

Section 3: Environmental Policy: Setting the Stage

An environmental policy is your organization's statement of its commitment to the environment. It is signed by top management and serves as a foundation document for your EMS and provides a vision for your entire organization. Everyone in the organization should understand the policy and what is expected of them in order to achieve your environmental goals. Use your policy as a framework for planning, action, and continual improvement—all else that follows will be based on your policy.

As you develop your EMS policy, it is critically important that the policy be consistent with other strategic environmental priorities you may have established through organization-wide strategic plans or other similar efforts. Don't make the mistake of having your EMS policy "exist in a vacuum." For example, you may have already embarked on major effort to improve the management of your capital assets through a formal assets management program. Make sure this commitment is reflected in your EMS policy and made part of your EMS throughout.

ISO 14001 Environmental Policy Commitments:

- Continual Improvement
- Pollution Prevention
- Compliance with Relevant Laws and Regulations

Step-by-Step Guide to Developing an Environmental Policy

- Step 1) Review Current Policies
- Step 2) Draft an Environmental Policy
- Step 3) Check Your Environmental Policy for EMS Conformance
- Step 4) Finalize Your Environmental Policy
- Step 5) Communicate Your Policy
- Step 6) Review Your Environmental Policy for Effectiveness

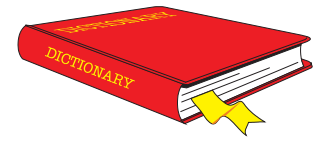


Step 1) Review Current Policies

You probably have some type of environmental or other organizational policies in place, even if they are not written down. For example, your organization is most likely committed to complying with environmental laws. Document what you have in place as a starting point. Leverage your current policies, build on them, and develop your environmental policy.

If no policy or language exists, you will need to draft a policy from scratch. There are plenty of examples your team can review to get

Key Section Terms



Continual Improvement – The process of enhancing an organization's EMS to achieve improvement in overall environmental performance in line with the organization's environmental policy. The basic principle of the plan, do, check, act approach.

EMS Core Team – A cross-functional team made up of individuals within the organization that helps facilitate EMS implementation across the organization. Team members are the EMS experts and cheerleaders.

Environmental Management Representative (EMR) – The clearly identified EMS team leader who has the responsibility and management authority for implementing the EMS from start to finish.

Environmental Performance – Measurable results of the EMS related to an organization's control of its environmental aspects, based on its environmental policy, objectives and targets.

Environmental Policy – An organization's formal statement defining its intentions and principles in relation to its overall environmental performance. It provides a framework for action and setting environmental objectives and targets.

Pollution Prevention – The development, implementation, and evaluation of efforts to avoid, eliminate, or reduce pollution at the source. Any activity that reduces or eliminates pollutants prior to recycling, treatment, control or disposal.

Methods Used to Internally Communicate Environmental Policies:

- ▶ Posting the policy at various sites throughout the work place (e.g., in lunchrooms) so there is a visual reminder of the statement and its importance
- ▶ Using paycheck stuffers, identification badges, wallet cards, etc. so that employees can carry the environmental policy with them
- ▶ Incorporating the policy into training classes and materials
- ▶ Referring to the policy at staff or all-hands meetings
- ▶ Posting the environmental policy on the facility's Internet

“Pull together a representative, cross-functional group from your organization when developing the policy and you'll have more buy-in of your EMS policy from every level.”

Beth Eckert
Gastonia, North Carolina
Public Works and Utilities Department

Involving Contractors and Temporary Staff

Contractors and temporary staff that work within your EMS fenceline are required to be trained on and understand your environmental policy. Most wastewater facilities that have an EMS conduct a shorter version of their EMS awareness training for their contractors and temporary staff that includes a site safety review and an overview of the EMS and the environmental policy.

started, including an example policy at the end of this section and examples from wastewater organizations are included in Appendix A. Avoid developing a policy that is vague or could apply to any organization. Your policy should be specific to the goals you want to accomplish.

Step 2) Draft an Environmental Policy

Once you have your EMR and EMS Core Team in place, create a draft environmental policy based on any current business commitments and/or organizational and environmental goals. Remember that conformance to ISO 14001 must include statements regarding the three key commitments noted above.

