

Subject: Introducing an Environmental Management System
Date of Meeting: 16 March 2009
Report of: Acting Director of Strategy & Governance
Contact Officer: Name: Mita Patel Tel: 29-3332
E-mail: mita.patel@brighton-hove.gov.uk
Key Decision: No Forward Plan No. N/A
Wards Affected: All

FOR GENERAL RELEASE

1. SUMMARY AND POLICY CONTEXT:

- 1.1 This report outlines the rationale and detail of proposals to introduce an accredited environmental management system (EMS) to allow the council to effectively gauge its environmental impacts and to measure and report success or improvements needed.
- 1.2 The implementation of an EMS would provide information required for the new Comprehensive Area Assessment (CAA), and provide data needed for producing the councils Environmental Footprint as required through the Annual Report and Summary of Accounts. In so doing, it will serve to support the councils value for money objectives and help to achieve the ambitions for 'performing well' by 2011 in the Audit Commissions Use of Resources assessment, as stated in the Corporate Plan. Furthermore, it will aid delivery and performance management of the Council's existing Climate Change Action Plan, Carbon Management Programme and proposed Climate Change Strategy for the city. It will also provide a framework for structuring a more formal programme for staff awareness, engagement and training on sustainability.

2. RECOMMENDATIONS:

- 2.1 (1) That the Sustainability Cabinet Committee approves:
 - (a) Development of an Environmental Management Policy
 - (b) Pilot implementation of an environmental management system accredited to the BS EN ISO 14001:2004 standard
 - (c) Consideration then of progression to the Eco-Management and Audit Scheme (EMAS).

3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS:

Environmental Footprinting

- 3.1 Since 2008 the Annual Report and Summary of Accounts assessment has introduced the need for reporting on the council's environmental footprint. Currently, information available for contributing to analysis of the council's environmental footprint is poor and inconsistent. For instance, although there is comprehensive data on carbon emissions, there is little or no information available on actual tonnages of various waste streams. This is also the case for water use where currently there is no regular council wide meter reading programme in place to monitor water use and to identify possible water leaks.

The Corporate Plan and Value for Money

- 3.2 In line with its prioritisation on achieving efficiency and Value for Money, in last years Annual Report, and in the Corporate Plan 2008-2011, the council highlighted its objective for achieving a status of 'performing well' in the Audit Commission's Use of Resources assessment, by 2011. However, in order for the council to confidently achieve this status, a more comprehensive environmental footprint profile will be needed for the Annual Report than is currently provided.

CAA and Use of Resources assessment

- 3.3 The CAA process through its Use of Resources (UoR) 2009 assessment (see Appendix 1) sets new, stringent requirements for the council on its environmental management. In order to achieve a status of 'performing well' the council would ultimately need to have a robust performance management strategy based on a good understanding of its use of natural resources. Furthermore, the council needs to have systems and processes in place across its operations including:

- Proof that it has a strategic and managed approach to reducing the use of natural resources and its impact on the environment;
- Delivery plans to support this strategy, for example to address climate change mitigation and adaptation, achieve energy and water efficiency, and optimise the use of renewable resources;
- Other corporate plans within the council, such as financial or HR plans to support the delivery of this strategy;
- Proof that it is working effectively with partners in developing, implementing and monitoring plans;
- Evidence to illustrate which of its operations produce most carbon and is targeting these areas as a priority.

- 3.4 The council will also need to identify how it is delivering against its strategy to manage the environmental risks it faces or might face in the future, and how effectively it works with partners to do this. This includes how it is adapting its work to deal with changes in climate and weather patterns i.e. damage to property and infrastructure from flooding and excessive heat. To 'perform well' the council will need to have:

- Reliability of information which it uses to monitor its performance and manage progress in achieving its strategy.
- A strong communications and engagement protocol with the public, stakeholders and staff.
- The environmental impact of its suppliers of goods and services within its commissioning and procurement decisions and how the council is working with them to achieve improvements.
- How the council is using its partnerships to help it to reduce its own impacts on the environment and preparing for climate change for example, using shared buildings.

Ultimately, there will need to be evidence to demonstrate progress is being made in delivering against its strategy, plans and targets and that this progress is spread across the organisation.

3.5 The council will also be assessed upon how well it governs itself and commissions services that provide value for money and deliver better outcomes for local people. This includes:

- Ensuring that all commissioning and procurement activity targets quality services and supplies, is tailored to local needs, and delivers both sustainable outcomes and value for money;
- Production of relevant and reliable data and information to support decision making and manage performance. This also includes ensuring that data is compliant with relevant statutory requirements.

