

# **GUIDE FOR THE ENVIROVISTA CHAMPION LEVEL**

**Alberta Environment's Program to Recognize and Promote  
Corporate Environmental Leadership**

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## **I BACKGROUND TO THE ENVIROVISTA PROGRAM**

Alberta has a long and successful history of environmental protection, pollution prevention and pollution control. Historically, Alberta Environment (AENV) has emphasized the use of regulatory instruments to ensure continued environmental protection - particularly through prescriptive terms and conditions within approvals issued under the Alberta *Environmental Protection and Enhancement Act*, R.S.A. 2000, c. E-12 (EPEA). This 'regulatory' approach has assured and will continue to assure a high level of environmental protection in Alberta.

AENV has also come to appreciate that many regulated (approved) facilities have demonstrated a commitment to environmental stewardship. Over the years, many facilities have voluntarily adopted corporate triple bottom line policies, Environmental Management System (EMS) and the application of pollution prevention and continuous improvement practices. These voluntary initiatives have yielded environmental outcomes that go beyond baseline environmental compliance obligations.

To recognize and promote excellence in environmental performance and environmental stewardship, AENV has developed the voluntary facility based EnviroVista Program ("Program"). All private and public facilities holding a valid, current EPEA approval (with specific emission limits, or in the case of facilities producing treated potable water, water quality limits) and that demonstrate the prerequisite environmental leadership qualities, are eligible to apply the Program. Program details are available from the web site:  
<http://www3.gov.ab.ca/env/protenf/approvals/factsheets/enviroVista.html>.

### **Two Levels of Participation**

The Program has two tiers or levels of participation:

1. The EnviroVista Leader level officially recognizes facilities that have a minimum history of five years of exemplary emissions performance, a comprehensive, publicly-accessible, audited environmental management system and five years without any enforcement activity under Alberta's Environmental Protection and Enhancement Act (EPEA). Additional information on the EnviroVista Program is available on the Alberta Environment web Site:  
<http://www3.gov.ab.ca/env/protenf/approvals/factsheets/doc/EnviroVistaLeadersGuide.pdf>.
2. The EnviroVista Champion level provides the same recognition as the Leader level and provides access to a broader suite of benefits and incentives, including a streamlined EPEA approval. Through a *Stewardship Agreement*, EnviroVista Champions are required to commit to enhanced environmental performance. This *Guide for the EnviroVista Champion Level* (Guide) outlines the eligibility requirements, expectations, obligations, incentives and benefits for EnviroVista Champion level participants and describes the process for applying to become an EnviroVista Champion.

## **II ENVIROVISTA CHAMPION LEVEL OF PARTICIPATION**

### **A. Introduction**

Existing EPEA approvals provide a high level of environmental protection by detailing administrative, operational and environmental performance requirements of a facility. Key to the protection of the environment is the specification of limits on emissions to the environment. Many facilities have historically performed well beyond these minimum limits and wish to continue to do so. However, the command and control nature of the existing EPEA approval, restrains certain facilities in this endeavour. The EnviroVista Champion level provides the means to facilitate excellence in environmental performance through the *Stewardship Agreement*, which includes streamlining of the EPEA approval.

The *Stewardship Agreement* focuses on desirable environmental outcomes to be pursued by a facility. Approval streamlining provides operational and administrative flexibility and a regulatory backstop to the *Stewardship Agreement*. The application prepared by a facility, after appropriate consultation with stakeholders, will list the proposed commitments from a facility and the incentives (including approval streamlining) requested by a facility

### **B. EnviroVista Champion Level Participation Criteria**

Excellence in past performance and having the formal structure in place to systematically manage environmental matters are the best indicators that a facility has the capability to continue to perform well and to improve into the future. AENV invites the most highly motivated facilities to apply for the Champion level. To qualify to enter this level, a facility must meet the EnviroVista Leader Participation Criteria (see Leaders Guide at: <http://www3.gov.ab.ca/env/protenf/approvals/factsheets/doc/EnviroVistaLeadersGuide.pdf>) and negotiate a *Stewardship Agreement* with AENV. To remain in the Champion level, a facility must fulfill all commitments made in its *Stewardship Agreement*.

