



Best Practices for Achieving Environmentally Sound Management (ESM)

At Facilities that
Refurbish and Recycle
Used and End-of-Life Electronic
Products in North America



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Please cite as:

CEC. 2013. *Best Practices for Achieving Environmentally Sound Management (ESM) for Managers At Facilities that Refurbish and Recycle Used and End-of-Life Electronic Products in North America*. Montreal, Canada: Commission for Environmental Cooperation.

Disponible en français – Disponible en español

Acknowledgements

The Commission for Environmental Cooperation (CEC) is an intergovernmental organization developed to support cooperation among the North American Free Trade Agreement (NAFTA) partners to address environmental issues of continental concern. To support its project theme Sound Management of Electronic Wastes in North America, the CEC has developed the following training materials appropriate for the needs of small and medium-sized enterprises involved in refurbishing or recycling electronic waste in North America.

The CEC would like to thank Laurie Giroux, from the Giroux Environmental Consulting firm, Carolyn Webb, Dr. Anne Goodman, and GLA Environmental Inc., for their contributions as lead consultants to this work. We would like to recognize the valuable and expert contributions of Michael Vanderpol from Environment Canada; Rick Picardi and Karen Pollard from the US EPA; and, Arturo Gavilán, Frinée Cano and Víctor Alcántara from the National Institute of Ecology and Climate Change (Instituto Nacional de Ecología y Cambio Climático—INECC) to the completion of this work. We also wish to thank the following persons, who were interviewed and contributed with time and their expertise to complete this work: From Canada: Shauna L. McCaffrey from Renewed Computer Technology, Canada; and Dennis Maslo, Computation Ltd. From the United States: Kelley Keogh, Greeneye Partners LLC; Pat Furr, Computers for Classrooms. From Mexico: Álvaro Núñez, Recicla Electrónicos México (Remsa); Jan René Aguirre Palme, Proambi, SA de CV; and Albino Fernand Bessa, Technologies Displays Mexicana, SA de CV.

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Commission for Environmental Cooperation

**Best Practices for Achieving Environmentally
Sound Management at Facilities that Refurbish
and Recycle Used and End-of-life Electronic
Products in North America**

Module 2
Top Management Commitment

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2 Module 2: Top Management Commitment

2.1 Learning Objectives

By the end of this module you will be able to:

- identify specific best practices for how top management commitment to a systematic approach could be implemented, improved, and/or demonstrated at your facility;
- assess whether your facility follows best practices to demonstrate top management commitment to the environment, health and safety and how improvement can be made;
- list key elements of an environment, health and safety policy;
- define key elements of an environmental management system; and
- determine key procedures to document at your facility, including those relating to communications and training.

Notes



2.2 Pre-questionnaire



1. Do you have any specific questions about top management commitment that you would like to have answered by the end of this module?

2. Name some of the policies and procedures that your facility has in place which demonstrate a top management commitment to environmentally sound management (ESM).

3. Think of your position in your company. In what areas of operations are you able to help your facility demonstrate a top management commitment to ESM?

4. What challenges might a facility like yours face in demonstrating top management commitment to a systematic approach to achieving ESM?

5. What would you like to learn from other participants about their environment, health and safety (EHS) procedures?

Check-in on Topics Previously Covered in Module 1

Module 1 (Introduction to ESM)

In Module 1 you learned about:

- ESM and why it is important, including some key international conventions and agreements that pertain to ESM and movements of hazardous waste, such as the Basel Convention;
- ESM criteria established under the work of the OECD and United Nations Basel Convention that form the framework for this training;
- some of the key substances of concern associated with processing used and end-of-life electronic products;
- management systems that are designed to minimize environment, health and safety concerns, such as environment, health and safety (EHS) management systems, and verification and certification programs for refurbishers and recyclers of used and end-of-life electronic products;
- the benefits that come from implementing ESM practices; and
- the waste management hierarchy and why it is important.

2.3 Introduction and Overview of this Module

Is this Training for You?

This module is geared toward top managers and managers (sometimes called middle managers).

- **Top managers:** This is the management team led by the managing director of the company. This management team has the executive responsibility for performance of the business, the ESM and/or the quality management system (QMS).
- **Managers:** Designated also as assistant managers, or management representatives, these are experienced workers other than top managers, to whom the managing director has delegated some of his/her operating responsibility, with regard to environment, health and safety management. The managing director remains responsible for all operations and actions taken by these mid-managers.

Overview of this Module

This module will introduce to managers the importance of their role in demonstrating commitment to ESM. The module will also discuss the responsibilities of managers to ensure that ESM criteria are in place.

The following topics are presented in this module:

