Environmental Policy Statements   EMS GN – 10.3

This Guidance Note outlines the key aspects of a good policy statement as required by ISO 14001: 2015 and gives examples of how to demonstrate commitment to the environment as well as considering some of the issues to avoid when writing a policy statement.

ISO 14001:2004 has now been replaced by a revised version of the standard - ISO 14001:2015.

ISO 14001:2015 was published on the 15th September 2015 and all certified organisations were required to transition to the new standard by the 15th September 2018.

Introduction

As the world becomes more globalised and the barriers to internal trade have dissipated it has become important for international standards of excellence to be adopted. The uptake of the 'quality standard' ISO 9001 has been considerable (adopted by over 1.1 million organisations worldwide) compared to the standard for environmental management – just ~346,000 organisations worldwide via accredited certification bodies (2016). UK businesses were initially slow to adopt the initial (1996) version of the ISO 14001 standard; however, more and more businesses are realising the importance of standardisation and being able to demonstrate their environmental commitment to customers, clients, the media as well as to the local community – *see also EMS GN 10.2 Environmental Management Systems.*

A key criterion of a good environmental management system (EMS) is the environmental policy statement (EPS); it is often the document the company is 'judged' upon. Consequently, it is important to get it right, so that it demonstrates a true reflection, but not an over-exaggeration, of the company's principles and intentions towards the environment. It is important for environmental policies to be clear, sincere and specific to the company in question.

What makes a good environmental policy?

ISO 14001:2015 defines an EPS as a:

> *"intentions and direction of an organisation related to environmental performance and formally expressed by its top management"*

ISO 14001:2015 requires that 'Top management' establish, implement and maintain an environmental policy that, within the defined scope of its environmental management system:

- is appropriate to the purpose and context of the organization, including the nature, scale and environmental impacts of its activities, products and services;
- provides a framework for setting environmental objectives;
- includes a commitment to the protection of the environment, including prevention of pollution and other specific commitment(s) relevant to the context of the organization;
- includes a commitment to fulfil its compliance obligations;
- includes a commitment to continual improvement of the environmental management system to
- enhance environmental performance.

How should a policy start?

There is no set standard for how to start a policy or indeed what order the statements should be written in. However, if applying for ISO 14001, there are certain criteria that an auditor will look for, which are detailed below.

In terms of an opening statement, it is important to include the company name and seniority of the responsible person (this should be the managing director or equivalent) as well as stating what the company does. This will show the reader the type of industry the company operates in, help to define the scope and in lay terms set the policy aside from that of others.

> The following could be used:
> (Insert company name) directors recognise that virtually all the activities in (state industry/service) have some impact on the environment. We believe that our performance as a well recognised (insert service), operating at (state site) will be measured not only by our profitability as a business but also by our impact on the shared environment.

How long should a policy be?

Again, there is no standard limit, but generally they do not need to be longer than one page of A4. Nevertheless, supporting material is acceptable and is often required to demonstrate how the policy aligns with other company policies, strategies and policy progress reports.

Key Action(s)

What details should the policy include?

First, under ISO 14001: 2015, the policy must be *"established by top management and be within the defined scope of the EMS"*. If being audited by ISO 14001 certification auditors, a member of senior management will be interviewed, so they need to know what they are talking about. A statement from a member of senior management shows that there is recognition of the company's responsibilities from the top. In the example above, company commitment by top management has been shown in the opening statement. Once all the statements have been written, the policy should end with a signature from the Responsible Person, along with a proposed policy review date.

In terms of scope, the policy must not cover issues which are wider, narrower or different from that of the EMS scope. For example, if the company has a number of sites throughout Europe, but the EMS scope only covered one site, then it would be unnecessary to include details specific to other sites, as well as wasting valuable space on the policy document.

Second, the policy must be *"appropriate to the purpose and context of the organisation, including the nature, scale and environmental impacts of its activities, products and services"*. This means that the policy must be geared to the nature of the business or institution and its likely impact on the environment. The policy should start from the premise that the company is part of a local community and that its activities have an impact on the environment. Consequently, from reading the policy it should be clear what the company's main activities are and how these may impact on the environment. The company's policy should contain a statement relating to its environmental achievements, i.e. how it has reduced waste or minimised it altogether. For example, in terms of the printing industry, it may be appropriate to mention that they have eliminated the use of solvents in production.

When writing within the confines of ISO 14001, the policy should be written in conjunction with the company's identified external and internal issues, needs and expectations of interested parties, environmental aspects, compliance obligations and subsequent objectives.

Third, the policy must *"Include a commitment to continual improvement and prevention of pollution"*. It is important to distinguish between **CONTINUAL** and **CONTINUOUS** improvement. Continual means a gradual improvement over a set period of time, whereas continuous means improvement every year. Consequently, if a company states that they will continuously improve and they have a slump one year, then the policy should not in theory be approved by the certification body or during a surveillance visit.

> An example statement could read:
> (Insert company) will strive to continually improve environmental performance and prevent pollution of land, air and water by eliminating the use of (insert company specific product, e.g. solvents) and by reusing packaging and recycling of waste cardboard (for example).

