

COMMUNICATION

Background and Exhibits

An EMS should define the means for proactive internal and external communication. Internal communication should identify, explain, and communicate environmental legal requirements and voluntary commitments to all employees, on-site service providers, and contractors whose work could affect your ability to meet those requirements and commitments. Refer to ***Exhibit 4-2: Procedure for Identification of Legal and Other Requirements (EP-001)*** to identify legal requirements and voluntary commitments that may be relevant to your facility. External communication should provide other stakeholders with information on your environmental programs and accomplishments and provide a means for external parties to comment or provide input to you.

Working with Stakeholders

Stakeholders include anyone who has a stake in your facility's environmental performance. Internal and external stakeholders can play an important role in helping our facility develop an EMS. Employees have a strong stakeholder interest in your facility and can provide strong support for EMS development. Customers, suppliers, and neighbors also can provide useful inputs. In addition, establishing partnerships with trade associations, suppliers, professional associations, and universities can be very helpful in developing parts of your EMS. This module will help you identify the kinds of stakeholders you may wish to include in the process, the potential benefits of including stakeholders, and tips for better communication with stakeholders. While employee involvement is critical to the success of your EMS, how far you proceed with including additional stakeholders is your decision.

Identifying and Understanding Stakeholders

Almost every facility will have a wide array of internal and external groups that may be interested in, and helpful partners to, that facility. These groups will not be homogenous. Each will have its own priorities and perspectives and each will have something different to contribute in support of your EMS. Part of communication is identifying and understanding these parties over time. Two types of stakeholders are discussed in this module: internal and external. Examples of internal and external stakeholders are provided below.

Internal stakeholders include:

- Employees;
- Shareholders;
- Customers;
- Suppliers;
- Investors and insurers; and
- Trading partners.

External stakeholders include:

- Neighbors;
- Community organizations (such as Community Advisory Panels [CAPs]);
- Non-governmental organizations (NGOs);
- Government organizations;
- The media; and
- The general public.

You may want to start by communicating with those stakeholders who have expressed interest in your operations. If you desire additional input, you might take the following steps in your effort to locate suitable stakeholders:

- Ask your employees, including facility/site managers and public relations personnel;
- Obtain suggestions from local officials;
- Contact a local planning agency for suggestions; and
- Get input from a national advocacy group regarding local or national groups that may be interested/suitable.

Stakeholder Roles

Before engaging stakeholders, be clear on what you expect their role to be. Consider why you want to include internal and external stakeholders and what roles they can play. What do you want from them? What do they want from you? What do you intend to tell them? Consider the following:

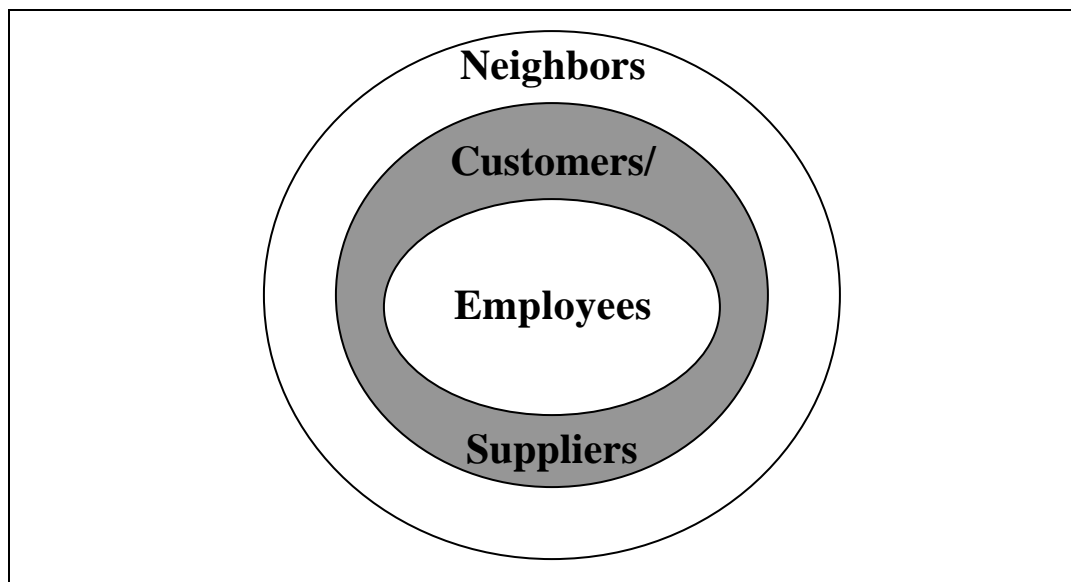
- Internal stakeholder (e.g., employee) participation can facilitate implementation of environmental projects as employees “take ownership” of the EMS and the changes it may bring;
- Different stakeholders bring useful perspectives to environmental issues, often identifying issues that may otherwise have been overlooked;
- Participation by all types of stakeholders can add credibility, transparency, and value to your EMS;
- Involving external stakeholders can help them understand your facility’s operating constraints;
- Being an environmental leader may lead to customer recognition and loyalty, and involving customers in your EMS can help them recognize your leadership; and
- Forming partnerships with customers and suppliers can help to identify shared concerns and ways to cooperate to resolve them. There may be ways that your facility can help your customers meet their environmental management needs. Forming partnerships with suppliers can help your facility obtain important information and may help you meet your EMS goals.