Designate a couple of EMS Core Team members to be responsible for your draft policy. Get input from top management and seek input from employees. It is important that your policy reflect your organizational culture and that it is appropriate to all levels of your operations and services.

A sample Environmental Policy is attached at the end of this section. Additional sample policies from wastewater facilities are attached in Appendix A.

NOTE



Before you finalize your environmental policy, consider sitting down and brainstorming how your facility impacts the environment (your “footprint”) and draft a few goals that you would like to achieve with your EMS. Identifying a few environmental goals before you finalize your policy will allow you to see how your wastewater facility considers environmental goals in line with business objectives. This approach will result in a policy that is specific to your organization and what you want to accomplish, rather than a “cookie cutter” policy.

Step 3) Check Your Environmental Policy for EMS Conformance

Check ✓

1. Is there top management support and a signature/date?
2. Is there a commitment to legal requirements, continual improvement & pollution prevention?
3. Is the policy communicated to employees? How?
4. Has the communication to employees been effective? (i.e., do employees understand the policy and their roles and responsibilities in the EMS)?
5. Is the policy available to the public? How?

Step 4) Finalize Your Environmental Policy

Once you have considered what you want to accomplish environmentally as an organization and checked your policy for conformance, finalize your policy by having top management sign, date, post, and communicate it. This shows commitment from the top.



COACH'S CORNER

Keep your environmental policy simple, understandable, and to the point. One quick test: Could your employees describe your policy statement in a few words?

Step 5) Communicate Your Policy

Once your policy is signed and approved, communicate it to your employees. Make sure that all employees understand the policy and how it relates to their work.

Conduct training to introduce the environmental policy to your employees, explain its purpose, and answer any questions. This can be done in separate training sessions and/or by incorporating training on the policy into other ongoing training (e.g., health & safety, environmental refreshers, etc.).

Case Study

Kent County Levy Court Public Works Wastewater wrote their policy to reflect an acronym that all employees could remember. They also added a symbol to help remember the acronym. In addition, they gave every fenceline employee a kitchen magnet with the policy information on it, and are considering placing the information on insulated mugs and mouse pads made from recycled materials. Kent County's Policy mascot, abbreviated policy, and acronym (CHIRP) are:



Environmental/Biosolids Policy

- ▶ Comply with regulations and NBP Code of Good Practice
- ▶ Have an environmental/biosolids vision
- ▶ Improve continuously
- ▶ Readily share information
- ▶ Practice pollution prevention

Three Lessons Learned

(from wastewater facilities):

- 1. Keep your policy simple.** A simple policy written with specific expectations provides employees with a straight-forward and realistic view of your environmental and EMS purpose.
- 2. Include employees from across your wastewater facility when drafting your policy.** Have a couple of Core Team members and management representatives draft your statement, then refine and finalize your policy based on feedback from the entire Core Team and staff at all levels. This will help secure employee buy-in.
- 3. Make sure your policy uses key words from the ISO 14001 Standard** (e.g., pollution prevention, continual improvement, and compliance), especially if you are working toward third-party certification.



Three Things to Avoid

(from wastewater facilities):

- 1. Creating a policy that is too long.** A lengthy policy makes it difficult for employees to identify the most important points. Make it one page or less.
- 2. Not defining your wastewater fenceline** (core operations and services) before drafting your environmental policy.
- 3. Rushing your drafting process.** Spend time drafting your policy since it really defines management's commitment to the EMS and sets the framework for development of your EMS.

Three Keys to Success

(from wastewater facilities):



1. Don't start from scratch. Use existing policies and organizational goals to document and expand your environmental policy. This will lead to positive, organization-wide acceptance.

2. When training your employees on the basics of the EMS policy, make sure they understand they do not have to memorize the policy. They do need to understand what your environmental commitments are related to the policy and be able to express that in their own words. Consider laminating and using badge/wallet size policy cards that employees can keep with them and that contain the basics of your wastewater environmental policy.

3. When developing your environmental policy (and your EMS), it is critical that top management listen to the working conditions and concerns of all employees.

Common Questions to Ask Employees about Your Environmental Policy Include:

- Can you describe the environmental policy in your own words?
- What does the environmental policy mean to you?
- How does your job contribute to your organization achieving the goals of the environmental policy?

