

Environmental management systems — Guide to the phased implementation of an environmental management system including the use of environmental performance evaluation

ICS 13.020

Committees responsible for this British Standard

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- AEA Technology
- Association of British Certification Bodies
- Association of Environmental Consultancies
- British Cables Association
- British Cement Association
- British Chemical Engineering Contractors' Association
- British Electrotechnical and Allied Manufacturers' Association
- British Plastics Federation
- British Standards Society
- Building Research Establishment/Loss Prevention Council Laboratories
- Chartered Institution of Wastes Management
- Chemical Industries Association
- Confederation of British Industry
- Consumer Policy Committee of BSI
- Department of Trade and Industry
- Department of Environment, Food and Rural Affairs
- Department for Transport, Local Government and the Regions
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- Society of British Aerospace Companies Ltd.
- Society of Motor Manufacturers and Traders Ltd.
- Staffordshire University
- Trades Union Congress
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Foreword

This British Standard has been prepared by Technical Committee ES/1, BSI Committee ES/1, whose constitution is shown in this British Standard, takes collective responsibility for its preparation under the authority of the Standards Policy and Strategy Committee. The Committee wishes to acknowledge the invaluable contribution of the Acorn Trust in the drafting of this British Standard.

This British Standard is related to BS EN ISO 14001 but is not equivalent in technical content. It also makes reference to the principles of environmental performance evaluation, which is the subject of BS EN ISO 14031, but is not equivalent in content to BS EN ISO 14031.

This standard makes reference to several implementation techniques (including environmental performance evaluation). These references are not to be used in order to add to or in any way change the provisions of BS EN ISO 14001 or BS EN ISO 14031.

This British Standard takes the form of guidance and recommendations. It should not be quoted as if it were a specification.

This publication does not purport to include all the necessary provisions of a contract. Users are responsible for its correct application.

Compliance with a British Standard does not of itself confer immunity from legal obligations.

Summary of pages

This document comprises a front cover, an inside front cover, pages i to iv, pages 1 to 69 and a back cover.

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Introduction

This British Standard provides guidance to all organizations seeking to implement a formal environmental management system, for example BS EN ISO 14001 or the EU Eco-Management and Audit Scheme (EMAS) [1]. In doing so, the standard makes particular reference to small and medium-sized enterprises (SMEs). It outlines an implementation process that can be undertaken in up to six separate phases (see Figure 1). It also allows for phased acknowledgement of progress towards full environmental management system implementation.

Much of the information will be relevant to both small and large organizations, but users of the standard should confirm for themselves that all the relevant features on which the guidance is based exist within their own organization. Such features might consist of processes, procedures, resources, practices and techniques.

Many organizations, including SMEs, already have some form of environmental management as part of their overall management structure. However, many face certain difficulties when implementing a formal environmental management system. For SMEs, challenges in implementing such a system are due at least in part to:

- limited resources;
- difficulty in effectively implementing the requirements of BS EN ISO 14001; and
- costs involved in implementation.

In these circumstances, a phased approach to implementation offers several advantages. However, the process outlined in this standard is specifically designed to help address the main problems of human and financial resource restrictions faced by any organization. Beyond this, those using the standard can:

- choose to engage in environmental performance management to the level commensurate with the risks they face;
- identify and maximize the areas of greatest potential return on investment; and
- demonstrate to interested parties that progress is being made towards the appropriate target level of environmental management.

Given competing demands for resources, implementation of an environmental management system can be seen as simply another investment of time, money and manpower, and can be treated and assessed as any other business investment. As for all investments, returns can be calculated and acknowledged even if they might not be immediately perceived as tangible. For instance, improved marketability might be difficult to quantify, whereas increased resource efficiency can lead directly to an improvement in financial performance, provided the necessary steps are taken.

The identification and use of environmental performance indicators at an early stage of environmental management system implementation can help to maximize the return on investment, make gains more visible in the process and encourage greater efforts to build on such success.

The maintenance (i.e. updating) of policies and procedures to reflect the current needs and requirements of an organization should be assessed in the light of its circumstances. Document control, important as it is, is no replacement for other forms of effective and responsive management practice where documents might not exist.

Being able to demonstrate improved environmental performance is obviously of vital importance. The need to do so is increasingly affecting SMEs owing to the use of supply chain evaluation techniques by their larger corporate customers. Key clients, having implemented their own environmental management system, now expect their suppliers (including SMEs) to be able to demonstrate some commitment to environmental protection and improvement, often though not exclusively through a formal environmental management system. As a result many SMEs want to improve their environmental performance but might not know where to start, might not be willing to begin a process that is not incremental, or might lack reliable and unbiased advice. This British Standard provides an implementation framework that allows organizations to choose the pace of their environmental programmes and the ways that they measure and monitor their performance.

It also offers larger organizations the opportunity to improve the environmental performance of their supply chain in a non-threatening environment, working closely with their key suppliers to achieve shared organizational goals.

