

Section 3: Communication—Internal and External

A central component of any EMS is to establish clear communication channels both internally within your organization and externally to interested parties. Effective, proactive communication is often an unexpected, but a welcome benefit of EMS implementation. You need to establish and implement procedures that describe how your organization:

1. Ensures effective internal communication through the flow of information from the top down, from the bottom up, and across your entire EMS fenceline;
2. Solicits, receives, documents, and responds to external communications; and,
3. Considers and records external communications on your significant environmental aspects.

Internal Communication: Do employees within your organization understand with whom to talk regarding your EMS and environmental procedures, emergency situations, and legal and other requirements? Communication requires the involvement of everyone within your organization. Internal communication is important to keep staff aware of your EMS, EMS success stories, and any changes to your operations and services that affect your EMS.

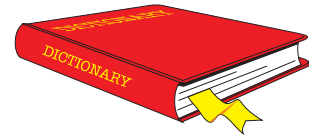
External Communication: As public organizations, it is important to consider proactively communicating with your local community and other interested stakeholders (e.g., regulatory agencies, citizens, Commissioners, etc.) about your EMS. Taking the initiative to obtain the views of your external stakeholders will help you better understand how the community feels about your facility. Also, getting their buy-in on your EMS will help ensure that you are identifying their most important environmental issues.

Step-by-Step Guide to Communication

- Step 1) Determine What Needs to be Communicated **Internally** to Your Organization
- Step 2) Determine Who You Currently Communicate With **Externally**
- Step 3) Determine Who has an Interest and Who has a Potential Effect on Your EMS
- Step 4) Define How Your Organization Can Best Reach External Stakeholders
- Step 5) Develop an EMS System Procedure(s) for Internal and External Communications
- Step 6) Check the Communication Procedure(s) for EMS Conformance



Key Section Terms



External Communication – Providing information and soliciting input, receiving inquiries and complaints, responding, and documenting exchanges with interested parties outside the fenceline of your facility.

Internal Communication – Flow of information top-down, bottom-up, and across your entire EMS fenceline.

Interested Parties (“Stakeholders”) – An individual or group, internal or external to the organization, concerned with or affected by the environmental performance of your organization. For example, local residents, citizen groups, and environmental regulators are all examples of “interested parties.” In addition, consider your own employees—inside and outside of your fenceline—to be interested parties.

System Procedure – An EMS (ISO 14001) required document that establishes purpose, scope, roles & responsibilities, the tasks to be completed, and where and how the associated records and documents are maintained.

Common Wastewater External Interested Parties (“Stakeholders”)

- Local citizen/community groups
- Neighbors
- State/local environmental groups
- Regulatory agencies
- Advisory groups
- Local Officials
- Emergency response personnel
- Contractors and vendors

Internally Communicate:

- Environmental Policy
- Legal and Other Requirements
- Procedures and Work Instructions
- Roles & Responsibilities
- Significant Aspects
- Objectives & Targets
- EMS Progress and Success Stories
- EMS Audit Results

COACH'S CORNER



Remember that great ideas come from front-line employees that work directly in areas that affect your wastewater facility's environmental impact. Make sure there are ways for them to provide feedback to their line managers and to top management.

Externally Communicate:

- Environmental Policy
- Significant Aspects (Optional)
- Objectives & Targets (Optional)
- Requirements to Suppliers and Contractors
- Annual Reports
- EMS Highlights and Successes (Optional but Highly Recommended!)

Step 1) Determine What Needs to be Communicated Internally to Your Organization

A good place to start in developing your EMS communication strategy is to look at how your organization currently communicates messages internally. How do managers currently get information to employees and receive information and communicate back to managers? How do line managers communicate with one another? Leverage these strategies that are already in place, especially those that are familiar to personnel.

REMEMBER



Keep your communications simple, fresh and to the point. Think KISS! Also remember, the EMS is about continuous improvement.

Internal Communication Vehicles

- ♦ Employee Meetings
- ♦ Environmental, Health, and Safety Training
- ♦ Working Lunches (free food!)
- ♦ Newsletters
- ♦ Pay Stub Inserts
- ♦ Intranet
- ♦ Bulletin Boards

For a sample EMS newsletter, see Appendix B

Step 2) Determine Who You Currently Communicate With Externally

Once you have your EMS internal communication strategy in place, the first step in determining your external communication strategy is to identify with whom you are currently communicating. As a public organization, you probably already have external stakeholders that you talk with, including City Commissioners, local citizens and citizen groups, the Mayor, regulatory agencies, etc.

