

ROUNDY'S SUPERMARKETS, INC.
PICK 'N SAVE • COPPS • RAINBOW FOODS

2007 Green Tier Annual Report

Roundy's Oconomowoc Distribution Center, Oconomowoc, Wisconsin

March 2008



1. Executive Summary

Roundy's Supermarkets, Inc. is pleased to provide our first Annual Report under Green Tier. This report covers the activities and accomplishments related to the Roundy's Oconomowoc Distribution Center, a Green Tier participant since December 22, 2006.

2. Business Overview

Headquartered in Milwaukee, Wisconsin, Roundy's Supermarkets, Inc. is one of the Midwest's oldest and largest grocers. The company owns and operates 153 retail grocery stores in Wisconsin, Minnesota and Illinois under the Pick 'n Save, Copps Food Center, and Rainbow Foods banners.

The Roundy's private label brand encompasses more than 3,000 items and is enhanced by the food processing plant in Kenosha, Wisconsin. In addition, Roundy's operates three distribution centers, all in Wisconsin, including the 1.1 million square foot Oconomowoc Distribution facility opened in April, 2005.

Roundy's Supermarkets, Inc. has nearly \$4 billion in sales and 21,000 employees. Roundy's Supermarkets, Inc. is the third largest private company in the Milwaukee area, according to the Milwaukee Business Journal's book of Lists. Roundy's Supermarkets Inc. is ranked #1 on the list of the 50 fastest growing retailers from 1999 to 2004 in Deloitte's 2006 Global Powers of Retail Catalog.

The company has always strived to be a good neighbor, a positive influence on our community and to be a good environmental steward. We continued to show our commitment with participation as a Green Tier participant. On December 22, 2006 the Roundy's Supermarkets, Inc. Oconomowoc Distribution Center was formally accepted as a Green Tier Participant. In 2007, the distribution center implemented its' Environmental Management System (EMS).

3. EMS Implementation and Self Declaration

The Roundy's Oconomowoc Distribution Center environmental team developed and implemented its EMS in 2007. The distribution center selected two objectives and targets specifically incorporated into its EMS to improve environmental performance. They included:

- 5 percent waste reduction to landfill based on 2006 volumes

- Evaluation of fuel economy and emissions reduction technologies through vendor evaluation

The results of both objectives and targets are presented in the following section. The company also trained two internal auditors that will be used for EMS internal assessments in 2008. On December 5, the EMS system was audited. The audit results indicated that the EMS meets the functional equivalency for the International Standards Organization ISO 14001:2004. A letter to the Wisconsin Department of Natural Resources (WDNR) indicating this conformance was submitted on December 12, 2007.

4. 2007 Agreement Environmental Performance Demonstration

WDNR requested that Roundy's also provide information in this report on the items included in the WDNR December 22, 2006 Green Tier agreement letter (copy attached). This information is presented in the following section.

4.1. Minimize Energy Use

The Oconomowoc Distribution Center continues to implement energy use minimization ideas, including occupancy sensors, day lighting, and use of high efficiency replacement bulbs and ballasts. The Oconomowoc Distribution Center was constructed with energy conservation in mind. The building included installation of 2,913 two-stage lighting fixtures throughout the complex. The fixtures utilize a 400-watt bulb with a motion detector. If no motion is detected, the output drops to 200 watts. The building itself was designed to maximize the use of natural lighting and reduce the demand for artificial lighting along the west side of the building. The Company also incorporated additional insulation beyond requirements into the construction project. As a result, the non-freezer portion of the warehouse does not require cooling during the normal summer season. These green features ease energy use throughout the facility.

4.2. Minimize Waste Minimization

Roundy's also agreed to minimize the Oconomowoc Distribution Center's waste cardboard and packaging waste. The Oconomowoc Distribution Center established a 2007 objective and target of 5 percent waste reduction from cardboard and plastic based on 2006 volumes. All employees were trained on recycling requirements related to cardboard and plastic. Specific collections were established for cardboard and plastic. In addition to the cardboard and plastic collected for recycling at the facility, our

