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Communication

Background and Exhibits

An EMS should define the means for proactive internal and external communication. Internal communication should identify, explain, and communicate environmental legal requirements and voluntary commitments to all employees, on-site service providers, and contractors whose work could affect your ability to meet those requirements and commitments. Legal requirements include statutes, regulations, permits, and enforceable agreements. Voluntary commitments include any environmental principles or industry norms that a facility may choose to adopt. Examples of voluntary commitments include voluntary codes of practice for safety, risk management, and energy efficiency issues, or sectoral and international environmental principles such as the Coalition for Environmentally Responsible Economies (CERES) principles or the International Chamber of Commerce Business Charter for Sustainable Development, among others. External communication should provide other stakeholders with information on your environmental programs and accomplishments and provide a means for external parties to comment or provide input to you.

Working with Stakeholders

Stakeholders include anyone who has a stake in your facility's environmental performance. Internal and external stakeholders can play an important role in helping your facility develop an EMS. Employees have a strong stakeholder interest in your facility and can provide strong support for EMS development. Customers, suppliers, and neighbors also can provide useful inputs. In addition, establishing partnerships with trade associations, suppliers, professional associations, and universities can be very helpful in developing parts of your EMS. This module will help you identify the kinds of stakeholders you may wish to include in the process, the potential benefits of including stakeholders, and tips for better communication with stakeholders. While involvement of employees is critical to the success of your EMS, how far you proceed with including additional stakeholders is your decision.

Identifying and Understanding Stakeholders

Almost every facility will have a wide array of internal and external groups that may be interested in, and helpful partners to, that facility. These groups will not be homogenous. Each will have its own priorities and perspectives and each will have something different to contribute in support of your EMS. Part of communication is identifying and understanding these parties over time. Two types of stakeholders are discussed in this module: internal and external. Examples of internal and external stakeholders are provided below.

Internal stakeholders include:

- Employees;
- Shareholders;
- Customers;
- Suppliers;
- Investors and insurers; and
- Trading partners.

External stakeholders include:

- Neighbors;
- Community organizations;
- Environmental groups;
- Larger companies;
- The media; and
- The general public.

You may want to start by communicating with those stakeholders who have expressed interest in your operations. If you desire additional input, you might take the following steps in your effort to locate suitable stakeholders:

- Ask your employees, including facility/site managers and public relations personnel;
- Obtain suggestions from local officials;
- Contact a local planning agency for suggestions; and
- Get input from a national advocacy group regarding local or national groups that may be interested/suitable.

Stakeholder Roles

Before engaging stakeholders, be clear on what you expect their role to be. Consider why you want to include internal and external stakeholders and what roles they can play. What do you want from them? What do you intend to tell them? Consider the following:

- Internal stakeholder (e.g., employee) participation can facilitate implementation of environmental projects as employees “take ownership” of the EMS and the changes it may bring;
- Different stakeholders bring useful perspectives to environmental issues, often identifying issues that may otherwise have been overlooked;
- Participation by all types of stakeholders can add credibility, transparency, and value to your EMS;
- Involving external stakeholders can help them understand your facility’s operating constraints;
- Sometimes being an environmental leader can lead to customer recognition and loyalty, and involving customers in your EMS can help them recognize your leadership; and
- Forming partnerships with customers and suppliers can help to identify shared concerns and ways to cooperate to resolve them. There may be ways that your facility can help your customers meet their environmental management needs. Forming partnerships with suppliers can help your facility obtain important information and may help you meet your EMS goals.

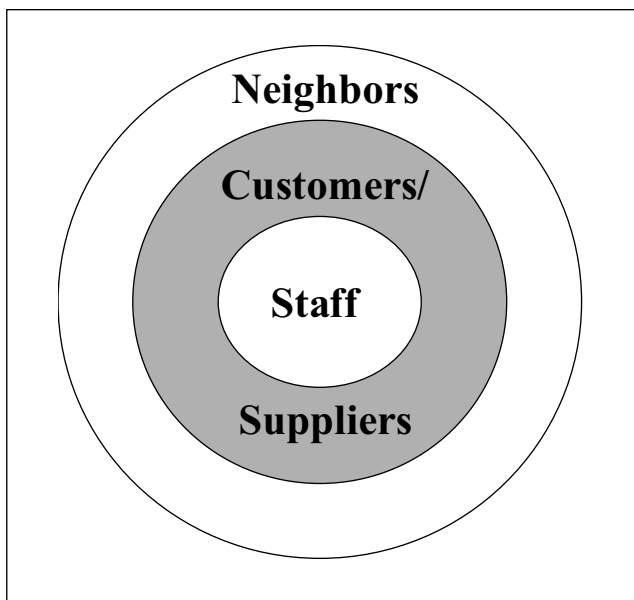
How to Work with Your Stakeholders

The next stage of the process is to communicate with stakeholders. This provides an opportunity to further refine your understanding of their interests.

