

FACES OF



Compliance takes Detail, Documentation not Expense

When meeting regulatory compliance requirements, attention to detail and thorough documentation are often a big part of what is needed.

Webster's dictionary defines documentation as the act of furnishing or authenticating with documents. Synonyms include confirmation, evidence and proof. For those involved in compliance with environmental, health, safety and security regulations, a more common term might be paperwork — the recordkeeping that is necessary but which some consider a secondary part of the job.

In the ag retail world, the documentation related to compliance shouldn't ever be viewed as incidental or as a secondary part of the job. In fact, correctly preparing safety-oriented procedures and properly documenting the activities may be a big part of what is needed to ensure an ag retail location is complying with the hundreds of federal regulations

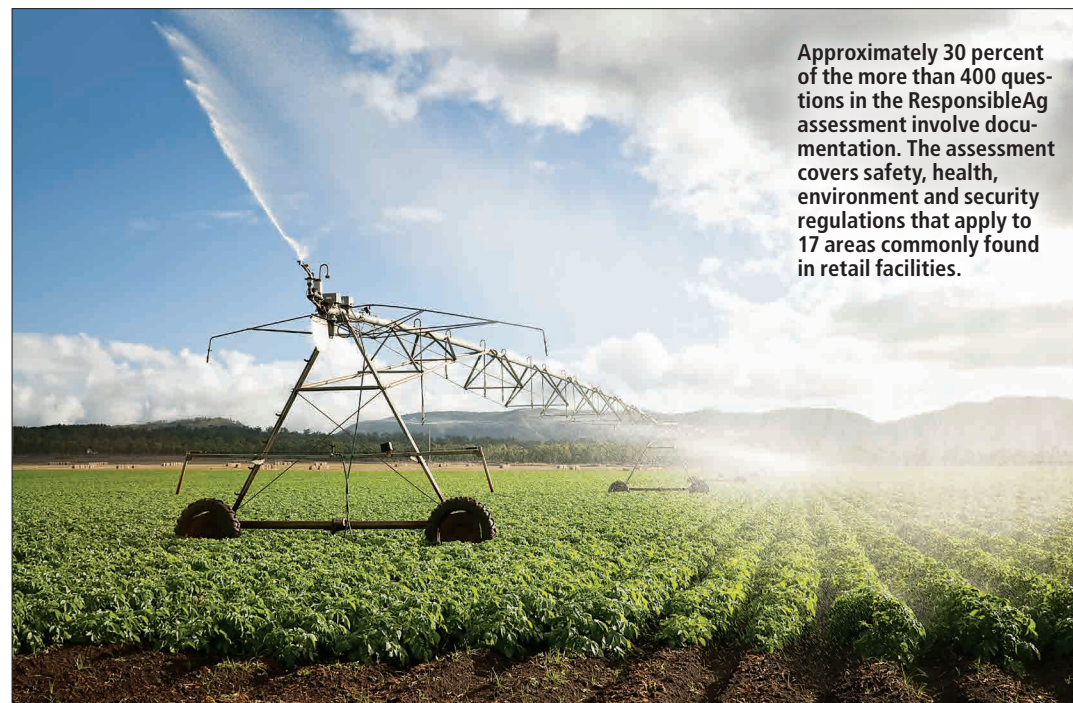
from OSHA, DOT, EPA and DHS. Regulations cover everything from storing, transporting and applying fertilizer and crop protection inputs to maintaining the shop, office and grounds at the facilities.

"Quite a few of the questions in the ResponsibleAg Certification Program assessment pertain to documentation — programs and their review, training, licensing, driver

files, regulatory postings, etc.," says Paul Derig, Environment, Health and Safety Manager for the J.R. Simplot Company and Technical Committee Chairman for ResponsibleAg. Derig also is a credentialed ResponsibleAg auditor. He began his career with Simplot in 1977 and became interested in hazardous material preparedness when working as a volunteer fire fighter and



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Approximately 30 percent of the more than 400 questions in the ResponsibleAg assessment involve documentation. The assessment covers safety, health, environment and security regulations that apply to 17 areas commonly found in retail facilities.



Anhydrous ammonia facilities and anhydrous ammonia mobile equipment are both covered in the ResponsibleAg assessment checklist.

department training officer.

Derig began arranging HazMat trainings for Simplot, and in 1994, when Simplot created EHS manager positions, he assumed responsibility for the North Plains Region, based in Grand Forks, ND. In 2001, he joined the corporate team in Boise, ID, to work with all Simplot retail locations. Derig is a strong proponent of ResponsibleAg, incorporating it into the EHS program at Simplot.

Important tool in the toolbox

"From the beginning, I've viewed the ResponsibleAg Certification Program as an important tool in our

business, particularly for smaller facilities that don't have EHS staff," says Derig. "There are so many demands in ag retail. We all must be focused on the safety of our employees and customers while being accountable to regulators and our communities. ResponsibleAg is a tool that can help retailers be more safety focused, identify issues, develop a plan to correct them and approach compliance in a practical way."

He also views ResponsibleAg as one of the least costly tools in a retailer's toolbox.

"The ResponsibleAg assessment is the most inexpensive way a retailer can review and address regulatory compliance. It is a way to gather information about your business that may be overlooked on a day-to-day basis, then develop a plan for continuous improvement," Derig explains.

"The cost of membership is probably less than a retail location spends on coffee and donuts in a month's time, and you really can't put a price tag on a person's safety." Annual membership is \$150 per location. Facilities that use a ResponsibleAg contract auditor have an additional expense for the audit, but that is every three years.

Common issues not costly to fix

Something Derig sees frequently as he completes ResponsibleAg audits is facilities that simply overlook documenting things and having written programs in place.

"Often, compliance is related more to the time commitment to ensure things are documented and that programs are in place," he said. "Maybe we do an inspection, make repairs, but don't make the time to document the procedure. Time to finish the paperwork is not costly, particularly in the off season."

Other things found during assessments are often simple enough to be repaired or addressed before he ever leaves the site — inexpensive things like putting on a new faceplate for a wall switch or an electrical outlet.

"I don't know of any large capital expenditures that have come from a ResponsibleAg audit, and if an issue is identified that requires capital expense, it can be corrected over time," he says.

Certification supports transparency with regulatory community

Derig also believes certification through ResponsibleAg will have even greater value for retailers in the future.

"I believe ResponsibleAg certification is a way for retailers and our industry to be more transparent to the regulatory community," Derig says. "As the program grows, I think regulators will understand the process, see its value and become more comfortable with facilities that are certified."

Certification through ResponsibleAg involves a facility audit by a credentialed professional auditor. These findings generate a corrective action plan for any deficiencies found. The program also provides a robust set of educational tools to help the facility become fully compliant.

For more information or to sign up, visit www.ResponsibleAg.org or call 270-683-6777.

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MISSION

ResponsibleAg is an industry-led initiative **committed** to helping agribusinesses properly store and handle farm input supplies. The program helps members ensure they are **compliant** with environmental, health, safety and security regulations to keep employees, customers and our communities **safe**.

