

## Environmental Policy

### *Communicating your environmental vision*

#### **Key Policy Commitments:**

- Continual improvement
- Pollution prevention
- Compliance with relevant laws and regulations



*Sample environmental policies are provided in the **Tool Kit** (see Appendix A).*



#### **Continual Improvement:**

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

ISO 14001

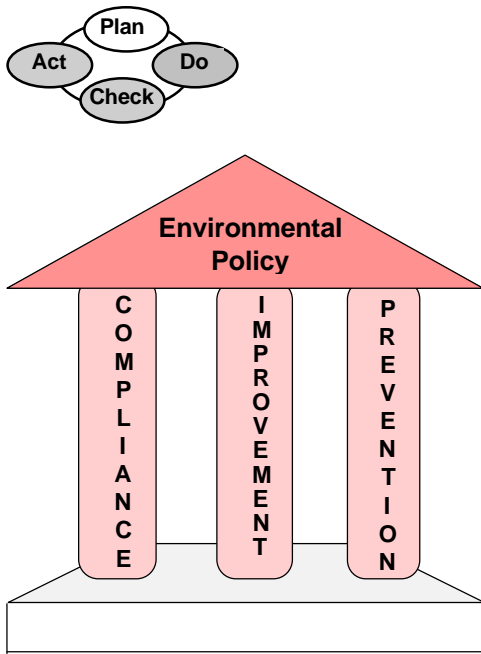
An environmental policy is top management's declaration of its commitment to the environment. This policy should serve as the **foundation** for your EMS and provide a **unifying vision** of environmental concern by the entire organization. Given its importance, your policy should be more than just flowery prose.

Since it serves as the framework for setting environmental objectives and targets, the policy should be **brought to life** in your plans and deeds. Everyone in the organization should **understand** the policy and what is expected of them in order to achieve the organization's objectives and targets.

Your policy should reflect three key commitments (see box), including a commitment to **continual improvement**. While this does **not** mean that you must improve in all areas at once, the policy should drive your organization's efforts to continually improve environmental management (and the improved performance that results from these efforts).

#### **Hints:**

- Your organization probably has some type of environmental policy now, **even if it's not written down**. For example, your organization probably is committed to complying with the law and avoiding major environmental problems, at a minimum. Document existing commitments and goals as a starting point.
- The policy should relate to your products and services, as well as supporting activities. Consider the results of your **preliminary review** (see Section 3) and your analysis of the **environmental aspects** of your products, services and activities before finalizing the policy. These two steps can provide insight as to how your organization interacts with the environment and how well it is meeting its challenges. For example, information obtained during the preliminary review might help you define specific policy commitments.
- Keep your policy **simple and understandable**. Ask yourself: What are we trying to achieve? How can we best communicate this to the rest of the organization? One test to use: Could our employees describe the intent of our policy in twenty words or less?



**Figure 4:**  
**Three Pillars of an  
Environmental Policy**



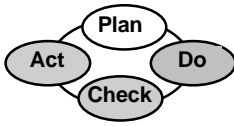
- **Environmental Aspects**
- **Objectives & Targets**
- **Training & Awareness**
- **Communication**
- **Management Review**

- The environmental policy should be **explicit enough to be audited**. If you choose to use phrases such as “We are committed to excellence and leadership in protecting the environment”, consider how you would demonstrate that such a commitment is being met.
- The environmental policy can be a stand-alone document or it can be **integrated** with your health & safety, quality, or other organizational policies.
- Consider who should be involved in **developing the policy** and the best process for writing it. Input from a range of people within your organization should increase commitment and ownership.
- Make sure that your employees **understand** the policy. Options for communicating your policy internally include posting it around work sites (e.g., in lunchrooms), using paycheck stuffers, incorporating the policy into training classes and materials, and referring to the policy at staff or all-hands meetings. **Test awareness** and understanding from time to time by asking employees what the policy means to them and how it affects their work.
- The policy also should be communicated **externally**. Some options for external communications include placing the policy on business cards, in newspaper advertisements and in annual reports, among other options. You might choose to communicate the policy proactively or in response to external requests (or both). This decision should be factored into your overall strategy for external communication (see later discussion under “Communications”).
- Consider how you would **demonstrate** that you are living by the commitments laid out in the policy. This is a good test of whether or not the policy is a “living document”.