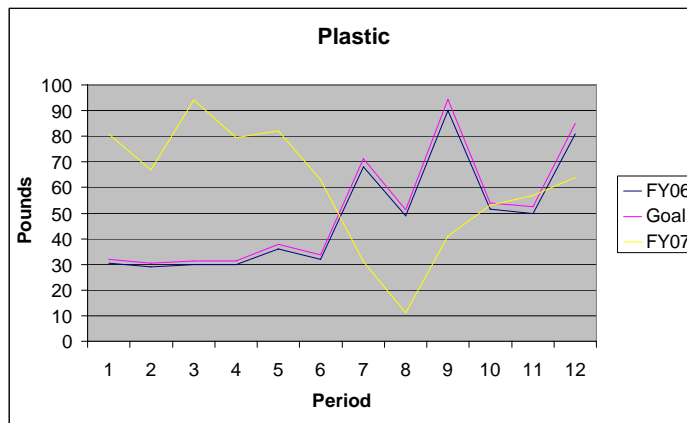
center has been designated the central storage point for cardboard and plastic collected at all of the retail stores served by the distribution center.

Results from the effort are presented in the graphs below. Each graph presents the pounds of plastic and cardboard recycled by Fiscal Reporting (FY) period.

4.2.1. 2007 Plastic Recycling

The FY 2006 plastic recycling benchmark was 577 pounds or .28 tons. In 2007, the distribution center recycled 723 pounds or .32 tons of plastic. The 2007 program yielded a 13 percent increase in recycled product from 2006 volumes. Roundy's believes that the increased capture of plastic at the facility is associated with increased awareness through employee training, increased opportunities for plastic recycling, increased number of designated bins, and diligence in supervisor monitoring and adherence to the recycling program.

2007 Plastic Recycling Tracking



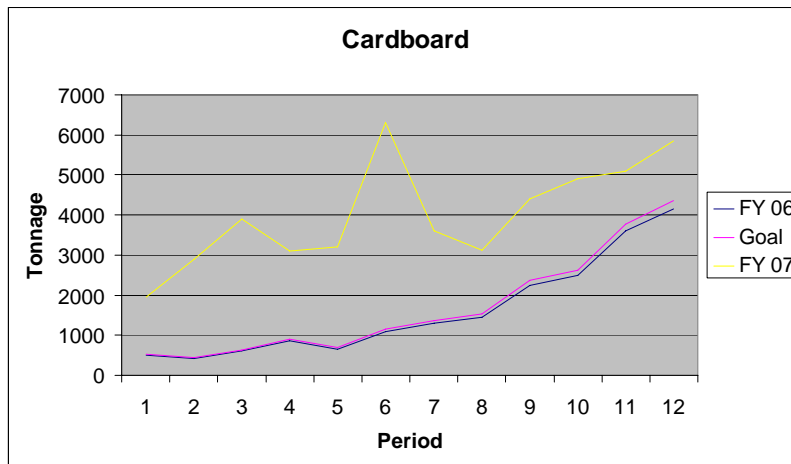
4.2.2. 2007 Cardboard Recycling

The FY 2006 cardboard recycling benchmark was 19,375 pounds or 9.7 tons. In 2007, the distribution center recycled 42,479 lbs or 21.2 tons of cardboard. The 2007 program yielded a 55 percent increase in recycled product from 2006 volumes. Part of this increase is most likely from an approximate 6 percent increase in receipts, while the remaining increase is believed to be from the employee training program, increased bins for recycled cardboard storage, and management attention to achieving the recycling goal.

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2007 Cardboard Recycling Tracking



The graphs present recycling results by fiscal period, and although there are 12 periods, the days in each period can vary based on the number of weeks considered to be part of that period. The recycling volumes vary between FY 2006 and FY 2007 periods because the number of weeks in each period varied between the two years.

4.2.3. Evaluate Vendor Technologies

The WDNR December 22, 2006 Green Tier letter also contains Roundy's agreement that it evaluate technological and operational equipment, processes, and/or devices to determine whether these products present an actual benefit to reducing mobile emissions and fuel economy. The Distribution Center has internally evaluated approximately five vendors of technologies consisting of diesel fuel additives, fuel performance catalysts, technologies to keep trucks warm without the engine running and mufflers. As a result of this evaluative process, Roundy's is now testing a device that can keep trucks warm without the engine running and will be further evaluating muffler technology.

4.2.4. 2008 Objectives and Targets

The facility is continuing to focus on waste reduction in 2008 and has set an objective and target of 5 percent waste reduction of cardboard, aluminum, and plastics based on 2007 volumes. The focus for 2008 is waste streams that are generated from office areas, cafeteria, and other ancillary activities. The facility is investigating establishing an employee benefit reserve that would be funded from the recycling revenues. The fund may be used for employee welfare or other charitable causes.