How to Work with Your Stakeholders

The next stage of the process is to communicate with stakeholders. This provides an opportunity to further refine your understanding of their interests.

Develop stakeholder participation in stages and learn as you go. You might think about the different kinds of stakeholders as forming ever-broader circles around your business, as is illustrated in *Exhibit 9-1: Levels of Stakeholder Interest*. Begin with the innermost circle and work outward.

Exhibit 9-1: Levels of Stakeholder Interest



Create and maintain a list (see *Example 9-2: Communications Program Matrix* for a sample list) of everyone you can think of who would be interested in your facility's environmental activities and how you can reach them (for example, if you already have established ways of communicating with certain groups, you might start with those). You can then make a decision about where to begin. You can start with staff and later add other stakeholders if that suits your capabilities and needs. It is helpful to make your communication list as complete as possible and then pare it down to a manageable list as you begin. Start small then expand, using your list, when ready.

Your stakeholders' concerns may be very different from what you expect and may be less difficult to resolve than you may think. The only way to find out is to talk with them.

When working with either internal or external stakeholders, effective communication will facilitate smooth implementation of your EMS. You will want to follow these rules of communication.

1. Begin early in the process. Let people know what you are doing. In most cases, you will need the cooperation of several people within your facility to gather information and develop an EMS that works. In small and large facilities, early communication will pay off in greater acceptance of the resulting system.

2. Set communication objectives. Decide what you want to achieve. Setting goals will help you get the right message across without overwhelming people with too much information, spending too much time, or missing the mark. It is helpful to create an EMS communication procedure for your facility. The procedure should outline what kinds of information will be communicated to external stakeholders and how the facility will document and respond to communications from external stakeholders. It should include communication for emergency preparedness and response stakeholders. It should also address internal stakeholder communication principles.
3. Communicate regularly and integrate EMS communication with other efforts. To build support for the EMS, communicate on a regular basis. Some simple means of regular communication can usually be accomplished without straining resources — for example, use existing channels of communication such as bulletin board postings, email messages, or articles in the facility newsletter. Don't forget to consider direct word-of-mouth communication, particularly in smaller facilities. Talking directly with key individuals at regular intervals may be the best mechanism for ensuring good communication. Use existing channels of communication to communicate your EMS activities.

Consider various methods of regular communication with stakeholders about your facility and your environmental efforts and goals. These methods can build on existing methods, such as:

- Discussing the EMS at facility meetings;
- Updating the facility Web site to communicate your environmental policy and other important elements of your EMS and to solicit comments and suggestions;
- Including EMS information in your annual report;
- Scheduling tours of your facility;
- Producing a fact sheet about your facility's activities, the EMS program, and why and how your facility would like to include stakeholders;
- Establishing a phone line to answer questions, record concerns, etc.;
- Starting a community advisory panel (for more information about community advisory panels [CAPs] visit the American Chemistry Council Web page at <http://memberexchange.americanchemistry.com/852567F500451442/0/9E65CE0E79FABE6985256A54006AE422?Open>); and
- Holding public meetings when you feel it is appropriate.
 - Ensure that stakeholder dialogue is a two-way process. The stakeholders will want to know that their comments and concerns are being heard and taken into account. Convey that your facility is genuinely interested in their input and explain how you will include them.
 - Consider assigning responsibility to a lead person for external communications (communications liaison). There also should be two back-up employees that could fill-in when the lead person is absent. The facility should choose people for these roles who have experience in communicating effectively with the news media and the community, and they should be properly trained for this role.
 - Track communication. Develop a procedure for documenting and responding to stakeholder communication. This will help you track input from stakeholders and

document your responses or efforts. Also, appoint a person to be responsible for carrying out your communication procedure.

Refer to *Exhibit 9-2: Summary Checklist* for a set of steps that can help you begin the process of communicating to your internal and external stakeholders about your EMS.

