Review of the ISO 14001:2004 Standard

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Achieving Continual Improvement
with ISO 14001: 2004

Continual Improvement

Management Review

Checking

Implementation & Operation

Environmental Policy

Planning

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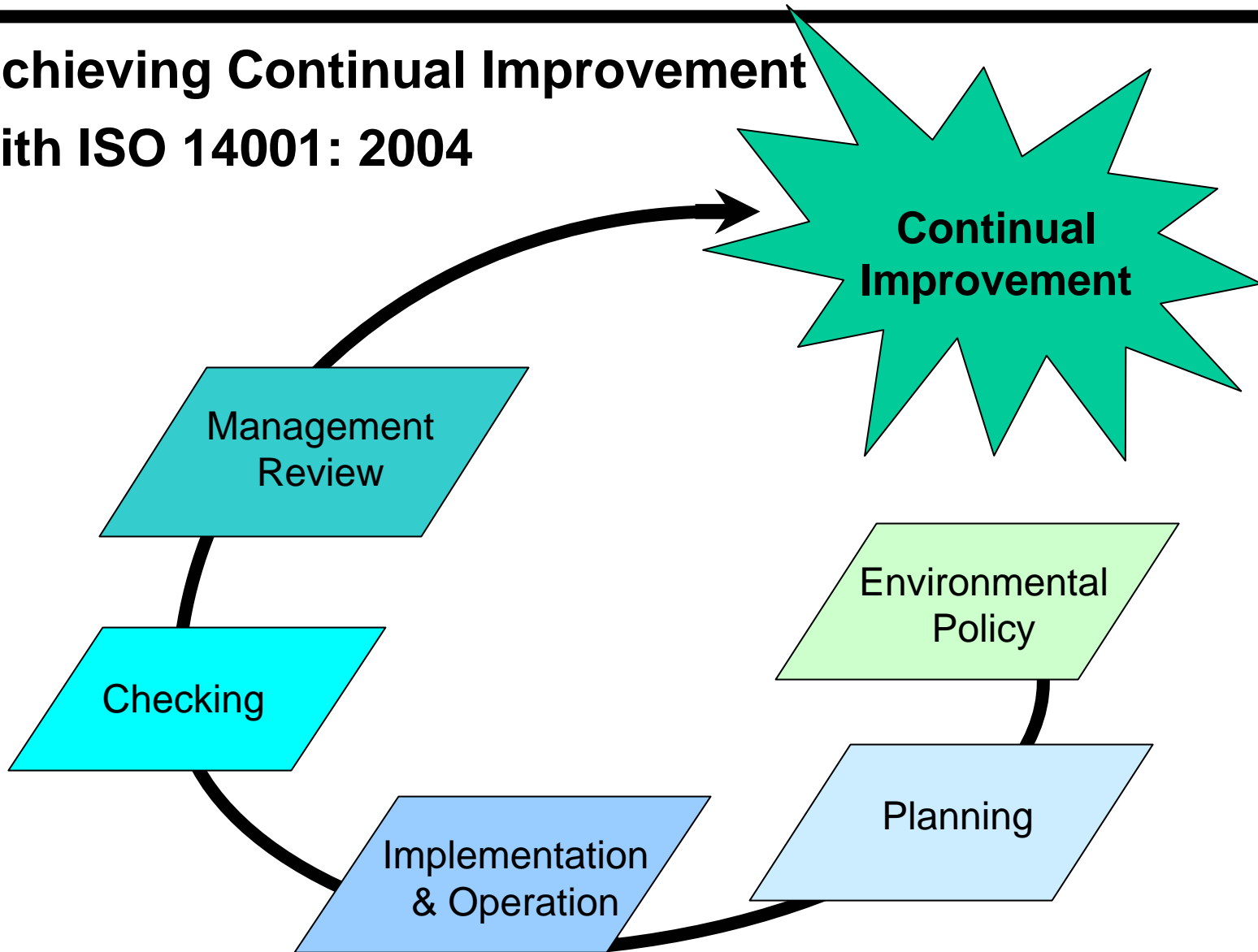
Sections 1, 2 and 3 of the Standard

❖ **1 Scope:** Describes what the International Standard is and the purpose of the Standard

❖ **2 Normative References:** Nothing noted – just added to keep the numbering between ISO 14001:1996 and ISO 14001:2004 the same

❖ **3 Terms and Definitions**: A section that defines terms such as – auditor, aspect, impact, non-conformity etc. It is similar to ISO 9000:2000 in its format
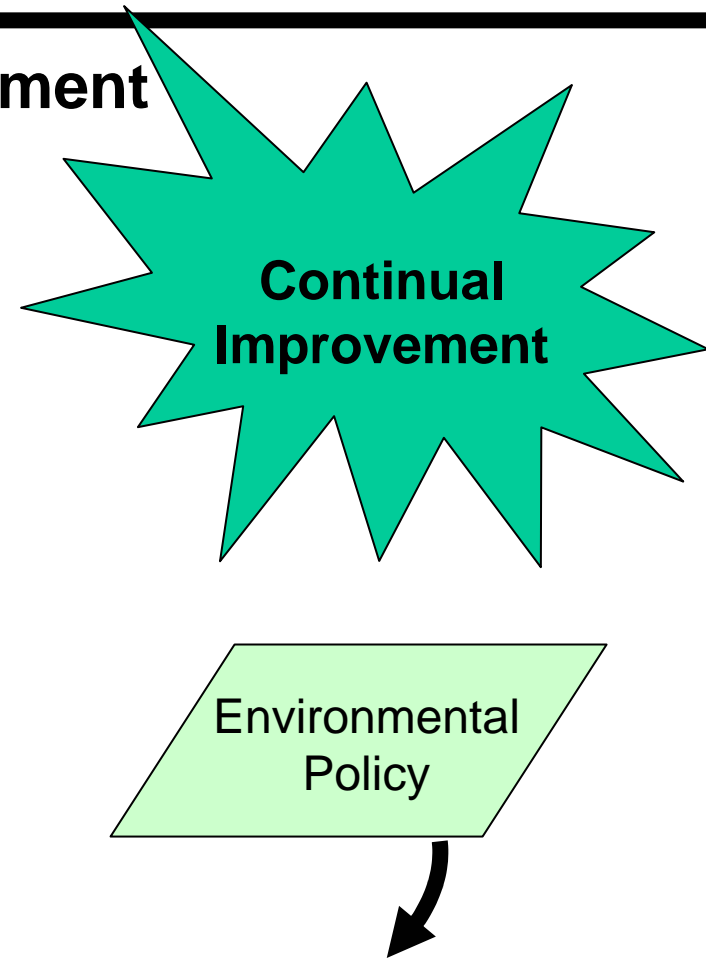
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4.1 General requirements

