

How to Develop a Written EHS Program That Works in the Field

An expert guide to
translating
requirements into
responsibilities, operating
controls, and verifiable actions



Introduction

A written EHS program should do more than describe an organization's intentions. It should define how a specific risk will be managed, who has authority to make decisions, what controls must be in place, and how the organization will verify that required actions have been completed.

That level of detail does not come from adding company information to a standard template. It comes from making a series of technical and operational decisions before the first draft is written.

Which requirements apply? Where does the program begin and end? Who owns each action? Which decisions require technical review or approval? How will the requirements be carried out at each location? What evidence will demonstrate that the program is functioning as intended?



When these questions are resolved during program development, the writing becomes more precise and implementation becomes easier. When they remain unresolved, the final document may contain the right terminology while leaving important decisions open to interpretation.

What You'll Find in This Guide

This guide examines the work behind effective EHS program development and the elements that distinguish an operating program from a document that exists primarily for reference.

- **01** Program Development Begins Before the Writing
- **02** Five Decisions That Shape an Effective EHS Program
- **03** Write for the Decisions People Must Make
- **04** Four Mistakes That Weaken Written EHS Programs
- **05** The Written EHS Program Development Review
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Program Development Begins Before the Writing

Before drafting begins, the organization must understand the regulatory, technical, and operational basis for the program.

That analysis may include federal and state regulations, consensus standards, company requirements, manufacturer instructions, contractual obligations, risk assessments, exposure data, audit findings, and lessons from previous incidents.



The development team must then determine how each requirement will function within the organization.

From Requirement to Real-World Application

A requirement to conduct an inspection, for example, creates several additional questions:

- ✓ Who is qualified to perform it?
- ✓ What conditions must be evaluated?
- ✓ What constitutes an acceptable result?
- ✓ What happens when a deficiency is found?
- ✓ Who can stop work or approve corrective action?
- ✓ Where will the results be recorded?
- ✓ Who verifies that inspections are being completed correctly?

A strong EHS program answers these questions or directs the user to a controlled procedure that does.

Repeating the original requirement is not the same as establishing how the organization will meet it.

Five Decisions That Shape an Effective EHS Program

Effective EHS programs are built on a series of technical and operational decisions. Getting these right makes the writing clearer and implementation easier.

01

Define the scope and technical basis

02

Assign ownership and decision authority

03

Convert requirements into operating controls

04

Build the right document structure

05

Establish verification and maintenance



01 Define the scope and technical basis

The program should state exactly where and when it applies.

Depending on the subject, this may include specific locations, operations, equipment, materials, work activities, employees, or contractors. The program should also address exclusions, special circumstances, and conditions that require additional evaluation.



The development team must identify the sources that govern the program and determine how each requirement will be addressed.

A requirements matrix can be especially valuable during development. It connects each regulatory, technical, or company requirement to the section of the program, procedure, form, training module, or operating control that fulfills it. This process exposes omissions and identifies requirements that have been acknowledged but never converted into action.

02 Assign ownership and decision authority

Responsibilities should be assigned to defined functions, not broad groups such as “management” or “the safety department.”

The program should identify who is responsible for:

- ✓ Program ownership and approval
- ✓ Hazard identification and technical evaluations
- ✓ Selection and implementation of controls
- ✓ Work authorization
- ✓ Employee and contractor training
- ✓ Inspections and monitoring
- ✓ Recordkeeping
- ✓ Corrective action
- ✓ Periodic review
- ✓ Site-level implementation

Responsibility and authority must be considered together. Assigning someone responsibility for approving work or correcting a hazardous condition has little value if that person lacks the authority, access, qualifications, or resources to act.

The EHS function should not automatically own every requirement. Operations, maintenance, engineering, procurement, supervisors, employees, and contractors may each own part of the program.

03 Convert requirements into operating controls

This is where many written programs lose their connection to the work.

Regulations and standards establish obligations. The EHS program must explain how the organization will fulfill them.

Operating controls may include:

- ✓ Procedures and work instructions
- ✓ Permits and authorization processes
- ✓ Equipment safeguards
- ✓ Inspection protocols
- ✓ Preventive maintenance activities
- ✓ Exposure monitoring
- ✓ Purchasing specifications
- ✓ Contractor qualification requirements
- ✓ Management of change
- ✓ Forms and checklists
- ✓ Escalation and stop-work criteria

For each control, the organization should define who is responsible, when the control is required, how it will be carried out, and what evidence will demonstrate completion. If a program states that hazards will be evaluated “as necessary,” employees and supervisors are left to decide what “necessary” means. A stronger program defines the conditions that trigger the evaluation, who performs it, which method is used, and what happens with the results.

04 Build the right document structure

Not every instruction belongs in the main program.

The written program should establish governance, scope, responsibilities, required controls, and oversight. Detailed task instructions may belong in procedures, work instructions, permits, forms, or job aids.

Separating these documents correctly makes the system easier to maintain. A corporate program should not require a complete rewrite every time a site changes a form or replaces a piece of equipment. At the same time, supporting documents must remain controlled and consistent with the governing program.

The development process should answer four questions:

- 01 What must remain consistent throughout the organization?
- 02 What must be adapted for each site?
- 03 What belongs in the governing program?
- 04 What belongs in a supporting procedure or tool?

Corporate consistency does not mean that every site document must be identical. A corporate program can establish minimum controls, technical criteria, governance requirements, and required records, while site-level documents address local equipment, hazards, responsibilities, and regulatory differences.