Exhibit 9-3: Communications Program Matrix is provided to help you plan your outreach to various stakeholders. You can customize the procedure provided in *Exhibit 9-4: Procedure for Communication with Stakeholders (EP-004)* and the supporting form, External Stakeholder Communication Record (EF-004.01), to begin the development of your communication system with outside parties.

Exhibit 9-2: Summary Checklist

COMMUNICATION

- Step 1: As part of your EMS, define the means for proactive internal and external stakeholder communication. Internal communication should explain legal requirements and voluntary commitments to employees and contractors. External communication should provide information on environmental programs and accomplishments and provide a means for external parties to comment. Use *Exhibit 9-3: Communications Program Matrix* to identify stakeholders (internal and external) and assess key concerns or interests. Determine, using this matrix, methods and responsibilities for ensuring this information is communicated (see *Example 9-2: Communications Program Matrix*).
- Step 2: Using *Exhibit 9-4: Procedure for Communication with Stakeholders (EP-004)*, document the processes for internal environmental communication/awareness within your facility and external environmental communication (see *Example 9-1: Case Study—Working with Stakeholders*). Include this customized procedure in your EMS manual (see *Exhibit 10-3: EMS Manual*).
- Step 3: Consider a process for external communication of your facility's significant environmental aspects and record your decision in your EMS manual (see Section 11 of *Exhibit 10-3: EMS Manual*).

Exhibit 9-3: Communications Program Matrix

| Stakeholder(s) | Potential Environmental Interest | What We Want to Tell Them | What We Want Them to Tell Us | How We Will Communicate With/Tell Them | When We Will Do It | Person Responsible |
|-----------------------|---|----------------------------------|-------------------------------------|---|---------------------------|---------------------------|
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Exhibit 9-4: Procedure for Communication with Stakeholders (EP-004)

1.0 Purpose/Scope

This procedure defines the process for:

- a) Internal environmental communication/awareness within [**Facility's Name**]; and
- b) External environmental communication between [**Facility's Name**] and external interested parties, such as regulatory authorities and the public/local community groups.

2.0 Activities Affected

All areas and departments.

3.0 Forms Used

External Stakeholder Communication Record (EF-004.01)

4.0 References

- 4.1 Environmental Policy
- 4.2 Procedure for Identification of Legal and Other Requirements (EP-001)
- 4.3 Procedure for Obtaining Agency Approval (EP-002)
- 4.4 Procedure for Environmental Aspects, Objectives and Targets, and Programs (EP-003)
- 4.5 Procedure for Environmental Management System Management Review (EP-006)
- 4.6 Procedure for Emergency Preparedness and Response (EP-007)
- 4.7 Procedure for Environmental Training and Awareness (EP-008)
- 4.8 Procedure for Contractors and Sub-contractors (EP-016)
- 4.9 Procedure for Document Control (EP-014)
- 4.10 ISO 14001:1996, Element 4.4.3

5.0 Definitions

External Communications: written or electronic correspondence, telephone conversations, and discussions or meetings with anyone external to the facility.

6.0 Exclusions

None

7.0 Procedure

- 7.1 Internal Communications/Awareness
 - 7.1.1 Internal environmental communications shall be implemented to ensure those personnel at each relevant level and function are aware of the following:
 - 7.1.1.1 The Environmental Management System;
 - 7.1.1.2 The importance of conformance with the environmental policy, procedures, and system;
 - 7.1.1.3 The potential consequences of system non-conformances;

- 7.1.1.4 Individual roles and responsibilities in achieving conformance with procedures, including emergency preparedness and response; and
- 7.1.1.5 The significant environmental aspects associated with work activities and the environmental benefits of improved personal performance.
- 7.1.2 Internal environmental communications may be accomplished by the use of:
 - 7.1.2.1 Notice boards;
 - 7.1.2.2 Awareness training of facility personnel, as appropriate in line with job function;
 - 7.1.2.3 Environmental training of relevant job functions, as appropriate (see Procedure for Environmental Training and Awareness);
 - 7.1.2.4 Newsletters;
 - 7.1.2.5 Electronic notes;
 - 7.1.2.6 Team meetings and meeting minutes;
 - 7.1.2.7 Management reviews and meeting minutes; and/or
 - 7.1.2.8 Corrective Action Requests.
- 7.1.3 Communication of environmental issues from employees to top management shall be handled by the Cross Functional Team (CFT) member representing the affected area, in coordination with the Environmental Management Representative (EMR). These communications shall be documented.
- 7.1.4 Communication of changes to legal and other requirements to employees shall be handled by the Area or Department Manager or designee. These communications shall be documented.
- 7.2 External Communications
 - 7.2.1 External communications concerning the environmental aspects of the facility should be directed to the lead community liaison person (the plant manager, plant supervisor, production supervisor, health, safety and security manager and the EMR are some likely choices for the lead community liaison role) or his designee.
 - 7.2.2 The lead community liaison person or his designee is responsible for responding to inquiries from interested parties and regulatory agencies.
 - 7.2.3 The lead community liaison person or his designee is responsible for sending current copies of the environmental policy to interested parties. These requests will be documented on the External Stakeholder Communications Record (EF-004.01).
 - 7.2.4 The lead community liaison person or his designee is responsible for responding to media communications.
 - 7.2.5 When community concerns relate to an environmental emergency, the Procedure for Emergency Preparedness and Response (EP-007) shall be implemented.
 - 7.2.6 The EMR in consultation with the lead community liaison person is responsible for determining the need for and preparation of any notification to regulatory agencies on an as needed basis.