### **C. Application for the EnviroVista Champion Level**

A qualifying facility may apply for entry into the Champion level at any time during the term of its EPEA approval. When a facility participating in, or that qualifies to participate in, the EnviroVista Leader level amends or renews its EPEA approval, AENV may initiate discussions about participation at the EnviroVista Champion level. Participation is voluntary; the final decision to apply and participate rests with the facility but, once accepted, facilities are required to meet their performance and other commitments and share their results openly with government and the interested public.

Additional details on the process facilities will follow applying for the EnviroVista Program are found in Appendix I EnviroVista Champion Application Process. The Application, when finalized, will contain details of the facility's commitments to environmental stewardship and the facility's request for access to program benefits including approval modifications.

Application to the Champion level will generally follow guidance provided in *A Guide to Content of Industrial Approval Applications*, found on the AENV web site at: <http://www3.gov.ab.ca/env/protenf/publications/appindustrial.pdf>. The EnviroVista Stewardship Agreement will require that the facility provide additional information. In summary, the facility must establish its performance baseline both to show the facility is capable of performing well within its approval limits and to serve as a comparative measure to illustrate progress towards planned emissions performance targets. The applicant should also describe its pollution prevention and continuous improvement actions related to the emission targets and to the reduction in the use of resources and to reuse, recycling, and reductions of non-regulated waste streams. A facility may propose other voluntary stewardship activity both to receive recognition, and to raise its profile with the public. Appropriate public involvement and community consultation are also important to both the application process and as a commitment under the Stewardship Agreement. The application should also discuss the performance measures, monitoring and reporting that will be used to evaluate and celebrate progress towards achieving the performance targets and other commitments. Additional details on each term underlined above are available in the Application Process section of this Guide.

In the application a facility should also identify the approval streamlining and other program incentives it is seeking from AENV. A complete discussion of benefits and incentives is found later in this Guide. In addition to the incentives listed in this Guide, a facility may identify additional benefits or incentives specific to its circumstances for discussion with AENV.

#### **D. The Stewardship Agreement and Approval Streamlining**

Participation at the EnviroVista Champion level is initiated through an application for a *Stewardship Agreement*. The application will list the commitments made by the facility and the requested modifications to streamline the approval. Streamlining the EPEA approval allows for greater operational and administrative flexibility while leaving in place a regulatory backstop to the *Stewardship Agreement*. Combined, the streamlined approval and the *Stewardship Agreement* facilitate improvement in environmental performance and enhance environmental protection beyond what is possible with a standard EPEA approval alone.

## **1. The Stewardship Agreement**

In the process of completing an EnviroVista Champions Application, a facility will work with its community and public stakeholders and with AENV to identify: its commitments for environmental performance targets, its pollution prevention and continuous improvement plan, its performance baseline, monitoring, reporting and performance measures, community consultation and public involvement activities and its request for approval streamlining (see Application Process section for details). The environmental commitments and requested incentives in the Application, when agreed to by AENV, are appended to the Stewardship Agreement.

By fulfilling these commitments, a facility will perform well beyond the minimum expectations for environmental performance required in a standard EPEA approval. In recognition of the facility's excellent past performance and the commitments in the *Stewardship Agreement*, AENV will provide the facility with requested incentives (see the "Benefits of Participating as an EnviroVista Champion", below) including a streamlined EPEA approval.

## **2. Regulatory Flexibility through Approval Streamlining**

Approval modifications or streamlining will give facilities greater regulatory, operational and administrative flexibility. A Champion level approval will be shorter, less prescriptive and simpler than a regular EPEA approval. The streamlined approval:

- Provides the regulatory backstop to the *Stewardship Agreement* by identifying the minimum legally acceptable limits for emission sources and identifying the monitoring needed to provide data that can be used to measure performance against the limits.
- Includes administrative provisions (identification of the plant, signature block, etc.) normally found in an EPEA approval and
- Retains provisions that a facility may not want to vary from its existing approval.

(An EnviroVista Champion level approval will be subject to all compliance and enforcement authorities in place for a regular EPEA approval. Should a facility exit from the Champion level a "standard" EPEA approval will need to be put in place. To allow sufficient time to put this standard EPEA approval in place, facilities will be required to provide AENV 180 days written notice of their intent to withdraw from participation at the Champion level.)

