

# Defra position statement on Environmental Management Systems

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

This policy document updates the statement first published in September 2005.

### **SUMMARY**

**1.** The position statement outlines the benefits of implementing an environmental management system (EMS) and the role an EMS can play in helping business and the public sector reduce their environmental Impacts, achieve cost savings, comply with legislation and demonstrate their commitment to securing continuous performance improvement.

An EMS can help all types and sizes of organisations, including small organisations, public sector bodies, Government Departments and local authorities, meet their own environmental and sustainability targets as well as contribute to national targets on climate change, sustainable development, waste, water, emissions, energy, resource efficiency and other environmental issues.

The statement has six main recommendations:

- i)** Organisations should put in place an EMS that is appropriate for improving their environmental and financial performance, and which is best suited to their operations taking into account the size, complexity, nature and risks of their activities.
- ii)** Organisations implementing an EMS should consider the value of adopting a national or international standard or scheme, such as the international standard ISO 14001, the EU Eco Management and Audit Scheme (EMAS) or the British Standard BS 8555.
- iii)** Organisations should aim to achieve certification of their EMS that provides independent recognition of performance by using auditors accredited by the United Kingdom Accreditation Service (UKAS).
- iv)** Organisations should aim to integrate their EMS into all their business activities, secure senior management commitment and leadership and involve all levels of staff in the implementation and delivery of an EMS.
- v)** An EMS should be used to demonstrate compliance with legislation and performance against industry benchmarks and performance indicators. This information should be disclosed and communicated internally and externally in an open and publicly available format.

vi) An EMS should be used by organisations to help drive performance through the supply chain and support and encourage suppliers to attain more transparent and higher levels of financial, environmental and sustainable performance.

## WHAT IS THE ROLE OF AN EMS?

2. Defra 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. A formal EMS can provide organisations with a practical tool to help them to understand and describe their organisation's impacts on the environment, manage these in a credible way and evaluate and improve their performance in a verifiable way. Properly implemented an EMS can help with managing risks, liabilities and legal compliance.

4. Implementing EMSs can assist organisations improve their resource efficiency and reduce bottom line costs. They can also help conformity with customer requirements in the supply chain, enable sustainable procurement policies, enhance an organisation's reputation, secure new markets. and help improve communication with employees, regulators, investors, and other stakeholders.

## TYPES OF EMSs

5. Defra 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 components 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 environmental registration scheme which requires organisations to produce a public statement about their performance against targets and objectives, and incorporates the international standard ISO 14001.

- **BS 8555** is a British Standard, published in 2003, which breaks down the implementation process for ISO 14001 or EMAS into 6 stages making implementation much easier especially for smaller companies . The Institute of Environmental Management and Assessment (IEMA) has developed the IEMA-Acorn scheme which enables companies to gain UKAS accredited recognition for their achievements at each stage of the standard as they work towards ISO

14001 or EMAS. This process allows early recognition of progress against indicators and can be used very effectively to enhance supply chain management by setting agreed levels of performance, certified to a national standard, and which have been checked by an independent auditor. Organisations who complete each stage of the scheme are entered on a public Acorn register.

BSI Management Systems has also developed a scheme of UKAS accredited certification to each of the stages of BS 8555 called **Steps Towards Environmental Management Systems (STEMS)**.

**EMAS Easy** is a tool designed by the European Commission to specifically help small and micro businesses achieve registration for EMAS in clusters or groups making it simpler for them to implement an EMS in a very short period of time. The scheme has been piloted in a number of European countries. Defra is working with European delivery bodies, professional consultants and partners and will launch the scheme in the UK in 2008.

## **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 in annual reports.

**7.** Defra 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.** Defra 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 significant improvements by operating their own tailor made systems which may also be based on international standards. Other organisations have also continued to develop their own system before the international standard ISO 14001 was introduced. Defra recognises good practice and outcomes achieved at this level.

**10.** However there are real benefits in going beyond 'in house' systems and 'self certification.' A tailor made system may not provide the same level of assurance as a recognised accredited certified standard. Supply chain customers and regulators may require organisations to have put in place an externally certified system. That is why Defra believes that it would be inefficient use of time and effort for organisations beginning to implement an EMS to create a new bespoke system when recognised standards are already now widely available.

**11.** A recognised standard also provides a sound basis for high quality environmental reporting such as environmental, sustainability or corporate responsibility reports, including the narrative reporting requirements in the Companies Act 2006.

