

BS 8909

Guidance notes

Specification for a sustainability management system for film

These notes are to help you implement BS8909.

They are based on questions that were raised during the drafting of the Standard and during a series of trials undertaken by companies to test it before its launch.

They also give you some background on how the Standard came to be drafted and the organisations involved.

1. INTRODUCTION

BS 8909 is intended to help you run your business in a more sustainable way. It is not a toolkit or checklist of 'dos' and 'don'ts'; it lays out a framework to help you organise the way your company works to achieve objectives you set yourself. Nor is it a 'pass' or 'fail' calculator; it's a guide for a journey – it can help you raise your performance incrementally, so that your business can start from where it is today, set itself goals that you and your colleagues feel are realistic and achievable and, over time, aim higher. And it's not just about 'going green'; it is a 360 degree 'sustainability management system' that enables you to take account of the social and economic impacts your business has, as well as the more immediately obvious environmental impacts.

Like all British Standards, it has been drafted by industry professionals working with the staff of the British Standards Institution, with expert advice and industry feedback. The drafting group for BS 8909 was brought together by the UK Film Council and BSI and was then managed by BSI as one of its sub-committees. The sub-committee included representatives from production managers, cinema exhibitors, distributors, facilities operators, sales agents, archivists, trades unions and the UK Film Council itself, with an independent chair. Like all British Standards, it does not impose enforceable regulations or tell you how to implement legal requirements and practices. It is voluntary. However, although companies may choose to implement British Standards and monitor their own compliance, many feel it is preferable, and more credible, to have their compliance with the standard audited and certified by independent and accredited certification bodies.

2. WHAT IS A BRITISH STANDARD (BS)?

British Standards are published documents that contain technical specifications or other precise criteria designed to be used consistently as rules, guidelines, or definitions. They are designed to make life simpler, to increase the reliability and effectiveness of goods and services and to promote good working practices across an industry.

There are different types of standard and BS 8909 is a 'specification' for a management system. A **specification** sets out requirements for properties or processes. A **management system** is what an organization does to manage its processes or activities so that its products or services meet the objectives it has set itself. It provides the organization with a route map to follow.

Standards are drafted by representatives from the relevant industry, working with BSI officials and experts. They are designed for voluntary use and do not impose any statutory regulations. However, organisations usually get their management systems audited and third-party certified in order to give greater assurance to their customers and other stakeholders.

BS standards range from technical specifications for the building and computer industry to standards for the sustainable management of events. For example, the London Olympic park is being built and the Games will be run in accordance with BS standards.

3. WHAT IS BSI?

The British Standards Institution is the UK's National Standards Body. It represents UK economic and social interests across all the European and international standards organizations and assists the development of business information solutions for British organizations of all sizes and sectors. BSI works with manufacturing and service industries, businesses, governments and consumers to facilitate the production of British, European and international standards. As well as being widely used by UK industry, BSI standards are frequently used internationally and contribute to the development of world standards set by ISO, the International Standards Organisation.

BSI British Standards (the standards-making part of BSI Group) funds the development of standards through sales of standards and related publications to companies that wish to implement them. BSI Group also sells associated services such as product testing and auditing of management systems. It is a non-profit distributing organization, which means that any profits are reinvested into the services it provides.

4. ABOUT BS 8909

An initial meeting was held on 25 September 2009, convened by the UK Film Council, to which all the main trade, craft and professional bodies of the UK film industry were invited. On the basis of that meeting a drafting group was convened to include representatives from production (Production Managers

Association), exhibitors (Cinema Exhibitors Association), distributors (Film Distributors Association), facilities (UK Screen Association), sales (Film Export UK), trades unions (Federation of Entertainment Unions) and archives (British Film Institute) and the UK Film Council. This group was formed as a sub-committee of BSI and was chaired by an independent chair, appointed jointly by BSI and UK Film Council with the agreement of the members of the group.

Originally, the UK Film Council's intention in initiating this piece of work was three-fold:

- To help companies wanting to reduce their impact on the environment by providing them with a coherent system for doing so;
- To help the industry stay ahead of any changes in legislation and regulation – the value for companies buying into BS 8909 would be that they could plan their activities and investment in such a way as to minimise the costs and disruption that would otherwise arise when environmental and other standards are increased, either at UK or at European level;
- And, to give the UK industry a possible point of competitive advantage internationally – operating to good environmental standards would help the industry keep its costs down and make it more attractive to environmentally conscious investors, producers and talent from abroad.

