
UNIT 4 ENVIRONMENT MANAGEMENT SYSTEM

Structure

- 4.1 Introduction
- 4.2 The Concept of Environmental Management System
- 4.3 Management System: An Overview
- 4.4 Basic Elements of Environmental Management System (EMS)
- 4.5 Environment Management Systems in Municipalities
- 4.6 Let Us Sum Up
- 4.7 References and Selected Readings
- 4.8 Check Your Progress –Possible Answers

4.1 INTRODUCTION

Environmental Management System (EMS) refers to the management of an organisation's environmental programmes in a comprehensive, systematic, planned and documented manner. It includes the organisational structure, planning and resources for developing, implementing and maintaining policy for environmental protection. The International Organisation for Standardisation (ISO) has defined environmental management system as that “*part of the overall management system that includes organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy*” (ISO, 1996). It provides a systematic way to ensure environmental issues are managed consistently and systematically throughout an organisation. For cities and local authorities, an EMS can assist in comprehensively addressing environmental issues, while achieving increased credibility with key stakeholders, including regulatory agencies and citizens. Effectively applied, an EMS can help integrate environmental considerations with overall operations. It sets out environmental policies, objectives and targets with pre-determined indicators that provide measurable goals, and a means of determining if the performance level has been reached.

An EMS is an excellent mechanism for both understanding and promoting positive change within a city or local authority. It enables private companies, central and state agencies, and other organisations to establish and assess the effectiveness of, procedures to set environmental policy and objectives, achieve compliance, and demonstrate such compliance to others. This is because EMS focuses attention upon a number of critical organisational factors, including productive processes and technologies, management styles and systems, worker education and participation, internal communications, and relations with regulatory agencies, other governments, and neighbouring communities. The process of establishing an EMS requires “buy-in” from different levels of management and from employees. The successful implementation of an EMS creates positive change, environmental awareness and continuous improvement.

EMS applied to local authorities provides a systematic approach to develop policies, practices and procedures that are able to respond to the social, economic and environmental challenges ahead. In order to accomplish their goals for implementing an EMS efficiently, accurately and effectively, organisations need tools to assist them. In particular, experts and city managers recognise and highlight a lack of education and training tools specifically designed to enable local authorities assess the benefits, design and implement an EMS that meets their specific needs. Organisations in particular local authorities of cities and towns need a sound understanding of the environmental effects and impacts of the lifestyles, behaviours and values of its citizens. Need to understand that the environment has strategic implications which must be addressed by all stakeholders - at the global and local levels. Need for decision-making tools and decision support systems that enable implementation of EMSs. After reading this unit, you will be able to:

- Describe the key environmental issues concerning urbanization and in particular the opportunities for better environmental management of cities and urban areas.
- Explain to decision-makers the need for co-operation
- Develop easy to use environmental management tools that can be used to implement coordinated environmental policies and programmes involving all concerned stakeholders.

4.2 THE CONCEPT OF ENVIRONMENTAL MANAGEMENT SYSTEM

4.2.1 What Is an Environmental Management System?

The International Organisation for Standardisation (ISO) defines environmental management systems as *“that part of the overall management system which includes organisational structure, planning activities, responsibilities, practices, procedures, processes, and resources for developing, implementing, achieving, reviewing, and maintaining the environmental policy.”*

In other words, an EMS focuses on environmental management practices, rather than the activities themselves. The EMS provides the structure by which the specific activities can be carried out efficiently and in a manner consistent with key organisational goals, but does not specify levels of performance (just for instance the EMS will ensure that proper procedures are in place and that operator training exists, but won't specify methods or frequency of sampling). The EMS allows an organisation the flexibility to adapt the system to its needs and priorities, rather than forcing a “one size fits all” mentality. Implementation of an EMS is a voluntary approach to improving environmental performance. Over the years, many public and private sector organisations have implemented EMSs, and their numbers grow daily. These organisations report a number of important EMS benefits.

4.2.2 Why to Introduce an Environmental Management System?

The environment has become an important factor in the decision-making process of companies around the world. Environmental issues are becoming more

complex and interconnected. Traditional ways of addressing environmental issues - in a reactive, ad-hoc, end-of-pipe manner - are proving to be highly inefficient. As competition increases within the expanding global market, environmental laws and regulations are setting new standards for business in every region of the world. But good environmental performance is not just a legal or moral obligation. It also makes good business sense. Reducing pollution means increasing efficiency and wasting fewer resources. Improved health and safety conditions result in a more productive workforce. Supplying goods and services that respect the environment helps to expand markets and improve sales.

