



Compliance Obligations Checklist

#	Required	Complete?
1	Have we determined all compliance obligations related to our environmental aspects?	Yes <input type="checkbox"/> No <input type="checkbox"/>
2	Have we determined how all our compliance obligations apply throughout various departments?	Yes <input type="checkbox"/> No <input type="checkbox"/>
3	Have we made these compliance obligations easily accessible to those that are affected by them?	Yes <input type="checkbox"/> No <input type="checkbox"/>
4	Are those that can have an affect on our compliance obligations and those that are affected by it trained and aware of their responsibilities?	Yes <input type="checkbox"/> No <input type="checkbox"/>
5	If asked, are staff able to explain the compliance obligations relevant to their work?	Yes <input type="checkbox"/> No <input type="checkbox"/>
6	Do we take these compliance obligations into account when establishing, implementing, and maintaining the EMS?	Yes <input type="checkbox"/> No <input type="checkbox"/>
7	Are the compliance obligations documented?	Yes <input type="checkbox"/> No <input type="checkbox"/>
8	Are the compliance obligations reviewed on a scheduled frequency?	Yes <input type="checkbox"/> No <input type="checkbox"/>
9	Do we have a way to monitor new and redacted regulations as well as changes to current regulations?	Yes <input type="checkbox"/> No <input type="checkbox"/>
10	If the compliance obligations are posted in areas throughout various buildings, are these documents controlled?	Yes <input type="checkbox"/> No <input type="checkbox"/>
11	Are contractors, or other visitors made aware of their compliance obligations prior to coming on site?	Yes <input type="checkbox"/> No <input type="checkbox"/>

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Tips

Steps to Identify legal requirements in accordance with EMS Guidance Section 3.3.3:

1. **Collect information-** using the data collected from your aspects and impacts list, consider the legal and other requirements each of those aspects could be subject to.
 - Identify requirements for all jurisdictions in which the railway operates, including local, provincial/territorial, indigenous, federal and international.
 - Include contractual obligations with vendors, customers, and other transportation companies.
 - Review regulatory inspections that have occurred that may have highlighted unfamiliar requirements.
 - Identify any voluntary commitments that have been made by the organization with respect to environmental matters (e.g. MOU on locomotive emissions, Responsible Care).
 - Determine legal obligations for all relevant operations at the organization such as switching, storage, transloading, repair, etc.
2. **Consider what is applicable-** review what portions of the regulations you are subject to. Regulations are typically vast and cover a wide variety of operations so you may not be subject to everything under the regulation.
 - Use in-house legal resources to determine legal obligations.
 - Compile a list of known environmental approvals in place at the organization.
 - Consult with legal counsel to evaluate any missing obligations.
3. **Understand your requirements-**once you are aware of what regulations and other obligations apply to you, take the time to understand them and your responsibilities. Ensure the responsibilities are communicated to those affected by it.
 - Use e-mail notifications, periodic meetings, guidance documents, memos, or other means of communication to inform appropriate staff of laws, regulations, and policy changes that affect operations.
4. **Maintain your registry-** document all relevant compliance obligations (legal and other) and ensure these are reviewed on a set frequency ensuring all changes are captured, including changes to regulations as well as applicability to your organization.
 - Participation in the Railway Association of Canada Environmental Affairs Committee is a mechanism to stay up to date on changing legal and other requirements.
 - Subscription to environmental legislation monitoring services.
 - Many organizations create a legal register to document, monitor and evaluate what systems are in place to meet obligations.