



# 1.0 Environmental Policy Development

## 1.1 MANAGEMENT COMMITMENT

## 1.2 PROJECT TEAM BUILDING

## 1.3 SIX ELEMENTS OF A C3 ENVIRONMENTAL POLICY

COMPANY MISSION AND VALUES

CONTINUOUS IMPROVEMENT

POLLUTION PREVENTION

PUBLIC COMMUNICATION

ENVIRONMENTAL COMPLIANCE

INDIVIDUAL CONTRIBUTION TO ENVIRONMENTAL  
IMPROVEMENT

## 1.4 POLICY DEVELOPMENT STEPS

## 1.5 ENVIRONMENTAL POLICY DEVELOPMENT COMPLETION CHECKLIST





# 1.1 Management Commitment

Keys



**EMS program development must begin with a signed statement of management commitment.**

Policy and system development starts with commitment by people!

## Management Commitment:

An EMS is a serious undertaking and its success depends on **management commitment**.

The management determines a facility's:

- philosophy,
- culture,
- values, and
- priorities.

Management has final responsibility for:

- profit and loss,
- deciding the allocation of resources,
- and setting operating goals.

Management provides the initial commitment and ongoing leadership for the Environmental Management System. Unless the members of upper management are active leaders, the EMS cannot be successfully implemented and maintained. In short, you must have management dedicated to developing an EMS. A simple but strong statement of commitment to an EMS system shows their support and dedication.

On the following page is an example of a signed management commitment statement indicating that management is willing to commit time, people and resources to the development of an EMS.

You can write your own commitment statement using Form 1.1 provided, or develop your own form/layout that fits the documentation practices of your company. The important thing is that you have commitment and allocation of resources (preferably signed) by your management for the project.



## EXAMPLE 1.1

### Joseph's Forklift and Hauling Company

#### Management Commitment to Development of an EMS:

Joseph's Forklift and Hauling Company is committed to environmentally friendly operations and products. We stand by this goal by providing the time, people, and financial resources for developing an Environmental Management System.

**Signature:**

**Title:**

**Date:**

*Joseph Doe*

*President/Owner*

*June 30, 1999*

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*Chris Joseph*

*Vice President*

*June 30, 1999*

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*Jane Bond*

*Chief Financial Officer*

*June 30, 1999*

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FORM 1.1

**EMS Management Commitment**

**Company:**

**Date:**

**Management Commitment to Development of an EMS:**

Signature:

Title:

Date:

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# 1.2 Project Team Building

## Keys



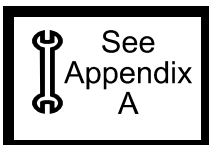
- ◆ **Develop a multifunctional project team.**
- ◆ **Define and document their roles.**
- ◆ **Schedule regular project meetings.**
- ◆ **Allocate company resources (e.g., time, money).**

Critical to the development of an EMS is a dedicated **project team** -- a small group of people representing different functions and operations to lead the implementation effort. The team leader and future EMS manager should be the facility “environmental champion,” if you have one, or an enthusiastic, experienced project manager. The ideal team has members experienced in quality control, operations, engineering, facility maintenance, human resources, environmental/health/safety, and finance. Many small organizations do not have all the components of the ideal team; you may need to adapt. Seek team members who have a genuine interest and who are open to new ideas.

Each team member plays a role in the development of the EMS. You may already know what role each person will take based on their responsibilities at your facility, or the roles may change and grow as the EMS develops. Schedule regular team meetings and keep meeting minutes that include action items, schedules and responsibilities. For your first meeting discuss what an EMS is and what roles each team member will play. (Appendix A contains an outline for discussing of the framework that makes up an EMS.) Develop an organizational chart or responsibility matrix for your team members so that everyone knows their role in the process.

Following are examples of a designated program development team.

Use Form 1.2 to assign and document your project team members. Or, use company letterhead and develop your own form/layout but document who is participating. You should develop a responsibility matrix assigning the role each person will play in the development of the system (e.g., one person can be responsible for finding all regulations that apply to your facility, another may be responsible for operations and implementing revised work instructions and procedures, and a third may do training and communication).



## EXAMPLE 1.2

### Joseph's Forklift and Hauling Company

#### EMS Project Development Team:

The following individuals will spearhead and promote the effort to develop and implement an EMS for Joseph's Forklift and Hauling Company.

#### Team Leader:

Chris Joseph (Vice President)

#### Team Members:

Vince Roy (Operations/Shipping/Warehouse Manager)

Ella Gray (Maintenance Supervisor)

Jill James (Office Administration/Accounting)

Lester Simons (Shipping Dept.)