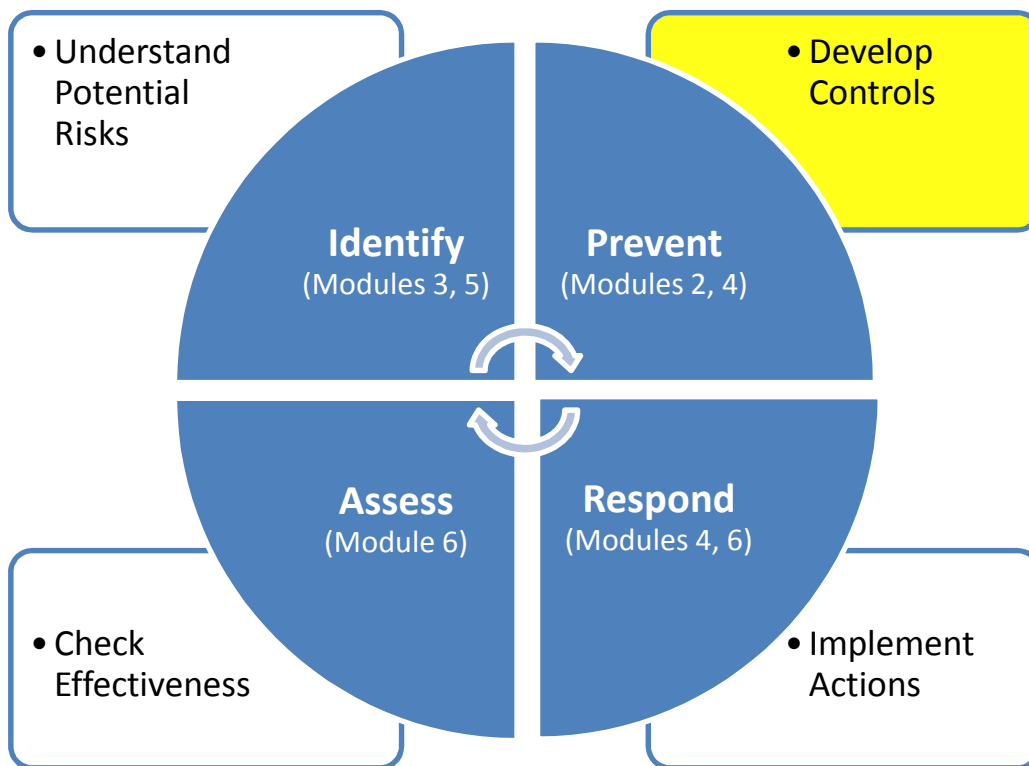
- The Importance of Management Commitment to a Systematic Approach for ESM;
- The Importance of Management Commitment to an Environment, Health and Safety Policy;
- The Importance of Management Commitment to Transparency and Verification in All Aspects of Company Policies, Procedures, and Operations; and
- The Importance of Management Commitment to Employee Training to Demonstrate a Commitment to ESM.

Module 2: Top Management Commitment

Exhibit 1 shows how the key responsibilities of operating a facility fit within the framework of ESM, and where these responsibilities will be covered in the training material.

The upper right quadrant is filled in yellow to highlight where the current module, Module 2, fits in the responsibility framework. Module 2 develops controls to prevent and minimize risks to your facility.

Exhibit 1: Key Responsibilities of Operating a Facility within the Framework of Environmentally Sound Management



2.4 What Is Management Commitment to a Systematic Approach for Environmentally Sound Management (ESM)?

**REMINDER: ESM Criterion #1
Top Management Commitment to a Systematic Approach:**
Demonstrate commitment of top management to integrate a systematic approach to achieve ESM in all aspects of facility operations, which often includes an environmental health and safety management system.

2.4.1 What Is “Top Management Commitment”?

Top management commitment refers to:

- *Direct participation by the highest-level executives in a specific and critically important aspect or program of an organization.* It includes:
 - ✓ setting up and serving on a quality committee,
 - ✓ formulating and establishing quality policies and objectives,
 - ✓ providing resources and training,
 - ✓ overseeing implementation at all levels of the organization, and
 - ✓ evaluating and revising relevant policies in light of results achieved.

2.4.2 What is “A Systematic Approach”?

According to ESM Criterion #1, noted above, commitment to ESM should be demonstrated through a systematic approach.

Answer:

A systematic approach is when an organization develops and commits to a *methodology*—something that is repeatable and learnable through a step-by-step procedure (or series of procedures) to accomplish goals.

Systematic Approach:

A methodology that is repeatable and learnable through a step-by-step procedure (or series of procedures).

2.4.3 *How Can I Demonstrate Top Management Commitment to Environmentally Sound Management (ESM)?*

“I am already ISO 14001–, EMAS- or OHSAS 18001–certified. Why should I implement ESM?”

The top management commitment to a systematic approach to ensuring ESM describes the importance of having an environmental, health and safety management system in place. An environmental, health and safety (EHS) management system focuses on *environmental protection along with worker health and safety* in any sector.

Typically an *environmental management system such as ISO, EMAS, or OHSAS does not include specific health and safety procedures* that apply to workers within this particular sector. Other OECD core performance elements (employee training, monitoring and reporting, emergency plans, and plans for closure and after-care) are all included in an environmental management system.

Answer:

Having an environmental management system that is certified under ISO 14001, EMAS, or OHSAS 18001 is a very good first step in ensuring environmental protection. Their standards could be considered to be solid platforms on which to add other important elements focusing on occupational safety at your facility as well as downstream. However, these standards by themselves are generic non-industry-specific standards that do not address the unique health, safety and environmental needs of the electronic products refurbishing/recycling sector.

Best Practice: Implement a combined environment, health and safety (EHS) system. A certified environmental management system is only a first step in environmentally sound management because it does not include worker health and safety plans, policies, or procedures that are specific to refurbishing and recycling electronic products.



2.4.4 *Where on the Spectrum of Quality Control Management Systems Does Environmentally Sound Management (ESM) Apply?*

Some managers might be familiar with the generic *quality management system* (QMS), which focuses on procedures to ensure predictable outcomes of industrial product production lines. The ISO 14001 series of *environmental management systems* aims to ensure environmental protection in any industry. A combined *environment, health and safety (EHS) management system* weaves environmental and worker health decision-making into the identity of a business, facilitating compliance while improving overall performance. The systematic approach of an EHS management system focuses on environmental risk minimization and worker health and safety. This type of combined system moves much closer to the objective of ESM than the previous quality control systems.

Answer:

To achieve ESM, facilities should include a combined environmental, health and safety (EHS) management system. This will protect the environment and workers at their facility, along with workers and the environment at downstream processors. Module 4 presents information on management controls that could be used to influence downstream processors. The diagram below depicts how your facility can move closer to achieving ESM by integrating each type of management system.