In short, companies become more competitive when they practice good environmental management system.

On the other hand, the risks posed by mismanaging environmental issues are complex and varied. They include the obvious, such as damage to the environment with negative consequences for the overall standard of living. They can also include damage to a company's reputation and a resulting loss of confidence among customers, neighbours and shareholders, the loss of market share, and, of course, legal liabilities. Such risks cannot be dealt with on an ad-hoc basis. As with any financial or commercial risk, only a well-founded and properly implemented management approach can provide a measure of confidence that good performance is not an accident and that poor performance can be identified and rectified. By properly implementing an appropriate environmental management system (EMS), any company, large or small, can ensure that they effectively manage environmental risks while identifying and exploiting the myriad opportunities proper environmental management can bring. Such a systematic approach to environmental management is at the very heart of the ISO 14001 standard. This checklist is intended to allow managers of industrial facilities to review existing operations and management approaches against this standard to determine how well they measure up to what is soon to be considered as "state-of-the-art" in effective approaches to environmental management.

An Environmental Management System (EMS) performs the following functions:

- Serves as a tool to improve environmental performance
- Provides a systematic way of managing an organisation's environmental affairs
- Is the aspect of the organisation's overall management structure that addresses immediate and long-term impacts of its products, services and processes on the environment
- Gives order and consistency for organisations to address environmental concerns through the allocation of resources, assignment of responsibility and ongoing evaluation of practices, procedures and processes
- Focuses on continual improvement of the system

4.2.3 What is ISO 14000?

ISO 14000 is a family of standards intended to support environmental protection and prevent pollution in balance with socioeconomic needs. The international standard does not establish absolute requirements for environmental performance beyond commitment to compliance with applicable legislation and regulations and to continual improvement. Thus, two organisations carrying out similar activities but having different environmental performance may both comply with

ISO 14000 requirements. ISO 14000 encompasses 16 standards that address organisational issues and products. ISO 14001 is the EMS specification document outlining the requirements that an organization must meet for its EMS to be registered or certified to the standard. It is a tool to measure the effectiveness of environmental management programmes. ISO 14001 is being used by private corporations to enhance their competitiveness in both foreign and domestic markets. Federal and other public agencies are evaluating the potential of ISO 14001 or alternative EMSs to improve performance, and some agencies have already launched pilot projects.

4.2.4 Characteristics of EMSs and ISO 14001

Many federal and state agencies as well as private companies find ISO 14001 to be a flexible, its baseline approach that can be adapted to organisations of all sizes and types, and to a variety of cultures, processes, and businesses. The fundamental principles of ISO 14001 promote a programme of continual improvement to achieve objectives and targets set by the organisation itself. The objectives and targets derive from an assessment of significant environmental aspects and commitments made in the organisation's policy. The Code of Environmental Principles (CENT), another type of environmental management system, is also important in this regard. The CENT specifically addresses compliance, assurance, and pollution prevention, a distinguishing difference from ISO 14001.

4.2.5 Incorporating EMS into Corporate Business Practices

As an EMS is integrated into an organisation's business decision-making processes, it can improve programme management and enhance environmental performance. Some speakers' organisations found that the EMS improved overall productivity. As an EMS is incorporated into central management systems and organisational strategies, there is less need for external oversight as core business operations take ownership of environmental responsibility. The full cost of implementing an EMS includes the salary and time costs of in-house staff devoted to the project, as well as costs of any certification program. Total costs will vary, depending on the quality of the organization's existing environmental management/protection systems. Several speakers concluded that an EMS, once implemented, should result in cost savings over time. One speaker from a large corporation stated that, with the implementation of a corporate wide management system, his organisation's long-term vision includes facility self-governance, incorporating self-auditing of their compliance with environmental regulations. Several speakers addressed the benefit of dealing with environmental, safety, and health issues together as part of business planning and operational risk assessment. They agreed that integrating these issues into the same management concepts makes good business sense.