The policy also needs to be **communicated externally** and made available to the public. Some options for external communications include placing your policy on business cards, in newspaper advertisements, in annual reports, and posting it on your organization's public Internet site.

Step 6) Review Your Environmental Policy for Effectiveness

Once your policy is in place, consider how you will demonstrate that your organization is implementing the commitments you laid out in the policy. This is a good test of whether or not the policy is a "living," working document and not just a hard copy document that will collect dust.




Review your policy during EMS Management Reviews (See the Management Review section later in this Handbook). These meetings are times when management, the EMR and other staff can determine whether the EMS is functioning consistent with your policy commitments, and that your environmental goals are being met.

Have your Environmental Policy readily available to the public. Provide the front office with copies of the policy so they can hand it out to inquirers. Also consider posting it on your Internet and at the local library and/or local public offices.

James Naber
Buncombe County, North Carolina
Metropolitan Sewer District

Development of our Environmental Policy enhanced Senior Management's ability to have open dialogue and constructed a message that coincided across the entire Metropolitan Wastewater District's mission.

Chris Toth
City of San Diego
Wastewater Collection Division



Environmental Policy

(Cut out this section for handy reference)




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

- Ensure that your organization's management establishes an environmental policy that defines your wastewater facility's environmental vision and goals, and that the policy is communicated and understood by all employees and applicable contractors and vendors.

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

- An approved environmental policy (EMS Document) that is implemented and understood throughout your organization.
- Firm management commitment to EMS implementation.
- Communication of the environmental policy throughout your wastewater organization, and its availability to the public.

Before you Begin this EMS element:

- Determine where your EMS will be applied (“fenceline”).
 - Consider defining your organization’s impact on the environment and setting your environmental goals before finalizing your environmental policy.
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ISO 14001 Requirements	Key Links to Other EMS Elements	Required Documents & Records	Optional Documents & Records
<p><i>Environmental Policy</i></p> <p>Top management shall define the organization's environmental policy and ensure that it:</p> <p>a) Is appropriate to the nature, scale and environmental impacts of its activities, products or services;</p> <p>b) Includes a commitment to continual improvement and prevention of pollution;</p> <p>c) Includes a commitment to comply with relevant environmental legislation and regulations, and with other requirements to which the organization subscribes;</p> <p>d) Provides the framework for setting and reviewing environmental objectives and targets;</p> <p>e) Is documented, implemented, maintained, and communicated to all employees;</p> <p>f) Is available to the public.</p>	<p>Environmental Aspects - Conduct your aspect/impact analysis to determine environmental management priorities in order to finalize your environmental policy.</p> <p>Objectives & Targets - Consider setting goals before you finalize your environmental policy. This will set the framework and vision for environmental improvement.</p> <p>Training & Awareness - Every employee within the EMS fenceline needs to understand the basics and purpose of the EMS and the environmental policy, especially as it relates to their job.</p> <p>Communication - Communicate the environmental policy throughout your organization and make it available to the public.</p> <p>Management Review - Regularly review the effectiveness of the policy with top management.</p>	<p>A Documented Environmental Policy</p>	<p>Other Environmental Commitments (e.g., EPA's Green Lights, etc.)</p> <p>City/County Environmental Policies</p> <p>Business/Technical Objectives</p>



Commissioners of Public Works

4.2 - Environmental Management System - Environmental Policy Statement

The Charleston Commissioners of Public Works (CPW) is committed to the improvement of the environment for present and future generations through:

- The treatment and delivery of safe potable water.
- The collection, treatment, and proper disposal of wastewater.
- The responsible impact of its activities, products and services on the environment.
- The continual environmental improvement and the prevention of pollution.
- Compliance with all applicable federal, state, and local laws, regulations, statutes and other environmentally related requirements to which the organization subscribes.
- The establishment of environmental objectives and targets that are periodically reviewed to ensure success.
- And communication of its Environmental Management System to CPW associates and to other interested parties.

CPW will establish and maintain an Environmental Management System (EMS) that corresponds to the ISO 14001 Standard and the mission, vision, strategic business plan and core values adopted by CPW.

William Koopman, Jr.,
General Manager

John Cook, PE,
Assistant General Manger

Kin Hill, PE,
Director of Operations

Dorothy G. Harrison,
Director of Administrative Services