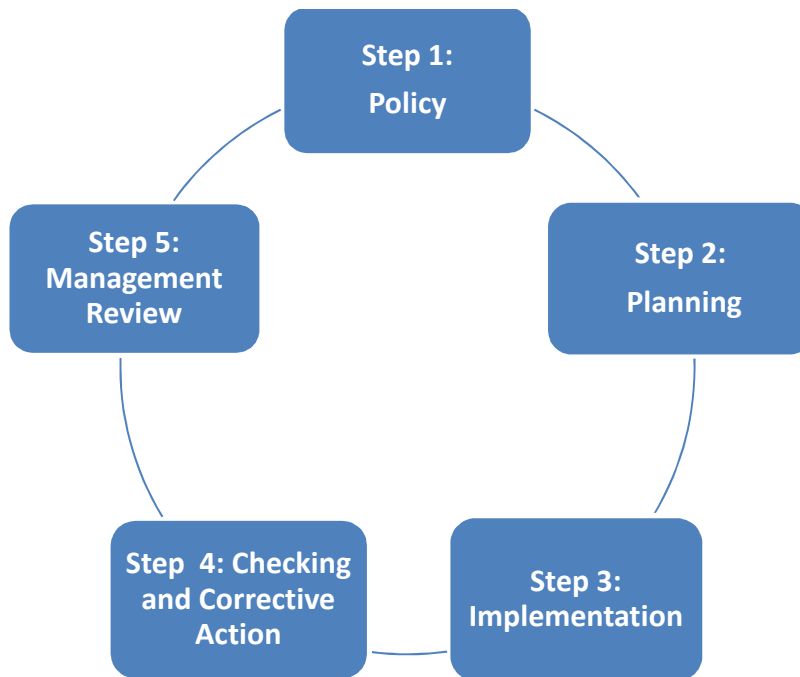


For more information on controls that enable downstream processors to take further steps towards ESM, see Module 4

2.4.5 How Does a Management Commitment to the Environment, Health and Safety Management System Facilitate Environmentally Sound Management (ESM)?

Answer:

Management must implement all of the stages of an EHS management system to demonstrate commitment to ESM. Specifically, the *policy* (Step 1) sets the stage for an over-arching commitment to everything that flows below it. *Planning* (Step 2) involves management developing procedures to ensure environmental protection and health and safety. *Implementation* (Step 3) of the EHS involves assignment of responsibilities to ensure accountability. *Checking and corrective action* (Step 4) and *management review* (Step 5) are both areas of management's responsibility to demonstrate they are committed to continual improvement¹.



Elements from all of these steps can be found throughout the training curriculum. This module (Module 2) presents some detailed information relating to Steps 1, 2, 3.

¹ Bureau of International Recycling (BIR). 2006. *Tools for Environmentally Sound Management: All You Need for an ISO-Compliant Environmental Management System that Includes OECD Core Performance Elements for the World's Recycling Industries*.

2.5 The Importance of Management Commitment to an Environment, Health and Safety Policy

Most management systems require an overarching policy to be developed for the organization. Such a policy:

- is fully supported by senior management,
- outlines the objectives of the company and demonstrates senior commitment to workers and to the public,
- can be thought of as a plan of action that has been deliberately chosen and that guides or influences future decisions,
- states principles and rules,
- indicates the degree of an employer's commitment to health and safety and the environment,
- provides the direction for the remainder of the EHS management system, and
- should be more than an outline of legal duties with respect to employees.²

A Policy:

A course of action that has been deliberately chosen and that guides or influences future decisions.

In many jurisdictions, it is common for health and safety legislation to require employers to have a health and safety policy in their workplace. A written occupational health and safety policy helps promote an effective health and safety program. The policy should be signed by a designated official or president of the company, to demonstrate highest-level commitment to health and safety.³

An environmental policy is an important element of any environmental management system, whether that system is certified or not. Its importance is demonstrated by the fact that certification of environmental management systems, such as under ISO 14001 and EMAS, requires an environmental policy. The policy should clarify compliance with environmental legislation that may affect the company and should stress a commitment to continuous improvement.

Best Practice: Establish an overarching environment, health and safety policy, to demonstrate a top management commitment to ESM at your facility. The policy should be documented, reviewed annually by top management, and updated as needed.

An EHS Policy supports the OECD core performance elements (CPEs) 1, 2 and 3. See Module 1 for more information on the OECD core performance elements.

² Canadian Centre for Occupational Health and Safety, <http://www.ccohs.ca/oshanswers/hsprograms/osh_policy.html>.

³ *ibid.*

Examples of health and safety aspects to be included:

The policy statement should provide a clear indication of the company's objectives and plans for occupational health and safety, such as:

- senior management's commitment to the establishment of a healthy and safe workplace and to the integration of health and safety into all workplace activities,
- the intention to treat basic safety and health legislation as a minimum standard rather than maximum,
- responsibility of all personnel in maintaining a safe workplace,
- accountability of all levels of management for carrying out health and safety responsibilities,
- importance of consultation and co-operation between management and employees for effective implementation of policy,
- commitment to regular reviews of the policy and to monitor its effectiveness, and
- commitment to provide adequate funds and details of how money will be available.

Examples of environmental aspects to be included:

The commitment of the company's management team and all its employees to the protection of the environment should be clearly expressed, through statements such as the following:

- We recognize the value of environmental responsibility and are committed to continual improvement, prevention of pollution and the reduction of resource consumption.
- We will comply with the relevant environmental legislation, regulations and other requirements to which we subscribe (e.g., ISO 14001:2004 and relevant international guidance on ESM from the OECD and United Nations Basel Convention).
- Our management team establishes the framework for setting and reviewing environmental objectives and targets through its periodic management review process.
- Our environmental policy is documented in this environmental management system manual. It is implemented, maintained and communicated to all employees.
- This environmental policy is available to the public through our website and publications.