8.0 Frequency
Ongoing

9.0 Records
Records shall be retained consistent with the Procedure for Environmental Records (EP-005).

Record of Revisions

| Revision Date | Description | Sections Affected |
|---------------|-------------|-------------------|
| | | |
| | | |
| | | |

External Stakeholder Communication Record (EF-004.01)

| | |
|--|-------------------------------|
| Date _____ | Contact Name(s): _____ |
| Time _____ | _____ |
| Type of Contact: Meeting _____ Email/Letter _____ | Person Completing Form: _____ |
| Telephone _____ | _____ |
| Other (describe): _____ | |
| _____ | |

Environmental Issue/Concern:

Actions to be Taken:

Type of Follow-up Required:

Examples

Example 9-1: Case Study—Working with Stakeholders shows how “ABC Chemical Company” set up a Community Advisory Panel as an important link between the facility and their neighboring communities.

Example 9-2: Communications Program Matrix shows an example of how to complete the matrix presented in *Exhibit 9-3: Communications Program Matrix*.

Example 9-1: Case Study—Working with Stakeholders

Case Study: ABC Chemical Company—Working With Stakeholders

The chemical industries Responsible Care initiative requires its member and partner companies to develop mechanisms for outreach with the communities in which they operate. The Community Advisory Panel (CAP) concept is, in part, an outgrowth of the Responsible Care initiative. CAPs can serve as important links between chemical facilities and their neighboring communities. They continue to grow in importance as a way to improve the dialogue between plants and local communities, while building mutual respect and trust.

In 1996, the ABC Chemical Company plant in Hometown, Michigan started a community advisory panel (CAP). In 1998, the CAP added several new members, including the local fire chief, a doctor, a member of the clergy, a teacher, and a student. These changes revitalized the group, and the panel began to take a more active role with the facility and the community. The panel was involved in the Responsible Care[®] Management Systems Verification (MSV[®]) process when ABC Chemical decided voluntarily to open up this process to the CAP. CAP members were able to communicate the public viewpoint of the facility during this MSV[®] process. The CAP also was responsible for helping to construct the Hometown Middle School Environmental Center. This building allows students to observe animal behavior and to see how nature operates on a daily basis. ABC has also worked to involve the CAP in community activities. The group works with the facility to staff a company display at the local chamber of commerce exposition and was an integral part of ABC Chemical Company’s Risk Management Program (RMP) presentation. CAP members have also assisted in developing company presentations and have participated in the RMP community event. Emergency response has also been a focus of the CAP. The panel has worked with ABC Chemical and local emergency responders to distribute information about a county-wide emergency response drill.

Example 9-2: Communications Program Matrix

| Stakeholder(s) | Potential Environmental Interest | What We Want to Tell Them | What We Want Them to Tell Us | How We Will Communicate with/Tell Them | When We Will Do It | Person Responsible |
|-----------------------|---|------------------------------------|--|---|--|---|
| Employees | <ul style="list-style-type: none"> • Safety for workers • Protection of the environment • Competitiveness | Environmental policy | How to get it done | Memo, bulletin board, meetings, suggestion box, Intranet | Initial training for new employees, EMS update at annual picnic, as needed via training program for specific workers | EMR, CFT, and training personnel |
| Neighbors | <ul style="list-style-type: none"> • Expansion of facility, near residences • Run-off into creek behind waste water treatment plant | Environmental policy and EMS plans | Their environmental concerns, particularly regarding planned expansion | Meetings, open house, flyers, suggestion box, Web site | Town meeting in November (for expansion discussion) Annual open house Web site (ongoing) | EMR with communications representative (as appropriate) |
| Customers | <ul style="list-style-type: none"> • Major client considering requiring EMS for suppliers | Environmental policy and EMS plans | Specific EMS requirements that might ensue | Above, plus inserts in direct mail advertising, or invoices and on our Web site | Ongoing and as billing occurs | Marketing lead and facility president |