

The Key to EMS Implementation: Management Support is Not Just Money

Authors: Harry S. Kemp, CHMM and Phil Wood, CHMM

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Abstract: We all know that successful implementation of any new initiative will be dependent on management support, and environmental management system (EMS) implementation is no different. Of particular importance is the designation of the person who has the responsibility for development and implementation of the EMS, the management representative (MR).

EMS development and implementation requires a manager first and an environmental expert second. The MR must be highly organized and possess the leadership and management skills necessary to build teams, manage projects, influence opinion, and implement decisions. It is also critical that the MR has already made the transition from solely a compliance viewpoint to a system vision.

Success of an EMS is also dependent on visible and active involvement by top management especially in setting objectives and targets. The general goal of any EMS should be the evolution from a reactive system to a proactive system where the implementation of effective cross functional management procedures creates an organization-wide EMS with self-correcting programs.

The responsibility for environmental performance will then extend beyond the bounds of the environmental department. Management must work with the MR to develop an overall vision of an integrated management system, not just the environmental components, and then very carefully develop plans to achieve it. Taking the time to figure out what you need to do, how you will do it, and which people must be involved will pay big dividends from the implementation of an effective EMS. An essential element of an EMS is planning, and the planning should start before you even begin.

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Many businesses have jumped on the Environmental Management System (EMS) "bandwagon" and many of these businesses have realized organizational improvements and environmental profits from doing so. Since 1996, over 11,000 companies worldwide have successfully implemented an EMS using the ISO 14001 quality-based principles of plan-do-check-act. However, the majority of these companies have put an EMS in place for the wrong reasons. The three most common reasons cited for ISO 14001 registration are customer requirement, competitive market advantage, and cost or risk reduction through improved resource management.

Consider for example the Ford/GM mandate to implement an EMS. This has clearly increased the number of companies implementing an EMS and has increased the marketplace demand for EMS consulting services. Unfortunately, the "we have to put an EMS in place" solution to these types of external pressures is leading to development of barely functional EMSs that lack a clear strategy and upper management support. Under these circumstances the full potential of an EMS is not being realized, at great cost in time and money to the organization.

Management Support

We all know that successful implementation of any new initiative will be dependent on management support, and EMS implementation is no different. In fact, working under a management system is often such a different approach to operations that employees will not even take notice unless

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they clearly see that it is important to management. This requires visible and active support by management. The term “management support” has different meanings to different people. Many management teams believe that if they hire a consultant to assist with implementation they are fulfilling their responsibility. This may be of help, but successful implementation that will provide the organization with all of the promised benefits of an EMS requires support from management that integrates the EMS into the everyday natural course of business. Of particular importance in accomplishing this is designating the person responsible for development and implementation of the EMS, the management representative (MR).

Selection of the Management Representative

Management, knowing that it is an environmental management system, often takes the easy way in designating the MR by defaulting to the environmental manager (EM). This is a functional rather than a strategic decision and often dooms the project to failure from the start, ensuring minimal effectiveness of the EMS. Management should select the MR based on qualifications, the person most capable of successfully managing the development and implementation of the system, who will also be able to properly maintain the system properly so that it fulfills the promise of continual improvement. EMS development and implementation requires a manager first and an environmental expert second, if at all.

There are many highly skilled professional, capable and accomplished EMs, but this does not ensure their success with system management. Management would be well advised to consider several important criteria for selection. The MR must be highly organized and possess the leadership and management skills necessary to build teams, manage projects, influence opinion, and implement decisions. The MR must understand operations to facilitate management procedure development and be able to conduct detailed assessment of the effect operations has on the environment. The MR must be skilled in management by objective to orchestrate environmental performance improvement through development of objectives and targets and implementing environmental management programs.

If we are to achieve results never before accomplished, we must expect methods never before attempted.
- Sir Francis Bacon -

