# INTERNATIONAL REQUIREMENTS FOR AUDITING

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Presented by: Jagdev S. Bilkhu, CEA, EMS(LA)
Jacques Whitford

### JACQUES WHITFORD

- Established in 1972
- One of Canada's largest provider of Engineering, Earth Science and Environmental Solutions
- Over 1100 Staff
- 39 offices in Canada, USA and the UAE
- Worked in over 65 different countries worldwide
- More CEAs and EMS(LA)s than any other consulting company in Canada
- ISO 9001 Registered QMS





### PRESENTATION OUTLINE

- International Auditing Requirements
- Case Study Russia



### TYPES OF ENVIRONMENTAL AUDITS

Various Types of Environmental Audits exist to assess different aspects of environmental performance

- EMS Audits and Assessments
- Compliance Audits
- Due Diligence Audits
- Phase I, II, and III ESA's
- Others:
  - Occupational Health and Safety
  - Energy Audits

- Quality Audits
- Waste Audits



### INTERNATIONAL AUDIT REQUIREMENTS

- Voluntary Agreements (ISO 14001)
- International Financial Institution (IFI)
   Requirements (e.g. WB/IFC, EBRD)
- Insurance (e.g. MIGA, EDC)
- Private Sector Financial Lending Institutions (e.g. Equator Principles)



### ISO 14001

- Audit references
  - 4.5.1 (Documented procedure for evaluating compliance with environmental legislation and regulations)
  - 4.5.4 (programs and procedures for periodic EMS Audits)
- Over 60,000 "certifications" world-wide (December 2003, source: Federal Environmental Agency, Germany)
- Japan, China, Spain, Germany and USA top 5 countries (~ 32,000)

### IFI REQUIREMENTS

- World Bank Operational Policy 4.01 (Environmental Assessment) requires Environmental Assessment of projects proposed for IFC financing
  - Depending on the nature of the project, a range of instruments can be used – Environmental Impact Assessment, Environmental Audit, Hazard or Risk Assessment, or Environmental Action Plan.
- Other IFIs such as the EBRD have requirements to perform Environmental Audits for investment projects that involve existing or past operational activities. Protocol involves:
  - HSEMS
  - Environmental Performance
  - Health and Safety Performance
  - Worker Related Issues (Forced Labour, Child Labour and Discriminatory Practices)
  - Environmental Action Plan

### INSURANCE AGENCIES

- Multilateral Investment Guarantee Agency (MIGA, Part of WBG)
  - a global insurer to private investors and adviser to countries on foreign investment.
  - Expansions, Modernizations, and Retrofits
    - The entire plant (existing and proposed new facilities) is subject to evaluation of environmental issues.
    - Requires the project sponsor to retain an independent consultant to complete an environmental audit of the existing plant.
  - Privatization
    - Requires the applicant to retain an independent consultant to complete an environmental audit of the facilities
- Export Development Canada has Environmental Review Directive
  - Before entering into a transaction that is related to a project, determine whether a project is likely to have environmental effects (EA)
  - For certain projects, an Environmental Audit will suffice for this
  - EDC may require independent consultants to do third party review of the Assessments or Audits.

# PRIVATE SECTOR – LENDING INSTITUTIONS – EQUATOR PRINCIPLES

- First adopted June 2003 by 10 banks in 7 countries
- Voluntary Guidelines for Managing Social & Environmental Issues
- Applied Globally
- Based on Policies & Guidelines of World Bank/IFC
- Address issues including:
  - Sustainable Development
  - Protection of human health, cultural properties and biodiversity
  - Socioeconomic impacts
  - Public Consultation & Disclosure
- Aug 2004 27 financial institutions have adopted



# ENVIRONMENTAL MANAGEMENT TECHNICAL COOPERATION PROGRAM FOR TRANSNEFTPRODUKT









### OBJECTIVES OF THE PROJECT

- Jacques Whitford has a contract with the EBRD to assist Transnefteprodukt (TNP) to assist TNP in:
  - ✓ development and implementation of an environmental management programme in line with EU, World Bank Group and international industry standards;
  - ✓ areas of i) the environmental management; ii) oil spill
    prevention and response planning and training, and iii)
    structured approach to communication with the public
    on the environmental issues;
  - ✓ development of a wide range of environmental management tools including Environmental Audit; and
  - ✓ strengthen TNP's institutional capacity in the area of environmental management, in the light of future potential cooperation of the Company with the Bank.

#### **APPROACH**

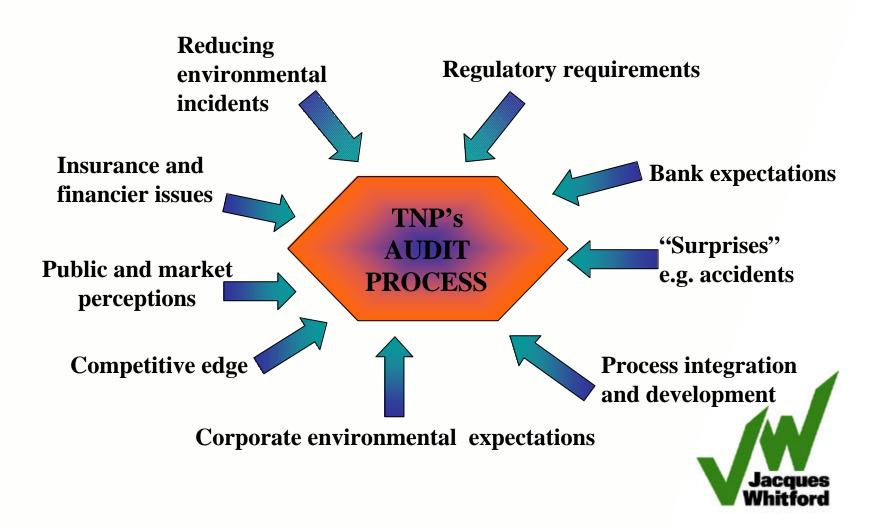
- Buy in and support by senior management
- One size doesn't fit all for subsidiaries
- "Building Block" Analysis
- Use of Russian partner
- Frequent trips to Russia from initiation (4)
- Final component is EMS Audit