❖ Includes the need to establish, document, implement, maintain and continually improve an EMS

❖ And, includes a requirement to define and document the "scope" of the EMS

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4.2 Environmental Policy

❖ Within the scope of the EMS

❖ Formally documented, communicated, and maintained (including personnel that work on behalf of the organization)

❖ Appropriate to nature and scale

❖ Sets framework for objectives and targets

❖ Includes a commitment to comply with applicable and legal requirements (related aspects), and continual improvement, prevention of pollution

❖ Available to the public

And, the policy must be supported by management

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Environmental, Health and Safety Policy

Note:
This EH&S Policy is to be used by all Lear Plants Worldwide

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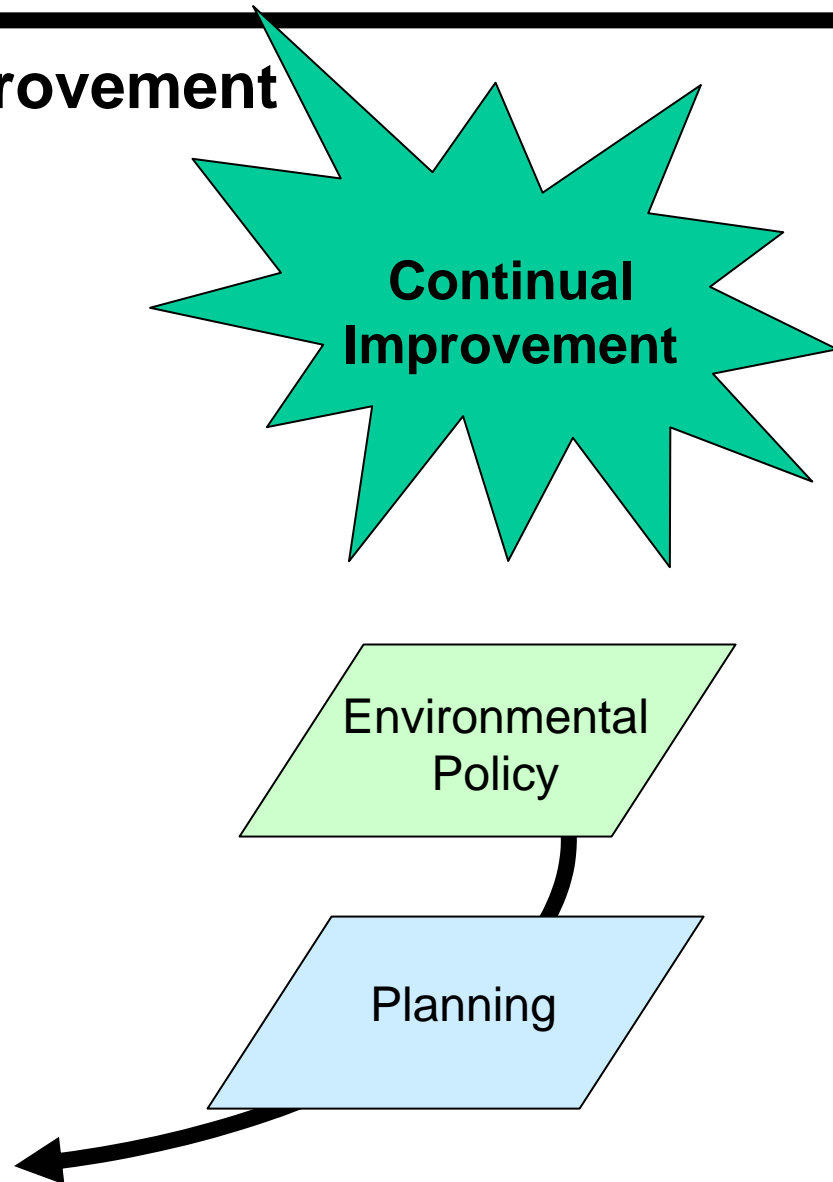
4.3 Planning

- ❖ **4.3.1** Environmental aspects

- ❖ **4.3.2** Legal and other regulatory requirements

- ❖ **4.3.3** Objectives, targets and program(s)

4.3.1 Environmental Aspects

❖ Are within the scope of the EMS

❖ All activities, products, and services are considered

❖ The company <u>can</u> control and have <u>influence</u> over them

❖ Aspects must have a significant impact on the environment and must be considered when setting objectives and targets and the EMS

❖ And, they must be kept current

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Environmental Aspect

An element of an organization's <u>activities or products or services</u> that can <u>interact with the environment</u>.

