



Environmental Strategies Group, LLC



PROACTIVE ENVIRONMENTAL MANAGEMENT FRAMEWORK (PEMF)

Why You Need One Now More Than Ever... "Pioneering Changes in Proactive Environmental Solutions"

White Paper

DESIGNED TO ACHIEVE A MORE COMPREHENSIVE,
PROACTIVE AND SYSTEMATIC APPROACH TO
ENVIRONMENTAL COMPLIANCE...



“HELPING BUSINESSES AND
INDUSTRIES SET NEW PRIORITIES – TO
PROACTIVELY ACHIEVE
EXTRAORDINARY ENVIRONMENTAL
STEWARDSHIP”

CONTENTS

Background	2
Introduction	2
Proactive Environmental Management Framework Defined	3
Proactive Environmental Management Framework Structure	4-6
Proactive Environmental Management Framework Benefits	7
Proactive Environmental Management Framework Statement of Practical Solutions	7-8
Glossary of Proactive Environmental Management Framework Definitions	8

BACKGROUND

In the past, environmental compliance was primarily an issue of formally complying with externally mandated regulations established by government agencies, and today that is still the case. However, with the maturity of the environmental industry, many companies are exploring ways to institute proactive measures to address environmental issues internally and not wait to react to a violation. Additionally, it is also becoming apparent that environmental compliance is not only limited to rules established by the EPA, but other government agencies are also beginning to flex their powerful regulatory muscles to address potential violation of state and federal laws.

The bottom line is that in the 21st century, environmental issues have become a strategic concern with companies vying to meet their environmental performance obligations while simultaneously attempting to handle other challenging regulatory or operational demands.

Indeed, companies must now develop effective environmental programs that can successfully handle a multitude of internal and external drivers, such as growing enforcement concern and interest in such concepts as sustainable and green environmental performance; increased public pressure for greater transparency; improved environmental compliance; and the need to demonstrate environmental responsibility and heightened environmental stewardship. Instituting and embracing a proactive, comprehensive and systematic environmental management approach provides a solid framework for accomplishing these tasks.

Understandably, many companies are exploring new approaches to meet and exceed their environmental obligations, which this “white paper” attempts to address.

INTRODUCTION

Before continuing further, ask yourself these questions:

- Does your company need to comply with environmental or any other regulatory requirements?
- Is your current approach to dealing with environmental concerns sporadic, ad hoc, reactive or non-existent?
- Is your company affected by significant environmental impacts? Do you need to define those impacts and address your environmental performance footprint?
- Would establishing plans and procedures help your company to more effectively implement its environmental policy?
- Does your company need a framework for demonstrating responsible environmental stewardship, promoting positive change and enhancing staff morale while reducing the possibility of non-compliance?

If your answer is “yes” to any of the above questions, you need an approach such as our Proactive Environmental Management Framework now more than ever.

Read on to find out more...

PROACTIVE ENVIRONMENTAL MANAGEMENT FRAMEWORK DEFINED

As defined by Environmental Strategies Group, a Proactive Environmental Management Framework is:

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

As is evident from the definition, a proactive environmental management framework is a systematic structure or framework that encompasses all of a company practices and policies that impact its environmental policy.

In addition, a fully mature environmental management framework is characterized as:

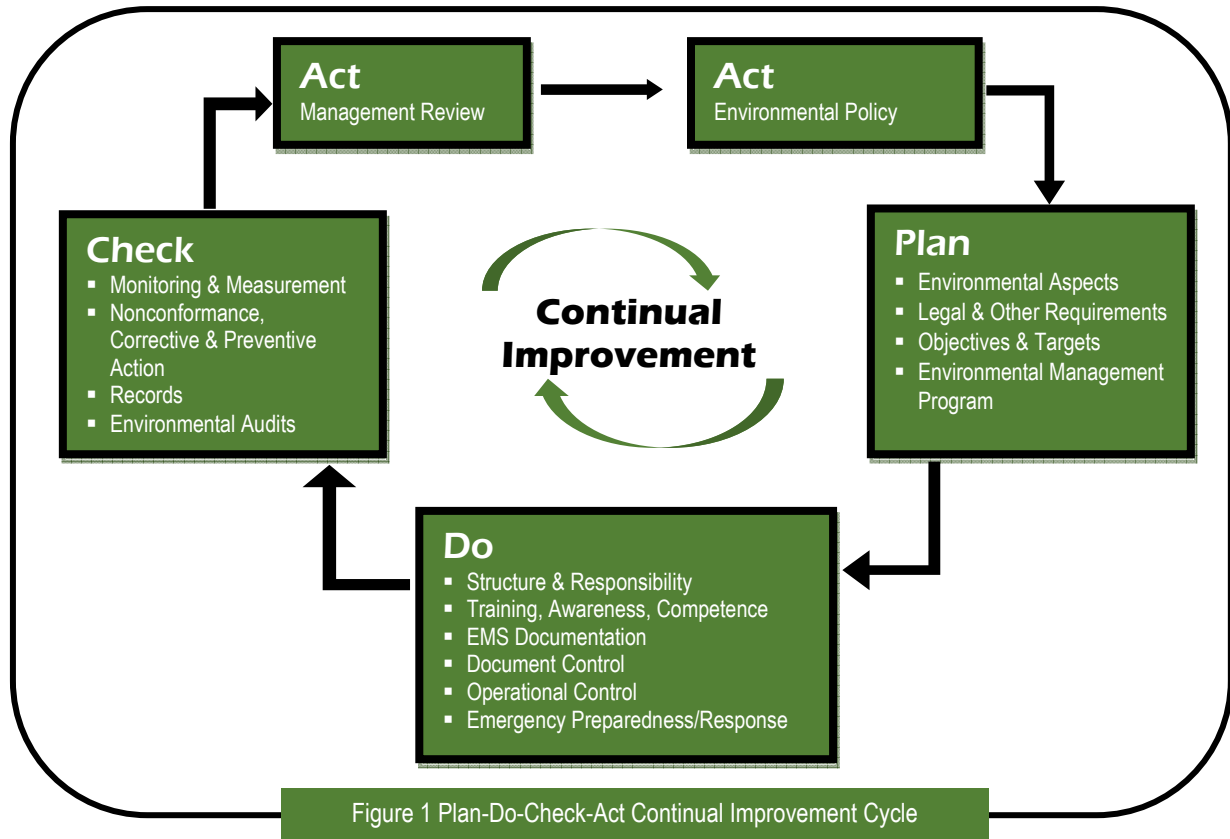
- Comprehensive — all environmental compliance or stewardship concerns
- Systematic — organized, repeatable and quantifiable processes and procedures are in place to measure and promote environmental performance
- Proactive — deficiencies and weaknesses are actively identified and remedied before they become serious problems
- Improvement-focused — the system does not remain static, but continually adapts and improves to meet new or unexpected environmental challenges.

A recurring theme of the present “white paper” is that each of these features is crucially important to ensuring that your company has a solid and effective environmental management framework capable of dealing with a variety of environmental obligations and challenges.

PLANNING

PROACTIVE ENVIRONMENTAL MANAGEMENT FRAMEWORK STRUCTURE

All environmental management frameworks embrace “continual improvement,” and should be structured around the Plan-Do-Check-Act cycle, the most popular and effective continual improvement methodology available in the broader business sector.



As Illustrated in **Figure 1**, the key attributes of a **Plan-Do-Check-Act-Based** PEMF are as follows:

PLAN – Central to an effective Proactive Environmental Management Framework is planning for and identifying those environmental activities that can reasonably be expected to interact with environmental compliance. Known as environmental aspects, these elements must be under the company’ control and influence if the company is to be able to plan and act effectively. Once environmental aspects are known, the company can then engage in additional planning to identify those aspects that are likely to alter performance and have significant environmental impacts. It is important to note that, although briefly discussed here, planning is perhaps the most critical phase and drives many of the most important elements of the environmental management framework, including environmental objectives and targets, legal and other requirements, training needs, operational and emergency controls, risk element and audits.

DO -As the term suggests, the do phase of the P-D-C-A continual improvement cycle encompasses those environmental activities that the company undertakes to implement the proactive environmental management framework in furtherance of the declared environmental policy. Crucial features of this phase include executing proactive environmental management framework action plans (“What is to be done?” “Who is going to do it?” “When will it be done?”); providing appropriate training to enhance environmental competence and awareness, particularly of critical success factors; communicating and documenting environmental-critical information to keep internal and external stakeholders informed and engaged; furnishing effective daily operational control over the company’ environmental activities to maintain a tight focus and prevent non-compliance; and developing and instituting emergency preparedness and response plans to identify, prevent and respond to violations and other negative events.

CHECK - As the P-D-C-A continual environmental improvement cycle is essentially a feedback loop, the check phase (see Figure 2) serves to monitor and provide input on the operation of the environmental management framework itself. During this phase, the company performs the following crucial activities:

- Monitors and measures key characteristics of operations and activities that can have a significant impact on environmental compliance;
- Records information to track environmental performance, relevant operational controls and conformance with internal environmental objectives and targets as well as external rules and regulations;
- Identifies potential environmental non-conformances and undertakes corrective and preventive actions to remedy them and prevent recurrences;
- Performs environmental audits as necessary to check for conformity to applicable requirements;
- Evaluates environmental performance, pinpoints deficiencies and highlights areas of improvement; and,
- Provides crucial information to management and other key stakeholders.