Develop stakeholder participation in stages and learn as you go. You might think about the different kinds of stakeholders as forming ever-broader circles around your business, as is illustrated in

Exhibit 9-1: Levels of Stakeholder Interest. Begin with the innermost circle and work outward.

Exhibit 9-1: Levels of Stakeholder Interest



Create and maintain a list of everyone you can think of who would be interested in your facility’s environmental activities and how you can reach them (for example, if you already have established ways of communicating with certain groups, you might start with those). You can then make a decision about where to begin. You can start with staff and later add other stakeholders if that suits your capabilities and needs. It is helpful to make your communication list as complete as possible and then pare it down to a manageable list as you begin. Start small then expand, using your list, when ready.

Your stakeholders’ concerns may be very different from what you expect and may be less difficult to resolve than you may think. The only way to find out is to talk with them.

When working with either internal or external stakeholders, effective communication will facilitate smooth implementation of your EMS. You will want to follow these effective rules of communication.

1. Begin early in the process. Let people know what you are doing. In most cases, you will need the cooperation of several people within your facility to gather information and develop an EMS that works. In small and large facilities, early communication will pay off in greater acceptance of the resulting system.
 2. Set communication objectives. Decide what you want to achieve. Setting goals will help you get the right message across without overwhelming people with too much information, spending too much time, or missing the mark. It is helpful to create an EMS communication procedure for your facility. The procedure should outline what kinds of information will be communicated to external stakeholders and how the facility will document and respond to communications from external stakeholders. It should include communication for emergency preparedness and response stakeholders. It should also address internal stakeholder communication principles.
 3. Communicate regularly and integrate EMS communication with other efforts. To build support for the EMS, communicate on a regular basis. Some simple means of regular communication can usually be accomplished without straining resources—for example, use existing channels of communication such as bulletin board postings, email messages, or articles in the facility newsletter. Don't forget to consider direct word-of-mouth communication, particularly in smaller facilities. Talking directly with key individuals at regular intervals may be the best mechanism for ensuring good communication. Use existing channels of communication to communicate your EMS activities.
- Scheduling tours of your facility;
 - Producing a fact sheet about your facility's activities, the EMS program, and why and how your facility would like to include stakeholders;
 - Establishing a phone line to answer questions, record concerns, etc.; and
 - Holding public meetings when you feel it is appropriate.
4. Ensure that stakeholder dialogue is a two-way process. The stakeholders will want to know that their comments and concerns are being heard and taken into account. Convey that your facility is genuinely interested in their input and explain how you will include them.
 5. Track communication. Develop a procedure for documenting and responding to stakeholder communication. This will help you track input from stakeholders and document your responses or efforts. Also, appoint a person to be responsible for carrying out your communication procedure.

Use your answers to the questions provided in *Exhibit 9-2: Element Review Questions* to begin the process of communicating to your internal and external stakeholders about your EMS.

Exhibit 9-3: Communications Program Matrix is provided to help you plan your outreach to various stakeholders. You can customize the procedure provided in *Exhibit 9-4: Procedure for Communication with Stakeholders (EP-004)* and the supporting form, External Stakeholder Communication Record (EF-004.01), to begin the development of your communication system with outside parties.