Sources of evidence

3.6 The following list provides some examples of potential sources of evidence to support the assessment:

- Sustainable development policy and objectives.
- Environmental policy and objectives.
- Sustainability impact appraisals
- Planning and monitoring information on environmental impact.
- Performance indicators (including National Indicators).
- Reports to the cabinet covering procurement decisions and investment appraisals.
- A verified environmental management system such as [EMAS](#) (EU Environmental Management and Audit Scheme) or [ISO 14001](#) (Environmental Management System).

Relevant National Indicators (NIs) from the Local Area Agreement (LAA)

3.7 Relevant NIs that have been selected within Brighton & Hove's LAA that an EMS would support are:

- ✓ NI 185 - CO2 reduction from local authority (council) operations.

3.8 Under the CAA our performance will also be assessed on the

- ✓ NI 194 – Air Quality - % reduction in NOx & primary PM10 emissions through local authority's estate and operations.

- ✓ NI 197 – Improved local biodiversity – proportion of local sites where positive conservation management has been or being implemented.

Proposals for way forward

Introducing an Environmental Management System (EMS)

- 3.9 The requirements for managing and monitoring the council's environmental performance as set within the CAA, and as detailed above, provide clear evidence for the need for introducing an accredited EMS in the council. The EMS would provide the Council with a structured framework for identifying evaluating, managing and improving its environmental performance. The EMS would help to ensure that the Council's overall environmental aims, as set out in its environmental policy, are implemented throughout the organisation.
- 3.10 The EMS would also ensure employees, contractors and suppliers would also know their roles and responsibilities in helping the Council achieve these environmental aims. This would be achieved through staff awareness and training, allocation of responsibilities for compliance and ensuring that responsible people are trained and competent. Continual improvement of the EMS would also hinge upon top management commitment as well as proper, focused and effective employee training. Furthermore, this will support delivery of the council's Investor in People policy with its commitment to performance management.

Initial Environmental Review (IER)

- 3.11 Before seeking any type of formal accreditation, the council would need to ensure that a thorough assessment is undertaken to account for all existing work across the organisation. Undertaking an IER will identify which key environmental aspects and impacts will require management and control and will inform the development of the Environmental Policy and improvement plans etc...

ISO 14001

- 3.12 ISO 14001 is an international standard specification for an EMS. It allows an organisation to take a systematic approach to the evaluation of how its activities, products and services interact with the environment and to control those activities to ensure that established environmental objectives and target are met. If the council wants to move on to introducing Eco-Management and Audit System it is necessary first to implement an EMS that meets the requirements of ISO 14001.

Eco-Management & Audit System (EMAS)

- 3.13 The Eco-Management and Audit Scheme (EMAS) is the EU's voluntary scheme designed for companies and other organisations committing themselves to evaluate, manage and improve their environmental performance.

3.14 EMAS is currently the most credible and robust environmental management system on the market, adding four pillars to the requirements of the international standard for environmental management systems ISO/ EN ISO 14001:

- Continual improvement of environmental performance;
- Compliance with environmental legislation ensured by government supervision;
- Public information through annual reporting;
- Employee involvement.

Next steps

3.15 The proposed next steps would be:

- To work with TMT to identify specific departments and/or service areas to pilot an EMS;
- Undertaking an Initial Environmental Review for the selected areas;
- Develop a business case, and identify financial & resources implications.

4. CONSULTATION

4.1 Consultation has taken place between the Council's Performance Improvement Team and the Sustainability Team.

5. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

5.1 The report outlines the importance of environmental management within the UoR assessment. Implementation of an Environment Management System will require resources to be identified within existing budgets. An Initial Environment Review will need to be undertaken and it is estimated that one or two full time staff, plus associated costs, will be required to coordinate the system in the longer term.

Finance Officer Consulted: Peter Francis

Date: 12/02/09

Legal Implications:

5.2 Introducing an Environmental Management System (EMS) should strengthen the Council's position in relation to the Carbon Reduction Commitment, a scheme given effect by the Climate Change Act 2008. The timescale under this legislation provides that CO₂ allocations can be traded between organisations from April 2011. This will mean that if the Council emits less CO₂ than its allowance in any one trading year, it can sell the excess volume it has not produced. Conversely, if it exceeds its CO₂ emissions allowance, it will be obliged to buy surplus allocations from other trading organisations.

