



Update

Vol. 9, No. 5
May 2002

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News and Information on ISO 14000 and the Environment

U.S. Department of Defense Launches EMS Offensive

Coincides with Federal Support of EMS Implementation, Looming EO 13148 Deadlines

Responding to the increasingly visible support of environmental management systems (EMSs) from the highest levels of the federal government, the U.S. Department of Defense (DOD) stepped forward April 5 to announce that EMS principles will be integrated into all missions, activities and functions carried out under the department's direction. Officials emphasized that the position is not a new policy but rather a shift in management practices as well as a reassertion of a long-standing commitment to the environment.

Indeed, EMS implementation is not a new concept on the federal level. In April

2000, the Clinton administration issued Executive Order (EO) 13148, *Greening the Government through Leadership in Environmental Management*, which requires all government agencies affected by environmental regulations to have an EMS in place by Dec. 31, 2005. The urgency of this approaching deadline was punctuated April 1 when a letter signed by White House Council on Environmental Quality Chairman Jim Connaughton and Office of Management and Budget Director Mitchell Daniels was delivered to all federal agencies requesting that they make EMS implementation a priority. DOD leadership told *IESU* that the release of

its policy statement four days later reflects DOD's grasp of the importance that the Bush administration has placed on compliance with EO 13148 and the department's coordination of its efforts with Connaughton.

"We began working with him almost immediately and came to understand that the Bush administration was entirely in accord with the goals of EO 13148," said Assistant Deputy Under Secretary of Defense for Environment John Paul Woodley. "The work that DOD had been doing prior to the change of administra-

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ISO Group Proposes Corporate Social Responsibility Standard

Responses to Proposal Question Feasibility, Market Drivers

A committee within the International Organization for Standardization (ISO) wants to move forward with developing an international standard on corporate social responsibility (CSR).

But not everyone wants to go with them.

A draft proposal was released last month by ISO's Consumer Policy Committee (COPOLCO) and has met opposition from groups within and outside the ISO community who question whether CSR concepts can or should be taken up by the standards development body.

COPOLCO's Consumer Protection in the Global Market Working Group created the report, titled "The Desirability and Feasibility of ISO Corporate Social Responsibility Standards." It lays out extensive background information regarding existing initiatives on the subject and international interest in formal guidance on CSR. The report concludes that ISO is in a favorable position to respond to this need and should move forward with the development of a CSR management systems standard (MSS).

"The Working Group concludes that ISO CSR MSSs are both desirable (from a consumer and business standpoint) and feasible (from a standards perspective and a

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tion is considered valuable and something that should be fostered under the new administration, so we have the highest-level policy support for our EMS efforts.”

However, DOD’s newly released policy statement on EMS comes at a time when that department’s commitment to environmental protection is coming under increased public scrutiny. Pentagon officials have been in Congress for the past month lobbying for changes in various environmental laws. Critics have argued that the proposals amount to a request for permission to ignore environmental laws, but Woodley was quick to point out that the Pentagon’s proposals apply only to readiness activities and would continue to hold 80 percent to 90 percent of the department’s normal operations accountable to existing environmental regulations.

“We seek a few changes to the manner that some [environmental] requirements apply specifically to military readiness activities—training our personnel in the skills that they need,” he said. “Nothing in the environmental reforms that we’ve requested would pertain to our industrial activities or normal base operations.”

“I think that close analysis shows that there is little if anything in the way of exemption in any of those reforms,” Woodley continued. “What we are really seeking is administrative and legal frame-

work that provides for the sustainability of our training landscape.”

Sticking to Commitments

Despite opposition from some legislators and many environmentalists, on May 10 the U.S. House of Representatives voted in favor of a ruling that changed the way DOD readiness activities were affected by the Endangered Species Act and the Migratory Bird Treaty Act. Woodley was quick to explain that the proposal also was approved by the U.S. Fish and Wildlife Service. It requires DOD’s readiness activities to consider both biodiversity interests and readiness needs in planning and executing its training operations. He said that a healthy and productive environment is considered a key element of national power and that the new EMS initiative is in keeping with DOD’s commitment to support all aspects of national power.

“It is fundamental, therefore, that we perform our mission in a way that is respectful of environmental values,” Woodley stated. “EMSs, and in particular those based upon the ISO 14001 standard, have as a very fundamental requirement a commitment at the highest levels of organizational management to continual improvement in reducing negative impacts on the natural world and improving environmental performance in the broadest sense.

“Once we [complete EMS implementation], the management of environmental concerns will be appropriately recognized as a contribution to the readiness

of our forces and not be seen as a problem or something that has to be overcome in order to make our forces ready,” he said.