In 2008, the facility will continue to promote the employee suggestion program and other stakeholder involvement, and the car pool program. Rising fuel prices and a workforce that must commute via privately owned vehicles, will likely result in continued and growing support for this program. The facility will track carpool usage in 2008.

4.3. Packaging

Roundy's Supermarkets Inc., maintains relationships with all of our suppliers of perishable and non-perishable goods. Roundy's continues to influence packaging decisions to minimize cardboard and plastic at the local level through efficient loading of trucks. Certain products such as bananas and watermelon arrive in sturdy cardboard and/or wooden boxes that are reusable for packaging and shipping from the distribution center. The facility is also converting to plastic pallets that can be indefinitely reused for all of the shipping that occurs on Roundy's fleet. Plastic flip sheets that are used as a stable base when stacking certain products on a pallet are replacing traditional cardboard sheets and, thus, further reducing cardboard usage.

4.4. Stakeholder Education

We approach communication and coordination with internal and external stakeholders as a means for information exchange and for feedback so we can continually improve. Our greatest internal communication impact is through the employee Environmental Continual Improvement suggestion program implemented in mid-2007. Employees consistently provide suggestions and feedback to management through the suggestion box. All suggestions and feedback are logged onto the Environmental Continual Action Database. Once logged, each idea, concern, or question is evaluated at Management Review meetings for implementation or response.

Our Distribution Center has the opportunity to make contact with hundreds of drivers daily as they deliver goods to the Distribution Center. Each driver receives our requirements for the no idle policy and information about the Environmental Policy. Additionally, information about Green Tier and the Distribution Center EMS is publicly available at <http://www.roundys.com/modules/content/index.php?id=53>. At this link we plan to add our environmental improvements and other relevant environmental information.

We will continue to coordinate with the Oconomowoc Chamber of Commerce and our other trade associations for which we are members on environmental topics including Green Tier.

Looking forward, the Distribution Center will present at the annual Federation of Environmental Technologists conference on the implementation of its EMS with our ARCADIS consultant.

4.5. Additional Recycled Materials

In addition to its specific Green Tier commitments, the Oconomowoc Distribution Center also committed within its EMS to a goal of 5 percent waste reduction to landfill based upon 2006 volumes. The EMS improves upon Roundy's existing waste reduction efforts. For example, Roundy's donates routinely to Second Harvest in Milwaukee. Donations from the distribution center are packaged and delivered directly to Second Harvest and potentially reduce waste from the distribution from products that would potentially perish, or expire. Roundy's Supermarkets, Inc. is committed to giving back to the communities in which we have a presence. Strong families are the lifeblood of communities and Roundy's is dedicated to helping through our support of organizations dedicated to hunger relief.

The facility also had a plan in place to deice parking lots with sand from a local company (Wolf Asphalt Paving) instead of utilizing salt. While this protects water quality, it results in periodically sweeping parking lots and the tractor yard during winter thaws and then reapplying new material during deteriorating weather conditions. In the past, the used sand was land filled in the spring. As a result of its EMS, the facility now contracts with Wolf Asphalt Paving to periodically throughout the winter transport the used sand with snow back to their operation where the sand is filtered and washed for reuse. In 2007, this practice resulted in approximately 130-150 tons of used sand being reclaimed. Wolf Asphalt Paving believes that most of the reclaimed sand can be used again on the distribution center parking areas.

In 2008, the distribution center is looking to expand its waste minimization effort and work towards reducing waste from office areas, vending areas, and the cafeteria.

5. Annual Report Environmental Performance

WDNR requested information from the Roundy's Supermarkets Inc., Distribution Center on certain environmental elements as part of its annual report. Applicable information is either presented below or we provide a pointer to where it is placed in other sections of this report.

