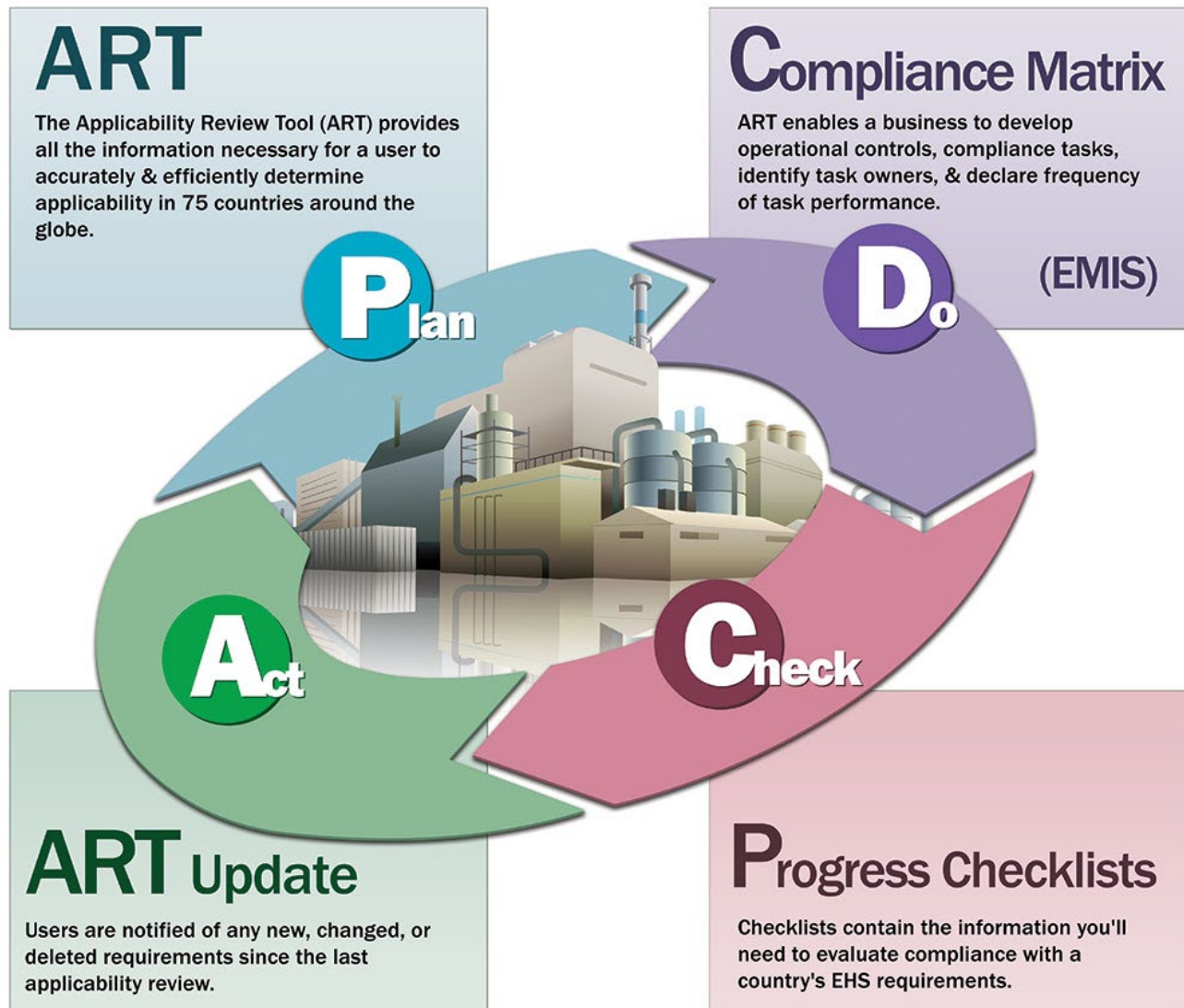


Citation Technologies' Compliance Continuum

A cost effective, high quality comprehensive process that enables organizations to efficiently manage environmental, health and safety compliance.



