

# LEIA Environment Information Sheet

Environmental Management Preparing An Environmental Policy

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## ENVIRONMENTAL INFORMATION SHEET

## ENVIRONMENTAL MANAGEMENT PREPARING AN ENVIRONMENTAL POLICY

### PREAMBLE

This information sheet is one of a series produced by the LEIA Safety and Environment Committee on topics relevant to the Lift and Escalator Industry. Whilst every effort has been taken in the production of these sheets, it must be acknowledged that they should be read in conjunction with the relevant legislation, codes of practice etc. They should not be taken an authoritative interpretation of the law; but guidance to it.

### ENVIRONMENTAL MANAGEMENT

Lift and escalator industry activities can have a significant effect on the environment. These effects are known as Environmental Impacts and can have positive and negative outcomes e.g. a leaking hydraulic system and its potential to pollute the ground and water sources, has a negative impact, whereas the provision of an escalator drive that is controlled by demand and its potential to reduce energy consumption has a positive impact. It is not practical to eliminate all negative impacts, although this should always be the aim, so companies should endeavour to reduce the magnitude of the negative impact, in the following priority order:

- Reducing
- Re-using
- Recycling
- Other recovery (for example energy recovery)
- Disposal

This is referred to as the hierarchy of waste.

For further details on waste management see LEIA Information Sheet 62 Waste Management: Good practice guide for the UK lift industry, available from the Member's pages of the LEIA website.

### PREPARING AN ENVIRONMENTAL POLICY

More and more organisations are preparing written statements declaring how they manage issues relating to the environment thus providing a framework for setting targets in order to improve their environmental performance. Such policies have become a corporate priority due to increased awareness of the environmental impacts and the drive from interested stakeholders, e.g. customers; employees etc. who want to see a public declaration from the organisation stating how environmental management is achieved

#### What is an environmental policy?

The two internationally recognised Environmental Management Systems - EMAS and ISO14001 both include the requirement for an Environmental Policy

EMAS, the Eco-Management and Audit Scheme, is a European initiative that encourages industry to manage its environmental impacts and to publically report progress on its environmental achievements. Environmental impacts requiring attention might include emissions to air and water, the management of waste including its disposal on land, and the use of natural resources.

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EMAS defines a policy as the company's overall aims and principles of action with respect to the environment including compliance with all relevant regulatory requirements regarding the environment.

ISO 14001:2004 states in Clause 3.11 that the policy is a statement by the organisation of its "overall intentions and direction of an organisation related to its environmental performance as formally expressed by its top management" It provides a framework for action and for the setting of environmental objectives and environmental targets

The environmental policy sets out publically the broad principles and aims of the company in terms of the environment. It should demonstrate to interested parties the level of commitment to *improve its environment performance*. As well as a public document, signed by the Chief Executive, it should demonstrate the company's top management's commitment to environmental matters to the rest of the organisation. It should set the broad goals and structure for action at operational levels.

The policy is the first step in implementing an environment system and should follow the Environmental Review, which will identify the environment aspects and impacts created by the business. This review will help shape the policy, which should be a strategic statement that empathises a forward thinking approach so that the company keeps ahead of environmental issues rather than reacting to them.

Conformance with the policy commitments will be a key factor in the assessment of companies aiming for accredited certification with an environmental standard.

ISO 14001 specifies that the policy should:-

- Be appropriate to the nature, scale and environmental impacts of its activities, products and services
- Include a commitment to continual improvement and prevention of pollution
- Include a commitment to comply with relevant environmental regulations, and with other requirements to which the organisation subscribes
- Provide the framework for setting and reviewing objectives and targets
- Be documented, implemented, maintained and communicated to all employees
- Be available to the public

As a minimum, the environmental policy should commit the organisation to:

- Meet legislative and regulatory requirements
- The process of continual improvement

Whilst the operations of most member companies will have limited environment impact there will also be an opportunity for improvement, this could be by reducing CO2 emissions or by better use of limited natural resources. The preparation of an environment policy, which has been complied after due consideration of the company's interaction with the environment, will focus management and employee's attention of improving performance.

#### Writing the policy

To be effective the environmental policy should be a short, unambiguous document. It should clearly state what areas of the company that it covers. It should be consistent with other organisational policies e.g. Total Quality Policy and Occupational Health and Safety Policy. It should be a flexible document - as the company gains more experience in managing its environmental commitment and a greater understanding of environmental issues, the document can be refined and developed.

The following is suggested as a possible format for companies preparing an Environmental Policy. A sample policy is reproduced overleaf.

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"The Company" makes a commitment, as part of its policy statement, to:-

- Reduce waste and consumption of resources (materials, fuel and energy)
- Design products in such a way as to minimise their environmental effects in production, use, and disposal
- Comply with relevant environmental legislation
- Minimise the adverse environmental effects of new developments through strategic planning.
- Reduce or eliminate the production of polluting releases to the environment
- Undertake continuing Education and Training of the workforce

Note: the above are suggestions - the policy commitments must be relevant to the company. There may be additional commitments as well as some of the above not being applicable.

When committing compliance to relevant environmental legislation consideration must be given to the following:

#### **Environmental Legislation**

(note that in many cases, separate legislation covers England, Scotland, Wales and Northern Ireland)

- Environment Act 1995
- Noise Act 1996
- Water Act 2003
- Control of Pollution (Amendment) Act 1989
- Environmental Protection (Duty of Care) Regulations 1991
- Hazardous Waste [England and Wales] Regulations 2005
- Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991
- Waste Electrical and Electronic Regulations 2006 and amendments thereof
- Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations2008 ["RoHS Regulations"]
- The Producer Responsibility Obligations (Packaging Waste) Regulations 2007 and amendments thereof
- Energy Performance of Buildings (Certificates and Inspections) Regulations 2007
- Environmental Damage (Prevention and Remediation) Regulations 2009
- Waste Batteries and Accumulators Regulations 2009

For any clarification of this information sheet contact your company Safety Advisor or the LEIA Safety and Training Manager.

#### REFERENCES

Waste Management: Good practice guide for the UK lift industry: the Lift and Escalator Industry Association <u>www.leia.co.uk</u>

European Waste Catalogue and Environmental Guidance Notes in England : The Environment Agency <u>https://www.gov.uk/government/organisations/environmentagency</u> Environmental Guidance in Northern Ireland and Scotland: NetRegs www.netregs.gov.uk