## **E. Ending Participation as an EnviroVista Champion**

### **1. Withdrawal by a Facility**

Facilities remain in the EnviroVista Champion level as long as they continue to meet the *Participation Criteria*. The Program is voluntary. A facility may, upon giving 180 days notice to AENV, withdraw from the EnviroVista Champion level of the Program and revert to their EnviroVista Leader status, or withdraw from the Program entirely. The 180-day notice period provides AENV and the facility adequate time to formally revert to a standard EPEA approval. There are no sanctions for a facility that withdraws while in good standing in the Program.

### **2. Removal from the Program**

The Program is open to only the best performers; participating facilities have proven that they are responsible managers of their environmental affairs. If required, AENV may initiate removal of a facility from the EnviroVista Champion level if the facility is found to be in breach of its *Stewardship Agreement* or if the facility has taken an action that discredits the Program (for example inappropriate use of the EnviroVista Champion logo)

### **3. Use of Logo, Certificates, Communications**

Whether a facility voluntarily withdraws from the Program or is removed, the facility will keep its original EnviroVista Leader certificates and any annual renewal certificates issued; it has earned these. On removal or withdrawal from the EnviroVista Champion level, the facility must discontinue use of the EnviroVista Champion's logo, and AENV will remove the facility from the list of current Program participants.

AENV will coordinate with the facility with respect to communications regarding removal from the EnviroVista Champions level to ensure clear understanding of the voluntary, versus regulatory, nature of the Program. AENV reserves the right to independently issue statements regarding violations of EPEA, its regulations or approvals.

## **F. Benefits of the EnviroVista Champion Level Program**

The EnviroVista Program offers a range of benefits and advantages to the environment, to the public, to the government regulators and to private and public sector facility operators.

## **1. The Environment**

With an emphasis on beyond compliance performance, pollution prevention and continual improvement, and the integration of an Environmental Management Systems (EMS) approach, the EnviroVista Program will result in:

- Improvements over a range of environmental impacts,
- Long-term reductions in emissions to the environment, and
- Greater reduction, reuse and recycling of resources from present waste streams.

Significant, measurable environmental performance targets, which will go beyond compliance limits, are expected from Program participants. The advantages offered to the exemplary environmental performers that are eligible to participate in the Program will encourage all regulated operators in Alberta to improve their environmental performance.

## **2. The Public**

The EnviroVista Champion level will result in improved environmental performance by participating facilities, while maintaining a high degree of public credibility and confidence in AENV's ability to protect the environment. Environmental non-government organizations (ENGOs) and the general public will have an on-going role in program design and operations through the EnviroVista Public Advisory Committee. As well, the program is designed to include the public, environmental and community in stakeholder consultations in the development of individual Stewardship Agreements. Champion level facilities will be expected to regularly share information with public stakeholders on the progress made on their commitments. Champions will also provide appropriate opportunities for community consultations throughout the term of the Stewardship agreement. The EMS structure in particular provides a constructive opportunity to discuss companies' performance and corporate environmental policies, with greater reporting transparency and verification of results.

## **3. The Regulator**

The EnviroVista Program provides for a greater level of environmental enhancement and protection than is possible with a regulatory approval alone, in particular, through the commitment to enhanced emissions performance in the *Stewardship Agreement*. By creating this alternate approach for exemplary facilities a greater percentage of departmental resources may be focused on those facilities that have more serious performance and compliance issues. A broader range of potential environmental benefits will help to foster improved relations between government, industry and the public. The continued existence of a strong regulatory framework (EPEA general do not pollute provisions, the streamlined approval) ensures basic environmental protection continues.



## **4. Champion Level Operator/Facility Benefits and Incentives**

### **4.1 Benefits**

The Champion Level provides an independent and objective forum for a facility to publicize its proactive environmental management and commitments to voluntary stewardship. Flexibility provided under the program is meant to encourage innovation and creativity to achieve economic, social and environmentally sustainable conditions for participating facilities.

Participation provides intrinsic benefits that can be used to improve the facility and corporate image and public acceptability in internal and external communications. Examples of how participation may benefit a facility include:

- Inside the corporation, where a facility is part of a larger company, participation in EnviroVista demonstrates strong alignment with corporate triple bottom line policies. This may give the facility a competitive edge when head office planners are looking for a location to invest in new product lines, expansion or upgrading.

Executives can use participation in the Champion level in reports to shareholders interested in hearing about corporate environmental initiatives.

- In the industrial sector, managers can point to participation as an example of environmental leadership. Such leadership can be used in recruiting new employees and in retaining valued existing employees.

