



FAQs ABOUT THE CRC ADVISOR

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The Center for Retail Compliance (CRC) and the CRC Advisor are initiatives of the Retail Industry Leaders Association (RILA). These resources are designed to help retailers evaluate, benchmark, and improve their environmental compliance programs. These FAQs provide general information about the CRC Advisor.

FREQUENTLY ASKED QUESTIONS ABOUT THE CRC ADVISOR

What is the CRC Advisor?

The CRC Advisor is a platform that companies can use to evaluate their programs that has benchmarking, reporting, tracking, and goal setting functions. The CRC Advisor uses the collected data to provide tailored guidance to help retailers improve program performance.

What does the CRC Advisor consist of?

The CRC Advisor currently consists of a questionnaire to assess an organization's program and provides guidance on program gaps or risks based on the data collected. For example, the system may suggest that a company with grocery may want to move their Essential Level Refrigeration Program to the Structured or even Optimized Levels to reduce regulatory risk, as well as improve environmental performance. Once you have completed your questionnaire, the CRC Advisor provides reports on your company's program levels, which can be shared internally to help spark conversations on the desired program levels, areas of potential risk, and goals for the future. Reports are also helpful for internal strategic planning and corporate reporting. Phase 2 of the CRC Advisor, currently in development, will add benchmarking, support for multiple organizations within a company (i.e., regions, banners, etc.), goal setting, and action plans to the CRC Advisor.

How can Companies use the CRC Advisor?

Companies can use the CRC Advisor to:

- Better understand their current environmental compliance program
- Identify program gaps and/or areas of risk
- Start internal discussions about the optimal program for the company
- Share reports with management to build understanding and support for program optimization
- Benchmark with peers (Phase 2)
- Benchmark and track different parts of the company (e.g., regions, types of facilities, retail banners, etc.) (Phase 2)
- Set goals for program levels and track progress in reaching these goals (Phase 2)

When will Phase 2 of the CRC Advisor be available?

Phase 2 of the CRC Advisor is currently estimated to launch in early 2019. A new release of the CRC Advisor application will allow retailers to see benchmark data for industry and peer groups and perform assessments for organizational subunits, such as facilities, regions, or business units, and roll them up for the company as a whole. Participants will also be able to set improvement targets and track performance against these targets in future assessments.

Does the CRC Advisor document compliance program inadequacies or issues?

No. The CRC Advisor survey assumes that companies have at least an Essential Level program. Only programmatic information is collected; no information on specific performance such as audit results, violations, etc. is collected.

If you are unsure if your program is at the Essential Level, download the [CRC Essential Level Summary](#) to evaluate your programs and identify any gaps.

Who can use the CRC Advisor?

Only verified retailers will be able to use the CRC Advisor to perform an assessment of their organization's environmental performance and compliance program and view results and recommendations.

Will my data be secure and confidential?

Company information entered in the CRC Advisor is stored in an encrypted, secure database on the cloud server. Entered data and detailed results are only available to the company and then only to individuals given permission by that company's Primary Contact. Shared benchmarking reports will only show aggregate information and are scrubbed of any individual company names or data. CRC staff only have access to the aggregated data and not to company-specific information. The CRC may make some aggregated data public, but only in summary form without any identifying information.

How does CRC Advisor handle more complex organizations where there may be more than one environmental compliance program or where its implementation is distributed?

The CRC Advisor allows users to set up more than one assessment for an organization. Users should name the assessment to reflect the scope of the compliance program that is covered by the assessment. For example, it may make sense to have one assessment called East Region and another called West Region. When Phase 2 of the CRC Advisor becomes available, users will be able to configure the organizational structure in the CRC Advisor, which will enable customization of how different subunits of an organization see data and how the data from subunits is viewed.

What do the Results (Scores) from CRC Advisor mean?

Using data from the questionnaire in a hierarchical scoring model, the CRC Advisor produces an overall score and sub-scores for each Category, Dimension, and Title. Each score has a range between 1 and 100. Scores map to the following ranges:

- Essential: ≤70
- Structured: 71 to 85
- Optimized: 86-95
- Proactive: 96-100

What is the Compliance Leadership Model (CLM)?

The [Compliance Leadership Model \(CLM\)](#) is a tool to help retailers evaluate and optimize their environmental compliance programs. It has been integrated into the CRC Advisor and provides the framework for the CRC Advisor Questionnaire.

What does the CLM consist of?