The process enables larger organizations to focus on levels of improvement in supply chain environmental performance directly related to risk exposure. This is very important in initiating a positive culture change within all organizations in the chain as well as motivating top management to see the business value in improved environmental performance. The implementation process outlined in this standard allows for a flexible approach.

In summary, given the need to help all organizations improve their environmental performance and to improve supply chain relationships, the guidance in this standard:

- describes a six-phase incremental approach to implementing an environmental management system using environmental performance evaluation;
- provides information to organizations on environmental management and the use of environmental performance indicators;
- will help organizations to satisfy the environmental criteria increasingly being set in contract tenders by new and existing major clients; and
- can be used by organizations who might wish to self-declare or seek voluntary phased acknowledgement at specified points throughout the implementation process.

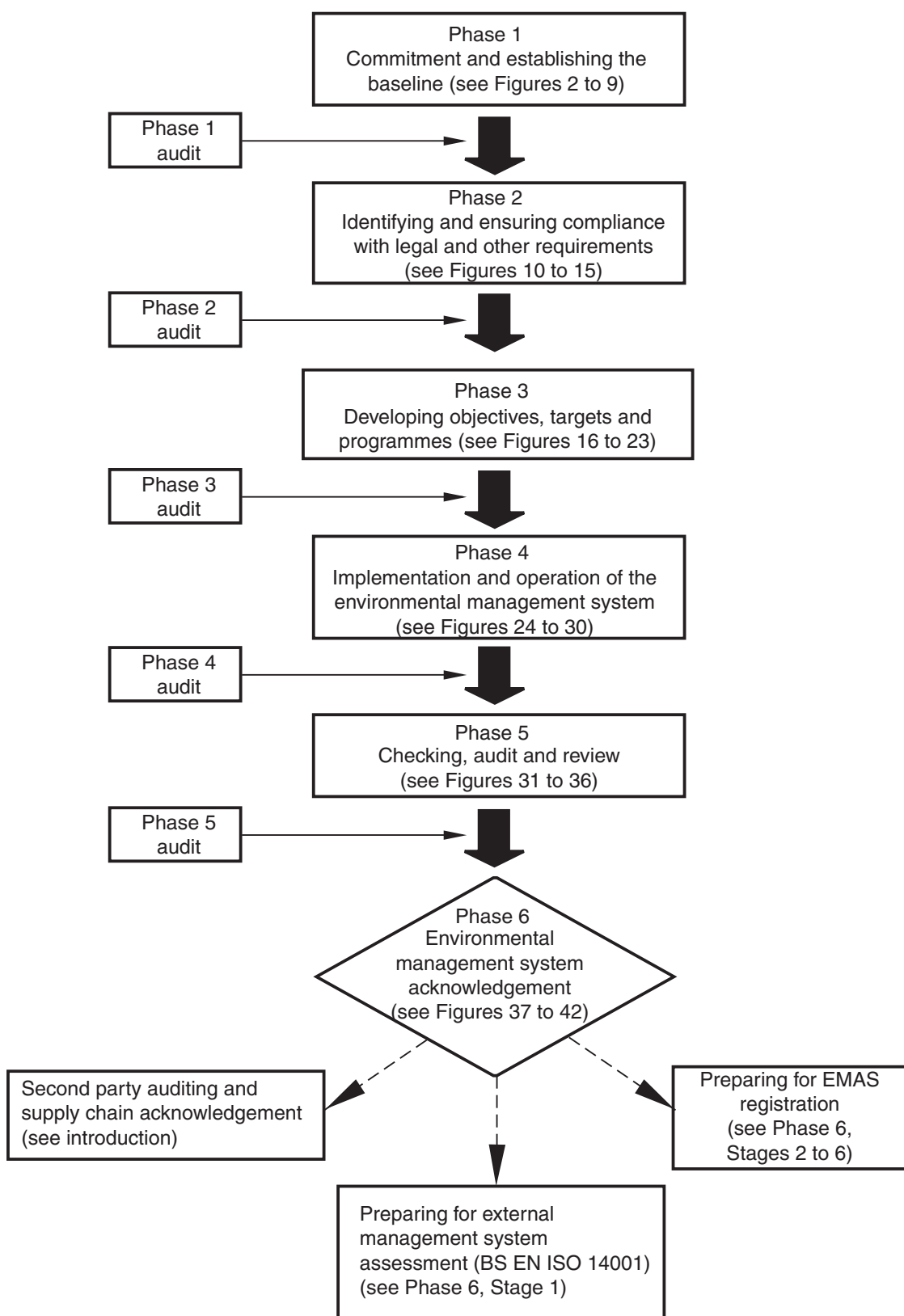


Figure 1 — Overview of the phased implementation of an environmental management system

1 Scope

This British Standard provides guidance for all organizations but particularly small and medium-sized enterprises, on the phased development, implementation, maintenance and improvement of an environmental management system. It also includes advice on:

- the integration and use of environmental performance evaluation techniques during the implementation process; and
- the coordination of such an environmental management system with other management systems, where appropriate.