5.1. Energy and Climate Change

As described in Section 4.1, the Oconomowoc Distribution Center was constructed with numerous energy conservation measures. The following list summarizes the features incorporated into the building:

- Installation of 2,913 two-stage lighting fixtures throughout the complex
- 400-watt bulbs with a motion detector; if no motion is detected, the output drops to 200 watts
- Designed to maximize the use of natural lighting and reduce the demand for artificial lighting along the west side of the building
- Sufficient insulation to cool the non-freezer portion of the warehouse during the normal summer season

5.2. Transportation

Roundy's voluntarily retrofitted approximately one-quarter its Class 8 truck fleet with diesel oxidation catalysts (DOC). Roundy's installed Fleetguard DOCs as direct replacements to the existing exhaust system on approximately one-quarter its 2001-2003 model year tractors. According to the DOC manufacturer, typical road-tested emission reductions from the use of this equipment are estimated at a greater than or equal to; (1) 25 percent reduction in particulate matter; (2) 70 percent reduction in carbon monoxide; and (3) 70 percent reduction in hydrocarbons (including toxic hydrocarbons).

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In addition to retrofitting significant portions of the Company's fleet, the Company prohibits all tractor-trailer trucks from idling in its tractor yard when temperatures are above 10 degrees Fahrenheit, and prohibits its own fleet from idling at all times. Idling is only allowed for tractor-trailer trucks when temperatures are below 10 degrees Fahrenheit, and only to the extent needed to avoid diesel fuel gelling and engine start-up difficulties. A copy of its Yard Rules containing its idling policy is provided in writing to third-party vendors that deliver to the facility.

According to the United States Environmental Protection Agency's Fleet Logistics Energy and Environmental Tracking (FLEET) Performance Model for carrier's software, the emissions and fuel savings that have resulted from the installations of the DOCs and installation and operation of other characteristics show the following CO₂ and PM savings:

FLEET Model Results Summary ¹

Fleet Design/Control Measure	CO₂ Saved (in tons)	PM Saved (in tons)
Truck Idling Control	336	.159
Aerodynamic Improvement Strategies	589	
Advanced Lubricant Technology Strategies	140	
Engine and Truck Upgrades	140	
Larger Capacity Trailer Strategy	1,838	
Speed Management (62 miles per hour)	797	
Oxidation Catalyst	2.67	.08
Total	3,842.67	.239

Going forward, the distribution center will continue to restrict idling and implement its anti-idling program through a combination of measures. These include training Roundy's fleet drivers on requirements and a two tiered inspection program. Audits for compliance with the idling policy are included in the distribution center internal audits that are conducted throughout the year. Transportation management staff conducts periodic, unannounced yard walks to confirm compliance with the policy. Finally,

¹ 2006 usage data

transportation management routinely responds to complaints regarding drivers who are not observing the idling restrictions. In 2007 the distribution center notified at least one supplier that one of its drivers was no longer permitted to enter the facility due to this driver's failure to comply with the facility's Yard Rules.

In 2007, the distribution center established a car pool program. At the program onset, the distribution center issued five car pool permits. The permit allows the designated carpool driver to park in a preferred parking spot that is nearest to an employee building entrance. This is a real perk for employees. Over the course of just a few months the carpool program has expanded to 15 parking permits and 64 employees. This is approximately 10 percent of the workforce.

5.3. Supply Chain

The distribution facility works with its customers to package efficiently and effectively. Our primary goal is to deliver the perishable and non-perishable goods in prime condition ready to be stocked in retail stores. We continue to communicate with our customers and vendors on the value of reusable pallets, and plastic flip sheets and routinely use these for shipments on Roundy's fleet.

While we cannot directly influence how manufacturers package their product for distribution, we must contend with the result from improper packaging from broken containers and boxes. We routinely communicate our experiences with our customers and salvage retail ready products from these deliveries.

5.4. Stakeholder Involvement

As described in Section 4.4 Roundy's has engaged in internal and external stakeholder coordination. Our involvement with employees, suppliers, customers is documented through:

- Employee Suggestion Program
- Employee Training and Awareness
- Coordination with External Stakeholders, Drivers, Suppliers, and Vendors

6. Applicable Environmental Indicators

The following section presents information related to the applicable environmental indicators.

6.1. Water

- 6.1.1. Facility Water Use: According to the City of Oconomowoc, the facility withdrew 14,706,000 gallons of water for potable and non potable uses. This includes water for drinking, sanitary purposes (janitorial, showers, restrooms) non contact cooling water for cooling towers, truck wash, and for other ancillary activities.
- 6.1.2. Facility Waste Water: The facility does not meter wastewater, but does measure sand, grit, and oils that are collected in the on-site oil water separator. In 2007, 8,100 gallons of oily wastewater was recovered for recycling.