Consider various methods of regular communication with stakeholders about your facility and your environmental efforts and goals. These methods can build on existing methods, such as:

- Discussing the EMS at facility meetings;
- Updating the facility Web site to communicate your environmental policy and other important elements of your EMS and to solicit comments and suggestions;
- Including EMS information in your annual report;

Exhibit 9-2: **Element Review Questions**

Questions	Your Answers
Who are our key external stakeholders ? How were these stakeholders identified ?	
With regard to our facility, what are the key concerns of these stakeholders ? How do we know this?	
What community outreach efforts are we making now (or have we made in the recent past)? How successful have these efforts been?	
What methods do we use for external communications? Which appear to be the most effective ? Who has primary responsibility for external communications?	
How do we gather and analyze information to be communicated? Who has responsibility for this?	
How do we communicate internally (as well as with our suppliers and contractors)? What processes do we have to respond to internal inquiries, concerns, and suggestions ? How effective are these methods?	
<i>Our next step on communication is to . . .</i>	

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Stakeholder(s)	Potential Environmental Interest	What We Want to Tell Them	What We Want Them to Tell Us	How We Will Communicate With/Tell Them	When We Will Do It	Person Responsible

Exhibit 9-3: Communications Program Matrix

Exhibit 9-4: **Procedure for Communication with Stakeholders** (EP-004)

1.0 Purpose/Scope

This procedure defines the process for:

- a) Internal environmental communication/awareness within **[Facility's Name]**; and
- b) External environmental communication between **[Facility's Name]** and external interested parties, such as regulatory authorities and the public/local community groups.

2.0 Activities Affected

All areas and departments.

3.0 Forms Used

External Stakeholder Communication Record (EF-004.01)

4.0 References

- 4.1 Environmental Policy
- 4.2 Procedure for Identification of Legal and Other Requirements (EP-001)
- 4.3 Procedure for Obtaining Agency Approval (EP-002)
- 4.4 Procedure for Environmental Aspects, Objectives and Targets, and Programs (EP-003)
- 4.5 Procedure for Environmental Management System Management Review (EP-006)
- 4.6 Procedure for Emergency Preparedness and Response (EP-007)
- 4.7 Procedure for Environmental Training and Awareness (EP-008)
- 4.8 Procedure for Contractors and Sub-contractors (EP-016)
- 4.9 Procedure for Document Control (EP-014)
- 4.10 ISO 14001:1996, Element 4.4.3.

5.0 Definitions

External Communications: written or electronic correspondence, telephone conversations, and discussions or meetings with anyone external to the facility.

6.0 Exclusions

None

7.0 Procedure

- 7.1 Internal Communications/Awareness
 - 7.1.1 Internal environmental communications shall be implemented to ensure those personnel at each relevant level and function are aware of the following:
 - 7.1.1.1 The Environmental Management System;
 - 7.1.1.2 The importance of conformance with the environmental policy, procedures, and system;
 - 7.1.1.3 The potential consequences of system non-conformances;
 - 7.1.1.4 Individual roles and responsibilities in achieving conformance with procedures, including emergency preparedness and response; and
 - 7.1.1.5 The significant environmental aspects associated with work activities and the environmental benefits of improved personal performance.

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Exhibit 9-4: Procedure for Communication with Stakeholders (EP-004) (continued)

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<p>7.1.2 Internal environmental communications may be accomplished by the use of:</p> <p>7.1.2.1 Notice boards;</p> <p>7.1.2.2 Awareness training of facility personnel, as appropriate in line with job function;</p> <p>7.1.2.3 Environmental training of relevant job functions, as appropriate (see Procedure for Environmental Training and Awareness);</p> <p>7.1.2.4 Newsletters;</p> <p>7.1.2.5 Electronic notes;</p> <p>7.1.2.6 Team meetings and meeting minutes;</p> <p>7.1.2.7 Management reviews and meeting minutes; and/or</p> <p>7.1.2.8 Corrective Action Requests.</p> <p>7.1.3 Communication of environmental issues from employees to top management shall be handled by the Cross Functional Team (CFT) member representing the affected area, in coordination with the Environmental Management Representative (EMR). These communications shall be documented.</p> <p>7.1.4 Communication of changes to legal and other requirements to employees shall be handled by the Area or Department Manager or designee. These communications shall be documented.</p> <p>7.2 External Communications</p> <p>7.2.1 External communications concerning the environmental aspects of the facility should be directed to the Security Manager, Human Resources Manager, or the EMR.</p> <p>7.2.2 The EMR or EMS Coordinator is responsible for responding to inquiries from interested parties and regulatory agencies.</p> <p>7.2.3 The Human Resources Manager or designee is responsible for sending current copies of the environmental policy to interested parties. These requests will be documented on the External Stakeholder Communications Record (EF-004.01).</p> <p>7.2.4 The Human Resources Manager in consultation with the EMR is responsible for responding to media communications.</p> <p>7.2.5 When community concerns relate to an environmental emergency, the Procedure for Emergency Preparedness and Response shall be implemented.</p> <p>7.2.6 The EMR, or designee, is responsible for determining the need for and preparation of any notification to regulatory agencies on an as needed basis.</p> <p>8.0 Frequency Ongoing</p> <p>9.0 Records Records shall be retained consistent with the Procedure for Environmental Records (EP-005).</p> <table border="1"> <thead> <tr> <th>Revision Date</th> <th>Description</th> <th>Sections Affected</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Revision Date	Description	Sections Affected									
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External Stakeholder Communication Record (EF-004.01)