4.3 MANAGEMENT SYSTEM: AN OVERVIEW

4.3.1 Basics about Management

The management process involves performance of certain fundamental functions. One useful classification of managerial functions has been given by Luther Gulick, who abbreviating them using the word POSDCORB - Planning, Organising, Staffing, Directing, Coordinating, Reporting and Budgeting. There is no

commonly held opinion about the managerial functions proposed by different experts. By combining many of those views, this unit discusses the managerial functions under the headings

- i) Planning*
- ii) Organising*
- iii) Staffing*
- iv) Directing*
- v) Coordinating*
- vi) Controlling*
- vii) Budgeting*
- viii) Delegation*
- ix) Leading*

4.3.2 Management Process

Management is a distinct process consisting of various functions of management to determine and accomplish stated objectives by the use of human and other resources. As a process, management consists of three aspects:

- i) Management is a social process** – Since people are central in the process of development, human factor is most important among the other factors. As managers of developmental programmes are concerned with developing relationship among people. It is the duty of manager to make interaction between people for attaining developmental goals.
- ii) Management is an integrating process** – Manager undertakes the job of bringing together human, physical and financial resources so as to achieve organisational purpose. As it is an important function to bring harmony between various resources and integrate them to attain the developmental goals.
- iii) Management is a continuous process** – It's a never ending process and concerned with constantly identifying the development problems and solving them by taking adequate steps.

4.3.3 Objectives of Management

The main objectives of management are:

- i) Getting maximum results with minimum efforts** – Management is basically concerned with thinking and utilising human, material and financial resources in such a manner that would result in best combination to secure maximum outputs with minimum efforts and resources.
- ii) Increasing the efficiency of factors of production** – Through proper utilisation of various factors of production, their efficiency can be increased to a great extent which can be obtained by reducing spoilage, wastages and breakage of all kinds, this in turn leads to saving of time, effort and money.
- iii) Maximum prosperity** – Management ensures smooth and coordinated development and helps in providing maximum benefits to the people.

- iv) **Human betterment and social justice** – Through increased productivity and development, management ensures better standards of living for the society. It provides justice through its uniform policies.

4.3.4 Importance of Management

- i) **It helps in achieving group goals** – It arranges, organise and integrate the resources in effective manner to achieve developmental goals. It directs group efforts towards achievement of pre-determined goals. By defining objectives of development clearly, there would be no wastage of time, money and effort.
- ii) **Optimum utilisation of resources** – Management utilises all the physical and human resources productively in the process of development. Management provides maximum utilisation of scarce resources by selecting its best possible alternate use.
- iii) **Reduces costs** – It gets maximum results through minimum inputs by proper planning of physical, human and financial resources in such a manner which results in best combination to reduce costs.
- iv) **Establishes sound organisation** – It establishes effective authority and responsibility relationship that is who is accountable to whom, who can give instructions to whom, who are superiors and who are subordinates. Management fills up various positions with right persons, having right skills, training and qualification.
- v) **Establishes equilibrium** – It adapts organisation to changing demand of people / changing needs of society.
- vi) **Essentials for prosperity of society** – Efficient management leads to better economical production which helps in turn to increase the welfare of people. Good management makes a difficult developmental task easier by avoiding wastage of scarce resources.

4.4 BASIC ELEMENTS OF ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)

4.4.1 What Are the Key Elements of an EMS?

The key elements of any environmental management system are:

- **Environmental policy** - Develop a statement of the organisation's commitment to the environment. Use this policy as a framework for planning and action.
- **Environmental aspects** - Identify environmental attributes of products, activities, and services. Determine those that could have significant impacts on the environment.
- **Legal and other requirements** - Identify and ensure access to relevant laws and regulations, as well as other requirements to which the organisation adheres to.
- **Objectives and targets** - Establish environmental goals for the organisation, in line with the policy, environmental impacts, the views of interested parties, and other factors.

- **Environmental management programme** - Plan actions necessary to achieve objectives and targets.
- **Structure and responsibility** - Establish roles and responsibilities for environmental management and provide appropriate resources.
- **Training, awareness, and competence** - Ensure that the employees are trained and capable of carrying out their environmental responsibilities.
- **Communication** - Establish processes for internal and external communications on environmental management issues.
- **EMS documentation** - Maintain information on EMS and related documents.
- **Document control** - Ensure effective management of procedures and other system documents.
- **Operational control** - Identify, plan, and manage the operations and activities in line with the policy, objectives, and targets.
- **Emergency preparedness and response** - Identify potential emergencies and develop procedures for preventing and responding to them.
- **Monitoring and measurement** - Monitor key activities and track performance. Conduct periodic assessments of compliance with legal requirements.
- **Non conformance and corrective and preventive action** - Identify and correct problems and prevent their recurrence.
- **Records** - Maintain and manage records of EMS performance.
- **EMS audit** - Periodically verify that the EMS is operating as intended.
- **Management review** - Periodically review the EMS with an eye to continual improvement.