Air

Natural Resources

Facility

Water

Groundwater

People   Plants and Animals

Soil/Ground

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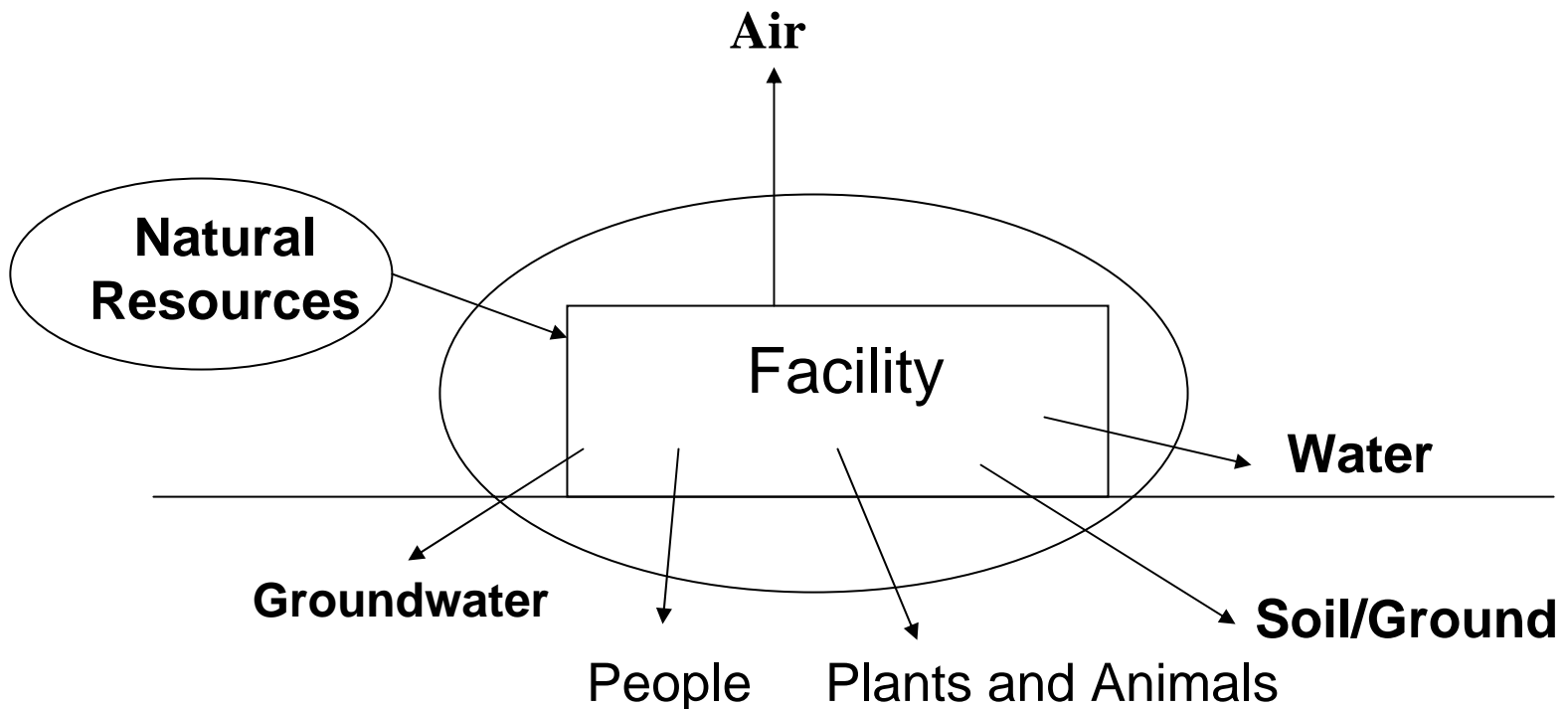
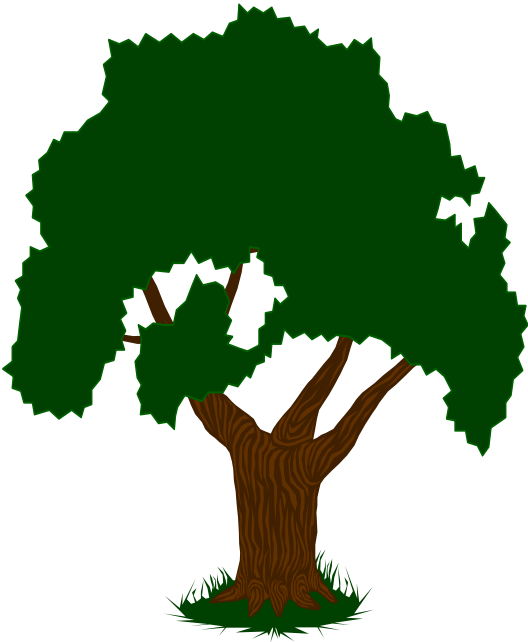# *Environmental Impact*

Environmental Impact
Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects

Environment
Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.

Environmental Impact

❖ A significant environmental aspect had or can have a significant environmental impact

❖ Must be <u>considered</u> when setting objectives and targets

❖ Must be <u>controlled and influenced</u> to maintain/ achieve:

   ❖ objectives and targets (including Pollution Prevention)

   ❖ commitment to compliance

   ❖ policy commitments

   ❖ emergency prevention and response procedures

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Determining Significance

❖ You decide which method works best for your facility/ operation

❖ Category Scoring is the recommended method for ranking the aspect or impact categories

❖ Typical categories:

    ❖ Severity of Impact   ❖ Legal and Regulatory Concerns

    ❖ Probability of Occurrence   ❖ Public Interest

    ❖ Cost to Facility

❖ Define scale consistent with facility operations (for example: minor, low, medium, high)

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4.3.2 Legal and Other Requirements