2.5.1 *What Makes a Policy Statement Effective?*

Answer:

Corporate policies can look very different in their form and content. Their style, however, is not as important as how clearly they identify management commitment and responsibilities.⁴ To be effective, a policy must involve senior management, be consistent with company objectives, and be relevant.

Best Practice: To be effective, a policy must:

- ✓ involve senior management and representatives in the preparation of the policy,
- ✓ be seen as consistent with the workplace's objectives of operating in an efficient and predictable manner,
- ✓ be relevant to a workplace's real needs, not simply copied from another workplace, and
- ✓ be accepted as equal in importance to the workplace's other policy objectives.

Tip for Managers:

While the assignment of responsibilities must be a complete list customized to your type of work and organizational structure, avoid being so specific that it makes people become too legalistic in interpreting the policy. For example, do not list the specific type of personal protective equipment that must be worn by an employee— simply state that all employees must use the personal protective equipment specified by the employer and/or required by the nature of the work. This way you have flexibility to make changes as needed.

⁴ *ibid.*

2.5.2 What Should be Considered when Writing the Policy?

Answer:

These are some of the major items to consider when writing the policy:⁵

- The policy should state the arrangements in place to support and implement it. It should outline items such as safety meetings, safe working procedures, occupational hygiene, and safety training.
- Policies are typically high-level documents and do not address specific “types of hazards.” Sometimes a policy sets the standard or overall objective, then the management system is written to address the specific hazards.
- The policy should discuss active and on-going participation of employees in helping to achieve the objectives. Employees should also be involved in preparing and implementing the policy. Without the meaningful participation of employees, a policy will not succeed.
- Policy statements need to be amended from time to time. They must keep pace with the changes occurring at the workplace.

The best policies are specific to a workplace. An employer may delegate the preparation of a policy to a staff member. However the written policy statement is a pledge to employees and therefore the employer is mainly responsible for content. The policy should be dated and signed by a designated official or president of the company.⁶



⁵ ibid.

⁶ ibid.

2.5.3 *How Can Management Make Sure the Policy is Implemented?*

Answer: Integrate accountability into the policy.⁷

Best Practice: Develop important companion pieces to a management system, to establish accountability, including:

- ✓ health and safety responsibilities and performance objectives in job descriptions,
- ✓ procedures to ensure that safety and health performance is considered as part of performance appraisals and salary reviews,
- ✓ health and safety training program,
- ✓ regular health and safety program reviews, and
- ✓ regular reporting requirements built into program elements.

Answer: Ensure that all employees are aware of the policy.

Management should clearly communicate responsibilities for carrying out policy objectives and make sure they are understood within the workplace.

Best Practice: Develop an implementation plan for the policy. The following are examples of how the policy can be put into practice:

- ✓ employee job descriptions may include a responsibility to adhere to the health and safety policy;
- ✓ each employee, on starting employment, may be given a copy of the policy and informed that it is a condition of employment to follow the policy;
- ✓ management can post signs at the workplace, write articles about the policy in company newsletters, or refer to it in job manuals;
- ✓ management should remind employees of the policy in safety meetings; and
- ✓ management should remind employees of the policy during all training.

⁷ *ibid.*

Notebook

Does your organization have an overarching EHS Policy? In light of the discussion above, what do you consider to be the policy's strengths and weaknesses? Is there some aspect of the policy that you think is particularly well done or innovative that you would like to tell others about?



A large area with horizontal lines for writing, intended for the user to provide their response to the questions above.



Group Discussion

Take a few minutes to share with the group your facility's best practices / good ideas regarding your EHS policy.

2.6 Management Commitment to Transparency and Verification in Various Aspects of Company Policies, Procedures, and Operations

**REMINDER: ESM Criterion #8
Transparency and Verification:**
Provisions to support transparency and verification can help facilities to provide public assurances that operations and activities are compatible with ESM.

2.6.1 How Can Management Demonstrate a Commitment to Transparency and Verification?

Answer:

Management can demonstrate a commitment to transparency and verification through:

- 1) ensuring a culture of continual improvement,
- 2) documenting of procedures (see Module 6 for details on record-keeping),
- 3) communicating and reporting, and
- 4) monitoring and evaluation (see Module 6 for all monitoring and evaluation details).

The first three items on this list are described further in this section of this module.

Best Practice: Ensure that the company structure provides a culture of opportunities focused around the principle of continual improvement.

To demonstrate corporate commitment to the ESM criterion of transparency and verification, senior management should:⁸

- acknowledge that a real commitment to ESM reaches further toward broader environmental and community health than basic legal requirements,
- ensure all workers are informed and know how to access pertinent environment, health and safety (EHS) documentation,
- ensure that processes are documented and that instructions in the EHS management system are clear, concise, readable and understandable,
- ensure that workers with designated responsibilities maintain records as instructed,

⁸ Bureau of International Recycling (BIR). 2006. *Tools for Environmentally Sound Management: All You Need for an ISO-Compliant Environmental Management System that Includes OECD Core Performance Elements for the World's Recycling Industries.*

- ensure the EHS representative has the authority to effect change within the company, and
- recognize that internal auditing provides added value to ensuring company success and is part of continual improvement.

2.6.2 Demonstrating Transparency and Verification through Documentation of Procedures

After documenting the environment, health and safety (EHS) *policy* (described earlier in this module), the most important aspects to document to demonstrate a strong management commitment to transparency and verification are *procedures*. Policy and procedures of a company can be thought of as an umbrella—with all other elements of the management system driven from above.

What Is a Procedure?

It is management’s responsibility to develop procedures for both the company systems and work instructions.

Systems procedures cover the management and control of both the EHS systems and the important environmental aspects and health and safety precautions. These procedures are applied company-wide.

Work instructions cover the environmental health and safety controls of specific operational activities and are usually process-specific.