Where the consequences of error are significant, it often makes sense to follow a well-defined, problem-solving process. A primary principle of Plan-Do-Check-Act is iteration—executing the cycle allows management of change to become a reality. Repeating Citation Technologies' PDCA cycle can bring an organization closer to the goal: environmental, health and safety (EHS) compliance.



*Compliance starts with the work of **ART***

ART is a Web-based software tool that enables businesses to transform reams of confusing and complex EHS regulatory data into a user-friendly format that fosters high-quality, informed applicability decision making. ART is the first component of Citation Technologies' Compliance Continuum.

ART delivers a high-level understanding of a site's applicable requirements by utilizing the expertise of extremely competent regulatory analysts, who do all of the initial research work in finding and analyzing all of the laws and regulations that could apply to an industrial site in any of 70 countries around the world. The following chart details some of the most compelling features of this software application.

	ART
Applicability Review	
SMEs and facility stakeholders designations	✓
Single-site or multiple-site evaluation	✓
Representation of activities, products, and services	✓
Incorporation of company policies, standards, or other supplementary requirements	✓
Easy to understand conditions-based applicability questions	✓
Prepared regulatory summaries	✓
Guide Notes with official definitions	✓
Links to full-text laws, regulations and supplemental requirements	✓
Ability to enter Rationale Statements	✓
Applicability Register	
Applicable Requirements Register	✓
Positive and negative applicability determinations, including who made the decision on what applies, and why it applies	✓
Registries of legal and other requirements to satisfy ISO-style EHS management systems	✓
Compliance Matrix	
A worksheet to build your Compliance Assurance Management System	✓
3 rd Party EMIS integration capability	✓
Management of Change	
ART Updates: notification of new, changed or repealed laws and regulations	✓
High-level MoC Compliance Requirements Matrix	✓
Experts available	
Citation Technologies' certified facilitators are available to assist in implementing compliance assurance systems	✓

Applicability Review

ART presents applicability questions in a consistent format to a structured team of involved parties. A brief summary of the requirement accompanies each question, along with a guide note that lists the official definitions of the terms used in the requirement.

Applicability Team

ART utilizes an “applicability team” decision-making approach. Knowing that almost all compliance is achieved in the field or on the factory floor and not in the EHS organization, ART encourages the building of a team of stakeholders and EHS subject matter experts. Users can either apply an ART-supplied listing of typical activities, products, and services or can self-define their operations. The mix of information availability and full-site representation yields a team dynamic that delivers the highest quality applicability determinations in the shortest time.

Supplemental Requirements

ART can incorporate company policies, standards, or other supplementary requirements alongside regulatory provisions. The integration of legal and corporate requirements allows for a more consistent applicability decision and avoids the dual path that frequently exists when dealing with external and internal requirements.

Available ART Countries			
Algeria	Egypt	Malaysia	Slovakia
Angola	Fiji Islands	Mexico	South Africa
Argentina	Finland	Mozambique	South Korea
Australia	France	Namibia	Spain
Austria	Gabon	Netherlands	Sweden
Azerbaijan	Georgia	New Zealand	Switzerland
Belgium	Germany	Nigeria	Tanzania
Bolivia	Greece	Norway	Thailand
Botswana	Hungary	Oman	Trinidad and Tobago
Brazil	India	Pakistan	Turkey
Bulgaria	Indonesia	Panama	United Arab Emirates
Canada	Iraq	Peru	United Kingdom
Chile	Ireland	Poland	United States
China	Italy	Portugal	Venezuela
Colombia	Japan	Qatar	Vietnam
Cyprus	Lebanon	Romania	Yemen
Czech Republic	Libya	Russia	Zambia
Denmark	Luxembourg	Saudi Arabia	Zimbabwe
Ecuador	Malawi	Singapore	

Applicability Questions

By using a simple, conditions-based applicability questionnaire format, written in layman's language, ART breaks through country *legalese* to present information that operational personnel can reasonably act upon. ART provides all the information necessary for a user to accurately and efficiently determine applicability. A worldwide team of regulatory experts analyzes laws and regulations to create the applicability questions and explanatory information.