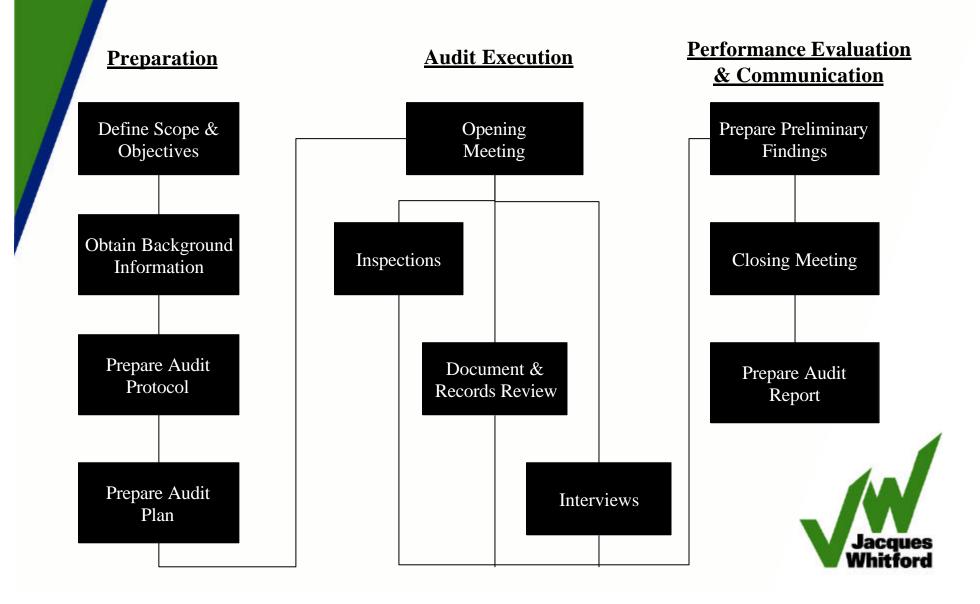


#### **DRIVERS**

 Many different forces drive the development of an audit program



### **GENERAL AUDIT PROCESS**

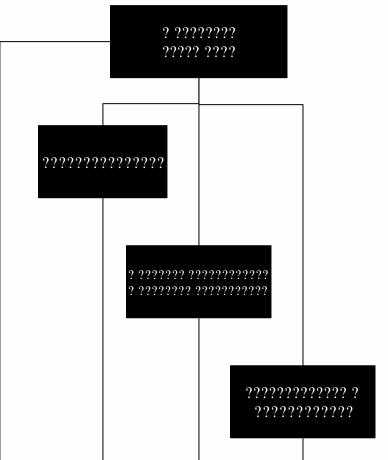


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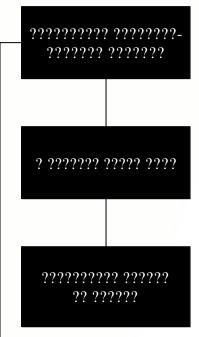
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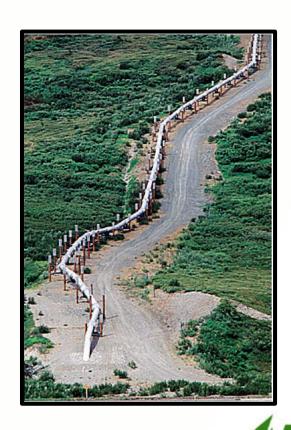
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### PITFALLS IN IMPLEMENTING AN AUDIT PROGRAM

- Failure to obtain the commitment of senior management.
- Failure to secure employee buy-in.
- Failure to define realistic commitments.
- Failure to prioritize findings.
- Failure to develop a corrective/preventative action.



### **SUCCESSES**

- Far greater comprehension on concept of management system than other nationals or cultures due to centrally planned economies
- Strong work ethic
- Desire for compliance
- Understanding of document control and records management





### **CHALLENGES**

- FSU slow in accepting ISO 14001
  - (Estonia -74, Lithuania -72, Russia-48, Azerbaijan-5, Ukraine-4, Kazakhstan-4)
- Resistance to Change
- Language barriers/translations
- Negative connotations of "Audit", "Inspections", and "Non-conformances" in Russian languate
- Size of TNP and its subsidiaries
- Changing regulatory regime in RF
- Inspections are routine; audits have not routinely been done
- Auditors have not been trained to perform audits
- Auditor Independence is a new concept

#### **CONTACT INFORMATION**

Jag Bilkhu, CEA, EMS(LA)
Director, International Operations

4370 Dominion Street
Burnaby, BC V5G 4L7
jag.bilkhu@jacqueswhitford.com

Phone: 604.678.3090

Fax: 604.436.3752