The CLM consists of 5 program dimensions with 4 possible levels. The dimensions are:

1. *Context of Compliance*--the reach and structure of an organization's compliance program--how the organization identifies and tracks obligations, understands environmental impacts, understands stakeholders, establishes responsibility, and the scope of the program;
2. *Leadership & Planning*--how the organization manages their environmental compliance program including the level of involvement by top management, compliance policies, target and goal setting, and the communication of targets;
3. *Compliance Operations*--compliance programs including standard operating procedures for specific regulatory areas such as air, water, waste, or hazardous materials transportation;
4. *Compliance Support Systems*--support functions associated with compliance programs such as training, competence, communications, reporting, records, documentation, and emergency response; and
5. *Continual Improvement*--the evaluation and continual improvement functions of a compliance program including inspections, audits, performance status, managing non-compliance, and top management review.

For each dimension, programs can be at one of the four levels: 1. Essential, 2. Structured, 3. Optimized, and 4. Proactive. These are outlined in the figure below.

CLM Dimensions and Levels

Dimensions	1 Essential	2 Structured	3 Optimized	4 Proactive
1 Context of Compliance	Compliance			
2 Leadership & Planning		Standardization & integration		
3 Compliance Operations			Optimization & risk reduction	
4 Compliance Support			Environmental impacts	
5 Continual Improvement			Life cycle thinking	

What is the optimum Level for a retailer?

The first or Essential Level is the minimum compliance program that every organization should have. Beyond that, the optimum level for any element depends on the organization's specific operations, compliance obligations, risk and corporate culture. For example, a retailer with gas stations has different regulatory risks than a retailer with a few storage tanks at distribution centers, and as a result probably would have programs at different levels.

How do I know if my programs are all at least at the Essential Level?

The [CRC Essential Level Summary](#) will help you evaluate your programs. It includes a checklist to help you identify any gaps.

What is the CLM framework based on?

The CLM is based on existing compliance frameworks, including ISO 14001:2015 Environmental Management Systems (EMS) and ISO 19600:2014 Compliance Management Systems – Guidelines. Both are widely used, internationally recognized standards. The CLM also reflects the U.S. Sentencing Commission Guidelines, Chapter Eight – Sentencing of Organizations, Section §8B2.1 Effective Compliance and Ethics Program to ensure that the CLM Essential Level meets the U.S. Sentencing Commission's description of an effective program.

What is the difference in the Levels?

Essential Level programs generally are implemented at the facility level, use ad hoc approaches rather than organization wide programs, do not use data analysis or other methods to evaluate and reduce compliance risks or improve performance, and limit their focus to compliance rather than improved environmental performance. At this level, top management is still expected to be responsible for compliance.

Structured Level programs tend to implement processes across all facilities and provide increased corporate guidance. However, the scope remains focused on compliance with few efforts to analyze and improve performance or reduce risk. As programs move to the **Optimized Level**, the scope tends to broaden to include environmental impacts, continuous improvement, and opportunities to reduce risk and improve both compliance and environmental performance. **Proactive Level** programs increase the scope even further to cover the entire value chain and look for ways to reduce or eliminate risk, drive innovation, and often include aspirational goals. Proactive Level programs are likely to include more sustainable thinking into their programs.

The box below has examples of the levels selected by different types of retailers.

Company A is a small clothing retailer that operates stores in malls. With few environmental compliance obligations or risks, most of their programs are at the Essential Level. However, because of a commitment to sustainability, their solid waste program is at the Proactive Level and they have set a goal for zero waste operations.

Company B is a regional retailer that carries a mix of home goods and gifts with both mall and standalone locations. While many of their programs are at the Essential Level, areas with increased regulatory risk such as stormwater and hazardous waste are at the Structured Level. Recently, they started carrying more items that might be considered hazardous waste such as electronics, batteries, and personal care products. As a result, the company is moving their hazardous waste program to the Optimized Level to improve compliance and find ways to reduce risk and costs.

Company C is a large grocery chain that also has gas stations. Because of the regulatory and environmental risks associated with the gas stations, refrigeration, and hazardous waste, most of their programs are at the Structured Level. However, to save money and reduce risks, the company is implementing Optimized Level programs in selected areas.

Company D is a small grocery chain with a “green” reputation that sells organic foods plus sustainable personal care products. With limited regulatory risk, most programs are at the Essential Level. However, given their corporate culture of sustainability and the significant value of their reputation, they are implementing Proactive level programs in some areas including refrigeration, solid and hazardous waste, and stormwater.

Are there other resources available?

Many CRC resources complement the CLM. The retail-specific [CRC Environmental Management System \(EMS\) Guidance](#) has detailed information on how to implement an EMS and includes checklists for gap analysis and spreadsheets to help with implementation. The EMS material is useful even for retailers who are not implementing a full EMS but are looking to implement best practices for certain elements of their program. Resources are organized by CLM dimension in the [CLM Resource Library](#).