Managers of EnviroVista facilities may also use their participation to drive changes in the regulatory system. Managers from participating facilities may argue that if they are able to voluntarily improve the environmental performance of their facilities, then AENV should require enhanced performance from their competitors, who are not participating in the Champion level.

- In the community, facility managers can use participation in the program to illustrate to local political leaders, public figures, opinion makers and residents that the facility is a good neighbour, interested in engaging the community in a dialogue on matters of mutual interest, and is committed to maintaining or improving the quality of the environment. Participation demonstrates to the community that the facility hears and proactively addresses concerns and operates in a manner that considers all environmental issues, not just the regulated ones. This becomes valuable when a facility is seeking any type of regulatory approval.

- In the economy, many companies require their suppliers to prove their commitment to the protecting the environment through participation in recognized stewardship programs. EnviroVista participants can use the program to promote products from their facilities to these companies. EnviroVista may also help to attract interest from the managers of capital investment funds that have adopted an environmental ethic as a requirement for new investments. Insurance companies and banks assess environmental risks in transactions with their corporate clients, participation in EnviroVista helps to reinforce that a facility has a sound environmental record and is proactively managing its risks.

#### **4.2 Incentives for EnviroVista Champion Level Participants**

The following list indicates incentives that will be offered to all Champion level participants at the launch of the Program. As part of the Application for the Champion level of the program, facilities may propose additional incentives for consideration by AENV, as well; facilities may decide to not take advantage of particular incentives listed below.

##### ***1. Letters to Elected Officials and Senior Management Officials***

The Minister or Deputy Minister will send a letter recognizing the leadership shown by the facility, commending the facility for its stewardship commitments and explaining the exclusive nature of the program. Facilities may request that letters be sent to the local MLA, to other Government of Alberta Ministers and senior officials, to local officials (ex. Mayors or Reeves) to corporate managers in the parent company of the facility and to others identified by the facility (ex. other provincial Ministers, federal officials or Ministers, to financial institutions).

##### ***2. Recognition***

AENV will develop a Champion level web page on the EnviroVista site. Champion level participants will receive a special certificate of recognition and will have use of a special logo, distinct from the Leader logo. AENV will use its web site to greater effect in recognizing Champion participants, possibly including pictures, stories and testimonials as well as links to the a facility or corporate web page. AENV in its annual conference and in its participation in other public events (ex: Special Weeks) will give special mention to Champion level participants and their achievements. Senior AENV officials, and the Minister will publicly recognize participants in the Champion level when speaking in public.

##### ***3. Coordinated Communications with Participating Facilities***

AENV will coordinate with Champion level facilities on press releases at the time of entry in to the program. Communications would focus on the voluntary beyond regulatory compliance nature of the program and on the partnership approach to environmental management where the department and facility share

responsibility for improvement in environmental outcomes. Such coordination will also be available if a facility withdraws from the Champion level.

**4. *Support for Applications for Environmental and other Awards***

AENV will assist Champion level facilities' applications for third party environmental awards (e.g. Consulting Engineers of Alberta Environmental Awards, Canadian Council of Ministers of the Environment Pollution Prevention Awards, Alberta Emerald Awards). Regulator support of applications for such awards can provide additional credibility and is often a requirement for a complete submission. AENV will provide special notice to EnviroVista participants that Awards are open for applications. AENV will post notices on its web page recognizing EnviroVista winners of these awards.

**5. *Ongoing Participation in Program Development***

The program continues to evolve. The Champion level when established puts the basic program framework in place, however there are enhancements that could be pursued. Bringing other regulatory agencies in to the program (e.g. EUB, SRD), offering sector wide participation, offering corporate wide participation, having categories of Champion level agreements (e.g. emission related, reclamation related) are a few concepts that could be explored. Three seats on the EnviroVista Program Advisory Committee are available to Champion level participants.

**6. *Policy Forums***

Senior AENV Management, and possibly including the Minister of Alberta Environment, will meet annually with executives of Champion level facilities to discuss new policy direction by AENV. These forums will provide an opportunity for company Executives to provide input on policy formulation. At the day to day level, Champion level participants can use the program as a means for identifying regulatory changes that would be incentives to continue to participate in the Program (e.g. evergreen approvals, or longer terms between approval renewals for participants). Participants can also use the program to recommend process changes (e.g. increased use of Director discretion to allow amendments to an approval, provided the changes will have no adverse effect on the environment).