The overwhelming opinion of the industry meeting of 25 September 2009 was to:-

- Produce a standard that addressed sustainability in a comprehensive way by looking at social and economic impacts as well as immediate environmental impacts;
- Help the industry stay ahead of legislation both in terms of the environment and social responsibility;
- And, aid the UK film industry by being a pioneer in sustainability.

Although at first sight this more inclusive approach to 'sustainability' seems to make the project more complicated, it has the advantage of addressing environmental issues in a broader context and balancing them against other practical considerations. For example, Marks and Spencer, when lobbied to stop importing fresh flowers from East Africa by air responded that, in their view, the social and economic impacts on the people of Kenya would outweigh the environmental benefits of stopping the trade. By having a broader range of social and economic as well as environmental criteria included in the Standard, companies can choose their own priorities in moving towards an inclusive strategy for making their working practices sustainable. This wider definition of sustainability is reflected in the standard.

Management systems standards usually apply to companies rather than to their individual products. Compliance with a management system standard tells you how that company works, but does not tell you anything about a

specific product, so a product can only be certified as to its properties rather than the way it was produced. However, the overwhelming view of the industry meeting held on 25 September 2009 was that any standard for the film industry should be able to be applied to a specific film as well as to a company working in the film industry. The drafting group's view was that because of the long and often complex life-cycle of a feature film, it does not make sense to give a film a 'green badge', but it should be possible for producers to include a claim, as part of a film's credits, along these lines – "This film was produced by [insert name of organization], which operates a sustainability management system that conforms to BS 8909".

The industry meeting of 25 September 2009 also discussed how broad to make the scope of the standard – should it aim to include television and all forms of screen-based digital media rather than restricting itself to the film industry, however defined? The view of the meeting was that for reasons of practicality it would be better to work with a drafting group drawn from the feature film industry and to focus on issues of concern to the feature film industry, while recognising that much of what was discussed would be equally applicable to a wider range of screen media. The ambition is that, over time, BS 8909 will provide a useful template for other screen media.

Finally, the strong view of the UK Film Council was that any standard must be sufficiently clear in its language and straightforward in its implementation to be of practical benefit to any film-related business, large or small, that is concerned about its environmental social and economic impacts. In other words, the scope and purpose of BS 8909 must be congruent with common sense. At the same time, standards are necessarily written in a formal and concise way that may need clarification. These guidance notes are intended to help readers make sense of the standard and are based on two review meetings held while the draft was being written, by inviting comments on the standards when it was still in draft form, and by asking a range of industry organisations to 'trial' it. These organisations included a major studio, a production company, a distribution company and a multi-screen cinema. But the most valuable guidance will come from the practical experience of companies as they implement the standard over time. The BFI, the industry bodies involved in the drafting of the standard and a number of companies have all indicated that they will take steps to disseminate further guidance and case studies as the standard is used.

5. DRAFTING BS8909

The membership of the drafting group was as follows:

BFI
Cinema Exhibitors Association
Federation of Entertainment Unions
Film Distributors Association
Film Export UK
Production Managers Association
UK Film Council
UK Screen Association

BSI officials
Co-opted sustainability experts

Association of British Certification Bodies

John Newbiggin, independent Chair

Other people with relevant professional expertise and with practical experience of implementing other BS standards were occasionally invited to meetings of the drafting group. An initial draft was circulated to industry organisations during the summer of 2010, and the resulting comments incorporated into the draft.

Notes on the clauses of the draft Standard

SCOPE

1c explains that the standard can either be self-certified or, if the user chooses, can be independently certified by an external assessor.

The final sentence, limiting the scope of BS 8909 to development, production, distribution, exhibition and archiving of film is included because the unanimous view of the initial industry meeting, endorsed by the drafting group, was that it was better to start with a standard that focused on the feature film industry, drafted by professionals with experience of that industry and focusing on issues of relevance to it. In fact, almost every aspect of the standard could apply equally to TV production or to commercials and the hope is that, in time, it will provide the basis for closely linked standards that apply across a wider range of the screen industries.

TERMS AND DEFINITIONS

The definition of 'film' is to make it clear that BS 8909 has been drafted by and for the feature film industry. This definition is an adaptation of one used by the BFI.

