

ISO 14001 ENVIRONMENTAL POLICY (4.2)

The Environmental Policy statement required under ISO 14001 is the keystone upon which the entire environmental management system is constructed. It is not a public relations document that is posted on the conference room wall or handed out to potentially impacted stakeholder groups. The Environmental Policy is the central focus of the environmental management system. It must contain and clearly communicate the following for the organization:

- Mission and core values with respect to the environment, and
- Commitments to control and improve environmental performance with respect to significant environmental aspects of the organization's products, services and/or activities.

The commitment to control and improve environmental performance with respect to the environment leads to the development of Environmental Objectives and Targets (4.3.3). Once those items have been delineated the rest of the environmental management system is devoted to accomplishing the objectives and targets which fulfil the Environmental Policy. ISO 14001 requires that a coherent and cogent Environmental Policy be developed and implemented.

Content Requirements of the Environmental Policy

- appropriate to the organization's environmental impacts
- provides a framework for setting Environmental Objectives and Targets
- commitment to continual improvement
- commitment to prevention of pollution
- commitment to comply with environmental laws and regulations, and other requirements to which the organization subscribes
- document and implement the Environmental Policy
- communicate it to all employees
- commitment to communicate the Environmental Policy to the public

Appropriate to the Organization's Environmental Impacts

Every organization has unique interactions with and impacts on the environment. An organization attempting to comply with the requirements of ISO 14001 must be able to demonstrate that is fully aware of all relevant environmental issues and their potential impact and importance. The organization will need to review at a minimum the following issues:

- its operation,
- pollutant emissions and releases,
- past environmental performance,

- location,
- land use activities,
- sensitive environmental areas,
- environmental impacts from other organizations nearby,
- environmental legislation and regulation,
- community stakeholder views,
- client and/or customer views,
- etc.

No distinct list will be appropriate to all organizations. The organization must develop its own methodology to investigate relevant environmental issues and their potential impact and importance.

Provides a Framework for Setting Environmental Objectives and Targets

Environmental Objectives are specific and defined goals that need to be achieved in order to meet the requirements of the Environmental Policy. Each Environmental Objective must be traceable back to the Environmental Policy statement. In order to be acceptable under the ISO 14001 standard every action, requirement, procedure, etc., contained within the environmental management system must have its roots in the Environmental Policy statement. If an Environmental Objective is developed that cannot be traced back to the Environmental Policy statement it must be assumed that the Environmental Policy statement is not accurate with respect to the organization's environmental aspects and impacts.

Commitment to Continual Improvement

Definition "3.1 -- Continual Improvement

Process of enhancing the environmental management system to achieve improvements in overall environmental performance in line with the organization's environmental policy."

To conform to this requirement the Environmental Policy statement must contain a requirement for continual improvement. This definition ties together two elements of ISO 14001: the Environmental Policy statement and Management Reviews (4.6). Management Review requires that at least two key elements be examined on a set frequency:

- must review the environmental management system, with special emphasis on the policy and the objectives, to ensure that the system is still effective to the organization's activities; and,
- if conditions under which the previous environmental aspects were evaluated have changed, the policy and the objectives(s) and target(s) may need to be reevaluated and modified.

Continual Improvement, as utilized in ISO 14001, requires that the environmental management system be reviewed and evaluated at a set frequency for changed aspects and impacts. A nominal frequency that appears to be acceptable is yearly.

Commitment to Prevention of Pollution

The requirement to include a commitment to the prevention of pollution in the Environmental Policy statement has one further implication. Once pollution based Environmental Objectives have been established the only requirement is that prevention of pollution be evaluated as one of the alternative approaches in setting the Environmental Target(s). If the prevention of pollution alternative is not the cost-effective approach, then it does not need to be accepted.

Commitment to Comply with Environmental Laws and Regulations, and Other Requirements to Which the Organization Subscribes

The commitment in the Environmental Policy statement is a rather straightforward. ISO 14001 requires a commitment to legal and regulatory compliance. There is not a specific clause contained within ISO 14001 that requires unconditional compliance with all applicable laws and regulations. What is required is as follows:

- identify applicable laws and regulations,
- decide whether in compliance or noncompliance,
- for those areas where noncompliance exists, develop an action plan to correct noncompliance, and
- establish a system to maintain compliance.

Does an organization need to be in full compliance with the appropriate environmental laws and regulations in order to conform with ISO 14001? The answer is a simple no. However, a continued pattern of noncompliance may lead to nonconformance with ISO 14001 due to a lack of an adequate "system to maintain compliance". If the organization subscribes to any codes of practice or voluntary guidelines the Environmental Policy statement will also need to include these agreements.

Document and Implement the Environmental Policy

An executive level manager must sign the Environmental Policy statement. In addition the Environmental Policy statement must be maintained in a manner consistent with Document Control (4.4.5) procedures.

Communicate It to All Employees

This requirement is really a subset of the ISO 14001 section Training, Awareness and Competence (4.4.2). All employees within the organization must understand and recognize the commitments. Additionally, employees of the organization should be able to relate how their job function interacts with the Environmental Policy statement.

Commitment to Communicate the Environmental Policy to the Public

There is a theme in ISO 14001 that favors communication with external stakeholders. When a complete Environmental Policy statement is crafted by the organization an opportunity is created to discuss openly the organization's Environmental

Objectives. These goals, along with mission and core values of the organization, have the potential to foster an open dialogue with outside parties.

Questions That Need To Be Answered

The following questions will need to be answered in order to determine whether the Environmental Policy Statement meets the intent of ISO 14001:

1. Has executive management defined and signed the organization's Environmental Policy?
2. Appropriate to the nature of the organization's activities, products and/or services?
3. Is the policy appropriate to the organization's scale?
4. Is there a commitment to prevention of pollution?
5. Is there a commitment to continual improvement?
6. Is there a commitment to comply with all appropriate environmental laws and regulations?
7. Is there a commitment to comply with voluntary requirements to which the organization subscribes?
8. Does it provide a framework for establishing Environmental Objectives?
9. Is there a process to review Environmental Objectives?
10. Is it documented?
11. Is it implemented?
12. Do all employees know how their job function relates to the Environmental Policy?
13. Is it available to the public?