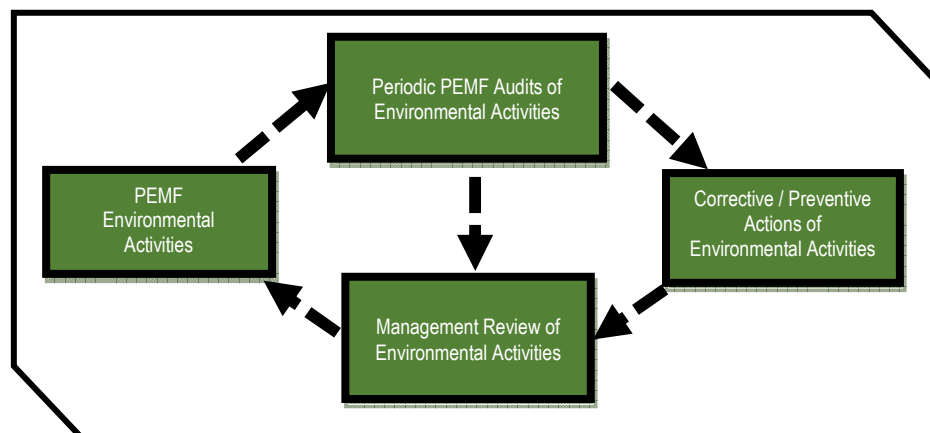


FIGURE 2) INTERRELATIONSHIPS IN CHECK PHASE

ACT- With the information provided during the plan, do, and check phases, management are able to act to ensure that the environmental management framework effectively meets its intended purpose of promoting the company' environmental policy. During this phase, management can and should ask some tough questions, such as:

- Are we living up to our environmental management framework policy?
- Is the environmental management framework working effectively?
- Are we controlling our environmental performance?
- What can we do to improve our environmental management framework?

Depending on the answers to these questions, management can make refinements or alterations to the environmental management framework, the environmental policy or both.



It is important to note that although the Act phase is listed last in the P-D-C-A continual environmental improvement cycle, the establishment of a sound environmental policy should be considered among the first tasks that a company undertakes to implement an environmental management framework.



PROACTIVE ENVIRONMENTAL MANAGEMENT FRAMEWORK BENEFITS

If you are still unconvinced that your company needs an effective and reliable environmental management framework now more than ever, you should consider these tangible benefits:

- Reduced potential for risk and EPA violations;
- Improved environmental and other regulatory cost;
- Reduced exposure to environmental liabilities;
- Improved demonstration of due diligence;
- Minimized environmental impact of activities;
- Reduced legal liability and risk concerns;
- Enhanced public image vis-à-vis the local community, EPA, other government and environmental industry; and,
- Increased competitive advantage over companies that lacks an environmental management framework.

Perhaps, most importantly, guarding against environmental violation is everyone's responsibility and an environmental management framework helps you do it.

PROACTIVE ENVIRONMENTAL MANAGEMENT FRAMEWORK STATEMENT OF PRACTICAL SOLUTIONS

In today's environment, companies must not only achieve operational targets to meet company requirements, but they are also expected to control and reduce their environmental impacts. This is important because unlike most departments within a company structure, no other departments are under such close scrutiny as environmental compliance is. As such, implementing a comprehensive and systematic-based environmental management framework can help companies measure and control those impacts industry-wide. Environmental Strategies Group will evaluate your environmental activities and perform a comprehensive on-site environmental gap analysis audit to determine whether your company needs to implement an environmental management framework or meets the requirements of an environmental management framework so that you have the confidence that:

- Your environmental activities provides a mechanism for facilitating compliance with environmental requirements;
- Your approach to dealing with environmental concerns is comprehensive, systematic, proactive and improvement-focused;
- You have defined your significant environmental impacts and taken steps to reduce your environmental footprint;
- You have established plans and procedures to help your company more effectively implement its environmental policy; and,

- You have a framework for demonstrating responsible environmental stewardship, promoting positive change and enhancing environmental department staff morale while reducing environmental rules violation and other risk. Regardless of your needs, Environmental Strategies Group will help you achieve the most value from your Environmental Management Framework investment.

GLOSSARY OF PROACTIVE ENVIRONMENTAL MANAGEMENT FRAMEWORK DEFINITIONS

The following definitions are taken directly from Environmental Strategies Group environmental management framework requirements to familiarize you with the terminology contained therein.

Continual Environmental Improvement - Process of enhancing the environmental management framework to achieve improvements in overall environmental performance in line with the company's environmental policy

Environmental Aspect - Element of a company's activities or services that can affect their environmental performance.

Environmental Impact - Any change to environmental compliance, whether adverse or beneficial, wholly or partially resulting from a company's environmental compliance activities.

Proactive Environmental Management Framework - The part of the overall environmental management framework that includes organizational structure, planning activities, responsibilities, practices, procedures and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy.

Environmental Objective - Overall environmental goal, arising from the environmental policy, that the company sets itself to achieve and is quantifiable where practicable.

Environmental Performance - Measurable results of the environmental management framework, related to a company's control of its environmental aspects, based upon its environmental policy, objectives and targets.

Environmental Policy - Statement by the company of its intentions and principles in relation to its overall environmental performance that provides a mechanism for action and for the setting of its environmental objectives and targets.