REQUIREMENTS

3.1 makes clear that implementing BS 8909 is to go on a journey; your management system may be very simple and basic to start with – the aim should be to “maintain and continue to improve” it and your organisation’s sustainability performance.

3.2 indicates that the requirements of BS 8909 apply only to the “film-related activities and functions” of companies whose activities may include other work in other media.

3.3 indicates that a participating company should set out its sustainable development principles in some form of documentation. While this is most likely to be a written document, the drafting group felt it important not to preclude the use of visual, audio or online material. As in 3.1 this may start with something very brief and simple but, over time, it would be expected to become more comprehensive and sophisticated. The final sentence of 3.3 talks about ‘purpose’, ‘values’, ‘objectives’ and ‘targets’. Several of the trial organisations felt unclear about how to distinguish between these four elements. **Appendix 1** offers examples of how companies have approached this.

3.4 and **3.5** set out the issues a company needs to bear in mind if it is to develop a systematic approach to sustainability. That does not mean everything needs to be done at once. For example, 3.4.1 requires you to take into account “supply chain organisations”. A decision will need to be taken as to how long a list of such organisations it makes sense for you to track initially and how far along the supply chain it is realistic for you to look even if, over time, your ability to monitor the activity of your suppliers improves. (3.7.6 sets out ways in which you can build up your systems for supply chain management.) Similarly, 3.5.1 (b) (6) requires you to consider “protection of habitat”. This may not be of immediate significance to your company, but if you were to be involved in a location shoot in an environmentally sensitive area, it obviously would be. Part of one studio’s approach to 3.4 and 3.5 is

to prepare a short document, setting out the company's commitment, which all crew members and freelancers involved in a production would be required to read and sign at pre-production stage. This would be based on the studio's statement of its sustainability policy, shown in **Appendix 2**.

PLANNING

This is the core of the Standard but, as noted above, while it lists the issues that you need to bear in mind when your company goes about its business – it does not assume you will immediately have a fully developed policy for each issue.

For example, 'community relations' is included as one of the social impacts that businesses in every part of the industry should be aware of. This is not intended to impose an obligation to positively improve community relations in the immediate area where a company's activities take place but an obligation to avoid negative impact on community relations. However, over time a company committed to sustainability may wish to develop a programme of corporate social responsibility that does have the intention of making a positive contribution to the life of the community in which it is located.

Similarly, a reference to 'slave labour' is included because there have been examples of film production companies being offered the use of convicted prisoners as extras without any assessment of whether the people in question are willing participants or not. Convenient and cost-effective though such an arrangement might be for a production company, one that is committed to BS 8909 should not find it acceptable. 'Fair wages' and 'child labour' are more typical employment issues on which film businesses committed to sustainability should develop clear policies.

Organisations that have trialled BS 8909 have proposed a variety of systems to tackle the requirements of **3.5**, including, for example, setting up facebook and twitter communities to build up lists of stakeholders; holding staff meetings; working with lawyers to ensure appropriate contracts for employees and suppliers; appointing their own sustainability manager, charged with producing short guidance notes for staff and freelancers; seeking advice from a specialist consultant on setting targets and keeping abreast of new domestic and European legislation. Some companies have found that this section of BS 8909 offers a coherent way of pulling together and integrating a variety of policies that they already have. **Appendix 3** includes a list of stakeholders compiled by a distribution company as their starting point in implementing 3.5.

3.5.4 sets out the way in which the Standard is intended to help companies improve their performance over time. A key element here is the need to "implement and maintain documented objectives" – a company committed to BS 8909 would be expected to have some record of that commitment and how it intends to implement it. This might be in the form of minutes of company meetings, an annual report, or a policy document that is reviewed regularly. Two key elements are in point (j) which talks about companies setting targets that include "the greatest improvement practicably possible, within the objective's timescale and the organisation's capacity to address" – here again, the emphasis is on common sense; it is better for companies to set themselves targets they feel they can realistically achieve in the short term with the aim of raising performance incrementally as the BS 8909 processes become more integrated into the day-to-day life of their business.

3.5.4 (k) reminds companies that environmental, social and economic standards are on a constantly rising ratchet because of present and future UK and EU legislation, so it encourages companies to plan their work practices and any investment in goods and services in a way that ensures they do not get caught out by changes in legislation.