❖ Identify requirements and have access to them

❖ Covers activities, products, and services

❖ Also, includes other issues, such as customer requirements, local issues and other

Emphasis is on compliance

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4.3.3 Objectives, Targets and Program(s)

❖ Documented for each relevant function and level of the organization

❖ Must be measurable

❖ Consider:

  ❖ Legal and other requirements
  ❖ Significant aspects
  ❖ Technological options
  ❖ Financial, operational and business requirements
  ❖ Views of interested parties

❖ Consistent with policy - including commitment to pollution prevention

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Objectives and Targets

❖ ***Objectives*** are <u>goals</u>, consistent with the environmental policy, that an organization sets itself to achieve

❖ ***Targets*** are detailed <u>performance requirements</u>, arising from the objectives, that need to be set and met in order to achieve those objectives, and must be applicable to the organization
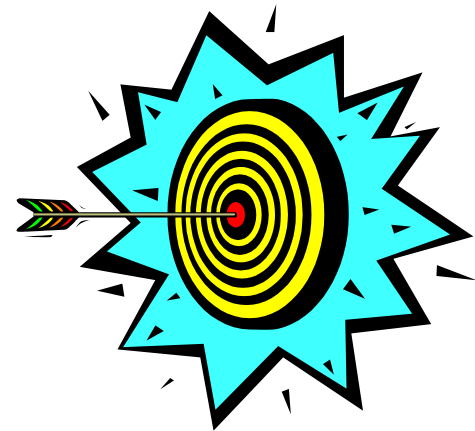
Example

Significant Aspect - Plant Utilities - Electricity Used by Presses and Chillers

Impact - Air Emissions from electric utility power plant degrade air quality and plant uses non-renewable natural resources (coal and fuel oil)
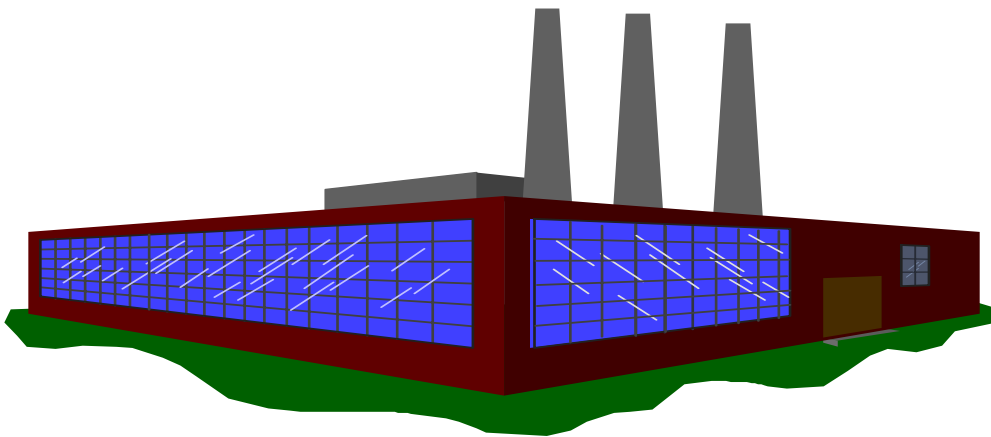
Objective:

Reduce Electrical Energy Use

Target:

7% in two years (based on seat sets)

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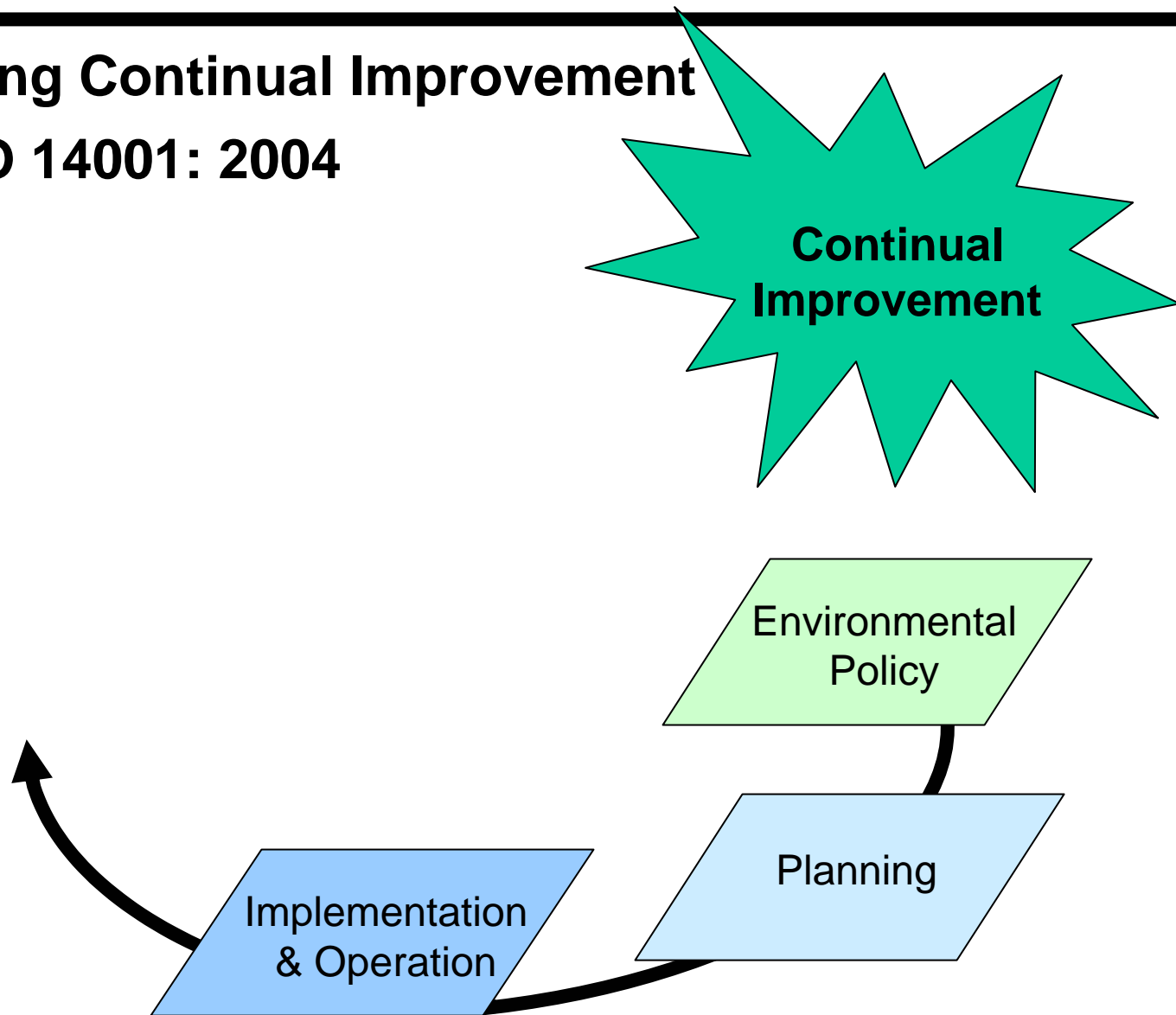
4.3.4 Environmental Management Program