The guidelines in this British Standard are applicable to any organization, regardless of the nature of the business activity undertaken, location, or level of maturity.

2 Normative references

There are no normative references at present.

3 Terms and definitions

For the purposes of this British Standard, the following terms and definitions apply.

3.1

audit

systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which audit criteria are fulfilled

NOTE 1 Internal audits, sometimes called first-party audits, are conducted by, or on behalf of, the organization itself for management review and other internal purposes, and may form the basis for an organization's self-declaration of conformity. In many cases, particularly in smaller organizations, independence can be demonstrated by the freedom from responsibility for the activity being audited.

NOTE 2 External audits include those generally termed second- and third-party audits. Second-party audits are conducted by parties having an interest in the organization, such as customers, or by other persons on their behalf. Third-party audits are conducted by external, independent auditing organizations, such as those providing registration or certification of conformity to the requirements of BS EN ISO 9001 or BS EN ISO 14001.

NOTE 3 Audit criteria are a set of policies, procedures or requirements. Audit criteria are used as a reference against which audit evidence is compared.

NOTE 4 Audit evidence is records, statements of fact or other information, which is relevant to the audit criteria and verifiable. Audit evidence may be qualitative or quantitative.

[BS EN ISO 19011:2002]

3.2

continual improvement

process of enhancing the environmental management system to achieve improvements in overall environmental performance in line with the organization's environmental policy

NOTE The process need not take place in all areas of activity simultaneously.

[BS EN ISO 14001:1996]

3.3

environment

surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation

NOTE Surroundings in this context extend from within an organization to the global system.

[BS EN ISO 14001:1996]

3.4

environmental aspect

element of an organization's activities, products or services that can interact with the environment

NOTE A significant environmental aspect is an environmental aspect that has or can have a significant environmental impact.

[BS EN ISO 14001:1996]

3.5**environmental impact**

any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities, products or services

[BS EN ISO 14001:1996]

3.6**environmental management system**

part of the overall management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy

[BS EN ISO 14001:1996]

3.7**environmental management system audit**

systematic and documented verification process of objectively obtaining and evaluating evidence to determine whether an organization's environmental management system conforms to the environmental management system audit criteria set by the organization, and for communication of the results of this process to management

[BS EN ISO 14001:1996]

3.8**environmental objective**

overall environmental goal, arising from the environmental policy, that an organization sets itself to achieve, and which is quantified where practicable

[BS EN ISO 14001:1996]

3.9**environmental performance**

measurable results of the environmental management system, related to an organization's control of its environmental aspects, based on its environmental policy, objectives and targets

[BS EN ISO 14001:1996]

3.10**environmental performance evaluation****EPE**

process to facilitate management decisions regarding an organization's environmental performance by selecting indicators, collecting and analyzing data, assessing information against environmental performance criteria, reporting and communicating, and periodically reviewing and improving this process

[BS EN ISO 14031:2000]

3.11**environmental performance indicator****EPI**

specific expression that provides information about an organization's environmental performance

[BS EN ISO 14031:2000]

3.12**environmental policy**

statement by the organization of its intentions and principles in relation to its overall environmental performance which provides a framework for action and for the setting of its environmental objectives and targets

[BS EN ISO 14001:1996]

3.13

environmental target

detailed performance requirement, quantified where practicable, applicable to the organization or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives

[BS EN ISO 14001:1996]

3.14

interested party

individual or group concerned with or affected by the environmental performance of an organization

[BS EN ISO 14001:1996]

3.15

organization

company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public or private, that has its own functions and administration

NOTE For organizations with more than one operating unit a single operating unit may be defined as an organization.

[BS EN ISO 14001:1996]

3.16

phase audit

audit carried out in order to ascertain whether all the stages within one or more phases of this standard have been implemented

3.17

prevention of pollution

use of processes, practices, materials or products that avoid, reduce or control pollution, which may include recycling, treatment, process changes, control mechanisms, efficient use of resources and material substitution

NOTE The potential benefits of prevention of pollution include the reduction of adverse environmental impacts, improved efficiency and reduced costs.

[BS EN ISO 14001:1996]

3.18

procedure

specified way to carry out an activity or a process

NOTE An effective method of ensuring repeatability and consistency of approach in organizational actions.

[BS EN ISO 9000:2000]

4 Implementation process

4.1 Overview

In order that organizations can more effectively husband resources given over to the implementation of a formal environmental management system, the guidance on this implementation process has been designed as a series of iterative cycles or phases. There are six phases in all (see Figure 1) with a number of step-by-step actions or “stages” within each phase. The first five phases relate to implementation of an environmental management system. At the end of each phase and prior to embarking on the next, organizations should consider an internal audit to satisfy themselves that the stages are complete, and that the associated guidance has been considered and, where appropriate, implemented.

A sixth phase with appropriate stages has been included for those organizations that wish to achieve accredited certification to BS EN ISO 14001 and/or that decide to pursue external reporting on their environmental performance and/or registration under the EMAS [1] scheme (see Figure 1).

