

Understanding the EHS Management System Development Process

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As many organizations begin the process of developing management systems for Environmental, Health and Safety performance, there will be many questions raised by those who have responsibility for such systems. In some ways, the concept of “management systems” is difficult to clearly grasp, particularly for those who have been focused on the day-to-day tasks of ensuring compliance with a myriad of regulatory requirements. The following “question and answer” series can help in gaining a better understanding of EHS management systems, why they are important, and how they are developed.

What the heck is a “management system”?

A management system is simply a series of steps that help to plan, set priorities, apply resources and monitor effectiveness. It is a disciplined process, one which requires the manager to “plan, do, check, act”, in the simplest statement of the steps. The most successful management systems today are based on the concepts of continuous improvement, which have revolutionized the process of quality management.

What are the key components of an EHS Management System?

Glad you asked. We are modeling our process on the internationally accepted standards, ISO 14001 and now ISO 45001. The key components are:

1. Management Policy and Direction – Has the top management of the facility provided adequate direction, guidance, leadership and involvement in the EHS management process?
2. Planning – Has the facility evaluated its most significant EHS issues; have specific objectives and targets been developed to address those issues; has an action plan to achieve the targets been established; is there an effective EHS management structure in place to work on the action plans?

3. Implementation and Operation – Are there effective controls in places for EHS issues; have training needs been assessed and satisfied; is there effective communication between all parties responsible for the plan; is there good documentation of the EHS management process?
4. Checking and Corrective Action – Are there processes and measures in place to ensure that plans are being implemented properly and have corrective action measures been taken where deviations are detected?
5. Management Review – Is there a process where top management receives the results of the management system assessment and takes action to redefine policy or change direction if necessary?

How does a management system help me do my job?

In a word, “focus”. The traditional approach to managing EHS issues has been to strive toward compliance with an ever-changing series of regulations. Even in smaller, less complex facilities, that can be a daunting, never-ending task. More importantly, the regulatory requirements may not actually address the real EHS issues that may impact a given facility. A management system not only addresses compliance requirements, but requires an assessment and evaluation of the most important EHS aspects of the operation. The focus is then driven toward the most significant issues.

My biggest problem is getting top management understanding and support for Safety and Environmental activities. How does a management system help me do that?

In three key ways.

- First, the management system requires a policy commitment on the part of top management that will state, in effect, that EHS is an area of performance that should be managed. The management of the facility must commit to a policy of compliance with regulatory requirements and, more importantly, to the concept of continuous improvement of the EHS management system.
- Secondly, in order for the management system to be effective, top management must also be involved in setting objectives and targets for EHS improvement.
- Finally, management must review the status of the EHS management system and progress toward established goals and targets. This puts EHS on a similar footing with other issues top management must address, using a framework managers understand.

Won't all this attention to the EHS management system really focus on how well I'm doing my job?

Not necessarily. One of the benefits to using the management system approach is the need to establish action plans that assign responsibility for task accomplishment explicitly. The development process tends to illustrate how critical it is to involve all levels of management and a range of staff resources in order to get the job done. EHS performance requires a team approach – all members of the team will normally have assigned tasks. The EHS manager will certainly have assigned tasks, but they will be more focused on coordination of EHS objectives and providing technical assistance as needed.

We rely on our corporate staff for some parts of our EHS Management Systems, such as keeping current with regulations. How is that assessed?

The focus of the assessment is the site EHS Management System. If the site effectively “out-sources” some of the required components, even to others within the corporation, that can be an effective means of managing those issues. The assessor will review how well that outsourcing process works and how reliable it is. If the process is not reliable because corporate staff does not routinely get timely regulatory updates out, it reflects negatively on the site EMS; the action to fix the problem would probably be assigned to corporate staff.

How will the assessment look at my existing management programs, such as Emergency Response, Respiratory Protection, Chemical Inventory, etc?

Such programs can fulfill several components of the EMS. For example, if response to and mitigation of releases of hazardous materials to the environment is identified as a significant EHS aspect of your operation, the assessor would review the Emergency Response Plan to find evidence of: 1) Procedures for emergency response (Planning); 2) Emergency response team organization (accountability and responsibility); 3) Equipment for emergency response (resource allocation); 4) Training requirements and documentation (training); drills and practice for emergency response (monitoring and corrective action). The assessor looks at specific regulatory compliance within the programs as evidence of commitment (or lack thereof) to compliance. Any issues will be identified as management system non-conformances, however, not regulatory noncompliance.

**We've had several audits of EHS compliance.
Don't these show how well the
management system is working?**

Not necessarily. While we normally expect that a good compliance management system will reflect a good overall EHS management system, compliance is only part of the picture. Part of our focus will be on how effectively EHS management is implemented. One facility may have a better compliance record than another for several reasons: fewer compliance issues, less complex issues, less expensive corrective action, application of more resources, etc. An assessment of the management system looks at "how and why" we take certain actions, and less at "what" we do. A better management system should make a facility with a good compliance record even more effective in maintaining that record.

**I'm not sure our facility has an
"EHS Management System" at this point.
Isn't a management system assessment premature?**

The real purpose of the assessment is to facilitate the development of the EHS management system. Many facilities have some components of an EHS management system; part of the challenge is to focus those components in a coordinated way. The assessment process examines the facility operations for evidence of the necessary components of an EHS management system. Where there are "gaps" or system development needs, the assessor will work with the facility to put together an action plan. The goal of the assessment is not to establish a "score" of current status, but rather to work toward continual improvement. Incrementally, all facilities are expected to show improvement in their EHS management system.

Exactly how will the assessment be conducted?

The assessor will use a set of questions which test for evidence of the existence of key components of the EHS management system. Depending on the size and complexity of the facility, the assessment may take from one to four days. Interviews with key personnel, such as top managers, supervisors, technical staff (including EHS staff) and line employees will be conducted. In some questions, review of certain documentation and records may be necessary. The assessor will observe conditions in the facility. Finally, the assessor will assign an "implementation level" from 1-5 (5 being best) to each question, providing backup for the decision. Based on the overall results, the assessor will work with appropriate facility staff to develop a basic action plan for improvement, including responsibility assignments and completion target dates. The facility is responsible for implementing and completing the action plan.