**7. *Fees and Priority Review of Applications***

For Champion level applicants fees currently charged by AENV for approvals, amendments, renewals will be waived. AENV will (to the extent possible under current legislation) move Champion level applications for amendments, renewals and approvals to the front of the applications line.

## 8. *Approval Streamlining*

At the Champion level, facilities advance their stewardship objectives through a performance based *Stewardship Agreement* negotiated with Alberta Environment (with public consultation). When a Stewardship Agreement is successfully negotiated, Alberta Environment will provide the facility with greater regulatory flexibility through a streamlined approval. Champion level facility approvals will be shorter, less prescriptive and simpler than regular EPEA approvals. Combined, the streamlined approval and the Stewardship Agreement facilitate improvement in environmental performance and provide a greater level of environmental enhancement and protection than is possible with a regulatory approval alone. Some examples modifications to an approval include:

### a. **Emission Performance Targets Vs Regulatory Limits**

The Stewardship Agreement will provide emission performance targets that a facility commits to meet. The approval will specify the minimum regulatory emission limits that a facility must meet to remain in regulatory compliance. (In the case of water treatment plants, the targets and limits may address the potable water to be produced). Stewardship Agreement targets will normally represent a significant improvement over the limits in the approval.

### b. **Operational Flexibility**

The Stewardship Agreement will describe the framework under which a facility will operate including reference to its environmental management system, pollution prevention, continuous improvement and other programs, standards and codes to be followed. All such operational detail will be removed from the approval (unless both AENV and the facility agree to retain particular details). A risk management approach is to be taken, details meant to mitigate high risk to the environment or human health only should be considered to remain in the streamlined approval.

### c. **Regulatory Flexibility**

Currently EPEA approvals contain details on many operational requirements for facilities. Facilities may request that these be removed as part of the approval streamlining.

Notification for flaring/startup/shutdown events – Currently industry must inform AENV before these types of events occur, otherwise a potential emission spike may be viewed as a compliance issue under the approval. Removal of this notification for every event would allow facilities to perform minor repairs and process adjustments on their own schedule. In the Stewardship Agreement, facilities will commit to appropriate communications with area residents regarding these events.

Advance approval may be provided for new construction, expansions, equipment or process modifications provided the facility commits to continue to meet its emission targets.

Facility wide "bubble limits" may be used in place of specific limits on each source.

Modifications could include removal of approval clauses that specify use or application of certain types of equipment or procedures. In the Stewardship Agreement a facility will commit to outcome-based requirements that would reduce emissions or improve environmental performance.

Facilities should review their approvals and identify any additional opportunities for streamlining in regard to operational activities.

**d. Administrative Flexibility**

Facilities may be relieved of detailed reporting requirements now standard in many approvals. Monthly written reports to AENV could be replaced with summary public reports through a web site and annual written reports to AENV, with monthly data stored on site. Modifications may also be made to some monitoring activity, especially where there is low risk, for example where past monitoring shows consistently stable conditions over the long term and no operational or other changes are contemplated.

**G. Assuring Environmental Protection at the Champion Level**

The *Stewardship Agreement* will provide for a greater level of environmental enhancement and protection than is possible with a typical regulatory approval alone, and will provide the operational, regulatory and administrative flexibility needed to pursue enhanced environmental stewardship objectives. Environmental protection and enhancement is assured by:

**1. Best Performers Only**

Access to the Champion level is open to best performers only: facilities that have a minimum history of five years of exemplary emissions performance, a comprehensive, publicly-accessible, audited environmental management system and five years without any enforcement activity under Alberta's Environmental Protection and Enhancement Act (EPEA), Facilities that meet the restrictive criteria established for the Leader level have the administrative and organizational structures

in place to maintain their high level of performance and improve on it as laid out in the Stewardship Agreement<sup>1</sup>.

## **2. Meaningful Public and Stakeholder Participation**

Environmental non-government organizations (ENGOS) and the general public will have an on-going role in program design and operations through the EnviroVista Public Advisory Committee. Champion level participants recognize that good community relationships have intrinsic value. The program is designed to include appropriate public, environmental and community stakeholder consultations in the development of the application for the Stewardship Agreements. Champion level facilities will be expected to indicate how and when they will share information with the public on the progress made on their commitments. Champions may also provide appropriate opportunities for community consultations throughout the term of the Stewardship agreement. A facility will report on its stakeholder involvement program, the issues raised by a stakeholder and how the facility addressed them. Maintaining and enhancing positive community relations is a strong motivation to meet performance commitments.