For the purpose of clarity, each phase is laid out in the form of an overview figure (e.g. Figure 2) and an associated series of stages. The overview figures represent the order of implementation within a particular phase as a whole and are provided so that implementing organizations can trace their progress through each phase.

The stage profiles present the implementation guidance in a series of graduated stages, and are arranged under headings that provide both background and specific information. The headings and their meanings are as follows:

Stage heading: The name of the particular stage to which the profile refers.

Phase number: The phase number to which the stage belongs.

Stage number: The number of the particular stage to which the profile refers.

Why: Information relating to the context and purpose of the advised actions contained in the stage.

When: Information relating to the timing of the advised actions.

Who: The people likely to be involved in the implementation of the particular stage.

How: The advised actions to be carried out in order to complete the stage.

Suggested inputs: Elements that provide a contribution to the overall completion of the advised actions in the stage.

Typical outputs: Examples of documentary or other outputs from the advised actions. Implementers are not limited to these outputs.

Achievement criteria: Information relating to the criteria for completion of the particular stage. The criteria can be applied following the completion of all the appropriate advised actions in the stage.

The successful completion of each phase is based upon the completion of each of the stages within that phase, following corrective action if necessary.

The internal “phase audit” (shown in Figure 1) at the end of each phase should establish that there is sufficient robust evidence that all the stages in that phase have been completed. Audits of subsequent phases should also cover earlier phases, e.g. phase audit 3 includes re-audits of Phases 1 and 2.

The appearance of phased audits in the overview diagrams is an indication that an organization might also choose to be audited by external parties at the indicated points if so desired.

The early phases begin in a simple fashion and progressively build in detail as the users become more familiar with the approach and proficient in its use.

In addition to the phases, Annex A (informative) provides examples of supporting tools and techniques appropriate to each of the stages within the phases. Annex B (informative) provides guidance on how users of the standard can extend their environmental management system in order to comply with the requirements of the EMAS regulation. Annex C (informative) shows broad technical correspondence between the achievement criteria of this British Standard and BS EN ISO 14001:1996.

Throughout this standard, the word “procedure” should not be taken to be a reference to paper-based documentation alone. In the same way, the phrase “establish and maintain a procedure” should be taken in its widest possible sense to include software and less formal, but nonetheless effective, forms of practice.

4.2 Phase implementation

The stages of Phase 1 are shown in Figure 2 to Figure 9.

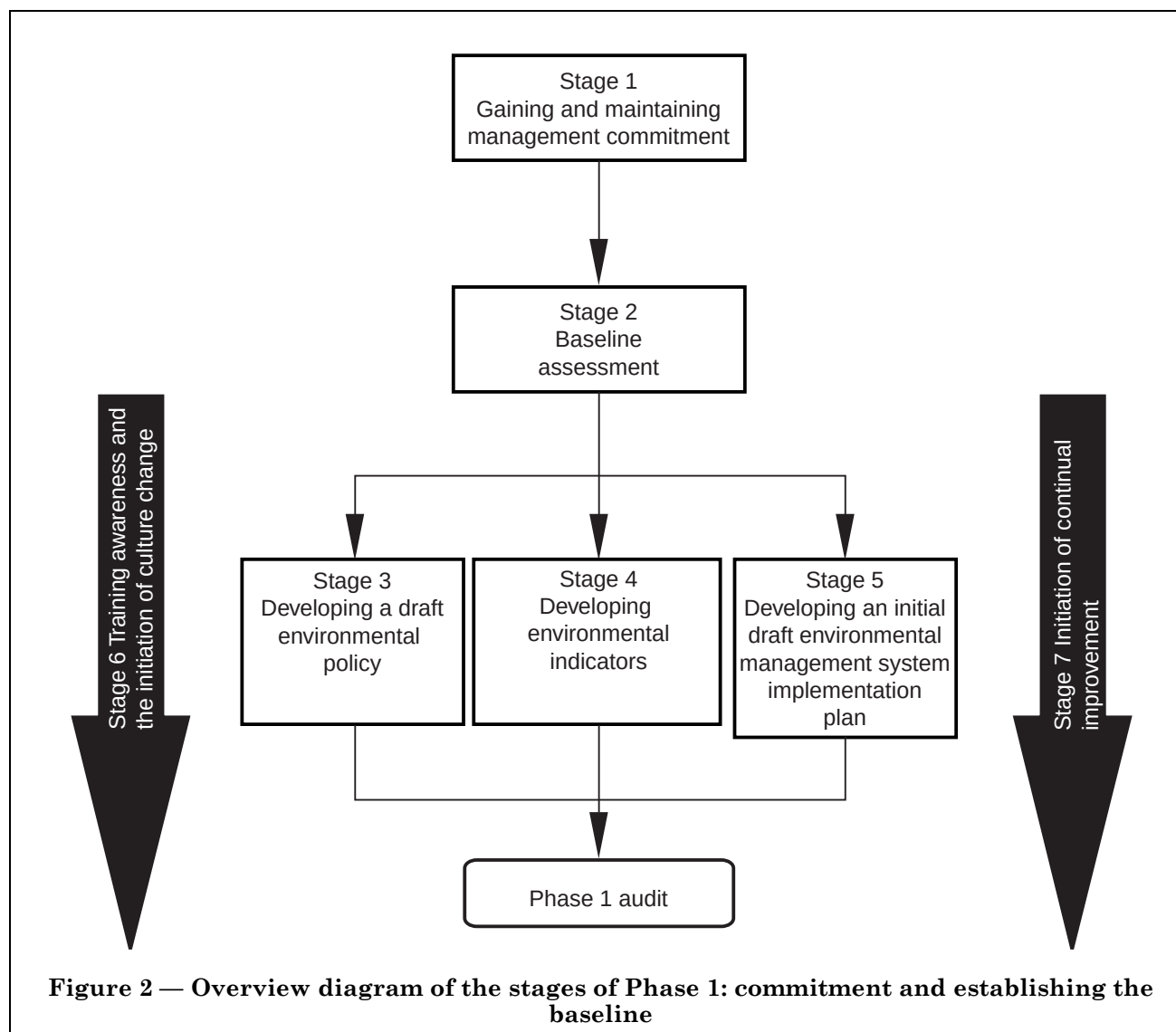
The stages in Phase 2 are shown in Figure 10 to Figure 15.

