

Fact-sheet - How to establish an Environmental Policy?



What is the objective?

The environmental policy is a core element of the EMS¹. An environmental policy is a statement about the **commitments** of a factory regarding its environmental values and performance. It has to be **signed by the top management** to validate and approve the vision of the management about how to address environmental issues in the factory. It is **communicated internally** in order to ensure the awareness and enforcement of the environmental objectives and to make sure the factory practices are aligned with the commitments mentioned in this policy. Finally, this document has to be **available to stakeholders** as, in particular, current and potential clients have to be able to take into account these commitments to decide to continue or start the business with a factory.



How to achieve this objective?

The environmental policy should cover:

Introduction

- Provide a short description of the main activities of the factory and how they impact the environment.

Commitments

- To comply with laws & regulations and clients requirements regarding the environment;
- To effectively manage all the significant environmental aspects to reduce as much as possible the pollution generated and to continually improve the environmental performance of the factory.

How to achieve these commitments?

- Explain what are the factory specific environmental objectives;
- Explain how the factory is going to achieve these objectives (example: by educating and training the employees about the environmental issues, etc.);
- Explain how the factory is controlling the enforcement of this policy (example: by monitoring the progress and follow-up on the environmental objectives).

The environmental policy shall be:

- **Dated and Signed** by the top management;
- **Communicated** within the organization;
- **Available** to interested parties (on the factory's website or sent by email to clients, etc.);
- **Reviewed** when there is a change in the factory activities, environmental impacts, objectives, etc.



Common non-compliances

Generic environmental policy

The environmental policy is mentioning very generic commitments such as “*we commit to protect the environment and control the pollution generated by our activities*” but:

- 1) There is no identification of the exact environmental impacts / sources of pollution of the factory;
- 2) There is no clear vision and approach from the factory to explain how they are going to achieve this objective.

¹ An environmental management system (or commonly referred to as an EMS) is a set of practices and processes helping organizations to manage their environmental impacts and improve environmental performance caused by their products, services and activities. An environmental management system provides structure to environmental management and covers areas such as training, record management, inspections, objectives and policies.



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Environmental policy not dated and not signed by the top management

The environmental policy can be written by the compliance manager or any member of the management in charge of the Environmental Management System but then this document has to be submitted to the top management (the factory Director for example) so he/she can validate the content of this policy by signing it.

The date is important to know when the policy was reviewed for the last time.

No internal awareness about the environmental policy

Based on interview with the management, the content of the policy is not known. The root cause might be: no internal communication of the environmental policy. The factory should make sure there is a process to communicate the policy to all the relevant management members and an internal meeting should be organized on a regular basis to discuss and review the policy (at least once a year).



Good practices

See below an example of Environmental policy of an Electronic manufacturing company (not full version)²:

Environmental policy statement
<p>COMPANY NAME is committed to operate in a way that is compatible with our environment, employees, and our customers. As a member of the global community, we recognize our responsibility to do our part in promoting sound environmental practices.</p> <p>We do so by adhering to the following principles:</p> <ul style="list-style-type: none"> • Our operations and our products will comply with all applicable standards and regulations. This includes local regulations for handling hazardous waste within our facilities, as well as international standards and regulations such as <u>RoHS</u> and REACH to eliminate toxic materials from our products. • (...) • COMPANY NAME customers and end-users in Europe can send their COMPANY NAME products directly to COMPANY NAME for responsible processing and recycling. • We will employ management systems and procedures throughout our operations to specifically minimize the use of hazardous materials by working closely with our suppliers, reduce the amount of energy required for our products through innovative designs, generate less waste by monitoring material usage, and promote recycling of materials in our packaging and processes. • We will continue designing and manufacturing products and tools that promote energy savings. For example, (...). <p>We will continually review opportunities to improve our environmental performance by establishing goals and objectives, and by measuring our progress. Examples of improvements include eliminating paper manuals and other material from our product packaging, and providing our customers an abundance of product information online that would otherwise be printed.</p> <p>We will communicate this policy of responsible environmental management to all our employees by providing the necessary training in all applicable procedures and practices, by informing suppliers of our environmental policy and encouraging them to adopt effective environmental management practices, and by soliciting input from employees, suppliers, and customers on meeting our environmental objectives.</p> <p style="text-align: right;">Date:...</p> <p style="text-align: right;">Signature of the CEO:...</p>

² This is an example to show what could be a correct structure of the environmental policy. This document cannot be copied.