

Walmart Environmental Compliance Program

Fact sheet

Since 2006, Walmart has developed and implemented a comprehensive environmental compliance program built around training, policies and procedures on how to safely handle consumer products that become hazardous waste.

Company specific environmental compliance measures include:

1. **Created and added dedicated environmental compliance staff and elevating their positions to higher management levels.**
 - **Compliance Office** – Led by Senior Vice President and Chief Compliance Officer, Walmart US, Phyllis Harris, who before coming to Walmart served as the Deputy Assistant Administrator, Office of Enforcement and Compliance Assurance, for the Environmental Protection Agency (EPA) in Washington, DC. Within the Compliance Office, Walmart has established an Environmental Health & Safety team led by Vice President Richard Leahy who previously worked as an enforcement attorney for EPA for 17 years.
 - **Regional Compliance Managers** – Added responsibility to the team of 120 field managers with environmental training that tours stores, teaches and trains associates to promote field compliance.
 - **Market Managers** – Added compliance responsibility to address any issues at the store level to better ensure compliance procedures are followed.
 - **Claims Supervisors** – Created store-level supervisors in 2008 with responsibility and accountability for hazardous waste management issues.
 - **Sam's Club Compliance Associates** – Dedicated positions in each club responsible for meeting compliance guidelines including oversight of environmental compliance.
2. **Developing and implementing more than 100 environmental compliance standard operating procedures and compliance job aids and signage for stores and clubs.**
 - Implement and track environmental training for store and club associates. For example, we train over a million associates every year on compliance with complicated federal hazardous waste regulations.
 - Monitor and track the disposition of products discarded at return centers.
 - Developed, implemented and continually review logistics and return center environmental management systems (EMS).

Walmart Environmental Compliance Program

Fact sheet

3. Clearly identifying which consumer products sold in stores and clubs become “hazardous waste” if discarded and making information readily available to associates through handheld terminal scanners and shelf labels.

- The Werco Ltd. Company provides third party product regulatory analysis on products that Walmart and Sam’s Club sell to help ensure regulated products are properly identified by the company’s environmental compliance program.
- Third party audits measure environmental compliance program execution at the store and club level – every other month for stores and once a quarter for clubs.
- A web-based data management system identifies, tracks, and reports environmental regulations for every facility to corporate environmental managers. It also provides automated workflows for tracking and resolving issues from regulatory inspections.

4. Implemented a hazardous waste management system so that store and club associates properly dispose of regulated items.

If a returned, damaged or spilled item is considered hazardous waste, the associate places the item into a chemical bag and labels the bag’s contents. The associate then places the bag in a bucket liner, seals the liner and places that liner into one of four color-coded buckets. The contents are transported by a licensed hazardous waste hauler from the store or club, with a manifest, to a licensed hazardous waste treatment facility.

Associates can determine the appropriate [color-coded bucket](#) by examining a label on the shelf from where the item is kept or by scanning the product’s UPC code with a handheld scanner.

- **Red Bucket** – products such as over the counter medicines or mouthwashes with an alcohol base or certain nail polishes.
- **Black Bucket** – products such as certain lawn and garden pesticides and some drain cleaners.
- **Yellow Bucket** – products such as certain bleaches and some pool chemicals.
- **Blue Bucket** – aerosol cans, including hairsprays, air fresheners, and other consumer aerosol products.

5. Providing enhanced environmental compliance training to associates in stores and clubs across the country.

- Eight environmental computer-based learning modules are designed to provide more than 1 million hours of environmental compliance training annually for our associates as part of on-boarding, and through yearly refresher courses in the US, and we track the completion rate among store and club associates to confirm timely completion of all training.

Walmart Environmental Compliance Program Fact sheet

- Standard operating procedures and visual job aids are available at the stores and clubs for associates to reference to properly process and store regulated items.

Environmental Compliance Programs Promote Compliance and also focus on Environmental Sustainability:

Walmart has a best in class environmental compliance program that has reduced hazardous waste through environmental sustainability measures by more than 30 percent since 2010.

Examples of environmental compliance activities include:

- In 2011 Walmart worked with key suppliers and implemented a consumer aerosol can recapping program that resulted in a significant reduction of nearly 250,000 cans managed as hazardous waste as compared to 2010. The cans' plastic caps were susceptible to breaking through shipping and traffic on the sales floor. Because there is no damage to the product itself, Walmart is now able to order replacement caps and return the aerosols to the sales floor instead of disposing them into the waste stream.
- Through extensive collaboration with the EPA and key suppliers, Walmart obtained federal approval to implement a bag patch program for solid pesticide and fertilizer bags that allows Walmart to patch bags with minor damage and sell them when they previously would be managed as waste. Between 2011 and 2012, this program prevented nearly 12 million pounds of bagged lawn and garden products from becoming waste, including a portion of which would otherwise have been managed as hazardous waste.
- Walmart completed a multi-year project to enhance IT systems that allows it to analyze waste generation trends for consumer products. This enables the company to better identify and track the disposition of products that for a variety of reasons will not be sold in stores. Walmart can now provide real time product specific direction to associates regarding properly managing products, significantly reducing the number of products that become hazardous waste.

###