

4.2 ENVIRONMENTAL POLICY

PURPOSE AND KEY CHARACTERISTICS OF AN ENVIRONMENTAL POLICY

An environmental policy is the foundation of an organization's environmental management system. As far as ISO 14001 is concerned, all decisions and actions taken by the organization must be consistent with, and designed to accomplish the commitments made in, the environmental policy. The organization's EMS performance will be judged by a Registrar and other auditors in relation to claims made in the environmental policy.

An environmental policy should reflect the vision, intentions, philosophy, values, and beliefs of the organization with respect to the environment. Top management should put a great deal of thought and imagination into developing and crafting the policy, since it will become the code of conduct by which the organization lives and operates. The policy should be practical and inspirational, providing a framework and a compass for business and technical decisions and actions, and at the same time motivate and encourage all personnel in the organization to achieve excellence in environmental performance.

ISO 14001 4.2 ENVIRONMENTAL POLICY says:

Top management shall define the organization's environmental policy and ensure that it

- a) is appropriate to the nature, scale, and environmental impacts of its activities, products, or services;
- b) includes a commitment to continual improvement and prevention of pollution;
- c) includes a commitment to comply with relevant environmental legislation and regulations, and with other requirements to which the organization subscribes;
- d) provides the framework for setting and reviewing environmental objectives and targets;
- e) is documented, implemented and maintained, and communicated to all employees;
- f) is available to the public.

ISO 14001 ENVIRONMENTAL POLICY TRANSLATED

The ISO 14001 Standard specifies several requirements for the development, content, intent, and implementation of an environmental policy:

1. Top management are responsible and accountable for defining the organization's environmental policy. They must, as a minimum, carefully review, approve, and commit to abiding by an environmental policy that has been developed for their consideration. Often other managers in the organization will compose policy drafts for senior management to comment on and edit. However, the ultimate responsibility for policy definition rests with the top management group.

2. The policy must completely cover the organization's (i.e., facility's) range of operations, including where appropriate, raw material acquisition, transportation, packaging, and shipping of product, as well as all on-site operations that may impact the environment.
3. The policy must contain three core commitments that are ISO 14001 absolute requirements:
 - (i) A commitment to continual improvement of the EMS and environmental performance.
 - (ii) A commitment to the prevention of pollution (i.e., this means taking all reasonable steps to eliminate, or at least minimise, pollution).
 - (iii) A commitment to comply with relevant environmental legislation and regulations, and with other requirements to which the organization subscribes. This means the organization commits to meet local, regional, and national legislated environmental standards. In addition the organization must commit to abide by other non-legal requirements, such as environmental commitments arising from its membership in industry associations, agreements with governments or other stakeholders, and internal company policies and procedures.
4. The policy must give direction and a framework for progress through new environmental objectives and targets that will be set during the course of implementing and maintaining the EMS.
5. The policy must be documented, which is ISO-speak for 'in writing', and it must be implemented through the day-to-day functioning of the EMS.
6. The policy must be maintained, another ISO idiom, meaning kept up to date and relevant to current operations and conditions.
7. The policy must be communicated to all employees. This implies active, intentional efforts by the organization, led by top management, to ensure all employees know about, understand, 'buy into', and apply the principles, ideas, and commitments in the policy. Various methods and techniques can be used by an organization to facilitate internal communication of its environmental policy and the underlying principles that the policy is founded upon.
8. The policy must be made available to the public, i.e., it must be accessible to all members of the public who wish to see it. ISO 14001 does not 'require' an organization to actively publicise the policy, but if the policy is properly developed, the company should be proud to have it displayed and broadcast to everyone as a demonstration of its values and commitments.

In addition to the essential requirements for an environmental policy summarized above, other considerations that may be incorporated into the policy include:

 - Principles of sustainable development, resource renewal, and preservation of biological diversity
 - A commitment to use the most effective pollution abatement

technology and equipment, consistent with economic viability of the business (i.e., BEAT – Best Economically Achievable Technology)

- Use of environmental performance indicators to quantitatively monitor progress
- Life cycle thinking – consideration of ‘cradle to grave’ impacts of a product, which would require the organization to assess cumulative environmental impacts from all stages, from design of the product; acquisition of raw materials; processing to finished product; packaging; shipment; end-use; and ultimate re-use, recycle, or disposal.

For all components of this element of the Standard to be brought to fruition, it is essential that there is clear allocation of responsibilities for developing, approving, communicating, disseminating, implementing, maintaining, and when necessary, revising the environmental policy. Although environmental policy is the first element of ISO 14001, it may be prudent for an organization to defer finalization of the wording of their policy until work has been done to identify the scope of environmental impacts from the operation, and other planning and preliminary preparation for the EMS has been done. This will help to ensure the policy is authentic and appropriate for the organization's purpose.

Environmental Policy – Forest Products Company Example

We are committed to responsible stewardship of the environment throughout our operations.

We will:

- Comply with or surpass legal requirements
- Comply with other environmental requirements to which the company is committed
- Set and review environmental objectives and targets to prevent pollution and to achieve continual improvement in our environmental performance
- Create opportunities for interested parties to have input to our forest planning activities
- Practice forest management that recognizes ecological processes and diversity and supports integrated use of the forest
- Promote environmental awareness throughout our operations
- Conduct regular audits of our environmental management system
- Communicate our environmental performance to our Board of Directors, shareholders, employees, customers, and other interested parties.

SUMMARY OF KEY POINTS

- An organization's environmental policy is the driver for the EMS; it is a beacon which guides the direction and course correction in all business decisions and actions.
- An environmental policy must convey an organization's values and commitments regarding environmental performance.
- The policy should be clear, concise, practical and inspirational, reflecting the organization's principles, values, and intentions towards the environment.
- The environmental policy should complement other organizational policies, such as quality, health and safety, and core business principles.
- The scope of the policy must encompass all operational areas of the organization, from raw material supplies to finished product or service.
- The policy must be approved and supported by top management, who should lead environmental initiatives by example.
- The policy must be kept up to date.
- All employees must be made aware, and have a clear understanding of the content and intent of the environmental policy.
- To promote awareness of the policy, it should be widely displayed within the organization, and made available to the public when requested, or better still voluntarily.