❖ Designate who is responsible for achieving objectives and targets at each relevant function and level of the organization

❖ Spell out the means and time frame for achieving them
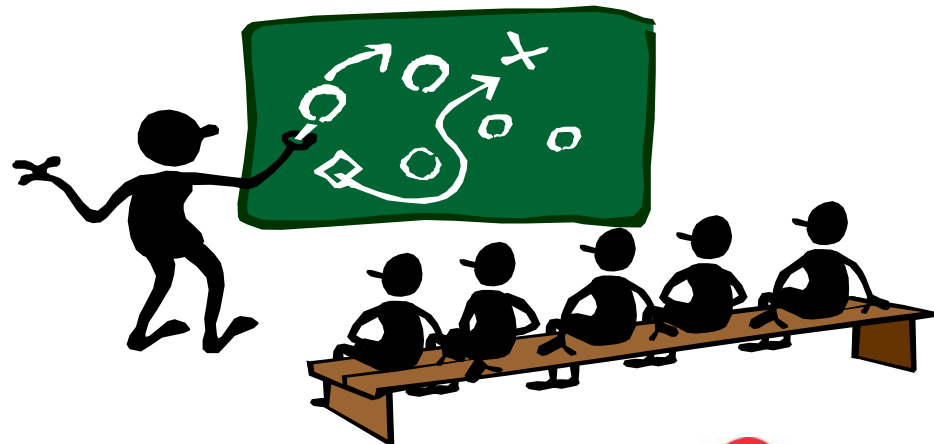
4.4 Implementation and Operation

❖ Resources, roles, responsibility and authority

❖ Competence, training, and awareness

❖ Communication

❖ Documentation

❖ Control of Documents

❖ Operational control

❖ Emergency preparedness and response

4.4.1 Resources, roles, responsibility and authority

❖ provides for the availability of essential resources (people, skills, technology, money)

❖ covers roles, responsibility, and authority

❖ documented and communicated

❖ designates a <u>management representative</u> (appointed by top management) to implement, maintain, report on EMS and recommend improvements

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4.4.2 Competence, training, and awareness

❖ Identify needs, complete and document training

❖ Train employees at each relevant function and level:

  ❖ Work activities that have actual or potential significant environmental impact and benefits of improved personal performance

  ❖ Importance of EMS, and individual roles and responsibilities required by EMS, including emergency preparedness and response

  ❖ Consequences of not following specified procedures

❖ Personnel who can cause significant impact on the environment must be competent

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4.4.3 Communication

❖ Covers internal communication between levels and functions of the organization

❖ How to receive, document, and respond to relevant communication from external interested parties

❖ Consider voluntary communication on significant environmental aspects and record decision
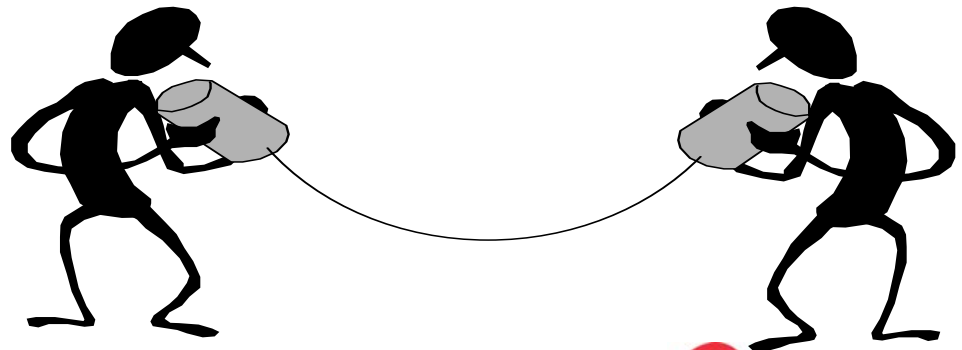
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4.4.4 Documentation

❖ Objectives and targets

❖ Scope

❖ Environmental Policy

❖ Describe core elements of EMS and interaction (road map)

❖ Refer to Lear Corporate Environmental Policies, Procedures, Statements and Work Instructions as appropriate

❖ Paper or electronic versions – must be legible

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4.4.5 Control of Documents

❖ Control all documents to be sure they:

 ❖ Are approved for adequacy prior to issue

 ❖ are periodically reviewed, revised, re-approved

 ❖ are removed when obsolete and prevent their use

 ❖ are identified, dated, legible, and kept at appropriate locations for specified periods

❖ Procedures and responsibilities shall be maintained for creating and modifying documents

❖ Ensure documents of external origin are controlled, as needed

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4.4.6 Operational Control

❖ Covers significant environmental aspects consistent with policy, objectives, and targets

❖ If you <u>didn't</u> have these control procedures, you'd deviate from policy, be out of compliance, or wouldn't achieve your targets

❖ Stipulate operating criteria in procedures

❖ Includes goods and services used by the organization

❖ Relevant procedures must be communicated to suppliers and contractors

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Types of Environmental Procedures

❖ <u>Core</u> EMS Procedures *for example*:
   - ❖ Identification of Aspects and Impacts
   - ❖ Training
   - ❖ Communication
   - ❖ Internal Auditing

❖ Corporate Environmental Policies, Procedures, and Work Instructions

❖ Facility Specific Procedures *for example*:
   - ❖ Handling Drums
   - ❖ Managing Process Changes

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About Environmental Work Instructions

❖ Function and/or Area Specific Operations *for example:*

   ❖ Shipping Hazardous Waste

   ❖ Labeling Universal Waste

   ❖ Recycling Programs

   ❖ Receiving Bulk Resin Shipments

❖ Provides short, descriptive instructions

❖ Used to train and audit employees on specific job responsibilities

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Lear Environmental Policies, Procedures and Work Instructions

❖ Corporate Environmental Management System (EMS) Policy Manual - Level 1

❖ Corporate Environmental Management System Work Instructions

Available on LearNet
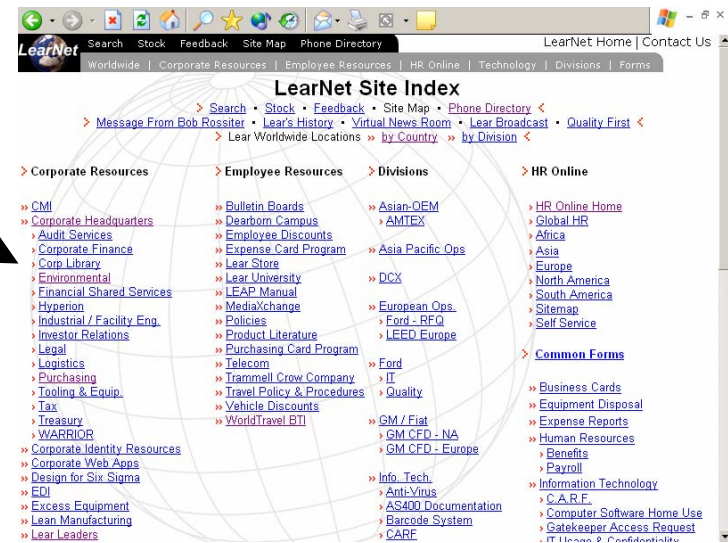
Lear Corporate Environmental Management System Policy Manual

Corporate Level 1:

❖ **EPM 1.0**   Introduction and General Requirements

❖ **EPM 2.0**   Environmental Policy

❖ **EPM 3.0**   Planning

❖ **EPM 4.0**   Implementation and Operation

❖ **EPM 5.0**   Checking and Corrective Action

❖ **EPM 6.0**   Management Review

❖ **EPM 7.0**   Corporate EMS Requirements

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Lear Corporate Work Instructions and Forms

- **CEWI 1.0** Divestiture or Closure of a Property or Business
- **CEWI 2.0** Acquisition of an Operating Business
- **CEWI 3.0** Lease or Purchase of Property for Office, Storage, or Future Development
- **CEWI 4.0** Environmental Compliance Program
- **CEWI 5.0** None Conforming Product Recycling
- **CEWI 6.0** Recycling or Donation of Electronic Equipment
- **CEWI 7.0** Identification and Management of Asbestos Containing Materials
- **CEWI 8.0** Maintenance Guidelines for Cooling Towers and Evaporative Coolers
- **CEF 1.0** Corporate Environmental Action Item Report Form
- **CEF 2.0** Preliminary Site Checklist

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EPM 7.0 Lear Corporate Environmental Management System Requirements

❖ Responsibilities and Competence
  ❖ Facility Environmental Coordinator
  ❖ Environmental Management Representative
  ❖ Hazardous Materials Supervisor

❖ Measurable - Environmental Performance Report due March 1 each Year

❖ Document Retention - Regulatory related records 5 years or as required by law, if more

❖ Authorized Signature

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EPM 7.0 Lear Corporate Environmental Management System Requirements *continued*

❖ Notification of regulatory inspection, non-compliance with regulatory requirements (violation) or reportable release - <u>must</u> be reported within one business day or sooner - Incident Reporting Form to Jose Salazar.