That commitment to EMS principles is spelled out specifically in the DOD memorandum distributed by the Under Secretary of Defense April 5. The document, addressed to the Joint Chiefs of Staff and the top-level directors of all DOD agencies, explains that EMS principles must be integrated into all core business areas to enhance mission performance, sustain compliance, avoid risk and pollution, inform the public, and promote productive interaction between DOD agencies and outside organizations as well. The components of all DOD EMSs must not only meet the requirements of EO 13148 but must also include several elements that mix military considerations and ISO 14001 language:

- Public commitment by leaders at the top levels of command to environmental compliance, pollution prevention and continual improvement of the management system;
- Integrated planning, including targets for reducing environmental impacts and supporting mission priorities;
- Operations to ensure that goals and targets are reached, and training to ensure competence and responsibility;
- Procedures for self-evaluation and corrective action, including priority inclusion of identified needs in budget processes; and

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International Environmental Systems

Update

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published monthly by CEEM Inc., 12110 Sunset Hills Road, Suite 100, Reston, VA 20190-3231; phone: 703-250-5900, 800-745-5565; fax: 703-250-5313. The annual subscription rate is \$275 (\$350 for mailing subscriptions to locations outside the United States).

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ISSN 1079-0837

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- Periodic review of the management system by senior leadership, with recommendations for improvement and publication of the review.

The resemblance between these items and the various elements of the ISO 14001 standard are no surprise, said Joe Cascio, chairman of U.S. TAG to ISO Technical Committee 207 on the ISO 14000 series of EMS standards. He stated that DOD's policy varies little from other national-level guidance on the application of EMS principles and reflects the current administration's commitment to EMS implementation across the federal government.

"I think that this indicates that EO 13148 is being taken very seriously throughout the federal government and is really energizing a lot of activity right now," Cascio asserted. "The DOD statement is another addition [to the recent EMS encouragement documents], but they all reinforce one another and are all heading in the same direction."

Setting an Example

Another aspect of the DOD initiative related to ISO 14001 that is mentioned in the memorandum is the issue of third-party registration to the standard. While this is a common practice in the business sector, some larger companies leave the decision of whether to seek a formal certificate attesting conformance to the standard up to each individual facility. The DOD document states that its sites may pursue third-party registration "only when it provides a clear and documented benefit to the mission." Woodley told *IESU* that while it is too early to predict the number of facilities that will seek registration, he said that the department plans to evaluate the options for facilitating this process for those that do—but not to the detriment of the overall initiative.

"Our focus, first and foremost, is on implementing sound, effective environmental management systems," he said. "We are certainly going to work at ways in which the certification process can be streamlined, where resources can be pooled and ways that we can make it as easy as possible for those [facilities] that decide they need external certification to achieve it."

The management system being implemented by the U.S. Air Force is one of the more recognizable programs within DOD, and it made the formal registration decision a site-by-site decision. (See *IESU*, March 2001.) It has been in the process of implementing an environmental, safety and occupational health (ESOH) management system since January 2001 as part of a program that was initiated even before EO 13148 was released. The program was built on compliance auditing, risk management and community-relations activities that the Air Force is working to put into an overarching ESOH system. The goal is to have a system that other service branches and departments can use as a model to meet the EO deadline at the end of 2005.

The Navy also has several programs involving EMS implementation, and one of them decided that formal certification to ISO 14001 was worth the effort. The Naval Sea Systems

Command T-AKE Program Office in Washington D.C., developed and implemented an EMS for its ship acquisition program. The T-AKE Program Office is tasked with designing the Lewis and Clark class dry cargo/ammunition ship, the next generation of logistics support and supply ships for the Navy. The T-AKE environmental health and safety manager created a cradle-to-grave EMS that integrates life-cycle principles into the acquisition program. Beside the achievement of getting ISO 14001 registered, they also have documented a projected 70 percent reduction in waste-stream generation compared to the class of ships that the Lewis and Clark class will replace and a potential \$5 million cost avoidance for ashore waste disposal for this class.

"The EMS was certified as a decision-making tool to allow them to establish the procedures for integrating and coordinating the requirements of our DOD acquisition regulations, which embodies a P2 requirement that environmental considerations be integrated into acquisition management at the design stage," he explained. "They applied this to the life cycle of the whole class of ships, and it's a remarkable thing to see that type of environmental consideration being brought to bear at the time that the very requirements for the major system acquisition are being developed at the level of the Department of the Navy."

Another DOD facility that justified its request to pursue and successfully achieved ISO 14001 registration is the U.S. Army's Ft. Lewis, located on Puget Sound in Washington. The Ft. Lewis Public Works organization was the first Army facility to achieve third-party registration to the standard in September 2000, Connaughton and Woodley visited it in February to get more details on the implementation and its results. They were impressed with the presentation delivered by the program managers, especially with the illustration of the benefits that the system has produced so far. These include cost savings and avoidance of more than \$1 million, reduction in greenhouse gases of 155,510 pounds (78 tons) and source reduction in the use of 178,458 pounds (89 tons) of hazardous chemicals, according to the division's Web site.