Date _____ Time _____ Contact Name(s): _____

Type of Contact: _____

Meeting ___ Email/Letter ___ Telephone ___ Person Completing Form: _____

Other (describe): _____

Environmental Issue/Concern:

Actions to be Taken:

Type of Follow-up Required:

Examples

Example 9-1: Case Study—Working with Stakeholders shows how “Facility B” set up a process to train and use employees (internal stakeholders) to identify environmental concerns and some of the benefits achieved.

Example 9-2: Communications Program Matrix shows an example of how to complete the matrix presented in *Exhibit 9-3: Communications Program Matrix*.

Example 9-1: **Case Study—Working with Stakeholders**

Case Study: Facility B—Working With Stakeholders

Facility B is a 50-person facility that does ship repair. With senior management backing and support from a local consultant, Facility B focused initially on building environmental awareness among its employees. Facility B offered general environmental awareness training to all workers and managers and additional training on how to identify specific environmental issues. Employees then were divided into 10 teams, each charged with identifying the environmental issues associated with a specific area of operation, from the acquisition of raw materials to delivery of the product. Using this input, Facility B developed a list of its most important environmental issues, concrete objectives, and plans for improvement.

The key to Facility B’s success lay in using participatory teams to identify new environmental issues and develop solutions. For example, the facility identified environmental impacts of abrasive blasting and teams from more than one area found ways of reducing these impacts. Facility B now has a process by which it routinely inspects and cleans sediment traps and drains to ensure containment of spent material. It also enhanced its training of new employees and contractors that do abrasive blasting on proper abrasive blasting methods, proper material handling, reducing floatable solids, and practicing good housekeeping. Employees whose jobs included filling abrasive blasting containers recommended the installation of particulate suppression equipment on vents to minimize emissions when containers were being filled.

Other benefits Facility B has realized include improved compliance, a safer work environment, and reduced emissions from its transport vehicles, thanks to improved maintenance. The environmental awareness of all employees has increased significantly, with some workers extending their new-found environmental awareness to their homes. The facility has also publicized its implementation of an EMS to the local community in an effort to improve its community relations and to improve the environmental awareness of the community.

Example 9-2: **Communications Program Matrix**

Stakeholder(s)	Potential or Known Environmental Interest	What We Want to Tell Them:	What We Want Them to Tell Us:	How we Will Communicate with/Tell Them:	When We Will Tell Them	Person Responsible
Employees	<ul style="list-style-type: none"> ➤ Safety for workers ➤ Protection of the environment ➤ Competitiveness 	Environmental policy	How to get it done	Memo, bulletin board, meetings, suggestion box, Intranet	Initial training for new employees, EMS update at annual picnic, as needed via training program for specific workers	EMR, CFT, and training personnel
Neighbors	<ul style="list-style-type: none"> ➤ Expansion on north side of ship yard, near residences ➤ Run-off into creek behind electrical shop 	Environmental policy and EMS plans	Their environmental concerns, particularly regarding planned expansion	Meetings, open house, flyers, suggestion box, Web site	Town meeting in November (for expansion discussion) Annual open house Web site (ongoing)	EMR with communications representative (as appropriate)
Customers	<ul style="list-style-type: none"> ➤ Major client considering requiring EMS for suppliers 	Environmental policy and EMS plans	Specific EMS requirements that might ensue	Above, plus inserts in direct mail advertising, or invoices and on our Web site	Ongoing and as billing occurs	Marketing lead and facility president