## **3. Contractual Obligations**

The Stewardship Agreement will be a written contract between the facility and AENV. A well-managed facility will not enter into a contract lightly; a facility will make only those commitments it is confident it can deliver on. Both parties will enter into the agreement in good faith expecting to fulfill their stated obligations. If a facility violates the Stewardship Agreement, it could lose all Program benefits, particularly regulatory flexibility provided in its streamlined approval.

## **4. Regulatory Backstop**

Participating facilities have proven that they are responsible managers of their environmental affairs. There is a Regulatory backstop to the Stewardship Agreement. The streamlined approval will include minimum legally acceptable limits for emission sources. Violation of such limits can be pursued using the suite of regulatory compliance assurance tools available to AENV. There are also general "do not pollute" provisions in the *Environmental Protection and Enhancement Act, RSA, Chapter E-12, Part 5: Release of Substances, Division 1: Release of Substances Generally*, that may be applied. Facilities that get into severe regulatory issues will revert back to a prescriptive standard EPEA approval.

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<sup>1</sup> Applicants for the Champion level must be participants in, or qualify for participation, at the Leader level. The EMS Leader level participation criteria requires that a facility have in place an Environmental Management System that contains ten essential elements. EMSs that meet this criterion provide the assurance that the facility has the formal policies, structures, resources, training and other features in place to systematically manage their environmental matters. See Appendix 2 for details on the ten required EMS elements.

## 5. Corporate Image

A facility will work to meet its Stewardship Agreement commitments to protect its image as a good corporate image, to maintain the goodwill of their local communities, to protect the reputation they have built up with customers, to remain in good standing with senior corporate executives, shareholders and potential investors.

Should a facility exit from the EnviroVista Champion level of the Program, a "standard" replacement approval will need to be put in place. To allow sufficient time to put this standard approval in place, facilities will be required to provide AENV 180 days written notice of their intent to withdraw from participation at the Champion level (see "Ending Participation at the EnviroVista Champion's Level").

(In general, the performance commitments made by an applicant in the *Stewardship Agreement* will not be enforceable through regulatory proceedings. Rather, failure by a facility to meet its commitments or to demonstrate good faith efforts in achieving the performance targets will be sanctioned through loss of incentives or removal from the Champion level of the Program.)

## III APPLICATION PROCESS

Application for the Champion level of the EnviroVista Program will generally follow the approval renewal / approval amendment process that is familiar to many current approval holders. In addition, to put in place an EnviroVista program Stewardship Agreement, applicants will:

- have an exploratory discussion about the Program and their facility with AENV,
- propose emission performance targets and other environmental stewardship activity,
- engage in appropriate public consultations on their proposal, and
- request regulatory flexibility and other incentives from AENV.

### **Qualifications**

Applicants to the Champion level must be participants in or qualify for the EnviroVista Leader level. Complete details on the EnviroVista Leader level are available at: <http://www3.gov.ab.ca/env/protenf/approvals/factsheets/doc/EnviroVistaLeadersGuide.pdf>.

### **Initial Discussions between AENV and Interested Facilities**

Facilities interested in the program should make themselves familiar with the program as described on the AENV web site at:

<http://www3.gov.ab.ca/env/protenf/approvals/factsheets/enviroVista.html>. The facility and AENV will meet to ensure a shared understanding:

- The EnviroVista Champion level (requirements, objectives, Stewardship Agreement, incentives – including regulatory flexibility, other benefits and application process, and the need for appropriate public involvement in developing and during the term of the Stewardship Agreement) and
- The facility (operations, features of its EMS, environmental performance, community issues and relations, public consultation activities and its potential performance commitments and expectations under the Champion level).

The outcome of this meeting should be concurrence that the facility is (or is not) a suitable candidate for the Champion level. If additional information is needed to assess suitability there should be agreement on what follow-up action is needed. Participation is voluntary; the final decision to apply and participate rests with the facility but, once accepted into the Champion level, facilities are required to meet their performance and other commitments. Facilities will also share their results openly with AENV and the interested public.

#### **AENV Initiated Discussions**

When a facility participating in, or that qualifies to participate in, the EnviroVista Leader level amends or renews its EPEA approval, AENV may initiate discussions about participation at the EnviroVista Champion level.