- 5.3 The EMS will be supported further by the revised Procurement Code of Practice on Sustainability which the Cabinet Committee approved and endorsed on 19 January 2009.

Lawyer Consulted:

Oliver Dixon

Date: 12/02/09

Equalities Implications:

- 5.4 If formal EMS is introduced across the council this would address equalities issues in the following ways:
- Provide access to the public on the council environmental performance
 - Provide a framework for active involvement of all council staff from all areas of the council in working to improve the council's environmental performance
 - Provide an opportunity to engage with the public in open dialogue about the environmental performance of the council (if EMAS is introduced)
- 5.5 If adopted right across council services an Equalities Impact Assessment may well be required.

Sustainability Implications:

- 5.6 A council-wide Environmental Management System would provide a comprehensive framework for achieving corporate sustainability objectives and targets in all operations throughout the organisation. It would provide accuracy of information and accountability towards sustainability and for managing and improving the council's environmental performance. Furthermore, it would support delivery of the councils Carbon Management Programme, Climate Change Action Plan, Sustainability Strategy, and Sustainable Procurement Code of Practise.

Crime & Disorder Implications:

- 5.7 None identified.

Risk & Opportunity Management Implications:

- 5.8 A formal risk assessment will need to be undertaken to fully assess the key risks and opportunities involved for introducing an accredited EMS. One of the key reasons for having an EMS in place is to reduce significant financial, service and reputational risks associated with non compliance to key environmental regulations. The Corporate Risk Register already recognises Corporate Risk 17 "Investing in the City's Sustainable Future". The introduction of an EMS could contribute to progression of actions to address this Corporate Risk.

Corporate / Citywide Implications:

- 5.9 Having an accredited Environmental Management System would demonstrate city council leadership and commitment towards sustainable development and in achieving improving environmental performance.

6. EVALUATION OF ANY ALTERNATIVE OPTION(S):

6.1 An evaluation of all alternative options have been considered through advice sought from both good case study examples from other Local Authorities who have an accredited EMS in place and from impartial and accredited third party assessors. The alternative options include the following:

a) Continuation of an informal environmental management approach

Although some good work has and is currently being delivered to improve the council's environmental performance, with no formal system in place to drive this, there are still many key areas that are not being addressed and information for which is not known i.e. poor overall management of our water use.

b) Going for ISO 14001 accreditation only across the council

Although achieving this council-wide would provide a comprehensive framework for environmental management that is recognised at an international level, in contrast to EMAS it does have limitations and is much less stringent on its requirements including (amongst others):

- No commitment for continued improvement of environmental performance of the organisation
- No requirement for open dialogue with the public,
- No staff involvement.

c) Going for EMAS only

Introducing this without ISO 14001 would mean that our environmental performance would only be recognised formally at a European level and would not formally comply with ISO International Standards. More importantly, in order to comply with the requirements of EMAS, the ISO/EN ISO 14001 certificate must be issued under one of the accreditation procedures recognised by the European Commission. The organisation would need to have taken steps to ensure that the scope to be covered by the EMAS registration is covered by an ISO/EN ISO 14001 certificate (see Appendix 2).

d) Going for the ISO 14001 and EMAS accreditation only in some departments.

Although this is a recommended approach in the short term, longer term ambition should be to seek EMAS accreditation right across the council so that a comprehensive management of the council's overall environmental performance can be achieved. This will also contribute to more accurate understanding of the council's environmental footprint data needed for UoR assessment.

Once this approach has been approved we will identify a department/s for undertaking pilot implementation.

7. REASONS FOR REPORT RECOMMENDATIONS

- 7.1 A drive for efficiency and Value for Money coupled with new environmental performance requirements in the UoR assessment mean that a more comprehensive and accountable environmental management approach is required.
- 7.2 Implementation of a formal EMS through the recommended approach specified in this paper will provide comprehensive knowledge, management and continued improvement of the council's environmental performance.

SUPPORTING DOCUMENTATION

Appendices:

1. Managing Resources - How well does the organisation manage its natural resources, physical assets, and people to meet current and future needs and deliver value for money?, Key Lines of Enquiry 3.1, Use of Resources 2008/09 – Audit Commission
2. EMAS factsheet published by the European Commission 2008

Documents in Members' Rooms

None

Background Documents

None