



Green Tier Annual Report Instructions Frequently Asked Questions



Rev. 10/29/2019
EA-19-0006-C

General

Q. These new instructions are requiring elements that weren't previously required. Will existing Green Tier participants be grandfathered to using the previous instructions?

A. *No, we are asking all participants to use the new annual report instructions. These new instructions were created to help participants provide the best information to show continual improvement in their environmental efforts. You can contact your single point of contact (SPOC) with any questions or concerns while working on your report.*

Q. If our company produces a corporate sustainability report (CSR), can we submit this as our annual report?

A. *We would prefer that you provide a separate annual report for Green Tier. However, your CSR may be accepted if all of the Green Tier requirements are easily found, including the Environmental Metrics spreadsheet from Appendix 1 and your EMS audit results from Appendix 2. Please discuss with your SPOC or Project Coordinator.*

Executive Summary

Q. Do we need to list all of our significant environmental aspects and impacts or just the ones we have goals for?

A. *We would like to see all of your significant environmental aspects and impacts. You can note the ones you have goals for and will discuss in the upcoming sections. For those significant aspects you do not have goals for, a narrative on why you are not or the risks of not addressing these items would be valuable.*

Q. Our environmental policy is available on our website, can I include a link to the document?

A. *Yes, you can provide a link to your environmental policy. You could also include a copy or an image of your policy.*

Q. What information are you looking for under "Sustainability Vision"?

A. *We are looking for answers to the following questions:*

- *What will it look like for your company to be sustainable?*
- *What do you need to get there?*
- *How much progress have you made?*
- *What are the big problems you have to solve?*

Environmental Performance

Q. Why are you requesting information since we joined Green Tier, isn't this an *annual* report?

A. *In this section we are looking for a summary of your past environmental performance, since you joined Green Tier, to give readers a summary of your efforts leading up to this year. This is also helpful to those participants that had large capital expenditures on past improvement projects like adding solar arrays or updating to more efficient equipment that may have slowed what they could accomplish in this reporting year.*

Q. What is meant by “performance improvements that have reduced the level of regulations”?

A. *We are looking for areas where environmental improvements have allowed you to reduce your permit levels or even to a point where you are no longer regulated. An example would be a company that used a hazardous waste material in production causing them to follow regulations as a small quantity generator (SQG), through their work in their supply chain they were able to find an alternative, non-hazardous material that provided the same quality product. They are no longer generating hazardous waste; therefore certain regulations no longer apply.*

Progress on Goals & Objectives

Q. Do we have to tie each goal to a Superior Environmental Performance outcome?

A. *Superior environmental performance is broad enough that most environmental goals can help accomplish at least one of the nine outcomes, but as long as you make the connection to at least one outcome, your report can be accepted.*

Q. We have long-term goals with 5-year or longer target dates for completion. On one of our goals we have yet to implement the changes to move the needle toward improvement, should we drop this goal from our report?

A. *No, you should keep the goal on the report and show what steps or actions you have taken so far to achieve this goal. Activities for the current fiscal reporting year can be strategic (long-term planning), tactical (short-term actions) or operational (actions put into use). This may include reviewing current equipment use, gathering data, building a business case for capital to purchase a new piece of equipment, or explaining the business plan to meet this target on time.*

Q. We’ve experienced a management change since the beginning of the year and our company focus and environmental goals have been changed. How should we report on our goals?

A. *Explain the changes that occurred and note the new objectives or goals that you are tasked with. Then explain the progress you have made on these new goals since they were in place.*

Metrics Narrative (more under Appendix 1: Environmental Metrics)

Q. I’ve already explained the metrics tied to my environmental objectives under “Progress on Goals & Objectives” do I have to repeat that information here?

A. *No, this section is to explain the metrics we are asking participants to supply in Appendix 1. These metrics may be broader than what you are tracking for your goals.*

Q. Why should I provide data on items I do not have objectives against?

A. *The information supplied in Appendix 1 will help the DNR tell the story of Green Tier by providing data to show the collective improvements on environmental impacts by participants in Green Tier. If you track*



these metrics, you may also find unintended improvements in different aspects of your business due to implementation of your goals or other projects.

Additional Accomplishments

Q. Our company was recognized as an industry “Best Place to Work” last year, does this qualify as they type of additional accomplishment you are looking for?

A. *This is an opportunity to share your achievements with the public. DNR is mostly interested in your other environmental accomplishments or achievements, but any accomplishment or certification that sets you apart from your industry peers is acceptable. The “Best Place to Work” recognition speaks to the culture of your company and how your employees feel about the goals and future of the company.*

Stakeholder Relationships

Q. I thought the law only required Tier 2 companies to have interactions with interested parties, do I have to report anything if I am in Tier 1?

A. *Both Tier 1 and Tier 2 companies should interact with interested parties and other stakeholders. Both ISO 14001 and Green Tier Functionally Equivalent EMS’s require training of employees (Stakeholders). Also, under 299.83 (3)(d)(3), Tier 1 facilities are to explain how discussions with community members near their facility influenced their choice of objectives in their EMS.*

Q. We did a supply chain survey and ranking as one of our environmental objectives, do we have to describe it again here?

A. *Giving a short summary of your survey work in this section would be appropriate. You could reference that more information is available under the “Progress on Goals & Objectives” section.*

Future Goals

Q. We’ve already set and achieved goals for all of our environmental impacts. How do we continue to set new goals?

A. *If you truly have tackled all your environmental impacts, then setting goals to maintain current levels is possible. But be sure that you have looked at all areas; could you review your suppliers and find more environmentally-friendly inputs?*

Q. Our EMS is very mature, and we feel like we have completed every upgrade at our facility. Where can we go next?

A. *Green Tier law includes the idea of facility or activity that is performed. Are there activities or processes that extend beyond your facility? Can you use a life-cycle approach to determine goals and objectives that go beyond your fence line?*

Q. We want to work on environmental objectives, but our facility doesn’t have much for environmental impacts. How can we continue to demonstrate a commitment to the environment?