#### **Facility Initiated Discussions**

A qualifying facility may apply for entry into the Champion level at any time during the term of its EPEA approval. Facility managers may initiate preliminary discussions with AENV through their approval contact, or by email to [EnviroVist@gov.ab.ca](mailto:EnviroVist@gov.ab.ca)

#### **The Stewardship Agreement**

A suitable facility should have a plan for consulting the public in the development of its proposed Stewardship Agreement. The Stewardship Agreement will follow a standard form with three schedules that allow the agreement to be customized to individual facilities. A sample Stewardship Agreement is available on the AENV web site at: <http://www3.gov.ab.ca/env/protenf/approvals/factsheets/enviroVista.html>.

Schedule A, EnviroVista Champion Commitments, lays out the actions the facility will take as a Champion. Commitments may relate to emission performance or to other stewardship activity. The facility will describe these in sufficient detail to satisfy the program requirements that they are above and beyond regulatory requirements. Applicants are encouraged to be creative in providing the necessary information, clearly explaining how the facility will meet program objectives, improve their environmental performance, and provide an indication of their future areas for further emissions reductions (continuous improvement) and environmental improvement.

Schedule B, Regulatory Incentives, is a copy of the streamlined approval provided by AENV to the facility; see Approval Amendment or Renewal below.



Schedule C, Alberta Environment Commitments, lists the non-regulatory incentives AENV agrees to provide to the facility. Participating facilities may select none, any or all of the incentives offered by AENV. As well, facilities may propose additional incentives for consideration by AENV.

**Approval Amendment or Renewal**

Applicants should follow the AENV document: "A Guide to Content of Industrial Approval Applications", available at:

<http://www3.gov.ab.ca/env/protenf/publications/appindustrial.pdf> in preparing an application for participation in the EnviroVista Champion level, including a streamlined approval.

An applicant facility will include additional information to the "Guide to Content" in two key areas:

1. The facility will indicate areas where it wishes to take advantage of the regulatory flexibility offered under the program. The facility should identify the sections, clauses, terms and conditions that it wishes to have streamlined from the approval. For each request, the facility should indicate how it would manage its operations to address the subject of the deletion. For example, the application may indicate:

"Section 4.1. 1 The approval holder shall notify... to 4.7.3..."

DELETE - see Environmental Management System, section 6.3...

"Section 4.7.4..." DELETE – see Environmental Management System, section 2.2...

"Section 5.1. 1 All plant industrial... to 5.4.2..." DELETE - see Application section 6.7, Pollution Prevention Plan...

"Section 5.3.22 The approval holder shall develop and maintain a..."

DELETE – see Application section 6.8, Other Commitments...

2. The facility will indicate its commitments that are not specifically related to a deleted or changed section of the approval.
  - a. In particular, EnviroVista Champions will be expected to establish emission targets (and associated monitoring and public reporting of progress) that represent an improvement over the performance expected in a regular approval.
  - b. Other waste reduction and resource use commitments may address pollution prevention and continuous improvement in areas such as efficiency of energy, water and other resource use, dealing with legacy issues at the plant site...
  - c. Stewardship actions other than those related to waste reduction or resource use may provide: support for local environmental initiatives, mentoring other facilities of the company (or within the sector) to help improve their environmental performance, support for environmental research ...

Information supporting the application for a Stewardship Agreement should cover:

**1. Performance Baseline**

The facility will provide details its emissions and related history. The length of record should include the past five years. Details on recent changes in technology and regulatory limits that help to explain the emissions performance should also be included. The purpose of this record is to serve as a baseline for future performance reports. The baseline report should be interpretive, not simply a listing of data tables, the intent being to provide a simplified format useable by a variety of reviewers. There should be consistency in format to allow comparison between the baseline reporting and the subsequent reporting of performance, see Performance Measures, Monitoring and Reporting section below.

**2. Environmental Performance Targets**

The scope of the planned performance targets would be determined by the facility's operations and by local issues regarding the facility's use of resources and its emissions and other environmental impacts. Where relevant, the performance targets implementation timeline should be sufficiently long to allow corporate planning for capital expenditures. Performance targets may be staged to establish short and mid term targets/targets to build on recent successes and to develop new targets that incorporate learning from recent achievements.