Joe Crane (Forklift Operator)

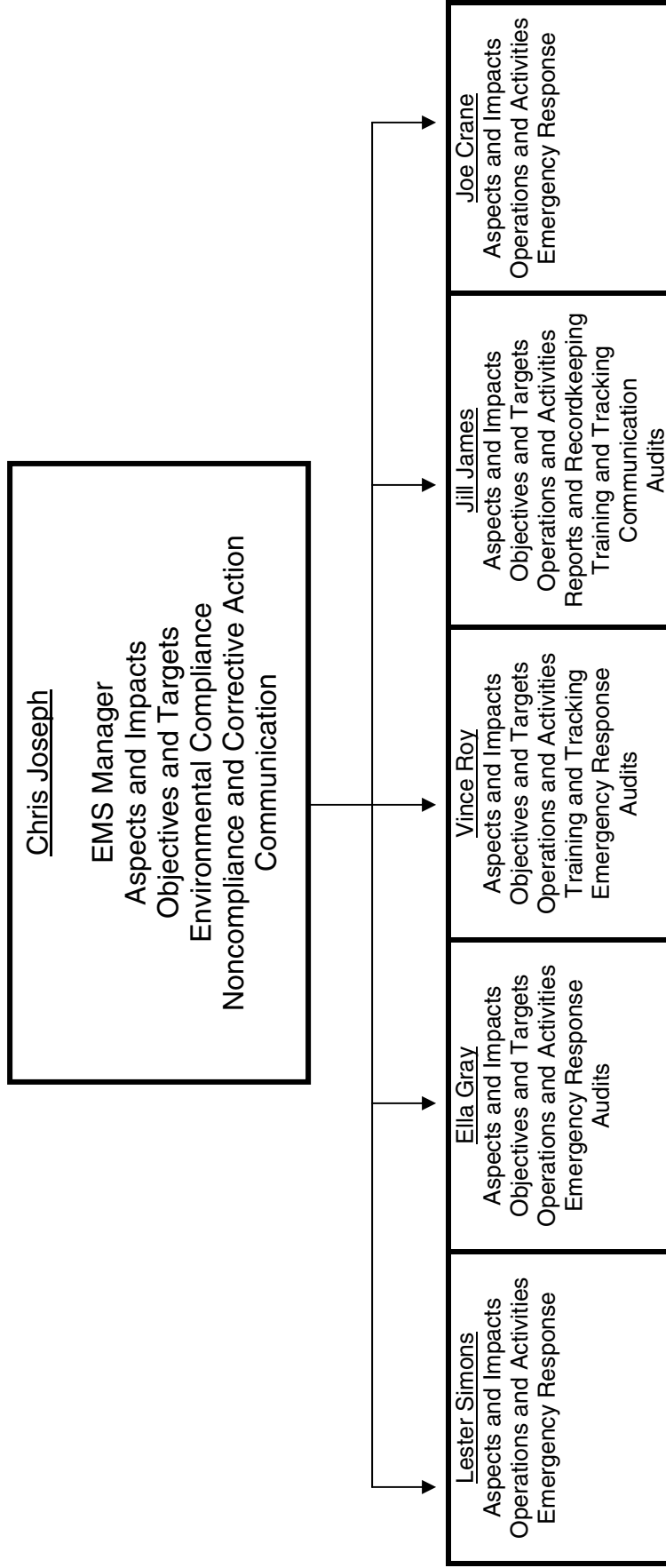
Signed: Chris Joseph

Dated: August 2, 1999

# Example 1.3

## Joseph's Forklift and Hauling Company

### Organizational Chart





## EXAMPLE 1.4

### Joseph's Forklift and Hauling Company

### Responsibility Matrix

ROLES          <b>TEAM MEMBERS</b>	EMS Manager	Policy Development	Aspects & Impacts	Objectives & Targets	Operations & Activities	Reports & Recordkeeping	Training & Tracking	Emergency Response	Internal Communication	Public Communication	Environmental Self Audits	Authority & EMS Audits
Chris Joseph	L	L	L	L	S	L	S	S	L	L	L	L
Vince Roy		L	L	L	L	S	L	L	S	S	L	L
Ella Gray		S	S	S	L	S	S	L	S	S	S	S
Jill James		S	S	S	S	L	L	S	L	S	S	S
Lester Simons			S	S	S			S	S			
Joe Crane			S	S	S			S	S			

L = Lead Role  
S = Supporting Role

FORM 1.2

**EMS Project Team**

**Company:**

**Date:**

**EMS Project Development Team:**

<b>Team Leader:</b>
<b>Team Members:</b>

Signed: \_\_\_\_\_

Dated: \_\_\_\_\_



## 1.3 Six Elements of a C3 Environmental Policy

### Keys



**Adopt an environmental policy approved by the responsible official or operate under an adopted corporate environmental policy. The environmental policy shall demonstrate a high level of commitment to environmental management through the establishment of guiding principles. [R 324.1505(2)(b)(i)]**

Top management will not be truly committed unless it perceives environmental management as a “business issue.” The way a facility aligns environmental commitment with business issues/ operations is through a policy that integrates the two.

The Environmental Policy will serve as the guiding force for your EMS. Top management must be involved in the making of the policy. It cannot be a document prepared by the environmental coordinator alone. This policy must be signed by a responsible company official if you are planning to apply for the C3 Program.

### A C3 Environmental Policy must contain the following six elements:

1. Articulate the company’s mission and values.
2. Emphasize continuous improvement.
3. Promote pollution prevention.
4. Acknowledge the importance of communication with the public.
5. Commitment to compliance with relevant environmental laws and regulations.
6. Recognize that every individual at the company can contribute to environmental improvement.