The stages in Phase 3 are shown in Figure 16 to Figure 23.

The stages in Phase 4 are shown in Figure 24 to Figure 30.

The stages in Phase 5 are shown in Figure 31 to Figure 36.

The stages in Phase 6 are shown in Figure 37 to Figure 42.



Stage heading	Gaining and maintaining management commitment		Phase 1	Stage 1
Why	Gaining top management commitment is a fundamental step in the implementation of an environmental management system, as for any other major project. Top management commitment is essential to give the project importance within the organization, as well as for approving any necessary resources and changes. Top management commitment can encourage a consistent approach to the environmental management system throughout the organization and facilitate gaining the commitment of key individuals working for, or on behalf of, the organization. Devolved responsibilities and commitment can enable the organization to get the most out of the environmental management system by having those working for, or on behalf of the organization at all levels involved, understanding and identifying opportunities.			
When	Prior to establishing the implementation programme and throughout its implementation.	Who	— Top management. — Line managers. — Supervisory individuals working for, or on behalf of the organization.	
How	— Recognize the specific drivers for the organization to implement an environmental management system. — Identify potential benefits and barriers. — Present the case for an environmental management system to top management highlighting the advantages of improving environmental performance through a staged approach. — Form an environmental management system implementation team from those working for, or on behalf of the organization. — Outline the management structure that can support the environmental management system implementation. — Outline the responsibilities of managers and other key individuals working for, or on behalf of the organization, under the environmental management system implementation. — Maintain top management support and commitment by regularly reporting on progress. — Identify and communicate benefits accruing from environmental management system activity.			
Suggested inputs	— Meeting with management to explain the benefits of an environmental management system. — Supporting information regarding potential benefits. — Allocation of time to undertake initial research. — Budgetary information. — Publications and guidance literature. — Consideration of the suitability of formal environmental management systems, e.g. BS EN ISO 14001 and EMAS.			
Typical outputs	— Clear statement of commitment and allocation of any required resources. — Commencement of the environmental management system implementation.			
Achievement criteria	— Robust evidence that top management commitment has been secured. — Robust evidence that a draft outline of the environmental management structure and responsibilities has been developed.			

Figure 3 — Gaining and maintaining management commitment, Phase 1 Stage 1

Stage heading	Baseline assessment		Phase 1	Stage 2
Why	In order to be able to identify what should be done to implement an environmental management system for the organization, the current situation concerning the environmental impacts of the organization’s business activities, products or services should first be established. The baseline assessment provides a quick and easy approach to gaining greater understanding of the current level of environmental performance and issues. The assessment considers existing management practices, the likely main environmental aspects and associated impacts, environmental costs, views of interested parties and key legal requirements.			
When	As soon as top management commitment has been secured.	Who	— Those working for, or on behalf of the organization involved in environmental management system implementation. — Other key information providers and those working for, or on behalf of the organization involved in other activities (i.e. maintenance) who might not appear initially to have a direct environmental impact.	
How	— Establish the scope of the baseline assessment. — Produce a site plan and mark on the current drainage system. — Establish site environmental history (e.g. previous use of site, potential contamination of land, any previous pollution incidents or prosecutions). — Identify the main activities, products and services that the organization is responsible for and can control or can be expected to have an influence over. — Identify interested parties. — Identify the likely significant environmental aspects and associated impacts (see also Figure 17, Phase 3 Stage 1). — Identify key legal requirements (e.g. process licences, discharge consents). — Review existing management practices and procedures. NOTE Organizations may also consider: — views of interested parties (internal and external); — a general assessment of potential environmental costs and benefits; — identification of potential opportunities and barriers.			
Suggested inputs	— Top management commitment. — Time and resources.			
Typical outputs	— Site plan. — General scope of environmental management system. — List of likely significant environmental aspects and associated impacts. — List of key legal requirements. — Identification of initial opportunities, e.g. to make cost savings, improve environmental performance, address the concerns of interested parties.			
Achievement criteria	— Information showing most likely significant environmental aspects of the business. — Information about key legal requirements. — Information regarding the site, the history of the site, and any environmental implications.			