4.4.2 Elements of ISO 14001

ISO/DIS 14001 is one of a series of emerging international environmental management standards, which aims at promoting continual improvement in company environmental performance through the adoption and implementation of an environmental management system. The (draft) standard specifies the core elements of an EMS, but contains only those elements that may be objectively audited for certification or self-declaration purposes. A companion guidance standard, ISO/DIS 14004 includes examples, descriptions and options that aid in the implementation of an EMS and in integrating the EMS into overall management practices. It is not intended for use by certification/registration bodies. ISO/DIS 14001 defines an overall environmental management system, closely modelled on the ISO 9000 quality systems standard, and covers the following key elements:

- i) **Establishment of an appropriate environmental policy** that is documented and communicated to employees and made available to the public, and which includes a commitment to continual improvement and pollution prevention, regulatory compliance and a framework for setting objectives.

- ii) **A planning phase** that covers the identification of the environmental aspects of the organization's activities, identification and access to legal requirements, establishment and documentation of objectives and targets consistent with the policy, and establishment of a program for achieving said targets and objectives (including the designation of responsible individuals, necessary means and timeframes).
- iii) **Implementation and operation of the EMS** including the definition, documentation and communication of roles and responsibilities, provision of appropriate training, assurance of adequate internal and external communication, written management system documentation as well as appropriate document control procedures, documented procedures for operational controls, and documented and communicated emergency response procedures.
- iv) **Checking and corrective action procedures** including procedures for regular monitoring and measurement of key characteristics of the operations and activities, procedures for dealing with situations of non-conformity, specific record maintenance procedures and procedures for auditing the performance of the EMS.
- v) **Periodic management reviews of the overall EMS** to ensure its suitability, adequacy and effectiveness in light of changing circumstances. The EMS provides a structured process for the achievement of continual improvement, the rate and extent of which is determined by the organization in light of economic and other circumstances. Although some improvement in environmental performance can be expected due to the adoption of a systematic approach, it should be understood that the EMS is a tool which enables the organization to achieve and systematically control the level of environmental performance that it sets itself. The establishment of an EMS will not, in itself, necessarily result in an immediate reduction of adverse environmental impact. Indeed, care needs to be taken that the mere establishment of an EMS does not lull the organization into a false sense of security. But effectively used, an EMS should enable an organization to improve its environmental performance and avoid or reduce adverse environmental impacts over time.

An organisation has the freedom and flexibility to define the boundaries of its system and may choose to implement an EMS throughout the entire organization, or within specific operating units or activities of the organisation. If it is implemented for a specific operating unit or activity, policies and procedures developed by other parts of the organization can be used to meet the requirements of an environmental management system, provided that they are applicable to the specific operating unit or activity that will be subject to the environmental management system. The level of detail and complexity of the environmental management system, the extent of documentation and resources dedicated to it will be dependent on the size of the organization and the nature of its activities. This may be the case in particular for small and medium-sized enterprises.

Integration of environmental matters with the overall management system can contribute to the effective implementation of the environmental management system, as well as to the efficiency and clarity of roles. In many aspects, the ISO

14001 standard shares common management system principles with the ISO 9000 series of quality system standards. In the beginning of the ISO 14001 standard, it states that “organisations may elect to use an existing management system consistent with the ISO 9000 series as a basis for its environmental management system. It should be understood, however, that the application of various elements of the management system may differ due to different purposes and different interested parties. While quality management systems deal with customer needs, environmental management systems address the needs of a broad range of interested parties and the evolving needs of society for environmental protection.”