## 1.4 Policy Development Steps

### Keys



**Keep your policy simple so everyone in your facility can understand it.**

- ◆ **What are you trying to achieve?**
- ◆ **Where do you wish to go?**
- ◆ **Do your employees understand it?**

*You can assign one person on your team to write the policy and review it with management or you could try to write the policy as a team.*

### Policy Development Steps:

1. Determine if you already have an environmental policy in place, either written or unwritten. Your facility's current policy may be as simple as "We will comply with all federal, state, and local environmental laws and permits."  
Or,  
Your facility may already have a written business or quality policy. You could revise your business policy and add the six elements of the EMS Policy.
2. Take each of the six elements individually and look at what your facility is currently practicing. Relate the elements to how your facility operates, your products and services, your supporting activities, and your current business policy/philosophy.
3. Think about what you would like to achieve with your EMS (mission and values). Are you currently practicing continuous improvement and pollution prevention, but need to develop a more aggressive policy? Do you have good internal communication but have never developed a policy to communicate with the public? Now is the time to develop a policy and goals for your EMS.
4. Ask your employees for input and have them review the draft policy. If your employees do not understand your policy, rewrite the parts that are unclear and ask your employees to review it again.

Examples of Environmental Policies are shown on the next page for your reference. Use Form 1.3 to write your policy, or develop your own layout for your policy.



## EXAMPLE 1.5

### Joseph's Forklift and Hauling Company

Joseph's Forklift and Hauling Company is committed to transporting and delivering materials in an environmentally-conscious manner from shipping dock-to-truck-to-shipping dock.

- \* We will seek ways to continually improve our delivery system.
- \* We will practice pollution prevention through maintenance, education and operation upgrades.
- \* We actively promote dialog with our neighbors on our environmental policies through participation in community groups and community notices.
- \* We will comply not only with all environmental laws and regulations that apply to our facility, but will seek ways to go beyond traditional compliance.
- \* We will involve all our employees in environmental stewardship and promotion of pollution prevention.

**Signature:**

*Joseph Doe*

**Title:**

*President/Owner*

**Date:**

*July 30, 1999*

## EXAMPLE 1.6

### CONSUMERS ENERGY COMPANY J.R. WHITING PLANT ENVIRONMENTAL POLICY STATEMENT

The life of any business cannot be separated from its impact on the natural environment in which it operates. The employees of the J.R. Whiting Electric Generating Plant take seriously their role in protecting and enhancing Monroe County's and Michigan's environment. Environmental protection is always a primary objective. A secondary goal is to lead the County's and State's business community and the nation's utility industry in establishing environmental policies and backing programs to achieve them. To this end, our activities will be consistent with sound environmental practices.

In managing our business, the employees of the J.R. Whiting Plant will strive to:

- Comply with all environmental laws and regulations.
- Integrate environmental protection considerations into J.R. Whiting Plant planning and decision making.
- Ensure the J.R. Whiting Plant meets Federal and State clean air requirements through the use of clean fuels and emission-control technologies.
- Seek opportunities to recycle wastes both on- and off-site and purchase and use recycled materials.
- Seek to resolve environmental-related problems which may have been created by past operations, practices or handling of materials.
- Work with appropriate environmental agencies and organizations to ensure timely, reasonable and cost-effective solutions to environmental issues before they become major problems.
- Participate in the formulation of Federal and State environmental legislation, regulation and policy issues that may significantly impact our business.
- Pursue membership in the Michigan Clean Corporate Citizen program.
- Encourage employee environmental stewardship and ensure a dialogue with management to identify situations in which the J.R. Whiting Plant may improve its practices with regard to environmental laws and regulations.
- Work on an ongoing basis with environmental organizations such as the Wildlife Habitat Council, Pheasants Forever and other groups on joint environmental enhancement programs on available Plant Land.
- Regularly review conformity with this policy to ensure compliance throughout the Plant site.

John G. Gose  
John G. Gose  
J.R. Whiting Plant Manager

11/20/97  
Date

**Policy not in original format. Reproduced as part of public record.**

FORM 1.3

**EMS Environmental Policy**

**Company:**

**Date:**

**Mission and Values:**

**Continuous Improvement:**

**Pollution Prevention:**

**Public Communication:**

**Environmental Compliance:**

**Individual Participation:**

**Signature:**

**Title:**

**Date:**



## 1.5 Environmental Policy Development Completion Checklist

*This completes the policy development section of this manual. Complete the following checklist to review what you should have accomplished in this section.*

### Check Box

- 1. Do you have a signed management commitment statement?
- 2. Have you designated a Project Team?
- 3. Have you developed a written Environmental Policy?
- 4. Are the six required elements of the C3 Environmental Policy part of your Policy?
- 5. Have you shown your policy to your employees and do they understand it?
- 6. Has your policy been signed and dated?
- 7. Have you scheduled regular team meetings for development of your EMS?

**You could be revisiting your policy many times during the development and implementation of your EMS. There is no right or wrong policy, just a continually evolving policy as your management system grows.**