Explanatory Information and Documentation

Applicability questions are accompanied by user-friendly regulatory summaries, expert-written *Guide Notes*, and links to full-text regulations and standards. Also available is an area to preserve applicability determination rationales.

Applicability Register

The *Applicable Requirements Register* lists all requirements, both legal and supplementary, that apply to a site. Included in the Register are the subject area, citation, title, summary, and link to the full text of the requirement – all in one view. The *Applicable Requirements Register* can be used to satisfy conformance with ISO 14001:2005 4.3.2. The Register can be structured to show applicable requirements by activity, product or service, as well as display all “No Applicability” determinations and the associated rationale.



Compliance Matrix

The second component of Citation Technologies' Compliance Continuum is ART's *Compliance Matrix*.

ART enables a business to break down the high-level applicable requirements into detailed compliance actions from which it can develop operational controls and compliance tasks, identify task owners, and declare frequency of task performance, all of which are now directly linked to the applicable requirement being reviewed. The completed Matrix itself can be used “as is” to manage compliance or can be uploaded into an Environmental Management Information System, EMIS.

Available for optional purchase, ART possesses a feature that pre-populates the Matrix with the compliance actions (called the *detailed requirements*) that must be taken to comply with the requirement. This information allows a site's compliance activities to be developed without the need of additional requirement research.



Audit Checklists

The third component of Citation Technologies' Compliance Continuum is *EHS Audit Checklists*. The Checklists provide a cost-effective solution for companies to test how well they comply with their regulatory obligations.

The best Audit Checklist is one that is tailored to the site being audited. By focusing auditors on those laws and regulations that specifically apply to a site (with a sample of those requirements that have been determined not to apply) saves the auditor valuable audit time and provides the audited with a cost-effective, high quality audit.

How is this accomplished? The audited site needs only to run an Audit Checklist for the particular activity, product or service under review. The checklist, along with the *Compliance Matrix*, links the applicable high-level law, regulation or supplemental requirement to the specific compliance activities that need to be addressed. It then links to the on-site tasks needed to achieve compliance. The *Applicability Register* provides the auditor with a complete record of what is considered applicable and what was not. Along with these determinations are rationale statements that justify the decision making.

ART allows for the production of custom-built protocols at no cost and on demand, having the most current information possible.



ART Updates - Management of Change

The final component of Citation Technologies' Compliance Continuum, and possibly the most valuable, is *ART Updates*.

Without question, a compliance assurance system must have the capability to manage change (MoC). ART supports a high-quality MoC process by periodically updating regulatory data. Users are notified of any new, changed or repealed requirements since the last applicability review was performed. These changes are presented in the same layman's language used during the initial applicability review. Included in the *ART Update* is an explanation of the regulatory change as well as summaries and links to the actual requirement.

ART Updates enable the applicability review team to

- determine applicability of all new requirements,
- decide whether to delete compliance activities for repealed requirements, to continue them as supplemental requirements, or
- review changed requirements to determine if previous applicability decisions need to be revised.

MoC Compliance Requirements are derived from *ART Updates*. The *MoC Incremental Matrix* enables site personnel to add, change, or delete compliance activities for only those requirements that are new or have changed, thus reducing the MoC effort dramatically.

Having the direct link from applicability determination to the site's compliance activities will enable an ongoing, sustainable compliance assurance system.

How does an organization make sure it gets EHS compliance right, not just this time but every time? The solution is to have a well-defined process. Citation Technologies' Plan-Do-Check-Act process model ensures an organization is on a superior, comprehensive compliance continuum.

**For additional information on
Citation Technologies' Compliance Continuum, contact**

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