4.5 ENVIRONMENTAL MANAGEMENT SYSTEMS IN MUNICIPALITIES

Since its publication in 1996, the manufacturing industry has embraced the concept of Environmental Management Systems. However the ISO standard was not designed specifically for implementation in manufacturing, or even just for-profit businesses; it specifically uses the word “organization” to imply any group of individuals that come together for a specific purpose under a specific administrative structure. The benefits of the EMS approach – which will also be discussed in this section – have led to its application in other locations, such as local governments, with similar success. Several pilot studies have been commissioned at the International, Federal and State levels to demonstrate this, and the evidence is clear that municipalities can realise benefits at least equal to those achieved by business. Much like businesses, municipal governments have a complex system of organizational management and are subject to large number of regulatory requirements. However, unlike many businesses, municipalities typically have a very wide scope of activities that encompass power generation, water and wastewater treatment, solid waste collection and disposal, maintenance of the local infrastructure, and enforcement of numerous federal, state and local codes. Further, many of these operations interact directly with the environment and have a high potential for significant impact if a problem occurs. For these reasons, an EMS may in fact be more useful for protecting the environment in a municipal setting than in a business setting.

i) Municipal EMS Pilot Project

The Pennsylvania Department of Environmental Protection (DEP), in conjunction with Five Winds International, conducted a Municipal EMS Pilot Project with seven Pennsylvania municipalities from 2001 – 2003. The materials used by those municipalities form the core of this guidebook, having been refined based on their experiences and recommendations.

ii) Municipalities Participating in the PA EMS Pilot Project

- Brockway Borough – Wastewater Treatment Facility
- Crawford County – Crawford County Correctional Facility
- City Of Erie – Erie-Western Pennsylvania Port Authority
- Hampden Township – Wastewater Treatment Facility
- Lawrence County – Long-Term Care Facility

- City of Philadelphia – Solid Waste Collection Operations and NW Transfer Station
- Venango County – Two Mile Run County Park

Examples from these case studies are included throughout this section to illustrate the benefits of implementing an EMS as have been realized by Pennsylvania municipalities. Additionally, success factors for implementation identified by pilot municipality participants are described.

iii) Benefits of a Municipal EMS

Multiple studies have been performed to examine the benefits of the EMS approach, several of which are referenced in 4.4.1. The evidence indicates that the systems approach to managing environmental issues that is fundamental to an EMS causes a deep, cultural shift in how the organisation addresses these issues. Every employee must incorporate environmental considerations into their daily job functions. Thus the documented benefits of implementing an EMS range from improved compliance with environmental regulations and often a reduction in fines to increased management efficiency, and even a reduction in waste production and energy consumption. The systematic EMS approach to the daily management of energy and environmental objectives leads to benefits that can only be created by an integrated effort across the entire organisation, and are typically difficult to foresee prior to the implementation of the EMS.

A particularly useful element of an EMS is the incorporation of stakeholder requirements and external communications. Because municipalities are public entities designed to serve local communities, the increased transparency and ability to respond to the needs of the community typically improves relationships between the municipality and its various stakeholders. The increased management and operational efficiency gained with an EMS also improves the ability of the municipality to provide its services to the community inexpensively and with greater effectiveness. The Pennsylvania EMS Pilot Project Participants anticipate realizing many of the benefits common to EMS implementation; however it is still relatively early to predict whether long-term benefits, such as improved relationships with regulators and regulatory compliance, will be achieved. Despite this, numerous benefits have been noted by Pilot Project Participants, including:

- Capturing Institutional Knowledge;
- Streamlining Operations.

iv) Primary EMS Benefits for Municipalities

- Positive effect on environmental performance and compliance
- Improved EHS/ emergency response training, awareness, involvement and competency
- Increased management and operational efficiency
- Improved relationships with regulators and the community
- Reduced waste production and energy consumption
- Process for inclusion of multiple stakeholder requirements
- Increased transparency and ability to respond to community requests for information

- Demonstration of management control over highly complex and varied activities
- Regulatory Fine and Cost Avoidance
- Improved Emergency Response Procedures and
- Increased Awareness and Participation.

Each of these benefits is discussed below in three broad heads:

a) Capturing Institutional Knowledge

All municipalities involved in the Pilot Project strongly agreed that the most significant, initial benefit they recognised from the EMS implementation process was to capture the institutional knowledge contained in the heads of employees. By consulting with employees and documenting the “how-to” of routine municipal operations, the participants found that the time required for training new staff decreased, and that they were protected from the loss of critical operating knowledge when senior employees retire. Additionally, the documentation of ongoing maintenance efforts required of the EMS has allowed many municipalities to coordinate municipal activities with greater efficiency and improve service delivery in some instances.

