

Part I: Steps of an Environmental Management System

Define the Scope of Your Facility's EMS and Assign Responsibilities

What

An EMS' scope is how much of a facility's activities the EMS covers. For example, the scope of your facility's EMS may be all of the operations occurring on site at the plant—from the point of entry of raw materials and energy to the point of exit of finished products. Or, your scope may extend even further to include your suppliers and contractors. EMS responsibilities should be assigned to individuals who can competently complete the tasks.

Who

While your facility's characteristics will determine who should be responsible for implementing your EMS, the following concepts are common across all facilities:

- One person can't develop and implement the entire EMS. An EMS involves everyone.
- Managers must reinforce the importance of EMS tasks.
- Employees with EMS responsibilities must know that they have management support.
- Authority and resources must be made available to employees with EMS tasks.

- Managers should evaluate each employee's performance of their assigned EMS duties.
- EMS assignments should be put in writing (see Sample Form 1: EMS Responsibilities, on the next page).

Select an EMS Team, made up of the following people:

- **Environmental Management Representative (EMR):** The EMR is a member of your facility's top management who: identifies all EMS tasks and makes sure they are completed on time; reports periodically to the management group; and demonstrates top management's commitment to the EMS.
- **EMS Coordinator:** The EMS Coordinator leads the EMS Team and ensures support for the EMS. The EMS Coordinator also makes sure that all EMS tasks are completed and maintains the EMS Manual under the leadership of the EMR. In a small facility, the EMR and EMS Coordinator may be the same person.
- **Cross-Functional Team (CFT):** The CFT is made up of members of each major operation within your facility who represent their area or department in several facets of the EMS and serve as an information resource. The CFT meets regularly.

Sample Form 1: EMS Responsibilities

EMS Function	Name	Regular Position
Environmental Management Representative (EMR)	Simon Cutright	Facility Manager
EMS Coordinator	Carol White	EH&S Manager
Cross-Functional Team	Willie Scott	Manufacturing Supervisor
	Darnell Jenkins	Injection Molding Line
	Julia Jordan	Finishing Line
	Paula Lingo	Packing Supervisor
	Jonathan Ash	Packing Line
	Maria Lopez	Sales Supervisor
	Oz Glenn	Building Maintenance

Why

The scope ensures that your facility's EMS is the right size and assigns responsibility for EMS tasks. Assignments won't get done if employees don't know whose job it is to do them.

How

A discussion between your facility's top manager or owner and key employees will quickly lead to a determination of the scope—what your EMS does and does not cover and why. It is important to assign the members of your EMS Team as soon as possible, as they will play key roles in developing your EMS.

Train employees who are assigned EMS tasks to make sure they are able to carry out their responsibilities. Training can take many different forms—from structured training classes to a two-minute chat once a week—as long as employees understand and can perform their job when it comes to the environment. To find out more on assigning responsibilities, see the "Who" section of each step in this document.

Create Your Environmental Policy Statement

What

An environmental policy states the main environmental commitments of your facility and guides the actions of employees and top management. It also demonstrates your facility's environmental performance commitments to employees, customers, and the public.

Who

Your EMS Team drafts your environmental policy.

Why

The policy sets the standard for how your facility interacts with the environment. It is a statement to employees, customers, and the public on how important the environment is to your facility. It recognizes that environmental performance is an important component of good business decisions.

Sample Environmental Policy

Star Plating is committed to improving the environment. We will do so by complying with all environmental laws and regulations. Star Plating also commits to:

- Minimize the amount of waste generated;
- Ensure the safe disposal of waste;
- Reuse and recycle whenever possible;
- Reduce emissions into the water and air;
- Use energy, water, and metals efficiently throughout our operations;
- Reduce human exposure to toxic materials in the facility and in the community;
- Monitor our environmental performance; and
- Continuously seek opportunities to improve on these principles.

At Star Plating, the environment is everyone's job, because we live here too.

Facility Manager:	Date:	Cross-Functional Team:	Date:
_____	_____	_____	_____
		_____	_____
		_____	_____
		_____	_____
		_____	_____

How

Your EMS Team should develop the policy that outlines your facility's commitment to improved environmental performance. Examples of commitments that should be stated in your EMS policy (as presented by EPA's National Environmental Performance Track) include:

- Compliance with legal requirements and any voluntary commitments;
- Pollution prevention;
- Continuous improvement in environmental performance, including non-regulated areas; and
- Communication with your community about your facility's environmental performance and the operation of your EMS.

Once your EMS Team drafts your policy, they

should sign it. Then, prominently display your policy throughout the facility to remind employees and visitors of your commitment to the environment. You can find interesting ways to remind your employees of the policy, such as printing the policy on T-shirts, coffee mugs, or identification badges. Top management should announce the policy to all workers to demonstrate its business importance.

Treat your environmental policy the same way you treat other types of company policies in decision-making, internal and external communication, implementation, and review. If your facility has a policy for quality control, consider building on it to develop your environmental policy. All employees and on-site personnel must be aware of the policy and implement it as they do their daily activities.