❖ Lease, Purchase or Closure of Property for Office, Storage or Other Use – due diligence required – contact Rebecca Spearot
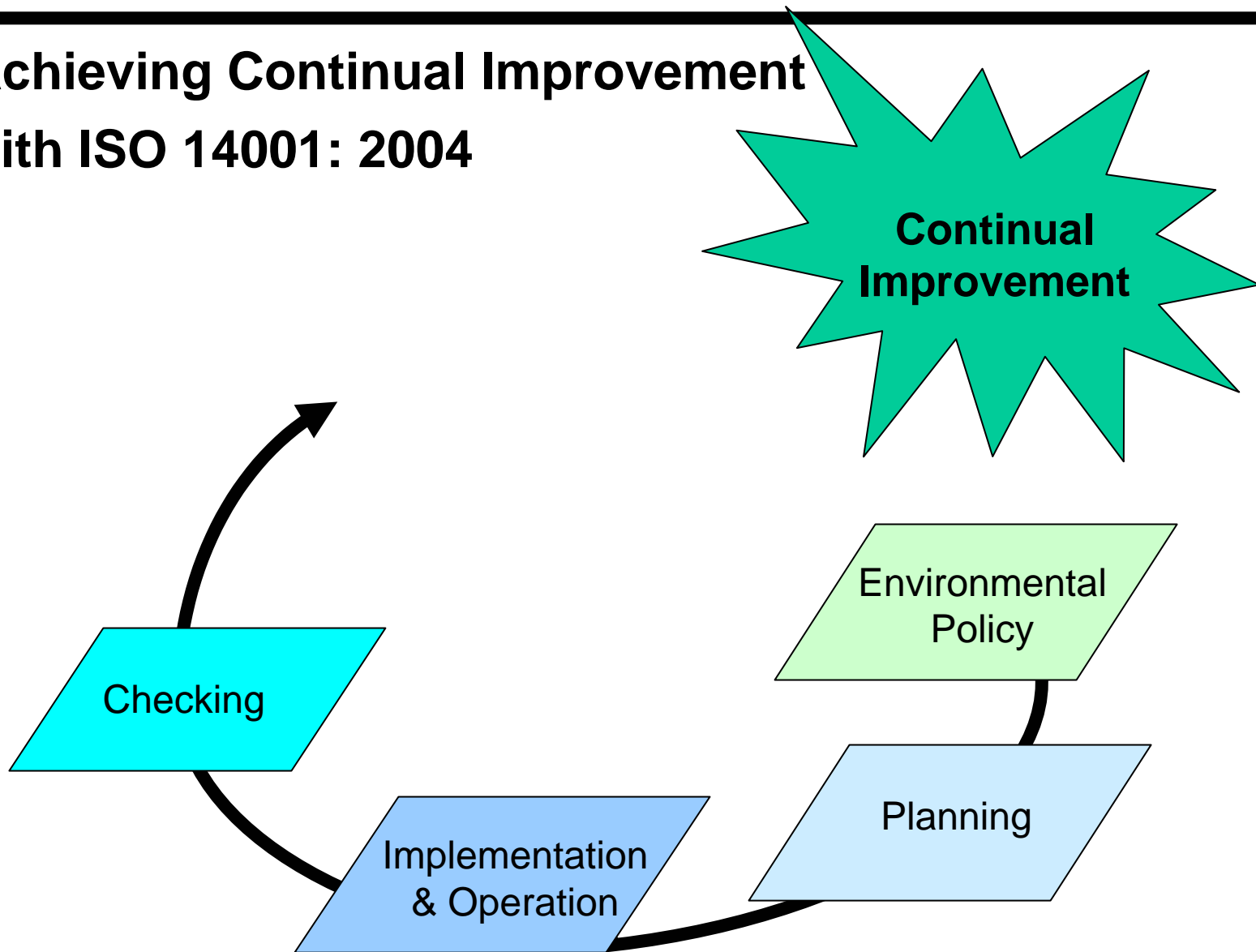
❖ Registrar Specific Requirements – as noted by Registrar

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4.4.7 Emergency Preparedness and Response

❖ Requires procedures for identifying the potential for accidents and emergency situations, and how to respond

❖ Includes responding to actual emergency situations and accidents and prevention or mitigation the associated adverse environmental impacts

❖ Periodically reviewed and revised, particularly after events

❖ Periodically tested where practicable

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4.5 Checking
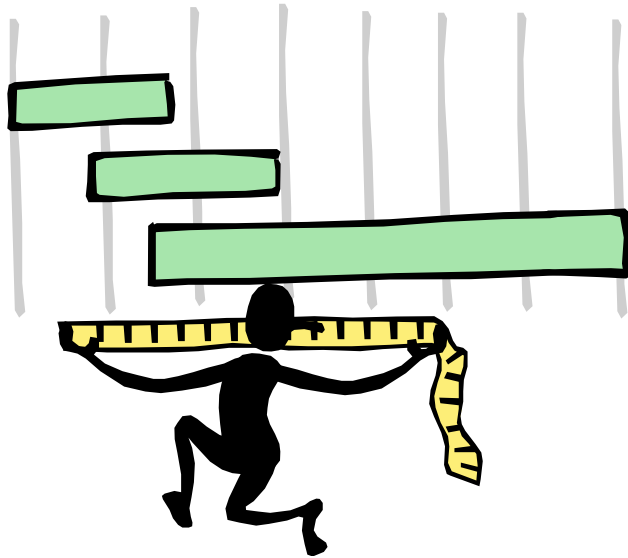
❖ Monitoring and measurement

❖ Evaluation of Compliance

❖ Nonconformity, corrective action and preventative action

❖ Control of records

❖ Internal audit

4.5.1 Monitoring and Measurement

❖ Covers operations and activities that have significant environmental impacts

❖ Records information to track performance, relevant operational controls, and conformance with objectives and targets

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4.5.2 Evaluation of Compliance

❖ Periodically <u>evaluate compliance</u> with applicable environmental statutory and regulatory requirements which are applicable to the aspects of facility operations

❖ These requirement may include:

  ❖ National and international legal requirements

  ❖ State/provincial legal requirements

  ❖ Local governmental legal requirements

  ❖ Corporate/company requirements

  ❖ Customer product requirements

  Use Lear Corporate Work Instruction CEWI 4.0

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4.5.3 Nonconformity, corrective action and preventive action

❖ Deals with actual and potential nonconformity

❖ Defines who is responsible to investigate and handle nonconformities, mitigate impacts, and to initiate and complete preventive and corrective actions