**3. Pollution Prevention and Continuous Improvement Plan**

Although one element of the required environmental management system includes a commitment to pollution prevention, the application should provide details on what that commitment means. The application should describe how the facility is minimizing or eliminating waste streams not addressed in the approval and what energy, water and other resource use efficiency measures are to be pursued. Pollution prevention actions may be related to the Environmental Performance Targets above.

**4. Other Environmental Initiatives**

A facility may propose to participate in regional or provincial organizations whose mandate includes the management of environmental issues, examples include Air Shed Zones, Watershed Planning Advisory Councils, local water stewardship groups, regional industrial organizations and others. A facility may propose other initiatives, examples include greening plant sites through rehabilitation of natural areas, sponsoring environmental research at an Alberta post secondary institute, supporting local environmental programs.

**5. Ongoing Community Consultation, Stakeholder and Public Involvement**

Public consultation is expected from facilities in the Champion level. Stakeholders should include interested individuals from the vicinity of the facility. A consultation program should be included in every application. Consultation may vary based on the size, location, emissions, type of facility and the nature of the commitments made. A large facility located in a heavily populated area will have a more comprehensive consultation program than will a small facility with few, or no nearby neighbours or sensitive land uses. A municipal water treatment plant may include both its

customers and its nearby residents in its consultations, while an export oriented industrial facility may not need to consult distant customers, but may have to address stakeholder interests from its surrounding community. Consultation will help to ensure that the Stewardship Agreement reflects community values.

- In the formulation of its Application, a facility should provide stakeholders with opportunities to: review the past environmental performance of the facility, to assist in setting performance targets and measures and to identify means for clear, understandable reports to the public on achievement of commitments made in the application.
- The application should also describe proposed ongoing public communications and stakeholder consultations for the duration of the Stewardship Agreement. Ongoing activities may, include: community advisory panels with a preset schedule of meetings, outreach activity like newsletters, open houses, booths at local events presentations to municipal councils, chambers of commerce etc. The objective is to inform and appropriately engage the community in discussions on progress and to discuss potential new or revised commitments that may be made during periodic review of the Stewardship Agreement. Where appropriate the facility should provide technical expertise to assist stakeholders in understanding and discussing issues.
- In their annual reports Facilities will report on their communications and stakeholder involvement programs, the issues raised and how they were addressed. These reports may also review the successes of past stakeholder involvement and seek improvements where necessary.

The benefits of enhanced stakeholder participation include broadened community awareness, earlier indications of concerns about the facility in the region, and equally important a better overall public and community response to initiatives taken under the Stewardship Agreement.

## **6. Performance Measures, Monitoring and Reporting**

During the process of developing the facility's Application, there will be discussion of suitable performance measures linked to the proposal(s) made by the facility. These will be translated to reporting measures and mechanisms. These performance measures, supported by the monitoring data, become the means for evaluating, and celebrating progress towards achieving the Environmental Performance Targets and other commitments.

The reporting of monitoring data should be transparent and readily accessible by the stakeholders. Graphic formats can often convey large amounts of data that can be quickly and easily interpreted by the public especially if relevant benchmarks, guidelines or limits are displayed on the figures. The Program is an excellent test

vehicle for companies wishing to pilot new data acquisition and reporting technologies and gain public confidence in these new systems.

Participating facilities will continue to be responsible for immediately reporting to AENV all incidents (spills, upsets, leaks, accidental releases and others) where an environmental effect is likely. In addition, to ensure transparency of operations, facilities would be expected to notify their public/community stakeholders of such events. Website posting of information reports would be a valuable asset to speed the dissemination of accurate information.

## **Summary**

The current regulatory approach to environmental management will continue to provide a high level of protection for Alberta's environment. Many regulated facilities have demonstrated their commitment to environmental stewardship through a strong history of beyond compliance performance and other voluntary initiatives. In particular, by adopting comprehensive Environmental Management Systems these facilities have put in place the formal structure to systematically manage their environmental matters. The EnviroVista Champion level provides a means to recognize and encourage this environmental ethic. Only the best performing facilities may apply for Stewardship Agreement. The Application, when finalized, will contain details of the facility's commitments to environmental stewardship and the facility's request for access to program benefits including streamlining of the EPEA approval. The Stewardship Agreement and streamlined approval, put in place for Champions, provides a greater level of environmental protection than the original command and control approval alone.