Figure 4 — Baseline assessment, Phase 1 Stage 2

Stage heading	Developing a draft environmental policy		Phase 1	Stage 3
Why	The environmental policy is a short public declaration that states the organization's intentions and commitment to improving its environmental performance. It also provides the focus for the development and operation of the environmental management system, and is a requirement of both BS EN ISO 14001 and EMAS.			
When	Once the baseline assessment has been completed.	Who	— Top management. — Those working for, or on behalf of the organization involved in the baseline assessment.	
How	— Brainstorm ideas in a group situation to identify what commitments might be included for the organization. — Use the requirements below as a checklist (this can be used to ensure that the draft meets the criteria of BS EN ISO 14001 if so desired). — Keep it simple and concise. — Introduce the organization, briefly describing activities plus any further relevant information. This will provide the reader with an idea of the nature and scale of the organization. — Try and keep things general in the policy to avoid making frequent alterations and re-issues. — Show the draft policy to senior management and those working for or on behalf of the organization to gain feedback.			
Suggested inputs	— Any environmental views or values relating to the organization. — Any existing environmental policies or commitments made to date.			
Typical outputs	— A draft environmental policy that meets all of the requirements of BS EN ISO 14001 and EMAS (as stated below).			
Achievement criteria	The draft policy should: — be appropriate to the nature and scale of the organization, and the environmental impacts of its activities, products and services; — include a commitment to continual improvement and prevention of pollution; — include a commitment to meet relevant environmental legislation and regulations, and other requirements to which the organization subscribes; — provide a framework for setting and reviewing environmental objectives and targets; — be documented; — be supported by plans to communicate it internally and externally and maintain it.			

Figure 5 — Developing a draft environmental policy, Phase 1 Stage 3

Stage heading	Developing environmental indicators		Phase 1	Stage 4
Why	Measurement, analysis, assessment, and review of data relating to the environmental performance of the organization, can help the organization operate an effective environmental management system and achieve stated aims. In addition to this, the collection and use of environmental performance data can support environmental reporting and communication within the organization (and beyond if so desired). The use of environmental indicators has been shown to be effective in maintaining focus on environmental goals and driving continual improvement in environmental performance.			
When	Following the baseline assessment.	Who	— Individuals involved in environmental management system implementation. — Other key information providers.	
How	— Identify the key areas of any costs, e.g. wasteful use of resources and benefits, reduced operating costs. — Identify any other issues of concern to the organization and to interested parties. — Develop simple environmental performance indicators that reflect the points identified above (e.g. litres of water drawn from mains, tonnes of waste landfilled) and correspond this with levels of activity (e.g. tonnes of production, kilometres travelled, “hours worked”). — Identify how indicator information will be used. — Identify the actions (including training) required to implement data collection and the use of the indicators developed.			
Suggested inputs	— Top management commitment. — Draft environmental policy (refer to Phase 1 Stage 3). — Findings of the baseline assessment. — Existing information within the organization. — A vision of what will be achieved through the collection and use of specified data.			
Typical outputs	— Records of environmental performance in specified areas of the organization. — Summaries of environmental performance in specified areas of the organization to assist communication.			
Achievement criteria	— Robust evidence that data collection is being undertaken to address key environmental issues as appropriate to the organization. — Robust evidence that the use of indicator information has been identified and planned.			

Figure 6 — Developing environmental indicators, Phase 1 Stage 4

Stage heading	Developing an initial environmental management system implementation plan		Phase 1	Stage 5
Why	Planning activities, responsibilities, timescales, resource inputs, costs and benefits relating to the implementation of an environmental management system can help the organization in the effective management of the implementation process to agreed timescales. In addition, it can also provide a structured outline of the project to assist the organization in gaining commitment from top management and at other levels within the organization. NOTE This stage profile should be revisited throughout the course of the implementation. The implementation plan should not be confused with the environmental management programme which is an ongoing programme to support the achievement of environmental objectives (see Phase 3 Stage 5).			
When	Once the baseline assessment has been completed (if not at the outset).	Who	— Individuals involved in environmental management system implementation. — Top management. — Other key information providers.	
How	— Identify the actions required to implement a full environmental management system to the required level (e.g. Phases 3 to 5, BS EN ISO 14001 certification). — Identify any timescale targets (milestones) or aspirations for the environmental management system (e.g. Phase 3 by this time next year, EMAS registration in two years). — Develop an outline plan showing tasks and timescales. — Identify responsibilities, specifying those working for, or on behalf of, the organization where possible. — Check plans to ensure that timescales and assumptions are realistic. — Develop an initial plan that can be used for presenting and communicating the plans, and for the management of the environmental management system implementation.			
Suggested inputs	— Initial top management commitment. — An understanding of the actions required and their sequencing. — Findings of the baseline assessment.			
Typical outputs	An outline plan of activities required for the implementation of an environmental management system (to required level) detailing: — activities; — timescales and milestones; — responsibilities; — identification of an environmental management representative.			
Achievement criteria	— A structured and realistic plan, detailing the timescales and responsibilities for the achievement of stated environmental management system implementation goals.			

