

## **ENVIRONMENTAL POLICY**

### **Background and Exhibits**

Once your facility has its EMS Team (the EMR, EMS Coordinator, and CFT) trained and in place, the next step is to create a working draft of your facility's environmental policy. As your EMS Team moves forward, the policy should serve as the foundation for your EMS and provide a unifying vision of environmental principles that will guide the actions of employees and management. This policy statement should provide the framework for setting environmental objectives and targets.

The EMS policy should set out the facility's overall commitment to a cleaner environment. Examples of commitments that should be stated in your EMS policy are those presented by EPA's Performance Track program:

- Compliance with legal requirements and any voluntary commitments;
- Pollution prevention;
- Continuous improvement in environmental performance, including areas not subject to regulations; and
- Sharing information about environmental performance and the operation of your EMS with the community.

### **Points to Consider When Developing Your Policy**

- Your facility probably has some type of environmental policy now, even if it's not written down. For example, your facility is probably committed to complying with the law and avoiding major environmental problems, at a minimum. Document existing commitments and goals as a starting point.
- For many facilities, the EMS Team will draft the environmental policy at the start of the EMS implementation process. This early draft will provide focus and guidance as the EMS Team does its planning. The EMS Team will then revise the draft policy after the facility establishes its EMS objectives and targets. Top management should review and sign at least the final draft of the environmental policy, but ideally should review and sign both the initial and final drafts. While it is up to your facility to determine the schedule for reviewing and revising your environmental policy, this should be done at least annually.
- The environmental policy should relate to your activities, products, and services.
- The environmental policy can be a stand-alone document or it can be integrated with your health and safety, quality, or other organizational policies.
- 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 this commitment is being met.
- Keep your policy simple and understandable. Ask yourself what you are trying to achieve and how you can best communicate this to the rest of the facility. Test simplicity and clarity by asking, "Could our employees describe the intent of our policy in twenty words or less?"
- Before finalizing your environmental policy, consider the results of establishing your facility's objectives and targets (see Module 6) so that it reflects consistency with those.

- Make sure top management commits to the environmental policy statement. The facility's president should sign and date it. The final environmental policy statement should be posted or distributed to employees and other interested parties.
- Make sure that your employees receive and 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 if they know there is an environmental policy, 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, in annual reports, and on a facility Web site (if you have one). You might choose to communicate the policy proactively and/or in response to external requests. This decision should be factored into your overall strategy for external communication (see later discussion in Module 9).

Refer to *Exhibit 3-1: Summary Checklist* for a set of steps that can help you begin the process of developing an environmental policy. Customize the text provided in *Exhibit 3-2: Environmental Policy Template* to fit your facility's needs.

### **Exhibit 3-1: Summary Checklist**

#### **ENVIRONMENTAL POLICY**

Step 1: Define an EMS policy to be endorsed by top management that is appropriate to the nature, scale, and environmental impacts of the facility's activities, products, or services, and that includes commitments to: comply with legal requirements and voluntary commitments; pollution prevention; sharing information on EMS performance with the community; and continuous improvement in environmental performance (including areas not subject to regulations). The policy also must provide a framework for setting and reviewing environmental objectives and targets.

Step 2: Using *Exhibit 3-2: Environmental Policy Template*, develop an EMS policy for your facility (see *Example 3-1: Sample Environmental Policies*). Include this signed policy in your EMS manual (see *Exhibit 10-3: EMS Manual*).

### **Exhibit 3-2: Environmental Policy Template**

It is the policy of **[Facility's Name]** to conduct its operations in a manner that is environmentally responsible and befitting of a good corporate neighbor and citizen. In accordance with this policy, **[Facility's Name]** complies with all environmental laws and manages all phases of its business in a manner that minimizes the impact of its operations on the environment. To further this policy, **[Facility's Name]** shall:

1. Comply with applicable environmental laws and regulations and voluntary commitments to which the facility subscribes.
2. Eliminate, or reduce to the maximum practical extent, the release of contaminants into the environment, first through pollution prevention (material substitution and source reduction), then recycling, and finally through treatment and control technologies.
3. Effectively communicate with facility employees, suppliers, regulators, and customers, as well as the surrounding community, regarding EMS performance.
4. Periodically review and demonstrate continuous improvement in the facility's environmental performance, including areas not subject to regulations.

## Examples

*Example 3-1: Sample Environmental Policies* presents two environmental policies that specialty-batch chemical manufacturing companies have developed.

### Example 3-1: Sample Environmental Policies

#### **Environment, Safety and Health Policy**

Our Environmental, Safety, and Health Policy is based on the principle that excellence in these areas maximizes the long term value ABC Company brings to our employees, our communities, our customers, our shareholders and the environment. We ensure leadership through concern for this key area of performance in our culture, in our strategies, in our plant and process design and operation, and in our product design, presentation, transportation, and technical support.

#### **Policy**

We will maintain strict compliance with the laws of the countries in which we operate.

We will comply with the policies and procedures of our shareholders in the plants where we have guest operations.

We will manage our products and our plants to meet the Principles of Responsible Care®.

We will make every effort to contribute to Sustainable Development by continuing to provide products that are essential for, and produced in a way that balances, economic, social and environmental progress.

The bases of our operating philosophy are:

- We will be recognized leaders in our industry in the development and commercialization of cost effective products and process that have value to our customers, are safer to produce and/or handle, and have a lower impact on the environment and its sustainability.
- We will create a working environment where all our employees seek to drive even lower the potential for injuries and health risks to themselves and their colleagues, to

our contractors, to the communities in which we operate or through which our products are transported, and to our customers. We will do this through continuously improving our plant designs, our working practices, and the training we give to all involved with our products and processes.

- We will continuously improve the environmental performance of our operations, and consider the long term cost and benefit when making decisions about investment. We will share information on our environmental performance with the community upon request.
- We will have a positive impact on our local communities through stringent control and reduction of emissions, through partnerships to improve awareness and emergency preparedness, and through partnerships to improve the local environment.



First Name Last Name  
Chief Executive Officer

**Environmental Policy Statement**

EFG Company recognizes that protecting and maintaining the quality of the environment is an integral part of the company's operations. It also acknowledges its duty to ensure that raw materials, products, and wastes are handled, transported, used, and disposed of safely and without unacceptable risk to the environment. It is therefore the responsibility of all employees and the company itself to ensure that this is adhered to and specifically it shall;

Comply with all legal requirements and voluntary commitments established to protect the environment.

Maintain proper records and documentation concerning activities relating to environmental matters.

Respond positively to any expression of public concern or inquiry and investigate fully any substantive complaint.

Participate with government, industry, and professional institutions and associations in the development of environmental regulations, reasonable environmental standards and improved environmental control technology.

Use its Research and Development facilities to further improve its processes and operations.

Promote an awareness of environmental protection associate with the operations among all employees and provide appropriate training to those responsible for implementing environmental control measures and for those whose particular areas have the potential to cause environmental damage.

Furthermore EFG is committed to continual improvement in the environmental performance of the company and shall to the best of its ability;

Promote pollution prevention and take steps to conserve resources through energy conservation and recycling.

Implement, maintain, and continuously improve an effective environmental management system.

Regularly communicate our environmental performance with all employees and neighbors.

First Name Last Name  
Chief Executive Officer