❖ Must ensure that the nonconformity is prevented from happening again

❖ Must be appropriate to magnitude and nature of environmental impacts

❖ Must be implement and record any changes in procedures that results from actions

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4.5.4 Control of Records

❖ Identify, maintain, and retain records for specified periods of time (see Corporate Record Retention Procedure), dispose of obsolete records

❖ Records include training, audits, reviews, and provide evidence to demonstrate conformance to ISO 14001

❖ Records must be:
  ❖ legible
  ❖ identifiable
  ❖ traceable to activity, product, service
  ❖ readily retrievable and protected against damage, deterioration, loss
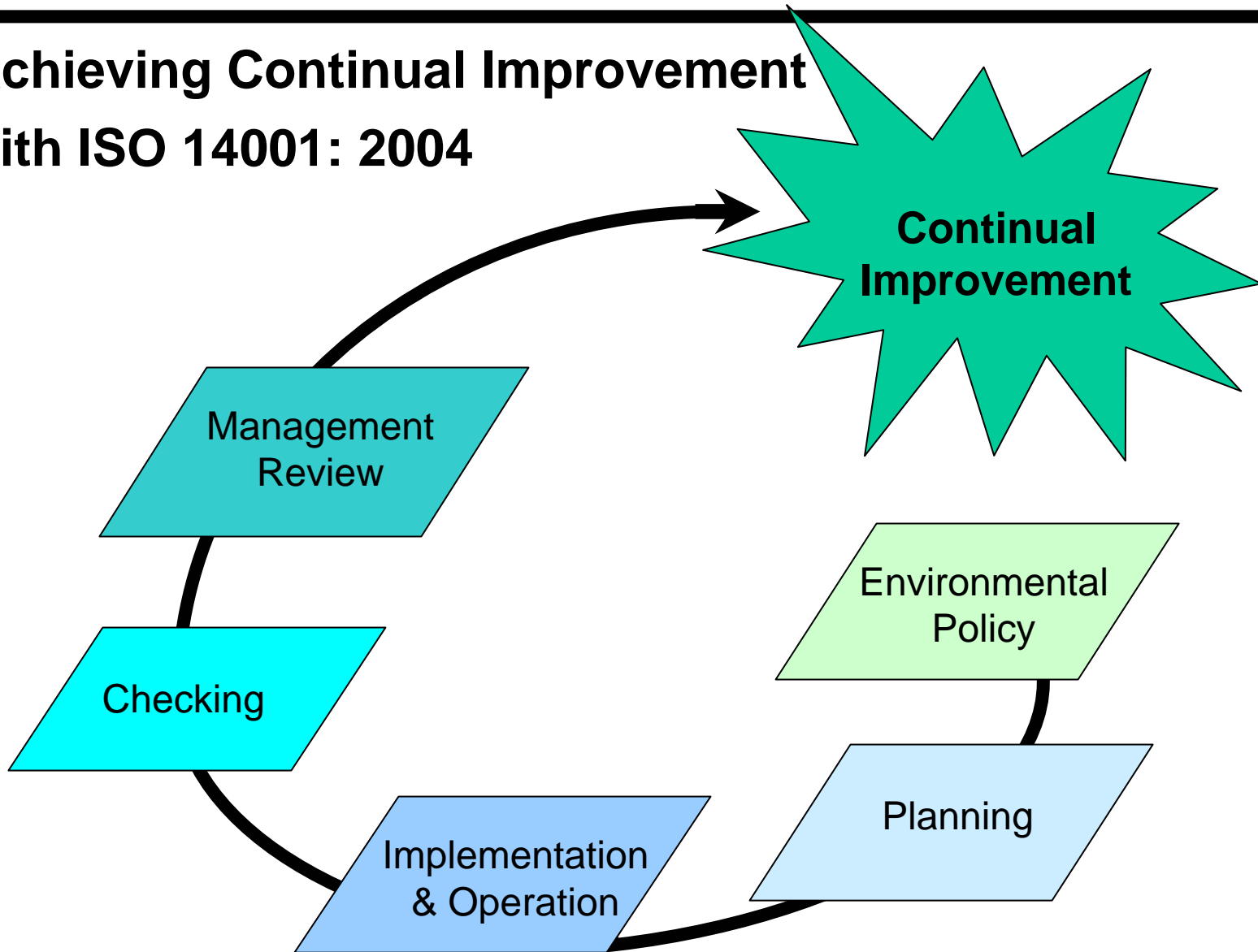
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4.5.5 Internal Audit

❖ Periodic and planned checks on the EMS to determine if:
  - ❖ It conforms to the planned arrangement & to ISO 14001
  - ❖ It is properly implemented and maintained

❖ Results of audits must be provided to management

❖ Audits must be comprehensive and have well written procedures and a plan

❖ Audit schedule set depending on importance of activities to be audited and results of previous audits

❖ Auditors must be trained and objective

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EMS Audit Functions

Type	Task	System
3rd Party Registrar	Conformance	ISO 14001
3rd Party Registrar	Surveillance (on-going conformance)*	ISO 14001
Internal Plant Audit	Confirm Implementation	EMS
Environmental Compliance	Verify Compliance	Regulations

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4.6 Management Review

❖ EMS reviewed at planned intervals determined by the organization, must be documented and must address the need to change the EMS in light of changing circumstances and the commitment to continual improvement

❖ Management review must include
  - ❖ Results of internal audits and evaluation of compliance
  - ❖ Communication (external), especially complaints
  - ❖ Environmental performance and meeting objectives and targets
  - ❖ Status of corrective and preventative actions
  - ❖ Follow-up items from previous management reviews
  - ❖ Recommendations for improvement

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