**For EPA’s Performance Track program, an organization’s policy must include:**

- **compliance with legal requirements and voluntary commitments;**
- **pollution prevention (see Figure 5);**
- **continuous improvement in environmental performance, including areas not subject to regulation, and**
- **sharing information on environmental performance and their operation of the EMS with the community.**

**For more information see Appendix B.**



### Commitments to Compliance with Legal Requirements and Pollution Prevention

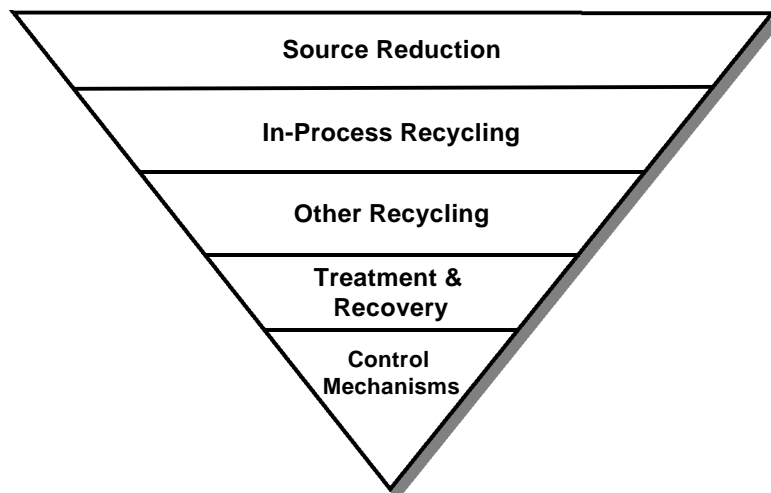
**Compliance with legal requirements is a critical consideration in EMS development and implementation. EMS implementation requires an organization, among other things, to:**

- develop and communicate an environmental **policy** that includes a commitment to compliance;
- develop and implement a procedure to identify, analyze and have **access to environmental laws and regulations**;
- set **objectives and targets** in line with its environmental policy, which includes a commitment to compliance;
- establish **management programs** to achieve its objectives;
- **train employees** and **communicate** relevant EMS requirements to them;
- establish and implement **operational control** procedures;
- establish and implement a procedure for **periodically evaluating compliance**; and
- establish and implement a procedure to carry out **corrective and preventive actions**.

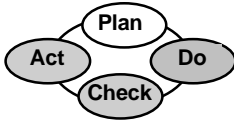
While the requirements noted above relate directly to an organization’s management of legal requirements, each of the seventeen EMS elements described in this Guide can contribute to enhanced compliance (including communication, documentation and document control, records management, EMS audits, and management review). An EMS that includes the elements described in this Guide will help your organization improve or maintain its compliance performance and facilitate the establishment of objectives and targets that go “beyond compliance.”

**Figure 5**

#### Prevention of Pollution Hierarchy



EMS design and implementation also should take into account the **Pollution Prevention (P2) hierarchy**. In evaluating P2 opportunities, organizations should start at the top of the pyramid (i.e., source reduction) and work their way down as needed to define the most appropriate methods for preventing pollution. Examples and best practices of P2 in operation are provided throughout this Guide.



Capture the Learning: Environmental Policy Worksheet

<p>Do we have an <b>existing policy</b>?</p> <p>If yes, how was the policy <b>developed</b>?</p> <p>When was the policy last <b>reviewed</b>?</p>	
<p>Does the policy reflect the <b>three key commitments</b> (commitments to compliance, prevention of pollution and continual improvement?)</p> <p>What <b>other commitments</b> does or should our policy contain?</p>	
<p>How does our policy take into account the environmental attributes of our <b>products, activities and services</b>?</p>	
<p>How would we <b>demonstrate conformance</b> to our policy?</p>	
<p>How is the policy <b>communicated</b> to our employees? Do our employees <b>understand</b> the critical elements of our policy? How do we know?</p>	
<p>What <b>feedback</b> have we received on the policy (from employees, contractors or other interested parties)?</p> <p>What happens when we receive feedback on the policy?</p>	
<p>How do we make our policy <b>available to external parties</b>? Is this process effective?</p>	
<p><b><i>Our next step on environmental policy is to ...</i></b></p>	