Phase 1, Stage 3

Developing a draft environmental policy

Why
The environmental policy is what really drives the whole of your EMS, and when finalized, it becomes a publicly available declaration of your intentions and commitment to improving your environmental performance.

At this stage, however, a draft policy simply helps to provide a focus for the further development of your EMS, and the document does not have to be seen by anyone outside the organization. For those interested, it’s also an ISO 14001 and EMAS requirement.

How
- Before you begin, identify whether your organization already has a policy, or has made environmental commitments within other management systems (e.g. health and safety or quality). Find out the background to these, and identify with current management whether these commitments still hold. Remember that policies are often developed in response to a specific request or challenge, therefore they may need to be amended/updated.

- A typical environmental policy need not take up more than one page of A4. It should include a list of broad environmental commitments and intentions. Identifying these could be achieved through a group brainstorming session. Remember that the finalized policy will need to be endorsed by senior management.

- A good environmental policy includes a brief description of the main activities, products or services that the EMS will cover. This provides the reader with an idea of the nature and scale of the company, and hence the scope of the EMS.

- ISO 14001 and EMAS require specific commitments to be included in your policy. These include compliance with relevant legal and other requirements, continual improvement and prevention of pollution. Review a copy of ISO 14001 (subclause 4.2) and familiarize yourself with its requirements. At this early stage, begin to think about what these commitments mean to your organization; they will be the focus for your EMS and will need follow through (i.e. don’t make promises you can’t or don’t intend to keep).

- Try and keep the policy general enough to avoid the need for frequent alterations and reissues.

- When you have drafted your policy, send it out to senior management and other key members of staff to gain feedback.
Case study

McNicholas Construction, a medium-sized utilities construction company, drafted its environmental policy at the training seminar for Phase 1 of BS 8555. The EMS representative reviewed previous attempts at developing a policy, and used the results of the baseline assessment to create a more meaningful and relevant draft policy.

Due to the managerial and operational structure of the company, the policy statement required input from a wide range of key parties in the company. In outlining the structure and content of the policy, the EMS representative organized a brainstorming session consisting of key customers (external), key contractors (external), senior managers, operational managers and operatives. Working collectively as a group, they managed to accommodate the range of interests represented into a streamlined policy. This was then finalized during Phase 3 of BS 8555 implementation and communicated to every employee and subcontractor.

<table>
<thead>
<tr>
<th>BS 8555 achievement criteria</th>
<th>Practical examples</th>
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<tbody>
<tr>
<td>Is it appropriate to the nature and scale of your organization, and the environmental impacts of your activities, products and services?</td>
<td>Results from the baseline assessment incorporated into the intentions and commitments.</td>
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<tr>
<td>Does it include a commitment to continuous improvement and prevention of pollution?</td>
<td>Short paragraph describing the company’s activities, products and services.</td>
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<tr>
<td>Does it include a commitment to meet relevant environmental legislation and regulations, and other requirements to which the organization subscribes?</td>
<td>Bullet points embedded in the policy specifically committing to continual improvement, prevention of pollution and compliance with legal and other requirements.</td>
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<tr>
<td>Does it provide a framework for setting and reviewing environmental objectives and targets?</td>
<td>The reader of the policy should clearly see how the commitments and intentions provided a framework for setting environmental objectives and targets.</td>
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<tr>
<td>Is it documented, maintained and supported by plans to communicate it internally and externally?</td>
<td>A document control identifier on each document, a review schedule and some details as to how you plan to communicate the final version should be available.</td>
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1.3.1 Planning your policy

Before you begin, identify whether your organization already has an environmental policy, or has made environmental commitments in other policies or statements. An important question is whether you know how these policies came about and whether these commitments still hold. Commonly, policies have been developed in ad hoc responses to an external request or challenge, with little focused thought as to what the organization is committing itself to. If, however, you are happy with an existing policy, check this against the requirements of ISO 14001 and EMAS (see Table 1.2).

If you are starting with a clean sheet, look at policies that other companies have produced to give you an idea of different styles. You may be able to request copies of policies from your customers, or find policies on company websites. Remember that your own environmental policy has to be relevant to your organization, and reflect your main environmental aspects and impacts, so it is not a good idea to rely too heavily on someone else’s.

Gather together other internal documents, brochures and policies as these can also be useful when looking at (or for) a ‘corporate style’. If you have someone who looks after marketing or public relations issues, it might be worthwhile getting them involved at this stage.