

# Government position statement on Environmental Management Systems

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## **GOVERNMENT POSITION STATEMENT ON ENVIRONMENTAL MANAGEMENT SYSTEMS**

### **SUMMARY**

1. This is a statement on how environmental management systems (EMSs) can help business and the public sector reduce their environmental impacts. The statement has five main messages:
  - i) Organisations should use a robust and credible EMS that is appropriate for improving their environmental and financial performance.
  - ii) Organisations implementing an EMS should use a national or international standard or scheme
  - iii) An EMS should be audited by an independent certifier accredited by the United Kingdom Accreditation Service (UKAS).
  - iv) An EMS should help improve environmental and financial performance through the supply chain.
  - v) An EMS that demonstrates good management of legislative compliance should be used to help achieve regulatory benefits such as reduced fees and charges.

### **WHAT IS THE ROLE OF AN EMS?**

2. The Government believes that a robust, effective, and externally certified EMS should secure positive environmental outcomes. An EMS should not just document procedures and administrative processes but focus on continually improving environmental performance and compliance with legislation.
3. Formal EMSs can provide organisations with a practical tool to help them to both understand and describe their organisation's impacts on the environment, to manage these in a credible way and to evaluate and improve their performance in a verifiable way. Properly implemented EMSs will help with managing risks, liabilities and legal compliance.
4. Implementing EMSs can help organisations improve their resource efficiency and reduce costs. They can also help conformity with customer requirements in the supply chain, enable sustainable procurement policies, enhance an organisation's reputation, and help improve communication with employees, shareholders and other stakeholders.

### **TYPES OF EMSs**

5. The Government recommends that organisations use a national or international standard. There are three recognised standards or schemes:
  - **ISO 14001** is the international standard for EMSs which specifies the features and requirements necessary to help organisations systematically identify, evaluate, manage and

improve the environmental impacts of their activities, products and services.

- **EMAS** (the EU Eco Management and Audit Scheme) is a voluntary EU wide scheme which requires organisations to produce a public statement about their performance, focuses on legislative compliance and includes ISO 14001 as the requirement for the EMS component.
- **BS 8555** is a recent addition to the EMS family and breaks down the implementation process for ISO 14001 or EMAS into 6 stages. The Institute of Environmental Management and Assessment (IEMA) has developed the Acorn Inspection Scheme which enables companies to gain accredited inspection and recognition for their achievements at each step as they work towards ISO 14001 or EMAS.

## **WHAT MAKES A GOOD EMS?**

**6.** To fully contribute to improved environmental performance, a good EMS should:

- be implemented at a strategic level and integrated into corporate plans, and policies. Top-level commitment is required so that senior management understand their role in ensuring the success of an EMS.
- identify the organisation's impacts on the environment and set clear objectives and targets to improve their management of these aspects as well as the organisation's overall environmental performance.
- be designed to deliver and manage compliance with environmental laws and regulations on an ongoing basis, and will quickly instigate corrective and preventative action in cases of legal non-compliance.
- Deliver good resource management and financial benefits.
- incorporate assured performance metrics that demonstrate the above and that can be communicated in a transparent manner.

**7.** The Government strongly supports the improvements made within the 2004 revision to ISO 14001 which highlight the shift of emphasis in the standard to a clearer focus on transparency of processes, continuous improvement of performance, and periodic evaluation of legal compliance.

**8.** The Government believes that achieving ISO 14001, EMAS or BS 8555 is not just about having a certificate of attainment. It is the start of a process which includes ongoing and dynamic use of the system throughout an organisation to reduce adverse impacts on the environment and support continual environmental improvement.

**9.** Some organisations have achieved improved levels of environmental performance by operating without using a recognised standard. Many of these organisations developed their own system before the international standard ISO 14001 was introduced. Creating a new bespoke system now will simply 'reinvent the wheel' whilst not providing the level of assurance for supply chain customers and regulators offered by a recognised standard.

A recognised standard provides a sound basis for high quality environmental reporting. This includes producing environmental, sustainability or corporate responsibility reports, and an Operating and Financial Review (OFR).

## **ACCREDITED CERTIFICATION**

**10.** The Government believes that a robust and effective EMS should be externally audited to the recognised international or national standard by a Certification Body accredited by the United Kingdom Accreditation Service (UKAS).

External third party certification is important to realise many of the benefits of an EMS. Companies with an accredited certified EMS are given greater recognition by the Environment Agency under Integrated Pollution and Prevention Control (IPPC). They also benefit under the Climate Change Agreements, the Ospar Strategy for offshore exploration and production operators, and in the market for contract compliance.

External certification means that organisations can demonstrate to shareholders, regulators and the public that their system has been audited, in the same way as are their financial accounts, by those with appropriate professional skills, and knowledge. The information provided by a certified system will be seen as being more credible and not just 'greenwash'.

Other benefits of external certification include:

- confidence that the system meets recognised requirements and standards.
- enhanced value and assurance to customers in the supply chain.
- independent review of the way the way the organisation is committed to its activities and their associated impacts on the environment.
- closer involvement of employees. and other stakeholders
- protection of reputational value.

**11.** Certification Bodies accredited by UKAS must meet international standards relating to the competencies of their assessors. This provides assurance for organisations and helps protect against the risks of system failure.