Some companies have commented on the difficulty of devising practical policies for addressing the issue set out in **3.5.5**, 'Dealing with modified activities'. Production companies and studios comment that by far the most cost and time-efficient way of implementing the provisions of 3.5 is to take its requirements on board when projects are at pre-pre-production or pre-production stage and that after that time, at least in the initial stages of implementing the standard, a company can only commit to using its "best endeavours" to work in a sustainable way.

EVALUATION

3.6 requires companies to set up their own system for reviewing progress, a reference to the fact that the Standard is voluntary – it helps those who want to help themselves, rather than being an imposition of external obligations and benchmarks. The important point is that, however it's done, there must be a demonstrable and verifiable system in place to evaluate, on a regular basis, how the organisation is matching up to the goals it has set itself.

IMPLEMENTATION

According to their size, trial organisations have considered a wide range of approaches to actual implementation, for example;- appointing a member of staff as a sustainability manager; holding company meetings to agree policies and targets; establishing a Sustainability Committee to meet quarterly with particular input from facilities managers, health and safety officers and HR staff. Some companies have stressed the desirability of spreading responsibilities for particular issues between members of staff so that burdens of implementation do not all fall on one or two people. One small company proposes documenting tasks and feedback on Dropbox and maintaining a 'task board' on their office wall so that any member of staff would know to refer to the correct Dropbox folder and check that they are working in line with company policy.

Another trial organisation broke down its roles and responsibilities into lists of simple, clearly defined operations, for example; "only switch on AC one hour before the first show".

Implementing the supply chain management's obligations of **3.7.6** presents particular challenges for some sectors of the industry. One studio proposes devolving responsibility to each department, acknowledging that departmental heads tend to have their own established networks of favoured suppliers. This would allow department heads to decide how to monitor supplier compliance, whether by requiring suppliers to sign a sustainability policy along with the standard health and safety requirements, or to mandate a "best endeavours" commitment from each supplier. In a similar approach, another organisation proposes to have what it calls 'informal' reviews and audits of supplier compliance carried out by its health and safety officer, with a view to working towards a situation in which it would be practical to write sustainability specifications into supplier contracts.

Some companies feel that the terms of **3.7.8** on documentation and record keeping are too onerous, but the intention of this clause is simply to ensure that whatever record keeping and documentation a company feels is appropriate for its size and scale of activities is systematically stored so as to demonstrate incremental improvement in fulfilling the overall obligations of BS 8909.

MONITORING AND REVIEWING

Most companies see spot checking as the most effective and cost-effective means of checking compliance and progress within their organisation and that the basic approach should be at least as much about instilling a positive culture within the company as it is about correcting failures. For example, one studio proposes a ‘pep talk’ for all crew and freelancers on the significance of sustainability by the First AD before a film goes into production. In a similar vein, several companies emphasise the importance of regular reviews as a means of learning lessons and thereby improving performance over time. **Appendix 4** sets out what one company intends to review each year to check that its management system is working.

Some companies have felt that there is confusion between the requirements set out in **3.8.4** for ‘Management system audit’ and the requirements of **3.9** for ‘Management review’. The intention of 3.8.4 is to review managements systems at appropriate points in the organisation’s natural life cycle (for example after a production has been completed) to ensure that the systems in place are delivering the necessary *outcomes* in terms of achieving targets that have been set or improving the overall sustainability performance of the company. The intention of 3.9 is to review management systems regularly (probably annually) to ensure that the necessary *processes* are in place to deliver improvement and that they are working effectively. Appendix 3 shows that this, for example, might include reviewing “whether staff sustainability workload is impractical”. Many companies will find that, in practice, there is little distinction between the requirements of 3.8.4 and 3.9 – by doing one they are also fulfilling the requirements of the other.

Appendices

Appendix 1

Definitions of purpose, principles, values & activities

The following Eco Age definitions and examples for clause 3.3 of BS 8909 have been approved by BSI:

Statement of purpose e.g. *Dogwoof Films releases films nationwide (UK), acquiring all rights for exploitation through theatrical, DVD, TV, Mobile and Online platforms, backing their releases with major marketing campaigns.*

Sustainable development principles: e.g. Integrity, Inclusivity, Transparency, Stewardship (see Appendix A2)