A. *Superior Environmental Performance references voluntarily restoring or preserving natural resources. You could look at some opportunities that exist near you. Are there local natural areas that could use your support? Are there any impacts that could be improved further to set you apart from others in the industry?*



Q. Our company has a strong commitment to addressing risks associated with climate change. Is this something we can use to set our future goals?

A. *Yes, these can be included in your goals. We encourage participants to look at ways they can address environmental issues; locally, regionally, and beyond.*

Appendix 1: Environmental Metrics

Q. Do I have to fill out the metrics that do not match our current goals, that we do not track, or that we decline to answer?

A. *Yes, we would like you to fill them out. Most of the metrics requested are easily accessible for participants to track.*

Q. I use normalized data for all of my reporting, can I supply this information on the metrics sheet?

A. *We are asking for raw data on the metrics sheets. This will allow Green Tier to better aggregate the data from all our participants. Since participants use different normalizing units it would be more difficult to combine the data. Please feel free to use normalized data to explain your metrics sheet in the narrative above.*

Q. My raw data numbers do not reflect the actual story of continual improvement and efficiencies my company has achieved. The total kWh have increased year on year, but when normalized it shows we use less per unit of production.

A. *As previously noted, Green Tier is using the raw data to show collective results of all our participants. Please use the “Metrics Narrative” to explain these numbers. You can say it was an overall increase due to a production increase, but we found efficiencies in the usage per unit. You can explain with the actual numbers or percentages. We will use these explanations to help tell the full Green Tier story for each metric item.*

Q. I do not want to provide purchasing information, the amounts we spend are proprietary.

A. *We are looking for the % of your purchases that come from the three categories, not the actual dollar amounts.*

- *Local Purchases: used to analyze if supply chain proximity is aiding in reduced transportation emissions*
- *In-State Purchases: used to show economic contributions to WI*
- *Green Tier Purchase: used to show interactions and support of other Green Tier participants*

Appendix 2: EMS Audit Information

Q. Our company has an ISO 14001:2015 EMS and certificate. Can we just attach our certificate instead of doing an audit report?

A. *GT law 3(d)(4) & 5(c)(2) states participants must provide a report on the EMS audit. Your ISO 14001 certificate does not give us the summary of your audit.*

Q. Our auditor will not give us the final report or letter of conformance for our functionally equivalent EMS audit, they want us to complete the corrective actions first. Why are they doing this?



- A. *Green Tier auditors are instructed to hold the letter of conformance of the EMS until they deem all nonconformities are sufficiently addressed and/or corrected. A non-functioning EMS is considered a violation of Green Tier law and must be resolved in 90 days or an agreed timeframe.*

Tier 1 facilities with a non-functioning functionally equivalent EMS are not permitted wait for their next external audit to prove their EMS is now functioning. It will need to be corrected in a timely manner and approved by your EMS auditor.

Q. My EMS auditor is not approved by the DNR, but they have been our auditor for several years, can they be grandfathered in or do I have to switch auditors?

- A. *You should request that your auditor contacts Green Tier to complete the necessary steps to become approve. Information on becoming a Green Tier auditor can be found on the [auditor page](#) of the Green Tier website.*

Q. We have a corporate contract with an ISO registrar and do not always get the same auditor, how can we be sure to have a DNR approved auditor?

- A. *This will be discussed on a case-by-case basis, please contact your Project Coordinator for more information.*

Appendix 3: Compliance Reporting

Q. My company had a violation found by an inspector, but we corrected it right away. Do we have to report this?

- A. *Yes, we are asking all participants to be transparent about their environmental performance over the reporting period. You should note there was a violation and give the time period it was corrected in.*

Q: Is it appropriate to request Deferred Civil Enforcement in the annual report?

- A. *No, to be eligible for deferred civil enforcement, you must report any violations to Green Tier immediately. You should use this section to summarize the outcomes of any deferred civil enforcement that has occurred over the past year.*

Q: My company is in Tier 1, do I need to explain the results of our Compliance Audit?

- A. *No, Tier 2 participants are required to provide information about their compliance audit. We do encourage Tier 1 participants to explain the audit but documenting when it occurred is sufficient.*

For more information please contact Green Tier

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WISCONSIN DEPARTMENT OF NATURAL RESOURCES NOTICE OF FINAL GUIDANCE & CERTIFICATION

Pursuant to ch. 227, Wis. Stats., the Wisconsin Department of Natural Resources has finalized and hereby certifies the following guidance document.

DOCUMENT ID

EA-19-0006-C

DOCUMENT TITLE

Green Tier Annual Report Instructions Frequently Asked Questions

PROGRAM/BUREAU

Environmental Analysis & Sustainability / Sustainability & Business Support / Green Tier

STATUTORY AUTHORITY OR LEGAL CITATION

Green Tier Law, §299.83

DATE SENT TO LEGISLATIVE REFERENCE BUREAU (FOR PUBLIC COMMENTS)

November 4, 2019

DATE FINALIZED

December 2, 2019

DNR CERTIFICATION

I have reviewed this guidance document or proposed guidance document and I certify that it complies with sections 227.10 and 227.11 of the Wisconsin Statutes. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is not explicitly required or explicitly permitted by a statute or a rule that has been lawfully promulgated. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is more restrictive than a standard, requirement, or threshold contained in the Wisconsin Statutes.

Signature

Date

11/26/2019