## **ACCREDITED CERTIFICATION**

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

**13.** Accredited 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) and some other regulatory regimes. Accredited 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 is often seen as being more credible and reliable.

**14.** 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.

**15.** 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.

**16.** Defra welcomes progress that has been made by UKAS to strengthen the accreditation of EMS certification bodies. This process has also helped to develop an international standard, ISO 17021, on conformity assessment which sets out the requirements for bodies providing audit and certification of management systems as well as new guidance, produced by the European Co-operation for Accreditation, on legal compliance as part of accredited ISO 14001 certification.

**17.** We expect UKAS to ensure that these standards are used to safeguard the quality and credibility of certification for users, improve procedures for handling non conformities and strengthen arrangements for checking compliance with legislation. We also look to UKAS to drive performance further and contribute to considerations of the content of EMS standards and how they can play a more strategic role.

## **BETTER REGULATION**

**18.** Accredited certified EMSs can play a significant role in supporting the implementation of European and national legislation and where appropriate contribute to the better regulation agenda by helping to reduce the administrative burdens on business.

**19.** 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.

**20.** The Environment Agency is currently reviewing OPRA, and will consider the potential for robust and effective EMSs to secure further benefits. Defra supports proposals by the Environment Agency to extend OPRA across all its regulatory regimes. This offers the opportunity to consider whether possession of an EMS for other activities should be recognised within the risk based charging scheme..

**21.** Implementing an EMS can help organisations meet the requirements of other relevant environmental legislation such as IPPC (see core guidance covering the Environmental Permitting Scheme)<sup>1</sup>, as well as make it easier to comply with voluntary or sectoral agreements.

**22.** Local authority regulatory regimes also provide benefits to organisations with robust and effective EMSs. We will continue to review the possibility for achieving further benefits, as evidence of the effectiveness of EMSs develops. We will work with the Department for Communities and Local Government and the Audit Commission to ensure that EMSs are incorporated in guidance for assessors of local authority performance under the new Comprehensive Area Assessments which will come into force in 2008.

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

**23.** Global business trends and annual increases in take up in the UK of EMSs indicate that demand for ISO 14001 is rising significantly and will continue to do so in future years. Suppliers are, for instance, increasingly expected to have a certified environmental management system in place to satisfy requirements of major customers.

**24.** Certifications for the IEMA-Acorn scheme of accredited inspection have risen quickly since 2005. More organisations now realise the potential role that the phased approach can play in sustainable procurement. BS 8555, for instance, 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. The IEMA-Acorn scheme provides organisations with the assurance that their suppliers have met all the requirements of BS 8555 and their performance has been independently checked.

### **EVIDENCE BASE**

**25.** Defra gives priority to evidence based policy making. We welcome the conclusions of the "remas" project,<sup>2</sup> led by the Environment Agency, which was completed in 2006, and which analysed performance data from IPPC regulated industrial sites in the UK and elsewhere in Europe, to assess the effectiveness of EMSs. The conclusions indicate that there is some positive evidence to show that:

- the adoption of an accredited certified EMS improves site environmental management activities.
- overall environmental management is better under EMAS than under ISO 14001, driven largely by better performance for *performance monitoring, documentation control and reporting environmental performance.*

- overall environmental management is better under ISO 14001 than under an informal system, which in turn is better than under no system.
- improved environmental management has an impact on the number of self recorded permit or licence breaches. This suggests that sites with a robust EMS are more aware of their compliance status and are therefore able to identify improvement opportunities.
- improved site environmental management leads to lower average emission levels. However, the strength of the evidence differs significantly across Europe and within sectors.

**26.** Defra will work with the Environment Agency to give wider recognition to EMS users and investigate the potential to develop further a standard 'compliance protocol' to help improve the assessment of legal compliance by the regulator, by management of sites and by EMS verifiers.

**27.** These conclusions support other recent research such as positive findings about the role of EMSs included in Defra's sponsored studies of the links between business environmental performance and corporate incentives, and the relationship between environmental performance, competitiveness and environmental regulation.<sup>3</sup>

**28.** The "remas" conclusions are also backed up by findings included in the IEMA-ENDS survey of EMS users,<sup>4</sup> carried out in 2006, which showed that confidence in the capacity of EMSs to deliver improvements in environmental management is increasing and that EMSs are becoming regarded as a minimal condition for responsible companies which they need to be seen to be complying with.