Many public organizations find that when they reach out within their local communities, sometimes for the first time, they are well-received and confronted with “Why haven’t you asked us before? We have some great ideas to share.”

While ISO 14001 does not require an organization to have a truly proactive external communications program, in all likelihood it will benefit your organization and your EMS if you make a strong effort to reach out to key external stakeholders. While the timing and nature of this outreach is up to you, you may wish to consult with key stakeholders *why* you have chosen to implement an EMS and what you want to get out of it. Finally, you are encouraged to keep key stakeholders abreast of your progress as you develop the EMS and how your system is performing once it is in place. Again, the final decision is always up to you, but as a public agency you have an obligation to work closely with your key stakeholders.

CASE STUDY

The Lowell, Massachusetts Wastewater Treatment Plant asked local residents to assist in efforts to address the facility's odor issues. Residents in a chosen target area recorded weather information on days the odor was prevalent, as well as the degree of the odor and the time the odor occurred. This information identified a pattern of specific conditions during which odors were most prevalent. The City of Lowell responded by making changes to its operational patterns during times when those specific conditions had occurred and, in turn, established greater trust within the local community.

Step 3) Determine Who has an Interest and Who has a Potential Effect on Your EMS

Once you've identified with whom you currently communicate externally, define additional external stakeholders or new methods of communicating by determining: 1) who potentially has an interest in your EMS and 2) who potentially has an affect on your EMS.

In determining what to communicate to your external interested parties, your organization will need to assess the extent to which your strategy will be proactive. Ask:

- What is your current level of public acceptance?
- What are your external stakeholder's concerns?
- Have you had public relations issues in the past that require certain strategies or cautions?
- Since communication is most effective when it's a two-way dialogue, what type of input from them would interest you most and be most useful?
- What will be the return on investment of a proactive approach?



Three Things to Avoid

(from wastewater facilities):

- 1. Starting your EMS communication plans and procedures from scratch.** Build on existing communication methods.
- 2. Not communicating frequently on the progress of your EMS.** Instead, send management and employees regular status updates of your EMS (i.e., send three EMS "good news bullets" each month in your newsletter).
- 3. Not identifying and communicating with your key external stakeholders and seeking their input.** The local community and other external stakeholders, if informed on what you are trying to achieve, can be critical allies for your organization.

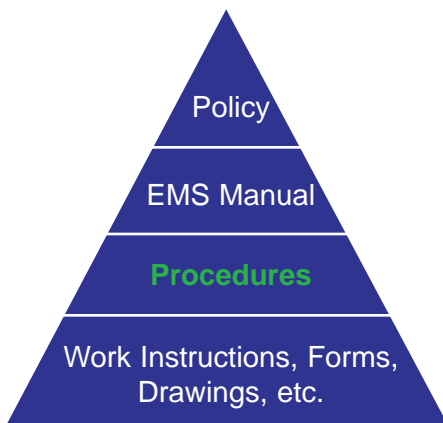
COACH'S CORNER



Your organization may want to take a very proactive external communications approach, at least initially. Include an educational focus and promote an understanding of the environmental controls involved in the management of your facility—this will lead to increased appreciation for your wastewater services by the community.

Three Lessons Learned (from wastewater facilities):

1. Communicate EMS information up, down, and across your wastewater organization. This will promote buy-in to your EMS.
2. Keep internal messages simple, clear, concise, and fresh. Remember, Keep It Simple, Simple (KISS)!
3. Proactive (two-way) communication with external parties is important. Take steps to obtain the views of external stakeholders. This will help you better understand how your organization and your EMS is perceived by others.



A **Communications system procedure** is required for this element. A system procedure defines the purpose (why the procedure is needed), scope (to what operations/ areas/staff the procedure applies), roles & responsibilities (who needs to complete the tasks), and the tasks that need to be completed for this element.

Step 4) Define How Your Organization Can Best Reach External Stakeholders

Now that you've determined who your external stakeholders are and the potential reasons why they might have an interest and effect on your EMS, determine how to best reach your external stakeholders. Consider the following methods that wastewater facilities with an EMS have used.

External Communication Vehicles

- ♦ Annual Reports
- ♦ Steering Committees and/or Advisory Groups
- ♦ Media Releases
- ♦ Open Houses and Tours
- ♦ Websites
- ♦ Surveys
- ♦ Mailings & Newsletters to Local Communities

NOTE



Find out which issues are of greatest interest to your external stakeholders and focus your efforts on what those issues (i.e., health and safety, compliance, SSO runoff into waterways, odor issues, etc.).