A Procedure:

A procedure is a pre-described series of actions. These actions are to be executed in a pre-determined sequence, and within the sequence, any points of choice are clearly indicated.

A procedure always outlines:

- *What* needs to be done?
- *Who* will have to do it?
- *When* will it have to be done?

Answer:

A procedure is a pre-described series of actions, possibly involving several people. These actions are to be executed in a predetermined sequence.⁹

Best Practice: *Identify* relevant procedures that must be documented, and then *document or record* them (either electronically or on paper).

This involves:

- ✓ describing procedures that are needed to ensure consistency with the EHS policy, objectives or targets;
- ✓ determining the status of procedures (e.g., procedures are needed but do not exist; procedures exist but are not documented; or procedures exist and are documented);
- ✓ assessing existing procedures, as follows: Is the existing procedure
 - established, documented, and aligned with EHS requirements and outlined in policy?
 - maintained, reviewed and updated at least once a year?
 - stipulating operating protocols for relevant business-related activities and services?

⁹ *ibid.*

- communicated to all relevant workers? and
- ✓ developing a plan of action to ensure that all necessary procedures identified are established or modified to comply with procedures and protocols.

What Procedures Should be Documented?

Answer:

Typical procedures that should be documented include the following:¹⁰

1. Procedures to identify environmental aspects of the company's activities, products and services which can have significant impact on the surrounding local or global environment (see *Module 3, Risk Assessment*).
2. Procedures to identify important worker health and safety aspects of the company's activities, products and services (see *Module 3, Risk Assessment*).
3. Procedures to identify applicable legal and other requirements and to determine how these requirements apply to environmental aspects (see *Module 5, Legal Compliance*).
4. Procedures for competence, training and awareness, to make employees aware of the importance of conforming with EHS policies, the significant environmental aspects of their roles and responsibilities, and the potential consequences (*this module*).
5. Procedures for internal and external communication across the various levels within the company and receiving, documenting and responding to relevant communication from external parties (*this module*).
6. Procedures to outline document control, to approve documents, review and update them, and to ensure that the current revision status is identified and available. Also to ensure that documents remain legible and identifiable (see *Module 6, Record Keeping and Performance Measurement*).
7. Procedures for operational control in situations where loss of control could lead to deviation from the policy, objectives and targets (e. g., air emissions of specific substance must not exceed a certain threshold) (see *Module 4, Risk Prevention and Minimization*).
8. Procedures for emergency preparedness and response, to identify potential emergency situations and potential accidents, as well as a procedure to review and test this procedure. Management should also guarantee that sufficient financial resources are in place to address emergencies as part of the plan (see *Module 4, Risk Prevention and Minimization*).
9. Procedures for control of records—for the identification, storage, protection, retrieval, retention and disposal of records. This includes a procedure to determine which records (i.e., internal audit, nonconformance, environmental incident report, management review meeting minutes, or other records that directly relate to the EHS management sys-

¹⁰ *ibid.*

tem) will be retained and who can access which records (see *Module 6, Record Keeping and Performance Measurement*).

10. Procedures for monitoring and measurement, to monitor on a regular basis the key characteristics of the company's operations, including internal auditing procedures. This should include recording information to: *track performance* related to meeting environment or health and safety objectives, or employee training objectives; and recording information to *track compliance* with regulations or certification requirements (see *Module 6, Record Keeping and Performance Measurement*).
11. Procedures for evaluation of compliance, for periodically evaluating compliance with the applicable legal requirements (see *Module 6, Record Keeping and Performance Measurement*).
12. Procedures for nonconformity, corrective action and preventive action, for dealing with nonconformities and for taking corrective and preventive actions (see *Module 6, Record Keeping and Performance Measurement*).
13. Procedures for facility closure and after-care. Closure plans should reflect the requirements of applicable laws and regulations governing facility decommissioning. Financial guarantees are necessary to ensure that adequate resources become available to carry out closure plans and cover clean-up costs upon cessation of the company's activities to return the site of operation to a satisfactory state, in accordance with applicable laws and regulations (see *Module 4, Risk Prevention and Minimization*).
14. Procedures for selecting a downstream processor, if the facility is involved in trans-boundary movements of used or waste electronic products. Procedures for ensuring compliance with legal requirements should also be documented (see *Module 4, Risk Prevention and Minimization*).



Notebook

Tick off and comment on which procedures have been documented at your facility, and note whether you think the documentation is adequate, or where improvement might be needed to address company activities, products and services:



Environmental aspects (e.g., potential risks)

Health and safety aspects (e.g., potential risks to workers and visitors)

Applicable legal or other requirements

Competence, training and awareness

Internal and external communications

Documentation control

Operational controls

Notebook

Emergency preparedness and response

Control of records

Monitoring and measurement

Evaluation of compliance

Nonconformity, corrective action and preventive action

Plan for closing the facility and for after-care

Selecting a downstream processor

2.6.3 How Do I Demonstrate Transparency through Communication Procedures?

Answer:

Transparency is demonstrated through the documentation of communication procedures.

Communication procedures are important for:

- internal communication between the various levels and functions of the organization, and
- receiving, documenting and responding to relevant communication from external interested parties.

Interested parties outside the company may include neighbors, community groups, local government, municipalities, regulatory agencies and emergency responders.

The company should keep the following communication-related records:

- received internal/external environmental communications,
- responses to internal/external communications,
- suggestions related to EHS communication issues,
- emergency response communication records, and
- internal/external audit reports.

The communication procedure should:

- describe internal communication methods,
- describe how to ensure effective communication with other departments within the company,
- reference the company's policy of external communication and how to communicate with external interested parties,
- make information available upon request (taking into account business confidentiality, personal information and the protection of intellectual property rights), and provide reliable and timely information about the activities of the facility which may affect the environment or the health and safety of personnel, and
- describe a uniform communications process, in order to increase the effectiveness of the company's internal communications regarding environmental issues, in line with the company's environmental policy (and other EHS requirements, as applicable).