**29.** There is a large amount of more qualitative as well as quantitative evidence to further support the effectiveness of externally certified EMSs, such as the public reports produced by EMAS registered organisations or in some case studies published by IEMA and EMS Certification Bodies.

**30.** This Position Statement is based on the available evidence from the "remas" study and elsewhere. It will continue to be updated to reflect the results of other published evidence which may be used to influence the future role of EMSs in environmental regulation and policy making.

## **FUTURE CHALLENGES**

**31.** 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.

**32.** UK organisations have made rapid progress in implementing EMSs over the last few years. Globally, the UK is now ranked 6th amongst countries with the highest number of ISO 14001 certificates (as of the end of 2007 there were 6,500, UKAS accredited certifications to ISO 14001 in the UK) This clearly makes the UK a world leader in the take up of this standard. EMAS has proven less popular with only 67 organisations currently registered in the UK.

**33.** The standard for phased implementation of an EMS, BS 8555, has only recently been launched but after two years there are positive signs of increasing business interest in the IEMA-Acorn scheme which provides UKAS accredited inspection to BS 8555.

**34.** Some companies have already used the standard to achieve ISO 14001. Regional projects are successfully managing groups of several hundred companies to achieve Phase Three of BS 8555, and a consultancy led scheme is underway to help organisations involved in horticulture, shipbuilding and industrial cleaning participate in the IEMA-Acorn scheme whilst developing sector specific guidelines for the stepwise approach. .

**35.** There seems potential for much wider take up of EMSs. For example, Japan has a significantly higher number of ISO 14001 certificates, with currently over 21,000. At the same time, the adoption of other certified systems and standards in the UK has grown even faster than for EMSs. There are for instance some 45,000 organisations committed and recognised for Investors in People, and over 80,000 companies certified for the Quality Management Standard ISO 9001 as well as a growing number of public sector bodies seeking registration for the Charter Mark,

**36.** We will ensure that our EMS policy is responsive to business needs and aligned with developments in standards creation such as the current strategic review of the ISO 14000 series undertaken by BSI Standards. We welcome initiatives aimed at helping organisations make the most effective application of these standards, how they can be used to encourage innovation, achieve greater efficiencies and develop scope for a more integrated approach to management of industry standards. We will consider how the implementation of PAS 99 – 2006 (Specification of common management system requirements as a framework for integration)<sup>5</sup> might be developed and used to increase commitments to achieving improved environmental performance.

**37.** To facilitate an increase in take-up of EMSs, Defra will seek to ensure that benefits are embedded in environmental policy making, better regulation initiatives and in communication with stakeholders.

**38.** We will also seek to ensure that information about the benefits of EMSs are included in our work with delivery bodies such as the Business Link Network, and the Regional Development Agencies, as well as in partnerships with professional

organisations such as IEMA. We will work with Government programmes such as Envirowise, the Carbon Trust, and the Waste and Resources Action Programme (WRAP) and encourage them to include information about the benefits of EMSs in their guidance to business. We will continue to explore opportunities for encouraging the European Commission to incorporate EMSs into regulation and policy making.

## **EMSs ,THE GOVERNMENT ESTATE and PUBLIC SECTOR BODIES**

**39.** In March 2007 Defra published the UK Government Sustainable Procurement Action Plan which incorporates all the targets for sustainable operations on the Government Estate and includes a mandate for: “departments to work towards an accredited certified environmental management system i.e either ISO 14001 or EMAS.”<sup>6</sup>

**40.** The *Sustainable Development in Government Report 2007*<sup>7</sup> makes clear that the Sustainable Development Commission (SDC), which monitors Government performance, considers that “the implementation of an appropriate Environmental Management System (EMS) is important to the wider delivery and management of sustainable development targets....Such a system should deliver the systematic approach to managing, reporting, checking and reviewing the process of meeting the SOGE targets” (see page 138). However the report also notes that “EMS coverage across the government estate is not as widespread as might be expected.”

**41.** Defra is committed to achieving the highest levels of performance. The 2005 UK Sustainable Development Strategy *Securing the Future*<sup>8</sup> says: “we want departments to do better and to set an example for the rest of the public sector and business.”