Step 5) Develop an EMS System Procedure(s) for Internal and External Communications

When you are satisfied that your process for internal and external communications conforms to the EMS requirements and that it allows your organization to achieve its goals for enhancing communication, document the process in a system procedure. As with all EMS system procedures, it needs to clearly define what, when, how, and where.

For samples of Internal and External Communications procedures from wastewater facilities, see Appendix A.

“From the beginning, we involved all employees in the EMS process. Therefore, we improved communications between ALL levels of staff in our wastewater facility.”

Beth Eckert
Gastonia, North Carolina
Public Works and Utilities Department

Step 6) Check the Communication Procedure(s) for EMS Conformance

After you have documented and implemented your communications procedure it's time to check if it's actually working according to your plan and establishing the necessary communication channels. Here are some questions to investigate:

Check ✓

1. Who are the key interested parties and how were they identified?
2. What are the key concerns of our defined interested parties?
3. Do employees know their roles and responsibilities for ensuring solid communication?
4. Are employees aware of procedures and operational changes that affect their daily activities?
5. Can employees relate, in their own words, how their job functions connect to the Environmental Policy? Significant Aspects? Objectives and Targets?
6. Can employees who need necessary information access it easily? What processes do we utilize to respond to internal inquiries, concerns, and suggestions?
7. Have EMS requirements been communicated and understood by the employees and contractors that need to know?

We felt that getting the word out about our EMS would help our public image, which was one of the reasons we wanted to develop the EMS. The easiest way to do that was to put information about our EMS program on our Website.

Jim Newton, P.E., DEE
Kent County, Delaware
Levy Court Public Works

Three Keys to Success

(from wastewater facilities):



1. Try using creative methods to communicate your EMS message. For example, in an effort to educate outside stakeholders and reward employees, Jefferson County, Alabama sponsored an EMS event at a minor league baseball game. Free admission was given to employees who provided EMS information at the admissions gate, while other ticket holders were given EMS information as they entered the game.

In addition, consider printing your EMS policy or a summary of your policy on mouse pads, coffee mugs, magnets, business cards, tee shirts, etc.

2. In communicating with your employees, explain not only what they need to do, but also why they need to do it. For example, when describing a legal requirement, explain the purpose behind the rule and why it is important. Make a clear connection between the requirement and how it applies to each person's job.

3. Get the word out on the EMS! Communication of your EMS (e.g., policy, cost benefits, objective and target performance, status of your EMPs, etc.) with internal and external stakeholders is key to obtain buy-in from employees and maintaining external stakeholder support.

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Internal and External Communication

(Cut out this section for handy reference)

The **Purpose** of this EMS element is to:

- Define and implement a procedure for identifying and communicating with internal and external interested parties regarding your EMS process and environmental management activities and approaches.

The **Results** of this EMS requirement are:

- An approved procedure(s) (EMS Document) for internal and external communication.
- A record of communications (EMS Record) with external interested parties.
- A record of your decision (EMS Record) on ways to communicate significant aspects to external interested parties.

Before you Begin this EMS element:

- Complete your significant environmental aspects analysis.
- Identify what and how you currently communicate both internally and externally.

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ISO 14001 Requirements	Links to Other EMS Elements	Required Documents & Records	Optional Documents & Records
<p><i>Communication</i></p> <p>With regard to its environmental aspects and environmental management system, the organization shall establish and maintain procedures for:</p> <p>a) internal communication between the various levels and functions of the organization; and</p> <p>b) receiving, documenting, and responding to relevant communication from external interested parties.</p> <p>The organization shall consider processes for external communication on its significant environmental aspects and record its decision.</p>	<p>Environmental Policy - Your Policy must be communicated to all employees and made available to the public.</p> <p>Environmental Aspects - Employees are aware of their roles and responsibilities in relation to environmental aspects. Processes for external communication are considered and decisions recorded.</p> <p>Objectives & Targets - Communicate with employees in areas and operations with environmental targets so that they understand their roles and responsibilities.</p> <p>Structure and Responsibility - Roles, responsibilities, and authorities shall be defined, documented, and communicated.</p> <p>Training & Awareness - Employees are aware of their roles and responsibilities in relation to environmental aspects and the potential consequences of departure from specified procedures.</p>	<p>Communications Procedure(s)</p> <p>Record of External Communications</p> <p>Record of decision on communicating significant aspects to external interested parties</p>	<p>List of Internal and External Interested Parties</p>