Values are based upon the organization's sustainable development principles and should bridge the gap between **principles** and **activities, objectives** and **targets** e.g. if the **principle** is *inclusivity* the **value** might be *stakeholder engagement* and the subsequent **activity** might be *stakeholder engagement workshops*. The **objective** might be to *'undertake stakeholder engagement with film audience communities including NGOs'* (to discuss organisation's current sustainability performance and get feedback) and the **target** might be *'undertake one stakeholder engagement workshop with the Ealing local community bi-annually'*

Values are not specific; rather they describe what is important to an organization in terms of an ethical / moral / environmental / creative viewpoint. Examples of **values** include *inspiration, community, fairness, responsibility, opportunity, creativity*

Appendices

Principle	Value	Objective	Target	Comment
Inclusivity	Stakeholder Engagement	undertake stakeholder engagement with film audience communities including NGOs'	Undertake one stakeholder engagement workshop bi-annually	
Stewardship	Leadership	Undertake regular environment impact / risk assessment		
Integrity	Responsibility	Minimise contribution to climate change	Reduce Carbon Footprint by 10% by 2015 (based 10:10 campaign)	
Stewardship	Supply Chain	Source suppliers based on their co-operate responsibility, environmental impact and quality of service	Incorporate sustainability requirements for all partners / suppliers in all tender and contracts documents by end 2011	
Transparency	Building Confidence	Regular updates to Stakeholders	Newsletter - alternative months	
Stewardship	Inspiration			Dogwoof is committed to innovation and believes that creativity and inspiration should go hand-in-hand with developing their business. We listen and are inspired by the ideas of our audiences, filmmakers and all our stakeholders in order to grow creatively.
Stewardship	Creativity			

Appendix 2

Draft Sustainability Policy

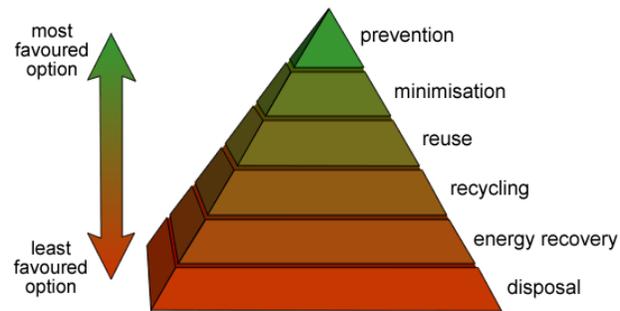
Ealing Studios is committed to leadership in sustainability in the film industry, by developing and producing exciting films in a sustainable manner and continually improving our sustainability performance. While striving for creative excellence, we aim to minimise negative sustainability impacts and maximise positive sustainability impacts of our activities on the environment and society.

- We aim to minimise resource use (e.g. energy, water etc) and where possible, measure our sustainability impacts
- All goods and services will be procured from companies with good ethical and environmental policies, and where possible, this should be a contractual requirement.
- Unnecessary travel will be avoided – flexible working, online meetings, conference calls are to be encouraged to support our staff and freelancers to move up the transport hierarchy:

An example of a "green" transport hierarchy:



- Waste will be minimised, recycled where possible and disposed of efficiently and ethically when no other option for re-use and recycling is available, as per the waste hierarchy:



- All recruitment should be undertaken without prejudice and all staff and freelancers should be paid a living wage¹.
- Health and Safety and Child Protection policies should be adhered to at all times
- This policy should be reviewed in conjunction with our Health & Safety Policy, Child Protection Policy, Environmental Policy and Green Travel Policy.

¹ An hourly rate, set independently, every year (by the GLA in London). It is calculated according to cost of living and gives the minimum pay rate required for a worker to provide their family with the essentials of life. In London the current rate is £7.85 per hour.

Appendix 3

One distribution company that participated in the BS 8909 trials listed the following stakeholders –

The Board of Directors

Communities

Facebook community

Twitter followers

Mailing list

Suppliers

Stationery

Printers

DVD manufacturers

DVD retail partner

DVD authoring

Designers

Film makers

Festivals

Ambassadors

Cinema Exhibitors

Press

Outreach partners

Official partners (e.g. bank)

Audiences

DVD owners

Appendix 4

One company involved in the trials of BS 8909 proposes to audit the effectiveness of its sustainability management systems by checking, annually, the following issues:-

- How effectively stakeholders are responding to sustainability messaging
- The level of improvement in sustainability for the organisation
- The frequency of messaging to stakeholders
- Whether staff sustainability workload is practical
- Whether the management system is based on systematic feedback regarding sustainability performance