Best Practice: Establish and maintain a procedure for internal and external communications regarding applicable environment, health, and safety (EHS) policies and management systems.

2.6.4 How Do I Demonstrate Transparency through Reporting Procedures?

Answer:

Transparency is demonstrated through recording important documentation. Examples include internal audit results or audit reports, reports that document monitoring results, completion of forms/declarations or permits, tracking employee training through maintenance of training records, and producing annual reports.

Records/Permits

Reporting of important documentation such as records and permits, or audit results, not only ensures transparency for stakeholders but gives useful information to management to make informed decisions about whether programs and investments are achieving desired results or if corrective actions need to be implemented. In some cases, documentation may be identified as a legal obligation and/or used to demonstrate facility compliance and due diligence with applicable legal requirements.¹¹

For more information on legal requirements, see Module 5

For more information on record keeping, see Module 6

Example of important documentation to ensure transparency:

If a facility is exporting used electronic equipment for sale or donation, it should be aware of new international technical guidelines under the United Nations Basel Convention that provide further clarification regarding when transboundary movements of used electronic equipment should be controlled as hazardous or other wastes under the provisions of the Basel Convention. In the case that a movement of used equipment is intended for direct reuse, the following should be provided or be in place to back up this claim to an authority on request (prior to the transport):

1. A copy of the invoice and contract relating to the sale and/or transfer of ownership of the equipment, with a signed statement that indicates that the equipment had been tested and is destined for direct reuse, is fully functional, and includes information on the user or, where this is not possible, the retailer.
2. Evidence of evaluation or testing in the form of a copy of the records (i.e., certificate of testing, proof of functionality) on every item within the consignment, and a protocol containing all record information.
3. A declaration made by the holder who arranges the transport of the equipment that none of the equipment within the consignment is waste, as defined by national laws of the countries involved in the movement* (countries of export and import, and, if applicable, countries of transit).

* UNEP. Basel Convention. 2012. DRAFT. Technical guidelines on transboundary movements of e-waste and used electrical and electronic equipment, in particular regarding the distinction between waste and non-waste.

Best Practice: Record and report important documentation, to contribute to transparency (e.g., declarations, permits, annual reports).

¹¹ Some countries may control transboundary movements of certain types of e-waste and used electronic products as hazardous waste under their national laws. In these cases, permits may be required before a shipment containing electrical and electronic equipment can proceed with import or export.

Annual Reports

An annual report on your company's activity/progress offers the following *internal* benefits:

- ✓ communicates goals and progress toward goals,
- ✓ builds internal alignment and capacities of employees,
- ✓ improves the management of risks and opportunities (i.e., what gets measured gets managed),
- ✓ improves performance through cost savings and more effective use of internal resources, and
- ✓ helps identify successes and challenges for the organization.

An annual report on your company's activity/progress provides the following *external* benefits:

- ✓ builds greater confidence amongst external stakeholders, regarding facility performance,
- ✓ enhances reputation and adds credibility to an organization, and
- ✓ can be used to demonstrate commitments to ESM and legal conformity.

Important aspects to consider in your annual report:*

In addition to defining the scope of facilities, activities, operations and services that are covered in the report, you should also clearly identify the reporting time period covered.

- Do the data represent your organization's fiscal year, or the calendar year?

- Do you report on an annual or biennial reporting cycle?

Reporting can be most effective as a driver for change when it is aligned with your business planning cycle.

* Stratos. 2007. *Performance Measurement and Reporting for Extended Producer Responsibility Programs: Reporting Guidance Document*. Prepared for Environment Canada.



Notebook

What are the strengths and weaknesses of your facility's communications and reporting processes? Note where improvement is needed and how your facility could make any needed changes. If you are feeling ambitious, include a timeline.



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2.7 The Importance of Management Commitment to Employee Training, to Demonstrate a Commitment to Environmentally Sound Management (ESM)

REMINDER: ESM Criterion #5
Awareness, Competency and Training:
Demonstrate commitment of top management to ensure employees have an appropriate level of awareness, competency and training with respect to the effective management of occupational risks.

2.7.1 How Does Management Establish a Commitment to Employee Training?

Answer:

The company should have a protocol to train employees at each relevant function and level so they are aware of: the EHS policy; significant EHS aspects of their work; and their roles and responsibilities in achieving conformance with the policy and procedures. The training plan must have dedicated financial resources.

It is important for management to identify, plan, monitor and record training needs for personnel whose work may create a significant impact upon the environment, or whose work may have significant health impacts associated with activities they undertake.

Types of training include:

- Awareness training: Given to all employees and provides an overview of relevant environmental, health and safety aspects important to the facility's operations. The training covers the topics outlined in the EHS documentation. This type of training is typically part of the initial orientation.
- Competence training: Tailored to each position and provides specific training in designated operating processes of the facility which can cause significant EHS impacts to ensure competency on the basis of education, training and/or experience.

A simplified example of a documented procedure for awareness and training is presented below. This type of a procedure could be modified or expanded upon in detail as needed for your facility, but the example outlines the important headings and types of information to document.



2.7.2 Procedure to Demonstrate a Commitment to Training and Awareness

Exhibit 2: Example of a Procedure for a Competence, Training and Awareness Commitment

Procedure for a Competence, Training and Awareness Commitment

Purpose:

The purpose of this procedure is to identify the training needs for all the company's personnel whose work may create a significant impact upon the health and safety of its workers, the community, or the environment, and to ensure that those training needs have been met.

Scope:

This procedure applies to all relevant levels of the company.