6.2. Air Emissions

- 6.2.1. The facility operates under an indirect air permit for emissions from mobile sources. Compliance with the permit requires limiting idling of trucks as detailed in Section 5.2 of this report. See Section 5.2 for the respective emission reductions from improvements to the Roundy's fleet and from the no-idle policy.

6.3. Waste

- 6.3.1. Solid Waste Shipments The facility shipped off approximately 621 tons of solid waste in 2007.
- 6.3.2. Total percentage of waste recycled: In 2007, the facility recycled 43,202 pounds or 21.5 tons of cardboard and plastic. This represents 3.4 percent of the total 2007 waste streams. This recycling effort diverted all that waste from the landfill. Because of this effort one less roll off box per week was needed for solid waste storage prior to disposal.

As indicated in section 4.5, in 2007 the facility reclaimed approximately 130-150 tons of sand from parking lot and tractor yard deicing. All of this former waste was formerly disposed of in landfills, but now can be reclaimed for continued reuse.

- 6.3.3. Hazardous waste volumes: The facility does not routinely generate or ship hazardous waste. In 2007, the facility did not generate or ship any hazardous waste.

6.4. Energy

- 6.4.1. Electricity: According to the City of Oconomowoc, the facility used 22,472,216 kilowatts of electricity. This includes electricity for lighting the interior and exterior portions of the facility.
- 6.4.2. Natural Gas: According to WE Energies, the facility used 24,455 therms for the meter read dates of January 25, 2007 to December 26, 2007. This period includes four days in 2006 and excludes four days at the end of 2007.

6.5. Transportation

- 6.5.1. Total Fuel Consumption: The 2007 Roundy's Oconomowoc Distribution Center on-road fleet consisted of 17 tractor trailer units. Total fuel usage attributed to all of these units for 2007 was 155,127 gallons of diesel. Fuel usage average was 6.82 miles per gallon.
- 6.5.2. Amount/Percentage of Vehicles using Alternative Fuels: Roundy's tractor trailers continue to use traditional fuels. See 4.2.3 for additional details.

6.6. Land Use

The site has been converted from agricultural to industrial consistent with the surrounding land use. Being good neighbors has meant doing our part to make an attractive facility that blends in with the surrounding uses. We maintain the landscape that is composed of traditional lawn, cold-hardy trees, shrubs, and perennials. We prohibit mowing on Ozone Action Days. To protect water quality the facility prohibits

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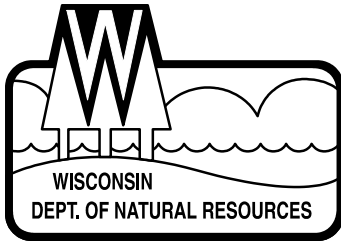
Roundy's Oconomowoc
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the use of salt on the employee parking, and truck yard areas. Instead we combat icy parking areas with sand. As parking areas thaw, the sand is collected and recycled.

7. Closing

Roundy's Supermarkets Inc., is pleased to be a Tier 1 participant in Wisconsin's forward thinking Green Tier program. The program goals and objectives match those of our own thinking with regard to environmental stewardship and waste minimization. Our leadership and staff at the distribution center really worked smart and hard to implement a system that can be sustained. We look forward to the future.

ATTACHMENTS



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary

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Madison, Wisconsin 53707-7921
Telephone 608-266-2621
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December 22, 2006

Michael J. Schmitt
Group Vice President
Roundy's Supermarkets, Inc
PO Box 473
Milwaukee, WI 53201

Subject: Green Tier Acceptance Letter for Tier 1

Dear Mr. Schmitt:

Thank you for completing an application for a Tier 1 agreement. The Department of Natural Resources (DNR) is pleased to approve your application and accept you into the Green Tier program. This letter of acceptance covers all facilities and activities. This letter of acceptance is authorized by The Environmental Results Program Act, § 299.83, Wis. Stats., created by 2003 Wisconsin Act 276 (effective on May 1, 2004), which is commonly called the "Green Tier Law."

This letter of acceptance recognizes the work already done and the projects that you intend to do, which are described in your application or which come out of your Environmental Management System. Your participation in the Green Tier program reflects your continuing commitment to superior environmental performance and continuous improvement. If future circumstances necessitate stepping back from this commitment, please notify us.