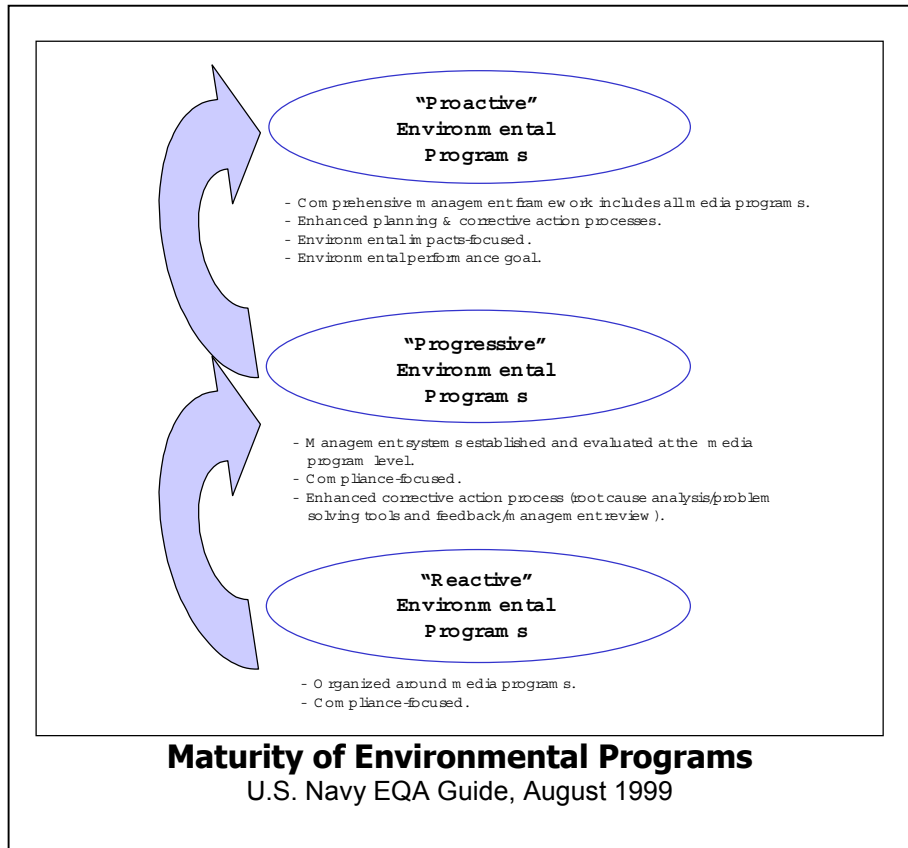
The MR is often in a lower-level position with no management authority, where success is based solely on the force of his or her personality and ability to influence other to pursue paths of action. An important responsibility of the MR is to report to management on the performance of the EMS as a basis for decision making on system improvement. The MR must command the respect of top management in order for this process to work.

It is also critical that the MR has already made the transition from solely a compliance viewpoint to a system vision. The MR must view environmental management proactively and desire to lead the effort to reprogram the organizations approach to managing it's environmental affairs. Management must carefully select an MR who has the initiative and the will to champion system implementation.

The second critical aspect of management support is developing an overall vision of an integrated management system, not just the environmental components. Management must choose an MR capable of working with them to carefully develop plans for effective implementation. Taking the time to figure out what needs to be done and how to do it, and which people must be involved, will pay big dividends. An essential element of any EMS is planning, and the planning should start before implementation begins.

Maturity of Environmental Programs

The first aim of EMS implementation should be to transform the traditional reactive EMS into a progressive system that begins to address management frameworks. This may be a system that is still compliance focused, but with an enhanced corrective action process that includes problem solving with root-cause analysis and feedback for management review. The next goal of EMS implementation would be to advance to a proactive system with a comprehensive management framework supported by enhanced planning and corrective action processes and environmental impact focus. Specific environmental performance goals should then be integrated into the business plan of the organization.



The Traditional EMS

Every organization has an EMS, but you must ask the question "How effective is it?" Consider the typical functions of the traditional compliance-driven EMS: fighting fires, auditing, reporting, training, and documenting. These are reactive activities organized around media programs, focused on meeting regulatory requirements but with limited planning functions. This type of system only maintains the status quo. Once the "compliance plateau" is reached there are no significantly reduced operating costs and rarely any continual improvement. A traditional reactive EMS does not usually provide opportunity for others outside of the environmental department to contribute to improvement in environmental performance. This ignores a vastly underutilized resource.

The Functional EMS

A functional approach is one that simply follows the specific guidance document being used as a tool to assist with EMS implementation. For example, the ISO 14001 planning element outlines the required functions, such as establish, maintain, and document procedures relating to environmental aspects, legal and other requirements, environmental objectives and targets, and environmental management programs. However, the planning element does not address why the organization decides to go there. To assist with development and implementation of a functional EMS, organizations may refer to one or more of the documents listed in the bibliography. Many select ISO 14001 solely because it's the most widely recognized standard. For many organizations the primary motivation for implementing a functional EMS is short sighted. Clearly, implementing an EMS for the first two reasons cited above – customer requirement, and competitive market advantage – will not likely produce the desired improvements.

A functional EMS will fail to achieve the mission-enhancing benefits of a robust, quality-based management system integrated into the core business mission. Unfortunately, many companies seem content with this type of approach to their EMS. They pick a guidance document (usually ISO 14001) write procedures and create documentation that will allow them to achieve and maintain third-party certification, but not much more. They are simply going through the motions. The approach is especially lacking:

- A key strategic vision
- Leadership to implement that vision
- A clear understanding of how to integrate environmental issues into overall management and business decisions.
- It will, however, provide a structure for achieving continual improvement and should advance the EMS beyond the reactive stage to the progressive stage. Reaching the proactive stage – breaking through the compliance plateau – will take a sincere effort on the part of management.

The Strategic EMS

Overall, performance and strategy are absent from the functional EMS guidance documents, which focus on the common themes of policy, planning, implementation, and evaluation, hopefully leading to continual improvement. Management must take a lead role in developing the organization's strategy for EMS implementation if the EMS is to be more than a hollow structure of procedures and reports. A good beginning is to make the decision internally to establish performance standards. Several examples of performance standards are now available, such as USEPA's "Performance Track" and "Stewardship Track," and New Mexico's "Green Zia Program," which is based on the Malcolm Baldrige Quality Model. Achievement of a chosen performance standard will be accomplished through a complex of adaptations in the organization meant to achieve a robust EMS. These adaptations define the strategy of the organization.