Definitions:

Environmental and/or health and safety (EHS) aspect—Element of a company's activities, products or services that can interact with the environment or affect human health or safety. An EHS aspect signifies the potential for an EHS impact.

Environmental and/or health and safety impact—Any adverse change to the environment, or to the health and safety of people, wholly or partially resulting from a company's activities, products or services.

Responsibility:

The management representative shall select the minimum training requirements that are necessary due to the operation's potential EHS aspects or impacts. The management representative may select a variety of training methods to fulfill this requirement. Training methods include: "training on the job," "training by reading," and "training meetings."

Awareness training:

Each company employee shall receive training with at least an overview of relevant environmental, health and safety aspects. The training shall cover the topics outlined in the EMS documentation. This training will be given to all employees and all new employees as part of their initial orientation, introduction to the company.

Competence training:

Each employee involved in operating a process and before operating a newly assigned process that can cause significant environmental impacts shall be trained in an overview of the process and in the operating procedures, to ensure competency on the basis of education, training and/or experience. This training will include on-the-job training.

Hazardous waste training:

All personnel involved in the management of waste and materials, in particular hazardous waste and materials, shall be capable and adequately trained to be able to properly handle the materials, equipment and processes in a manner designed to eliminate risk situations, control releases and carry out safety and emergency procedures.

Procedure:

- Senior management must ensure that laws are reviewed and evaluated by a competent person (inside or outside the company) and that appropriate training or operational processes are established in order to ensure compliance and mitigate any EHS aspects or impacts. Operations managers must be instructed to ensure that their employees have received the required training and that they are working in compliance with established processes and procedures. The audits would then evaluate the managers' adherence to implementing these requirements.
- The operations manager compiles and maintains copies of significant applicable environmental laws and regulations. The operations manager ensures that ready access is available from other sources, such as those listed above.
- The operations manager records training taken by all employees, in individual personal training records.

2.7.3 *How Does a Commitment to Employee Training Enhance Environmentally Sound Management (ESM)?*

Answer:

A commitment to employee training and awareness that includes regular training, dedicated resources, and innovative outreach will contribute to ESM objectives. See case study below.

Case Study: How a management commitment to employee training and community outreach enhances ESM at one Mexican facility

A glass recycling company located in a region of Mexico where there is strong competition for workers at nearby factories faces a high amount of staff turnover.

In an effort to retain workers, the company implemented a policy to communicate the positive impacts of its recycling practices—including its commitment to worker health and safety practices and to environmental protection—to its staff, the families of workers, and the local community. The company disseminates information about how its activities reduce negative impacts on the environment and is working to build up an ecological consciousness through enhancing awareness.

The company communicates this information through the following ways:

- 1) in its introductory staff training;
- 2) through staff workshops that are held every two or three months, where the messages are reinforced; and
- 3) working with the local authorities, and reaching out to the children of workers to communicate the benefits of their parents' employment.

Families learn how the parents' efforts at work and the company's commitment to employee health and safety are keeping workers healthy, and preventing hazardous materials, components, and substances from getting into the environment and affecting the local community's health.

This effort has been a success. Since the company began its communications, training and awareness program, the turnover in staff has slowed, which allows the company to justify dedicated resources for this ongoing training and in turn meet its training objectives of maintaining the knowledge among staff—rather than constantly starting over with new staff. The company is coming to be known as a “green” company in the area.

Notebook

What are the strengths and weaknesses of your facility's demonstrated commitment to employee training and awareness? Note where improvement is needed and how your facility could make any needed changes.



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2.8 Summary—Key Take-away Messages

Top management commitment enables a facility to achieve ESM and includes the following elements:



- ✓ a systematic approach to ESM, including an environmental, health and safety management system;
- ✓ an environmental, health and safety policy as a top-down commitment that drives all plans and procedures in the management system components;
- ✓ a commitment to transparency and verification through:
 - facilitating a culture of continual improvement,
 - documentation of procedures, and
 - communication and reporting, and
- ✓ a commitment to employee training to safeguard the environment, worker health and community safety.

All combined, best practices presented in Module 2 will allow your company to be in a better position to offer assurance that it is committed to protecting worker health and safety, the environment and the local community.

Notebook	
<p>Please check off which of the following measures your facility has in place to demonstrate a commitment by top management to a systematic approach.¹²</p> <div style="text-align: right;">  </div>	
Top Management Commitment to ESM: Checklist for Continual Improvement	
Has Top Management Made a Commitment to the Following through Documented Procedures and/or Policies?	Priorities for Action
<p>Systematic Approach:</p> <p><input type="checkbox"/> Is there a <i>systematic approach to ESM</i>, such as an environment, health and safety management system or other formalized systematic approach to management?</p> <p><input type="checkbox"/> Are there elements in the management system used that encourage continual improvement?</p>	<ul style="list-style-type: none"> • • •
<p>Policy:</p> <p><input type="checkbox"/> Is there an environment, health and/or safety policy to drive programs/actions?</p> <p><input type="checkbox"/> Is the policy considered effective, in your opinion? For example, does it drive action for environment protection, worker health or safety in other programs or activity at your facility?</p> <p><input type="checkbox"/> Is it relevant to the workplace's needs (for example, tailored to electronics processing)?</p> <p><input type="checkbox"/> Is accountability part of this policy? For example, are there other procedures in the workplace that ensure that safety and health performance is considered part of performance appraisals? Also, are there EHS reporting requirements built into program elements that stem from the policy?</p>	<ul style="list-style-type: none"> • • • • •

¹² UNEP. Basel Convention. 2011 (Revised). *Environmentally Sound Management (ESM), Criteria Recommendations*. Partnership for Action on Computing Equipment (PACE).