At a minimum, you have agreed to the following examples of superior environmental performance:

- a) Minimize energy use in the distribution facility
- b) Minimize waste from the distribution facility
- c) Continue to build relationships with suppliers to encourage reuse, especially of packaging materials
- d) Educate stakeholders about the benefits of daylighting and green design
- e) Continue to develop technological and operational fixes that minimize the production of air emissions from the facility
- f) Develop additional streams of recycled material and the infrastructure to effectively gather that material

With this letter, you are encouraged to use the Green Tier program logo on written materials that are related to your facilities. Attached to this Acceptance Letter is a unique certificate that recognizes you for participating in the Green Tier program. The DNR will work with you to annually celebrate your participation in the Green Tier program through a joint press release to local newspapers and will maintain your company's name on a list of participants that is available on the DNR's website.

As a participant in the Green Tier program, you are entitled to Deferred Civil Enforcement, as described in §299.83(6m)(d). In brief this means that if you discover either a non-conformance

in your EMS, or you discover a violation with an existing environmental requirement, and if you provide us notice of your discovery along with a corrective action plan that conforms to the requirements in the statute, and if you successfully and timely implement the corrective action plan, we will not seek to impose penalties on Roundy's for the non-conformance or violation. You are reminded that nothing in this acceptance letter replaces any obligation that you have to report on, and correct, any violations of law or regulation.

If you choose not to certify your EMS under ISO 14001, please document that your EMS is functionally equivalent to an ISO 14001 EMS by following the guidance attached. As you know, Roundy's needs to have in place within one year of this letter an EMS that either is demonstrated to be functionally equivalent to an ISO 14001 EMS, or is certified to ISO 14001. As a reminder, you also need to have audited your EMS by the end of the first year of this agreement.

You are also asked to update the DNR annually, beginning in March, 2008, on your consultation with interested persons in the area and on your progress in meeting your objectives and targets and implementing your EMS. Both of these requirements can be incorporated into your annual report to the DNR on your environmental performance accomplishments. Please also provide the DNR with documentation of your management review of your environmental management system at that time.

We would encourage you, as part of your annual report, to prepare an executive summary of your accomplishments over the last year that can be placed on the DNR's web site, and which could also be posted on Roundy's web site.

As a reminder, by the third year of your participation in the Green Tier program you must have your EMS audited by an outside environmental auditor. The results of this audit should also be reported to the DNR.

We also ask that you use the attached list of indicators to share your successes. The information that you gather on these broad indicators is designed to supplement any measures that you gather to demonstrate the effectiveness of your EMS.

Finally, if you have any questions about your interaction as a Tier 1 participant with the DNR, Mike Friedlander has been assigned as your single point of contact. Mike can be reached at 608 267-0806 or at Michael.friedlander@wisconsin.gov. Please coordinate with Mike on an annual meeting that will be used to brief the DNR on your environmental performance, and the progress made on the objectives and targets. This meeting may also be used to gather input on the objectives and targets to be set for the coming year.

Your acceptance into the Green Tier program is good for 5 years, and your status as a Green Tier company can be extended as we mutually agree. You may withdraw from the program at any time by notifying us of your decision to withdraw. We may also withdraw you from the program if we believe that it is in the best interests of the Green Tier program to end the relationship that is created with this letter.

We want to welcome you as a Tier 1 company and encourage you to work toward Tier II status in the future.

Sincerely,

/s/ Scott Hassett

Scott Hassett, Secretary
WI Department of Natural Resources

Attachment:

[Tier 1 Application](#)

Certificate of Recognition

Green Tier program Logo Guidelines

[Functional Equivalency Guidance](#)

[Generic Suite of Green Tier Indicators](#)

Proving EMS Functional Equivalency

Draft Final Guidance

Environmental Management Systems (EMS) are the foundation for Green Tier participation. Participants are expected to utilize an EMS that either meets the requirements of the ISO 14001:2004 standard or has been determined to be functionally equivalent to an ISO 14001 EMS. If an applicant has an ISO 14001 EMS, conformance to this requirement can be demonstrated by providing an ISO 14001 certificate of registration issued by a certification body that has been accredited by an International Accreditation Forum (IAF) member. If an applicant has a functionally equivalent EMS, they shall choose one of the options below.