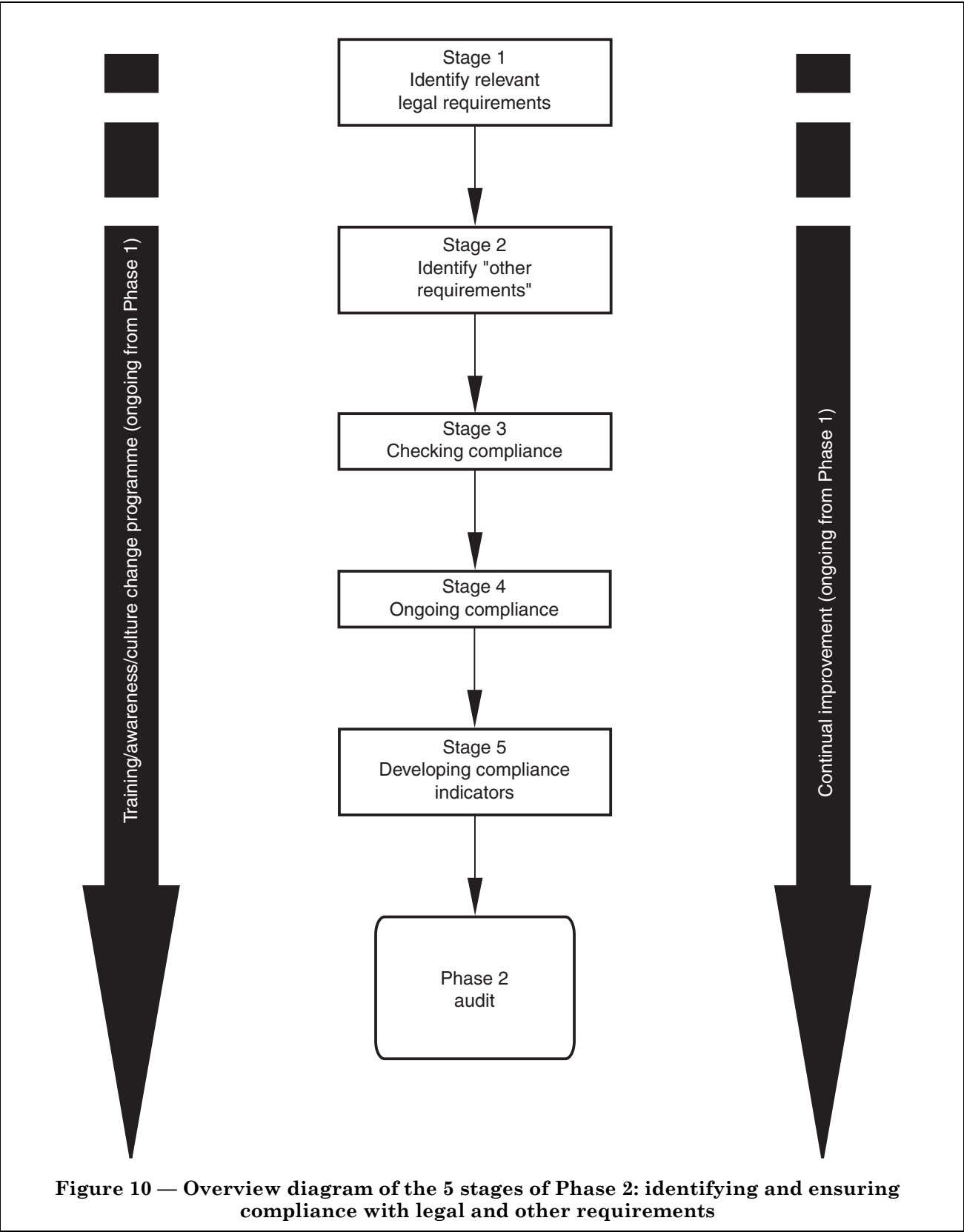
Figure 7 — Developing an initial environmental management system implementation plan, Phase 1 Stage 5