<p>Transparency and Verification:</p> <p>Are there documented procedures for:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Identifying important EHS aspects of facility operations <input type="checkbox"/> Identifying legal requirements <input type="checkbox"/> Training and awareness <input type="checkbox"/> Communication <input type="checkbox"/> Document control <input type="checkbox"/> Operation controls <input type="checkbox"/> Emergency preparedness <input type="checkbox"/> Control of records <input type="checkbox"/> Evaluation of compliance <input type="checkbox"/> Corrective action <input type="checkbox"/> Selecting downstream processors <input type="checkbox"/> Monitoring and evaluation 	<ul style="list-style-type: none"> • • • •
<p>Communication:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Does top management have a commitment to communication, demonstrated through communication and reporting procedures? 	<ul style="list-style-type: none"> •
<p>Training:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Does top management have a commitment to employee training, demonstrated through adequate resources dedicated to training all workers? 	<ul style="list-style-type: none"> •



Group Discussion—Demonstrating Top Management Commitment

Small and medium-size (SME) enterprises often have limited staff and resources. People feel stretched. How can an SME implement the best practices in this module? Discuss in small groups any strategies or ideas you have seen, experienced, or can think of.

2.9 Post-questionnaire



1. Do any of the questions you identified in Pre-questionnaire questions #1 and #5 (whose answers you wanted to learn in this module or from other participants) remain unanswered?

2. What examples or ideas did you hear today that might be worth considering how to implement at your facility?

3. What measures to demonstrate top management commitment do you think are priorities for your facility to act on?

4. What measures to demonstrate top management commitment are priorities for you, personally, to act on? Give a timeline for action.

2.10 Additional Resources

EMS Resources

ISO 14000:2004. *Guide to Environmental Management Principles, Systems and Supporting Techniques.* <http://www.iso.org/iso/catalogue_detail?csnumber=31808>. (\$)

ISO 14001:2004. *Environmental Management Systems: Requirements, with Guidance for Use.* <http://www.iso.org/iso/catalogue_detail?csnumber=31807>. (\$)

ISO 14001:2004 specifies requirements for an environmental management system, to enable an organization to develop and implement a policy and objectives which take into account legal requirements and other requirements to which the organization subscribes, and information about significant environmental aspects. ISO 14001:2004 is applicable to any organization that wishes to establish, implement, maintain and improve an environmental management system, to assure itself of conformity with its stated environmental policy, and to demonstrate conformity with ISO 14001:2004, by: a) making a self-determination and self-declaration, or b) seeking confirmation of its conformance by parties having an interest in the organization, such as customers, c) seeking confirmation of its self-declaration by a party external to the organization, or d) seeking certification/registration of its environmental management system by an external organization. All the requirements in ISO 14001:2004 are intended to be incorporated into any environmental management system.

ISO/IEC. Guide 66:1999. *General requirements for bodies operating assessment and certification/registration of environmental management systems (EMS).*

<http://www.iso.org/iso/home/store/catalogue_ics/catalogue_detail_ics.htm?csnumber=29232&ICS1=03&ICS2=120&ICS3=20>. (\$)

ISO 14031:1999. *Environmental Management—Environmental Performance Evaluation—Guidelines.* <http://www.iso.org/iso/catalogue_detail?csnumber=23149>. (\$)

This technical report identifies and describes elements and issues concerning environmental declarations and corresponding programs, including technical considerations, declaration format and communication, and administrative considerations for developing and/or using a Type-3 environmental declaration.

EU. Eco-Management and Audit Scheme (EMAS) Guidance documents.

<http://ec.europa.eu/environment/emas/documents/guidance_en.htm>.

EMAS. Toolkit for Small and Medium-size Enterprises.

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

Occupational Health and Safety Assessment Series (OHSAS) 18001 Health & Safety Standard.

<<http://www.ohsas-18001-occupational-health-and-safety.com/>>.

The OHSAS Electronic Toolkit. OHSAS 18000 actually forms part of the acclaimed Health and Safety Electronic Toolkit. This includes not only the text from OHSAS 18001/2, but a variety of support materials and information. <<http://www.ohsas-18001-occupational-health-and-safety.com/ohsas-18001-kit.htm>> (\$)

It contains:

- **OHSAS 18001/2**—The full text of OHSAS. Two Standards that assist in the implementation of an occupational health and safety certification system.
- **THE GUIDE**—“Guidance for Implementation of OHSAS 18000,” a practical MS-Word–based guide to the standards. It clearly explains how occupational health and safety management using OHSAS 18000 can be tackled and integrated, and includes graphical explanations, a checklist and plain-English descriptions.

- **THE SAFETY MANUAL**—A comprehensive and detailed MS-Word–based manual (80 pages), inclusive of policies, procedures, and handling guides.
- **RISK ASSESSMENT**—An excellent introduction to safety and risk assessment, again supplied in MS-Word format to enable direct editing if required.
- **OHSAS 18002 PRESENTATION**—A full presentation, supplied in editable PowerPoint format, introducing and explaining the OHSAS 18002 standard.
- **AWARENESS**—This is a substantial and detailed general health and safety presentation, designed to act as an awareness aid for staff and contractors. It is again provided in editable PowerPoint format to enable integration of any specific needs.
- **ASSESSMENT SURVEYS**—This comprises a collection of safety assessment surveys, provided in MS-Word format, designed to help identify shortcomings and potential problem areas.

Other Resources

Canadian Centre for Occupational Health and Safety. Guide to Writing a Policy Statement. <www.ccohs.ca/oshanswers/hsprograms/osh_policy.html>.

Bureau of International Recycling (BIR). 2006. *Tools for Environmentally Sound Management: All You Need for an ISO Compliant Environmental Management System that Includes OECD Core Performance Elements for the World's Recycling Industries.* <www.epa.gov/osw/conserves/materials/recycling/conference/resource/guide-esm.pdf>.