For Tier 1:

At the time of application to the Green Tier program, if a Tier 1 applicant has an EMS in place that is not an ISO 14001 EMS, it shall document that its EMS is functionally equivalent under either Option A or Option B below. If the applicant does not have an EMS in place at the time of application, it will need to develop an EMS within one year from the date of application to the program, and either submit a certificate of registration under the ISO 14001 standard or document that their EMS is functionally equivalent under either Option A or B below as part of the first annual progress report. It is important to understand that in order to demonstrate functional equivalence, the EMS must have been audited and the audit results must have been reviewed by management and corrective action must have been taken (if needed).

Tier 1 – Option A:

The applicant provides documentation that the components in its EMS satisfy each of the 12 components identified under Wis.Stats. §299.83(1)(dg) (see box). The applicant chooses the means of documentation and has the responsibility for supplying evidence that demonstrates conformance to each requirement. All of the documentation supplied under this option will be a matter of public record and may be put on the DNR web site. The documentation is to be

Wis.Stats. §299.83(1)(dg)

(dg) “Functionally equivalent environmental management system” means an environmental management system that includes all of the following elements and any other elements that the department determines are essential elements of International Organization for Standardization standard 14001:

1. Adoption of an **environmental policy** that includes a commitment to compliance with environmental requirements, pollution prevention, and continual improvement in environmental performance.
2. An analysis of the **environmental aspects and impacts** of an entity’s activities.
3. Plans and procedures to achieve **compliance** with environmental requirements and to maintain that compliance.
4. Identification of all **environmental requirements** applicable to the entity.
5. A process for **setting environmental objectives** and **developing appropriate action plans** to meet the objectives.
6. Establishment of a structure for **operational control** and responsibility for environmental performance.
7. An employee **training program** to develop awareness of and competence to manage environmental issues.
8. A plan for taking actions to prevent environmental problems and for taking **emergency response** and **corrective actions** when environmental problems occur.
9. A **communication plan** for collaboration with employees, the public, and the department on the design of projects and activities to achieve continuous improvement in environmental performance.
10. Procedures for **control of documents** and for keeping records related to environmental performance.
11. Environmental management system **audits**.
12. A plan for **continually improving environmental performance** and provision for senior **management review** of the plan.

accompanied by a declaration from the senior manager that signed the Green Tier application. This declaration shall include the following, *“I have reviewed the information provided. I find that the information provided conforms to each of the 12 requirements in Wis.Stats. §299.83(1)(dg) as a functionally equivalent environmental management system.”*

Tier 1 – Option B:

The applicant shall submit to a third party, evidence that their EMS conforms to the 12 components identified in the statute. The third party must demonstrate to the DNR that it (the third party) is both objective and competent*. The third party will then submit to the DNR a declaration, signed by a senior manager from the third party, that they have examined the evidence provided by the applicant and that the EMS conforms to each of the 12 components. This declaration shall include the following: *“I have reviewed the information submitted by the participant, and as an independent third party, I find that the information provided conforms to each of the 12 requirements in Wis.Stats. §299.83(1)(dg) as a functionally equivalent environmental management system.”* All of the documentation supplied under this option will be a matter of public record and may be put on the DNR web site.

***Objective and Competent Third Party for Tier 1** - RABQSA certified auditors have already produced evidence of competence to an objective third party and are considered qualified to make the functional equivalency determination. Others seeking to make the determination shall submit a demonstration of competence to DNR or a Department designee (contractor, review board, volunteers, etc.) prior to the Department accepting a functional equivalence determination. A demonstration of competence shall include documentation of attendance at an accredited ISO 14001 lead auditor training session and documentation of training or experience in the environmental laws that apply to the applicant. Knowledge and skills in the following areas will help demonstrate a third party’s competence:

- environmental terminology,
- environmental management principles and their application, and
- environmental management tools (such as environmental aspect/impact evaluation, life cycle assessment, environmental performance evaluation, etc.).

If an objective and competent third party provides the declaration described above, and the DNR determines that the auditor made a false or biased determination, the DNR will not accept any additional declarations from that party.

For Tier 2:

At the time of application to the Green Tier program, if a Tier 2 applicant has an EMS in place that is not an ISO 14001 EMS, they shall document that their EMS is functionally equivalent under either Option A or Option B below.