Stage heading	Training, awareness and the initiation of culture change		Phase 1	Stage 6
Why	A crucial part of environmental management is that those working for, or on behalf of the organization know what to do (from an environmental point of view). For example, what is required by law? How can they help the organization to improve its environmental performance or save money? Those working for, or on behalf of the organization should be aware of the project and its aims, as well as possessing the knowledge and competence to enable them to “get it right first time”. The more informed and competent employees are, the higher the chances will be of the environmental management system delivering predicted benefits. It can also enable the employees to get more back from the programme.			
When	As soon as agreement to implementation is obtained from top management.	Who	Everyone within the organization.	
How	— Assess the culture(s) within the organization and identify activities to raise the profile and importance of environmental management (e.g. posters, presentations, newsletters, quizzes). — Raise awareness throughout the organization about the environmental issues/pressures facing the organization and the environmental aspects of its activities, products and services. — Inform all those working for, or on behalf of the organization about the commitment to environmental management and how important it is for the organization in terms of protecting against risks and realizing benefits. — Involve those working for, or on behalf of the organization in environmental management system project activity as soon as practicable (there is particular benefit in involving different people in the baseline assessment). — Conduct an initial training needs analysis for those working for, or on behalf of, the organization, which will enable the organization to assess competence, progress the project and meet initial goals. It might be possible to use existing practices to assist in this. — Schedule awareness activity and specific training for those working for, or on behalf of the organization as identified in the training needs analysis and check that it supports the implementation plan. — Actively obtain feedback from people throughout the organization.			
Suggested inputs	— Top management commitment. — Information about the benefits of environmental management. — Results from the baseline assessment.			
Typical outputs	— Initiation of an environmental awareness raising programme. — An initial training needs analysis focused on personnel competence and a plan for environmental training activity.			
Achievement criteria	— Robust evidence that the organization has planned and initiated awareness raising and environmental training within the organization as appropriate.			

Figure 8 — Training, awareness and the initiation of culture change, Phase 1 Stage 6

Stage heading	Initiation of continual improvement		Phase 1	Stage 7
Why	The focus of environmental management is on improving an organization's environmental performance. In achieving this, a well run, correctly focused environmental management system can deliver cost savings, open up market opportunities, reduce risks, and help the organization improve its image with key parties.			
When	Ongoing.	Who	The implementation team.	
How	— Review the findings of the baseline assessment to identify potential for making improvements and cost savings. — Utilize the environmental management system implementation team to help brainstorm possible areas and initiatives for environmental continual improvement activity. — Use existing guidance and case studies to assist in identifying areas for potential saving, and in prompting ideas for projects and initiatives. — Ask those working for, or on behalf of the organization where they think improvements in environmental or cost performance can be made. — Establish programmes that the organization can implement immediately with goals and make a record of ideas to be addressed at a later stage [these may be programmed into the project plan (Phase 1 Stage 5) or at Phase 3]. — Support programme goals by developing indicators as per Phase 1 Stage 4 (see Figure 6).			
Suggested inputs	— Top management commitment. — Findings of the baseline assessment. — Environmental cost benefit information. — Suggestions from those working for, or on behalf of the organization, consultants, customers, case studies and relevant literature.			
Typical outputs	— Initiatives to improve environmental performance. — Communication and awareness raising about improvement initiatives.			
Achievement criteria	— Robust evidence that the organization has some initial continual improvement actions planned or ongoing.			

Figure 9 — Initiation of continual improvement, Phase 1 Stage 7



Stage heading	Identify relevant legal requirements		Phase 2	Stage 1
Why	Identifying all relevant environmental legislative requirements is essential for any environmental management system. It is important to be aware of the environmental legislative requirements affecting the organization in order to ensure compliance and prevent prosecution, fines, and any potential bad publicity. In particular, the organization should identify and review its site or process specific operation licences, permits and consents to establish what requirements have been imposed in such documents, e.g. effluent discharge levels and pH. As this subject is wide and varied, the relevant environmental legislation will be unique to each organization and site.			
When	After completion of Phase 1.	Who	— The environmental management system representative. — Nominated individuals working for, or on behalf of the organization. — Specialist contributors.	
How	— Use information from baseline assessment (see Phase 1 Stage 2) as a starting point. — Contact the trade association or local business support networks regarding environmental legislation relevant to the industry. — Contact regulators/enforcement bodies. — Use reference material to identify relevant legislation. — Identify which legislation applies to the organization and in what ways. — Develop a procedure for ensuring that the organization is alerted to changes in existing relevant legislation or the introduction of new legislation that might apply.			
Suggested inputs	— Information from baseline assessment. — Allocation of time to undertake initial research. — Consider contacting regulatory/ enforcement bodies. — Relevant documentation, including: — discharge consents; — process licences, permits and authorization documents; — any local bye-laws applicable to the site; — planning consents; — waste documentation (including packaging and transfer notes, etc.).			
Typical outputs	— Identification of relevant environmental legislation and understanding of how it applies to the organization. — A defined procedure for identifying, having access to and updating the organization’s records and information relating to environmental legislation.			
Achievement criteria	— Robust evidence that relevant environmental legislation has been identified. — A defined procedure for identifying, having access to and updating those environmental legislation requirements applicable to the organization. (See Phase 2 Stage 2 for other requirements.)			

Figure 11 — Identify relevant legal requirements, Phase 2 Stage 1