Fort Lewis also was involved in facilitating the EMS efforts of eight other Army installations and other DOD facilities, which included hosting tri-service workshops, participating in DOD in-process reviews, developing implementation training tools and conducting various outreach and information exchange efforts for civilian and other military facilities. In this way, Ft. Lewis also serves as an example of another of DOD's EMS policy objectives: promoting "interoperability" among DOD facilities, industry and other countries' militaries. Woodley cited DOD's focus on training programs as one area in which this might be accomplished. He visited with the Inter-service Environmental Education Review Board (ISEERB), which reviews training requirements, reviews and endorses courses to meet training requirements that are common across the Services, to see if the EMS program could take advantage of any existing overlap.

"I've asked them to work over next year to develop the common EMS training elements that can then be addressed by one course," Woodley said. "For example, the Navy might have a course at their facility in Rhode Island that could be reviewed

by ISEERB for use by all of the services instead of each developing courses independently.”

Just as important as the benefits of EMSs and the state of the environment is the cost of this initiative, since American taxpayers are ever-vigilant in keeping track of how the government spends their money. Woodley said that while cost is always an issue for DOD as well, he does not have any hard numbers regarding the overall cost of this program. He said that DOD is still making estimates but that he is certain of one thing: The benefits to the environment as well as national security will outweigh any financial costs that may be incurred.

“We have been benchmarking with industry and discussing these issues with allied nations, and we have a feeling for the range of potential costs involved in the EMS implementation,” Woodley stated. “When we talk about cost, I have no concerns about whether or not this will be a net drain on our resources, and I have no doubt that it will be not only good for the environment but also good for our mission in terms of gaining efficiencies and cost savings.”

United We Stand

Cooperation is certainly a crucial factor in the success of any project as large as the one embodied in the DOD EMS initiative, which is why Woodley has focused on making sure that all of the DOD facilities and departments are communicating effectively and sharing their experiences. He also said that communicating with organizations outside of DOD—

in the regulatory world and in the business world—would be equally important as the initiative gains momentum in the coming months.

Prior to his appointment to DOD, Woodley was secretary of Virginia Department of Natural Resources, during which time he had environmental regulatory responsibility at the state level. One of the disturbing trends that he saw during his tenure was an adversarial relationship between state regulators and industry that was counterproductive to the state’s environmental protection goals. He said that he hopes this initiative will not be another example of a “cops and robbers” mentality in terms of how DOD sites get along with the regulators in the state and local areas where they are located.

“I expect that as we move forward with the implementation of EMSs that the state, local and federal regulatory agencies’ relationship with DOD installations will continually improve so that we’ll have a much more positive regulatory atmosphere that will be focused on improving environmental performance,” Woodley said. “I don’t think that [adversarial] kind of atmosphere is the model for how 21st century government regulators and regulated entities should be behaving.”

To this end, DOD is networking with a number of differ-

ent organizations to learn about other implementation efforts and also to keep abreast of the latest techniques and innovations being pursued outside of the governmental realm. One of these is the Multi-State Working Group (MSWG) on EMS, which DOD has been in consultation with to get advice on how to acquire knowledge and awareness about EMS and doing this jointly with state and local officials where their facilities are.

Bob Stephens, chairman of MSWG and assistant secretary for environmental management and sustainability for the California Environmental Protection Agency, expressed his delight that DOD has become a part of MSWG and his optimism that there are opportunities for mutual learning. He noted, however, that the department has a long way to go before environmental responsibility is fully embedded across the organization.

“I do get the sense that those leaders in the Pentagon recognize that there is a major challenge ahead of them to try to change the culture of the department,” Stephens told *IESU*.

“It’s a big agenda that they have laid out, and they are not going to do it all by themselves.

“They recognize that transforming DOD and making them a good environmental steward is not something that they will do alone,” he added. “It is something that they have to do with others, and that’s the challenge for that department.”

But perhaps the biggest challenge facing DOD today is the multi-

dimensional operations that it has undertaken in the international war on terrorism. This is DOD’s highest priority right now, Woodley said, but that does not mean sacrificing the environment for the sake of military operations. In fact, the responsibility of the government to the environment and the public are inherently linked to one another, he said—and EMSs are one crucial tool that will assist DOD in meeting that dual responsibility.

“We have an imperative to incorporate these best management practices to steward our resources, protect the environment as an element of national power and embody in our actions the ideals of our people,” he said. “Our soldiers, sailors, airmen and Marines expect their leaders to operate in an ethical manner with respect to their impacts on the environment.

“In terms of national power, good management and moral imperative, our environmental program in general and our EMS implementation in particular are directly relevant to this department’s mission of national security and the struggle against global terrorism,” Woodley declared.

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—John Paul Woodley

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