Tier 2 – Option A:

The applicant provides documentation that the components in its EMS satisfy each of the 12 components identified under Wis.Stats. §299.83(1)(dg) (see box). The applicant is responsible for demonstrating how its system satisfies each of the twelve components of the statute, and for documenting the effectiveness of its system. Baseline information must be provided, along with at least one year of additional results to indicate effectiveness and performance. All of the documentation supplied under this option will be a matter of public record and may be put on the DNR web site. The documentation is to be accompanied by a declaration from the senior manager that signed the Green Tier application. This declaration shall include the following, *“I*

have reviewed the information provided. I find that the information provided conforms to each of the 12 requirements in Wis.Stats. §299.83(1)(dg) as a functionally equivalent environmental management system.”

Tier 2 – Option B:

Prior to submitting an application, the applicant shall provide evidence to an outside environmental auditor (§299.83(9)(1)(dr) and §299.83(7m) (see box) that their EMS conforms to the 12 components identified in §299.83(1)(dg) (see above). The outside environmental auditor shall review the evidence submitted and evidence of the effectiveness of the EMS and certify that each of the 12 components are satisfied. This certification should accompany the application, and will become part of the public record and may be included on the DNR’s Green Tier web site. This certification shall be signed by a senior manager of the outside environmental auditor and shall include the following: *“I have reviewed the information submitted by the participant, and as an outside environmental auditor, I find that the EMS conforms to each of the 12 requirements in 299.83(1)(dg) as a functionally equivalent environmental management system.”*

Wis.Stats. §299.83(9)(1)(dr)

§299.83(9)(1)(dr) “Outside environmental auditor” means an auditor who is functionally or administratively independent of the facility or activity being audited, but who may be employed by the entity that owns the facility being audited or that owns the unit that conducts the activity being audited.

Wis.Stats. §299.83(7m)

§299.83(7m) ENVIRONMENTAL AUDITORS. The department may not approve an outside environmental auditor for the purposes of sub. (3) (d) 4. or (5) (c) 2. unless the outside environmental auditor is certified by the Registrar Accreditation Board or meets criteria concerning education, training, experience, and performance that are equal to the criteria in International Organization for Standardization guidance 19011.

Upon receipt of a certification of functional equivalency for either a Tier 1 or a Tier 2 application,, the DNR project manager shall review the certification and determine whether the environmental management system is a functionally equivalent environmental management system.

The following Indicators are proposed for all Green Tier participants. In addition to this Generic List, it is expected that other indicators/metrics will come out of your Environmental Management System and would be used to document accomplishments. This Generic List is meant to help Roundys and the DNR document the relative success of the program.

Environmental Indicators

Some of the environmental indicators are already provided to the DNR. You would not be asked to report this information again if you have already reported it.

1.1 Water

- 1.1.1 Total water use
- 1.1.2 Total amount of phosphorous released into water
- 1.1.3 Total waste water produced

1.2 Air Emissions

- 1.2.1 Total greenhouse gas emissions
- 1.2.2 Total emissions of ozone-depleting substances
- 1.2.3 Total air emissions

1.3 Waste

- 1.3.1 Total solid waste produced
- 1.3.2 Total percentage of material ending up as waste
- 1.3.3 Amount/percentage of waste that is hazardous
- 1.3.4 Amount of mercury lost or released into the environment
- 1.3.5 Amount/percentage of waste recycled

1.4 Energy

- 1.4.1 Total energy used, listed by source
- 1.4.2 Amount/percentage of energy from renewable resources

1.5 Transportation

- 1.5.1 Total fuel consumption
- 1.5.2 Amount/percentage of vehicles using alternative fuels

1.6 Spills

- 1.6.1 Number of spills
- 1.6.2 Total amount of hazardous substances released due to spills

1.7 Land Use

- 1.7.1 Total amount of land owned and percentage that is permeable (not paved or covered)

1.8 TRI

- 1.8.1 Total TRI emissions

Economic Metrics

- 2.1 Total sales – revenue brought in from annual sales before subtracting any costs.
- 2.2 Profit or loss – Quantify the profit or loss during the most recent fiscal year
- 2.3 Workforce changes – number of people employed, and the change over the previous year (using Jan 31 as the baseline date)



Social Metrics

- 3.1 Amount provided to support alternative transportation options for employees
- 3.2 Income inequality – the multiple between lowest paid employee and highest paid employee
- 3.3 Percent of purchases made from companies in the state