overseeing the development of all ESMS channels of communication, both internally and externally. This includes employee updates via methods such as
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memos, hand-outs, employee newsletters, posters, wallet cards, web site postings, meetings and training, as well as submitting articles and other material for the HART newsletter and HART website; and

3.3.2 Representing the interests of their respective departments' personnel as well as disseminating pertinent information to the departments.

3.4 **ESMS Coordinator** is responsible for:

3.4.1 Maintaining external communication and internal communication folders within HART Connect ESMS. (In conjunction with the **Sr. Manager of Risk & Environmental Safety**);

3.4.2 Documenting and maintaining **ESMS 4.4.3-5 (F)_ Environmental Communication Occurrence forms** from interested parties. (In conjunction with **Sr. Manager of Risk & Environmental Safety**); and

3.4.3 Coordinating the implementation and maintenance of all ESMS channels of communication, both internally and externally. For example, keeping the ESMS bulletin board and Internet/Intranet pages up to date and submitting articles for the monthly employee newsletter.

3.5 This procedure applies to those working for or on behalf of Hillsborough Transit Authority, on-site vendors, contractors and interested parties. This procedure considers internal and external communication pertinent to environmental management to include permanent and temporary employees of the Hillsborough Transit Authority, and its respective vendors and contractors.

4.0 Definitions

4.1 Refer to **ESMS 4.4.4-2 EP_ESMS Related Definitions Procedure**.

5.0 Process

5.1 Internal Communication

5.1.1 Suggestions, recommendations, issues, concerns, ideas or activities associated with environmental issues raised by the employees will be directed to the **Sr. Manager of Risk & Safety** and **ESMS Coordinator** by the following:

   i) Supervisor
   ii) ESMS Core Team Member
   iii) Executive Leadership Team
   iv) Periodic supervisor communications meetings

5.1.2 Any changes or additions to the Environmental Policy, ESMS procedures and to the list of significant aspects that will affect the daily activities of employees will be immediately communicated to the affected supervisors by the ESMS Core Team

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Representative through the e-mail system and/or through meetings. Supervisors will then communicate the changes to their employees through training sessions, as necessary.

5.1.3 Whenever possible, the ESMS Core Team will use existing media to communicate internally with employees. The HART Connect ESMS, Internet/Intranet, employee newsletter and bulletin-boards will be used as media to communicate and post general information about the environment and the ESMS, including but not limited to environmental awareness postings, eco-friendly tips, the Environmental Policy, self-guided information seminars and awards.

5.2 External Communication

5.2.1 Environmental inquiries and complaints communicated by interested parties should be forwarded to the ESMS Coordinator by Customer Service Representatives. Customer Service Representatives will document the non-routine inquiries or complaints using the ESMS 4.4.3-5_ (F) Environmental Communication Occurrence form which is located electronically in the Customer Service Database. The inquiry and or complaint will be forwarded to the ESMS Coordinator who will review on a case-by-case basis. In the event the ESMS Coordinator is unavailable, the Sr. Manager of Risk & Environmental Safety will address the environmental inquiries and complaints. The ESMS 4.4.3-5_ (F) Environmental Communication Occurrence form and related documentation (attachments) will be electronically maintained by the ESMS Coordinator and/or Sr. Manager of Risk & Environmental Safety in the ESMS/V-drive. The information on the form includes:

i) Date and time of communication
ii) Inquiry or complaint
iii) Name, Address and Phone Number, Internal or External Party
iv) Nature of Inquiry
v) Occurrence received by (internal personnel)
vi) Response
vii) Response Date
viii) Respondent (internal personnel)

5.2.2 The ESMS Management Representative will be made immediately aware of external comments or complaints that require his/her attention;

5.2.3 The Chief Executive Officer will be made immediately aware of external comments, inquiries or complaints that require his/her attention;

5.2.4 The Public Information Officer is responsible for directing public inquiries, on Environmental Policy, to the HART website.

5.3 The significant aspects will not be communicated on the HART website or to the public,
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unless specifically requested:

5.3.1 Request of significant aspects will be communicated by the **ESMS Coordinator**, with approval of the **ESMS Management Representative**.

5.4 HARTs Objectives, Targets and Programs will be communicated on the HARTs Connect ESMS.

5.5 Future methods for communicating and promoting the ESMS for Hillsborough Transit Authority will be considered and recommended to Executive Management by the **ESMS Management Representative**.

5.5.1 Proactive methods will increase the effectiveness of external communication and the ESMS methods of communication may include: informal discussions; public outreach education, media release outlining specific ESMS programs, latest information about ESMS, HART ESMS achievements, submitting content for outside publications, organization open house days, publishing reports on performance, public notices, Monthly Community with HART newsletter, Next Stop with HART Stories; HART blog, HART The Inside Lane Annual Publication, organization email blasts, periodic social media posts; telephone hotlines, website information, and media press releases.

5.6 **Emergency Communication**

5.5.1 In the event of an environmental emergency or spill situation, employees are to immediately contact their supervisors. The supervisor will follow the communication protocol detailed in the **ESMS 4.4.7-1 EP_Emergency Preparedness and Response Procedure, Emergency Response Contingency Plan SOPs and/or the Spill Prevention Control and Counter Measures Plan (SPCC)**.

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**6.0 References / Related Documents**

6.1 **ESMS 4.4.3-S (F) Environmental Communication Occurrence Form**

6.2 **ESMS 4.4.4 2 EP_Related Definitions Procedure**

6.3 **ESMS 4.4.7-1 EP_Emergency Preparedness and Response Procedure**

6.4 **Emergency Response Contingency Plan SOPs**

6.5 **Spill Prevention Control and Counter Measures Plan (SPCC)**

6.6 **ISO Standard 14001:2004 4.4.3 Communication**

With regard to its environmental aspects and environmental management system, the organization **shall** establish, implement and maintain a procedure(s) for

a) Internal communication among the various levels and functions of the organization,
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b) Receiving, documenting and responding to relevant communication from external interested parties.

c) The organization *shall* decide whether to communicate externally about its significant environmental aspects, and *shall* document its decision. If the decision is to communicate, the organization *shall* establish and implement a method(s) for this external communication.