05 Establish verification and program maintenance

Publishing a program and completing training do not prove that the program is operating effectively.

Verification should examine whether the required controls are present and functioning.

Evidence may include:

- ✓ Completed permits and inspections
- ✓ Field observations
- ✓ Exposure monitoring results
- ✓ Maintenance records
- ✓ Corrective action closure
- ✓ Contractor documentation
- ✓ Employee demonstrations
- ✓ Supervisor reviews
- ✓ Equipment condition
- ✓ Record quality and completeness

The program should define what will be reviewed, who will conduct the review, how often it will occur, and what happens when performance does not meet the established requirements.

It should also identify events that trigger an interim review, including operational changes, new equipment or materials, revised regulations, incidents, audit findings, and changes to connected procedures.

Verification and maintenance should be designed into the program from the beginning, not added after implementation.

Write for the Decisions People Must Make

Effective EHS writing is built around the decisions employees, supervisors, and program owners face.

The program should tell users:

- ✓ When the requirement applies
- ✓ What action is required
- ✓ Who performs or approves the action
- ✓ What criteria must be met
- ✓ When work must stop or be escalated
- ✓ What documentation must be completed
- ✓ Where additional instructions can be found

Terms such as “periodically,” “when appropriate,” “if needed,” and “as soon as possible” should be used only when the program also explains how that determination will be made.

The same discipline applies to responsibilities. “The supervisor ensures compliance” does not explain what the supervisor must review, approve, observe, document, or correct.

Specific language reduces variation across employees, shifts, departments, and locations.

Four Mistakes That Weaken Written EHS Programs

01**Starting with an old template**

A template can provide an outline. It cannot determine applicability, assign authority, evaluate site conditions, or design operating controls.

Beginning with template language often causes the development team to preserve sections that no longer fit while overlooking requirements unique to the operation.

02**Copying regulatory language**

Regulatory text describes what an employer must accomplish. It rarely provides the operating system needed to accomplish it. A program that closely mirrors a regulation may still fail to define responsibilities, procedures, decision points, documentation, and oversight.

03**Writing before resolving ownership**

Drafting around unresolved responsibilities produces vague language. The document may refer repeatedly to management, supervision, or EHS without identifying who is expected to act. Ownership should be decided before it is documented.

04**Updating one document in isolation**

A change to an EHS program may affect procedures, permits, inspection forms, training materials, contractor requirements, software workflows, and records.

If those connections are missed, employees may receive conflicting instructions from documents that are all considered current.

The Written EHS Program Development Review

Before approving a new or revised program, determine whether the organization can answer each of these questions.

- ✓ **Requirements**
Have all applicable regulatory, technical, and company requirements been identified?
Can each requirement be traced to a section of the program or a supporting control?
- ✓ **Operations**
Does the program reflect current equipment, processes, hazards, and work practices?
Have the employees and supervisors who perform the work reviewed the relevant sections?
- ✓ **Responsibilities**
Is every required action assigned to a defined function?
Does that function have the authority and capability to complete the action?
- ✓ **Execution**
Have requirements been converted into procedures, permits, inspections, controls, or other operating mechanisms?
Are triggers, exceptions, acceptance criteria, and escalation points defined?
- ✓ **Integration**
Do procedures, forms, training materials, and recordkeeping systems support the program?
Have conflicting or obsolete documents been identified?
- ✓ **Verification**
Has the organization defined the evidence that will demonstrate implementation?
Is there a process for identifying and correcting performance that does not meet the program requirements?
- ✓ **Maintenance**
Are program ownership, review frequency, change triggers, revision approval, and document control established?

If several of these questions cannot be answered, the program may require additional development before the writing can be completed.

When Additional Program Development Support Is Needed

An internal team may be able to complete a focused update when the requirements are understood, responsibilities are established, and the change affects a limited portion of the program.

Additional expertise or capacity may be valuable when:

- ✓ A program is being developed for the first time
- ✓ The requirements are technically complex
- ✓ The program applies across multiple locations
- ✓ Site practices differ significantly
- ✓ Existing documents conflict with one another
- ✓ Responsibilities have not been resolved
- ✓ Findings continue to recur after previous revisions
- ✓ Internal resources cannot complete the work within the required timeframe
- ✓ Implementation requires new procedures, training, forms, or operating controls

Outside support should provide more than writing capacity. It should bring structure to the development process, identify the decisions that must be made, and connect the finished program to the way work is managed.

Start With One EHS Program

Organizations do not need to rebuild every written program at once.

Begin with a program that is due for development or revision, affects significant risk, applies across multiple sites, or has become difficult to administer consistently.

DEKRA's EHS consultants can support the full program development process, including:

- ✓ Evaluation of existing written programs
- ✓ Identification of applicable requirements and program gaps
- ✓ Development of new EHS programs
- ✓ Revision and restructuring of existing programs
- ✓ Corporate and site-level program alignment
- ✓ Development of procedures, forms, and job aids
- ✓ Implementation planning
- ✓ Training and ongoing program support

The result is not simply a completed document. It is a defined system for managing the requirement within the operation.

Before You Begin Another Rewrite, Talk With DEKRA

If an EHS program has remained unfinished, undergone repeated revisions, or no longer reflects the way work is performed, continuing to edit the existing language may not resolve the underlying issue.

A complimentary consultation with a DEKRA EHS specialist can help you define the scope of the work, identify the decisions that must be resolved, and determine whether the program requires a focused revision, complete redevelopment, or implementation support.

Choose one priority EHS program and request a complimentary consultation with DEKRA.