**42.** To achieve continuous improvement of performance Defra aims to roll out accredited certification to ISO 14001 across the whole estate at all of its 53 sites. As of December 2007 87% of all staff in Defra including NDPBs and Executive Agencies were covered by ISO 14001. A total of 31 sites have been certified. The remaining 22 sites (12% of staff) will be certified at a rate of at least four per year.

**43.** To support other public sector bodies including Government Departments make progress on implementing an EMS Defra has worked with leading local authorities to establish a National Network of Regional EMS Groups. The Network aims to help share good practise, knowledge, skills, training opportunities, tools and solutions to implementation problems. There are over 100 public sector bodies involved in these groups which meet throughout the year. We will explore more opportunities for developing dialogues on EMSs between central and local government and facilitating the exchange of expertise and EMS information with other networks in the public sector.

44. One of the key outcomes of the National Network has been the development of a tool to help local authorities manage their compliance with relevant environmental legislation.

## Conclusion

45. Defra believes that putting in place an environmental management system can help organisations openly demonstrate their responsibilities to their customers, investors, stakeholders, and clients and achieve regulatory benefits as well as secure improved efficiencies, and contribute to national efforts to reduce carbon emissions.

46. An EMS is a good practical tool, that can help organisations manage and continually improve environmental performance and ensure that environmental issues are understood from operational level to senior management.

47. This position statement is a developing document and will be regularly reviewed in the light of new evidence and information to support the benefits of EMSs for organisations.

## Endnotes

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<sup>1</sup> <http://www.defra.gov.uk/environment/epp/documents/core-guidance.pdf>

<sup>2</sup> Environmental Data Services, the ENDS Report, No.376, May 2006, page 34 and also see: <http://www.iema.net/index.php/remas>

<sup>3</sup> <http://www.defra.gov.uk/environment/business/scp/research/themes/theme4/sustain-business0506.htm>

<sup>4</sup> Environmental data Services, the ENDS Report No 382, pp.30-33

<sup>5</sup> <http://www.bsi-global.com/en/Shop/Publication-Detail/?pid=00000000030144033>

<sup>6</sup> UK Government Sustainable Procurement action Plan, Sustainable Operations Targets, p.41: <http://www.sustainable-development.gov.uk/publications/pdf/SustainableProcurementActionPlan.pdf>

<sup>7</sup> <http://www.sd-commission.org.uk/sdig2007/>

<sup>8</sup> <http://www.sustainable-development.gov.uk/publications/uk-strategy/index.htm>

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## **Contacts and other sources of information about EMSs**

### **1. What is an EMS?**

<http://www.iema.net/readingroom/show/283/c146>

### **2. Business Link guide on how to set up an EMS**

<http://www.businesslink.gov.uk/bdotg/action/layer?r.11=1079068363&topicId=1079422683&r.12=1079363464&r.s=tl>

### **3. The IEMA-Acorn scheme and BS 8555**

<http://www.iema.net/acorn>

### **4. BSI Management Systems STEMS scheme**

<http://www.bsi-global.com/en/Assessment-and-certification-services/management-systems/Standards-and-Schemes/BS-8555-STEMS/>

### **5. EMAS (EU Eco Management and Audit Scheme)**

<http://europa.eu.int/comm/environment/emas>

### **6. EMAS (UK Competent Body)**

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

### **7. EMAS Easy**

<http://ec.europa.eu/environment/emas/toolkit/>

### **8. Environment agency position statement on EMSs**

<http://www.environment-agency.gov.uk/aboutus/512398/289428/656055/>

### **9. United Kingdom Accreditation Service (UKAS)**

<http://www.ukas.com/>

### **10. ISO 14001**

<http://www.bsi-global.com/en/Shop/Publication-Detail/?pid=000000000030062232>

### **11. NetRegs**

<http://www.netregs.gov.uk/netregs/>

### **12. Envirowise**

<http://www.envirowise.gov.uk/>

### **13. National Network of Regional EMS Groups**

[http://www.sustainable-development.gov.uk/advice/local/ems\\_regional\\_networks.htm](http://www.sustainable-development.gov.uk/advice/local/ems_regional_networks.htm)

### **14. Legal Register for local authorities**

<http://www.sustainable-development.gov.uk/advice/local/leadingbyexample.htm#EMS>

### **15. Case studies of implementation of EMS in business and public sector**

<http://www.iema.net/readingroom/c189>