The environmental press has reported problems with the quality of the work of some

Certification Bodies. The Government supports the project undertaken by UKAS to strengthen the accreditation of EMS Certification Bodies and inspection of assessors. We expect UKAS to ensure that this safeguards the quality and credibility of certification.

Evidence of system failure at sites not audited by a UKAS accredited certifier has also been widely reported in the environmental press. Examples of system failures include breaches of consents and licenses, significant increases in emissions, errors in measurement of data, or minor accidents. These can lead to contractual problems with suppliers, loss of support from customers and increased costs associated with prosecution and enforcement notices by regulators.

## **BETTER REGULATION**

**12.** As mentioned above, the Environment Agency takes account of EMSs in its risk-based approach to regulation through the Operator and Pollution Risk Appraisal (OPRA) scheme. OPRA is linked to fees and charges levied on IPPC-regulated sites so having an EMS can result in lower costs. The Environment Agency is currently reviewing OPRA, and will consider the potential for robust and effective EMSs to secure further benefits.

Local authority regulatory regimes also provide benefits to organisations with robust and effective EMSs. We will review the possibility for achieving further benefits, as evidence of the effectiveness of EMSs increases.

## **EMSs AS AN EFFECTIVE SUPPLY CHAIN TOOL**

**13.** Global business trends indicate that demand for ISO 14001 is rising and will continue to do so in future years. Suppliers are increasingly expected to have an accredited environmental management system in place to satisfy requirements of major customers.

**14.** We also expect to see a significant rise in certifications for BS 8555 as more organisations realise the potential role that the phased approach can play in sustainable procurement. BS 8555 can be used to help organisations manage the performance of their suppliers, set the 'stage' that they need to achieve by a specific date and monitor their progress using an online register. BS8555 can be validated through the Acorn Inspection Scheme which provides organisations with the assurance that their suppliers have met all the requirements of the standard.

## **EVIDENCE BASE**

**15.** The Government places great emphasis on evidence based policy making. We welcome the "remas" project, which is analysing performance data from industrial sites in the UK and elsewhere in Europe, to assess the effectiveness of EMSs. The interim findings of "remas" are:

- EMS operations (performance monitoring, environmental reporting, and compliance and conformance control) can lead to better resource use in processes and therefore better environmental outcomes.
- EMSs are better implemented where a company has EMAS or ISO 14001.
- accredited certification provides a sound basis for achieving higher levels of environmental performance than DIY or in-house systems.

This supports some of the findings of a 2002 study by the Policy Studies Institute, which found that sites with an EMS had better procedures in place.

There is a large amount of more qualitative, case study evidence to support the effectiveness of externally certified EMSs, e.g. see

[www.emas.org.uk/guidance](http://www.emas.org.uk/guidance).

The Environment Agency has published a cost-benefit analysis showing that ISO 14001 has delivered significant cost savings and improvements in their own waste, water, and energy performance.

**16.** This Position Statement is based on the available evidence from the “remas” study and elsewhere. It will be updated to reflect the full results of ‘remas’, which will influence the future role of EMSs in regulation and policy making.

## **FUTURE CHALLENGES**

**17.** A major challenge is for more organisations of all sizes and in every sector to implement a robust and effective EMS. The 2005 UK Sustainable Development Strategy *Securing the Future* calls for an increase in the take up of EMSs.

**18.** UK organisations have made rapid progress in implementing EMSs over the last few years. Globally, the UK is now ranked fourth amongst countries with the highest number of ISO 14001 certificates (about 6,000, although not all of these are externally certified). This clearly makes the UK a world leader in the take up of this standard. EMAS has proven less popular, with only 63 organisations currently registered in the UK.

**19.** The standard for phased implementation of an EMS has only recently been launched but there are positive signs of increasing business interest in the scheme. Some companies have already used the standard to achieve ISO 14001. A number of regional projects are successfully managing groups of several hundred companies to achieve Phase Three of BS 8555.

**20.** There seems potential for much wider take up of EMSs. For example, Japan has a significantly higher number of ISO 14001 certificates, with over 13,000. At the same time, the adoption of other certified systems and standards in the UK has grown even faster than for EMSs. With some 37,000 organisations accredited for Investors in People, and over 80,000 companies certified for the Quality Management Standard ISO 9001 and a growing number of public sector bodies seeking registration for the Charter Mark,

**21.** To facilitate an increase in take-up, we will seek to ensure that the benefits of EMSs are embedded in Government programmes including Envirowise, the Carbon Trust, the Small Business Service, and the Waste and Resources Action Programme (WRAP). We will also explore opportunities for encouraging the European Commission to incorporate EMSs into regulation and policy making.

## **EMSs AND THE GOVERNMENT ESTATE**

**22.** The Framework for Sustainable Development on the Government Estate was introduced in 2002. It committed to use EMSs to improve the way in which Government manages its land and buildings. Targets for implementing a recognised EMS based on ISO 14001 or EMAS were set for both office and non-office based estates. However, the *Sustainable Development in Government Report 2004* made clear that whilst performance is improving, it is still very patchy.

**23.** We have renewed our public commitment to achieving higher levels of performance. The 2005 UK Sustainable Development Strategy *Securing the Future* says “we want Departments to do better and to set an example for the rest of the public sector and business”. We are now reviewing the Framework for the Government Estate to do exactly this. We will make new proposals for the Framework during 2005 and will aim to achieve a significant step change in performance.