b) Streamlining Operations

By documenting the processes used to complete routine municipal duties, many Pilot Project Participants also found that they were able to reduce the number of steps involved in the process, saving time, energy and money. Further, the documents allowed them to standardize the way routine tasks were performed, improving processes and creating additional savings. The EMS implementation process also forced participants to document training, compliance and maintenance schedules, which helped them to stay current with these items, plan staff schedules more effectively, and avoid schedule conflicts with other municipal activities.

c) Regulatory Fine and Cost Avoidance

Pilot Project participants observed significant savings through the avoidance of fines and costs that it could have incurred had the EMS not been in place. Specific cost savings resulted through reducing incidents due to improper maintenance, reducing the need for on-the-job training, and retaining and communicating of critical information over time. One participant even cited a reduction in regulatory fines due to increased employee awareness from EMS training programs.

4.5.1 Case Studies

The *Hampden Township* EMS effectively “caught” information that a pump was out of service at a lift station and allowed corrective action to begin before a total loss of pumping capability occurred.

Hampden Township was apprehensive at first, but an EMS is a great way to translate the old ‘verbal’ way of doing things into documented written procedures. It forced them to organize and write everything down, something one talked about doing for years but never accomplished..

The *Lawrence County* long-term care facility effectively reduced solid waste disposal by 1.5 tons per year by switching to a coffee concentrate that was brewed on demand, reducing staff time and waste coffee sent to the wastewater collection system.

4.5.2 Key Success Factors

Several important lessons were learned in the course of the Pennsylvania EMS Pilot Project that will be useful to other municipalities seeking to improve their environmental performance through an EMS approach. The experience to date suggests that while there are many operations/facility-specific factors that influence the success of EMS development and implementation, there are some key factors in determining success that apply to almost all operations/facilities. Some of these factors include:

- Commitment from senior management
- A clear project team and dedicated project manager
- Routine meetings
- Publication of the municipal commitment to improved environmental performance
- Integration into existing municipal systems
- Recognition that an EMS is a continuous commitment that does not end with implementation

In this section you have read about the concept of environmental management system, basic elements of environmental management system, environment management system in municipalities. Now answer the questions given in *Check Your Progress-1*.

Check Your Progress 1

Note: a) Write your answer in about 50 words.

b) Check your answer with possible answers given at the end of the unit.

1) What do you understand by ISO14001?

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2) What are the key elements of environmental management system?

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4.6 LET US SUM UP

Environmental management system (EMS) refers to the management of an organization's environmental programs in a comprehensive, systematic, planned and documented manner. It includes the organizational structure, planning and resources for developing, implementing and maintaining policy for environmental protection. The term can also refer to software systems for organizational environmental management. An environmental management system can also be classified as a system which monitors, tracks and reports emissions information, particularly with respect to the oil and gas industry.

4.7 REFERENCES AND SLECTED READINGS

- 1) UDPFI Guidelines, Volume 1, 1996. Ministry of Urban Affairs and Employment , Government of India, New Delhi.
- 2) ISO 14001 Environmental Systems Handbook by Ken Whitelaw Second edition 2004 published Elsevier Ltd.
- 3) *Design Guidelines for Environmental Auditing at Federal Facilities* (EPA 300-B-96-011). EMS Primer for Federal Agencies (Spring 1998).
- 4) *Environmental Management System Benchmark Report: A Review of Federal Agencies and Selected Private Corporations.* (EPA 300-R-94-009).

4.8 CHECK YOUR PROGRESS- POSSIBLE ANSWERS

1) What do you understand by ISO14001?

ISO/DIS 14001 is one of a series of emerging international environmental management standards aimed at promoting continual improvement in company environmental performance through the adoption and implementation of an environmental management system. The (draft) standard specifies the core elements of an EMS, but contains only those elements that may be objectively audited for certification or self-declaration purposes

2) What are the key elements of environmental management system?

The key elements of any environmental management system are:

- **Environmental policy** - Develop a statement of the organization's commitment to the environment. Use this policy as a framework for planning and action.
- **Environmental aspects** - Identify environmental attributes of products, activities, and services. Determine those that could have significant impacts on the environment.
- **Legal and other requirements** - Identify and ensure access to relevant laws and regulations, as well as other requirements to which the organization adheres to.
- **Objectives and targets** - Establish environmental goals for the organization, in line with the policy, environmental impacts, the views of interested parties, and other factors.
- **Environmental management program** - Plan actions necessary to achieve objectives and targets.