Despite progress in implementing functional types of EMSs, even leading industry sectors have not yet fully dealt with the environment as a strategic concern. EMS implementation, unfortunately, is still viewed as a functional rather than a strategic process. If implementation were more fully understood and supported by a proactive corporate management structure, greater benefits would accrue. The EMS experience is the same as that of implementation of pollution prevention (P2) programs. For example, P2 evaluations, while integral to setting up a P2 program, typically fail to include a management strategy for integrating the efforts into everyday business management activities. This prevents P2 from becoming a core element of the organizational culture.

Strategic concerns – quality, cost, distribution, and service – are integral to overall business planning and decision-making and are managed accordingly (and often aggressively). Decision-makers will always ask "how much," "when," and "who," but typically do not ask "What is the impact on the environment?" This is rarely a consideration until a regulatory issue is unavoidable. More prevalent today is focusing on the environment as a "functional" concern – the need to be in compliance or the need to implement an EMS – usually driven by an exterior force rather than strategic concerns. As with the Ford/GM mandate management reacts to these external drivers to meet short-term needs, but misses the opportunity to enable sustainable change by implementing a robust EMS.

There is nothing more difficult to carry out, nor more doubtful of success, nor more dangerous to handle, than to initiate a new order of things.
- Machiavelli -

A conceptual framework must be developed to define the vision, add clarity and structure, and provide practical guidance at the start of the EMS implementation process. Typically, "vision" consists of two major components: core ideology in the form of the functional EMS, and an envisioned future that defines what the system aspires to. Imagine if you were starting a new organization with the best of everything. What would the organization look like and how would it work? Of course, benefits accrue not only from the audacity of the vision but also from the level and duration of commitment to that vision. A well-defined strategy should lead to an EMS that produces superior results to a functional EMS.

In terms of strategy, very little guidance is available; this is where top management has to work hard to define its vision. How many companies can actually say that consideration of environmental costs and impacts are integral to decisions about the capital budget, process changes, new product introductions, facility expansions, and personnel? Using the available EMS guidance documents, such as ISO 14001, combined with a clear vision and strategy will augment the management process so holistic decision making can occur.

Some leading industrial companies clearly illustrate the point of thinking strategically rather than functionally, e.g., those companies participating in Innovest's EcoValue 21 program or in the British Standard's Sustainability: Integrated Guidelines for Management (SIGMA) project. Or like those companies that formally endorse the Coalition for Environmentally Responsible Economies (CERES) Principles, which is a 10-point code of corporate environmental conduct representing a voluntary commitment to continual environmental improvement that reaches beyond the minimum performance required by government regulations. These three programs clearly emphasize strategic management vision and seek management quality that includes an EMS, financial analysis and operational consistency, management commitment through transparency, implementation, and accountability. The organizations that have taken the path of implementing a strategic EMS clearly have visible and active support from top management.

Conclusion

To implement an effective and sustainable EMS that will contribute to achieving the business objectives and mission of the organization, consideration should be given to the following strategic steps:

- Develop a key strategic vision to add clarity, firmness, and direction and to articulate practical guidance.
- Put strong leadership on the implementation team to achieve continual improvement.
- Develop a clear, concise method for integrating environmental management into all business practices.
- Ultimately, environmental issues must be tied to economic performance, which will likely require key changes in accounting and budgetary practices.
- Develop uniform metrics linked to overarching environmental objectives to ensure that performance is connected to improvement.

- Involve employees. They will be the driving force behind, and key to, the system's success.
- Hold individuals accountable for meeting system development deadlines.
- Develop clear internal and external communication channels to promote and publicize the EMS.
- Develop a structured documentation system to effectively maintain knowledge and promote education.
- Establish corporate management review procedures.

Success of an EMS is dependent on visible and active involvement by top management. Once the appropriate MR is chosen management should continue to support improvement efforts. This is most effectively accomplished during the process of setting objectives and targets. The early phase of this process should focus on system objectives to get the EMS in place and working effectively. This will have an indirect influence on the environmental aspects of the organization. Then the effort should shift to a focus on performance objectives and targets, which have a more direct influence on environmental aspects. The general goal of any EMS should be the evolution from a reactive system of managing environmental affairs, concerned only with reaching and maintaining compliance of environmental media programs, to a proactive system where effective cross-functional management procedures create an organization-wide EMS with self-correcting programs. The responsibility for environmental performance will then extend beyond the bounds of the environmental department, involving the organization as a whole.

Management should serve as an invaluable resource in this process, but often becomes a liability due to inattention and lack of understanding and support. Ultimately, a company that develops a clearly defined and consistent strategy for environmental management will realize a positive impact on financial and environmental performance far greater than any functional or compliance-focused management system would achieve.

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