Fourth, the policy must *"Include a commitment to comply with its compliance obligations"*. As well as this general statement, it may be useful to show how the above will be facilitated. For example, a company could say that they will develop a compliance register in a designated

environmental file as well as complete periodic compliance audits.

Compliance obligations not only includes environmental law but may also include other statutes even if they are not classified as environmental legislation (i.e. DSEAR and COMAH Regulations) if they relate to your aspects. Therefore, if you store thousands of litres of chlorine you will be expected to comply with COMAH Regulations and acknowledge it in your EMS. However, applicable legislation would not stretch as far as say human resource or employment law (because they are not directly relevant to your environmental aspects) or perhaps even to COSHH as environmental risks are not included (although they are part of CHIP- opinion on this often varies, so it should be discussed with the certification body).

Fifth, the policy must *"Provide the framework for setting environmental objectives"*. A key aim should be to demonstrate continual improvement in environmental performance and prevention of pollution by setting quantifiable objectives and targets. This type of statement should be included in the policy document, and details of the framework should be set out (i.e. how they will be set and how often they will be reviewed). However, it is not necessary to include all objectives.

Having said that, it may be appropriate to mention a key company objective if it is particularly relevant to your company activities and impacts – e.g. 'The Company aims to recycle 10 per cent of all waste by 2020'. A company wishing to progress towards ISO 14001 certification should have a separate document which includes all its objectives (it may be best to have an initial list of all objectives) and then a breakdown of each objective and the programmes designed to achieve them.

Sixth, the policy must *"Be maintained as documented information"*. *"Documented information"* means there must be a record of it; in terms of the policy, it is clearly the best option to have it in a written as well as electronic format. This allows it to be updated and the records of previous policies archived.

Each statement must be actioned or in the process of being actioned (if it is an objective) and there should be auditable evidence to support it.

"*Maintained*" means that the policy should be updated. Initially the organisation is likely to need to update the policy on a regular basis as the first few months of an EMS are a period of constant change. However, as things stabilise the policy could be updated yearly. It is also important that the organisation ensures the policy is updated if the company undergoes change, for instance a new product is being produced which changes the company's environmental aspects.

A typical problem when updating a policy is that different employees have different copies. Therefore, the individual(s) responsible should be proactive in archiving old copies and re-issuing the new ones.

Seventh, the policy must *"Be communicated within the organisation"*. It would be sensible for the company to involve representatives across the workforce to ensure that consequences are fully understood across the board and that responsibilities have been appropriately delegated. This criterion also requires the company to state how they will achieve the above. This may involve internal or external training, team briefings and inducting new employees. All training (formal/informal) should be recorded on some kind of staff competence matrix (and be signed and dated by the member of staff). Brief details of the training can be included concisely in the main policy or be part of the supporting documentation. This will help ensure that the workforce is aware of the policy's existence and understand the general principles and their responsibilities.

Remember the importance of the word "*communication*" – just telling someone is not good enough, it must be a two way process so that understanding and competence can be demonstrated.

In terms of those working on behalf of the organisation, this includes part-time and temporary staff, contractors and volunteers. Communication to contractors could also be in the form of site rules or procedures rather than just giving them a copy of the policy.

Lastly, the policy must *"Be available to interested parties"*. This is a major opportunity to gain favourable PR; the policy could be promoted through reception areas, the workshop, annual reports, in-house publications, the internet and be available to the public on demand (via email or by post).

For example, in the policy the following statement would suffice: 'The policy will be made available to all members of staff and any interested parties, through our website, reception areas or it can be posted/ e-mailed on request.'

Now that we know what a policy should include, there are some things that it should avoid. For example, it should not:

• avoid issues or be a 'smoke screen' (i.e. it must deal with the issues pertinent to the company, such as its significant environmental aspects);
• make claims it can't substantiate (e.g. achieving zero waste); and
• make promises it can't keep (e.g. set unrealistic targets), nor should it underachieve to try to avoid the auditor's wrath (and thus not continually improve).

Other points to remember:
• An environmental policy statement is the document against which everything is judged (key from an auditor's point of view);
• All implications need to be considered;
• There needs to be an intention to comply with all statements;
• Companies need to consider how they demonstrate compliance (do not confuse policy with strategy);
• Has there been external verification? This adds gravitas to the policy;
• 'Little extras' improve the quality of the policy, e.g. adding a contact number, a revision number (indicates to the reader that it is a working document and is continually changing as the company develops) and perhaps the company address (in the header/footer).

The real key in deciphering both the appropriateness and accuracy of a policy is in the achievements that have been made as a result of its implementation. Internal audits should take account of how the results are delivered as well as the actual results themselves.

Although the policy is often seen as a stand-alone document, this should not be the case and there should be evidence in the form of strategic activity (methods to fulfil policy objectives) and results which show continual improvement.

In conclusion, policies should be written in a way to reflect a company's operations and the level of commitment made to try and reduce the impact the company's operations have on the environment.

Further Information/ Reading

BS EN ISO 14001: 2015 Environmental Management
https://www.bsigroup.com/en-GB/iso-14001-environmental-management/

International Organization for Standardisation (ISO)
www.iso.org

For further information, contact the Mentor advice line – 0800 634 7000 (Option 3 Environmental Management).

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