

EMS survey reveals widespread concerns over certification

An opinion survey conducted by ENDS and the Institute of Environmental Management and Assessment has revealed significant concerns about the effectiveness of environmental management systems and the quality of their certification.¹ One in three respondents felt that management systems do not inherently deliver sustained environmental performance. Nearly half felt that certification bodies are not sufficiently competent.

As ENDS has reported over the past few years, the importance of certified and verified environmental management systems (EMSs) is gradually growing. More firms are ploughing significant resources into writing and implementing these systems, and employing third parties to conduct audits and award certificates.

Some 3,000 firms in the UK now hold ISO14001 certificates, and 78 hold registrations under the EU eco-management and auditing scheme (EMAS).

However, a significant proportion of companies, certification bodies and consultancies are expressing scepticism as to what ISO14001 and EMAS certificates prove about a company's commitment to environmental protection (ENDS Report 327, pp 31-33). This has been prompted not least by revelations of pollution offences committed by companies which hold such certificates (ENDS Report 327, p 67).

Empirical studies have so far failed unequivocally to establish that certified EMSs deliver environmental performance improvements. Researchers at the University of Sussex found no discernible benefits from having an EMS when they looked at the emissions of certain pollutants in a Europe-wide study two years ago. For some pollutants, performance was worse (ENDS Report 311, pp 27-29).

In a study for the Environment Agency, the Policy Studies Institute found that firms with an EMS had demonstrably better procedures in place, but that these did not result in better outcomes such as lower rates of non-compliance or enforcement activity (ENDS Report 332, pp 3-4).

ENDS' survey was aimed at gauging the level of confidence now held in certified EMSs by inviting views from those with the most direct experience of them.

Some 350 people responded, representing a cross-section of companies with ISO14001 certificates, consultancies providing EMS implementation services, organisations providing both ISO14001 certification and EMAS verification and EMAS-registered companies.

Sustained performance?

A key finding is that a third of respondents believe that EMSs do not in themselves deliver sustained environmental performance improvements.

Some 17% believe they make a difference around the time of initial implementation but that this is not sustained. A further 16% feel they make no difference over and above effects that would have been achieved as a result of other drivers, such as legislation. The rest felt that they did deliver sustained

improvements. While it can be difficult to distinguish between performance drivers, it is significant that so many respondents felt unable to attribute improvements specifically to EMSs.

Around one in four participants from companies with ISO14001 certificates believes that EMSs do not inherently afford sustained benefit in terms of environmental performance (see Table 1). Curiously this view is shared by a third of respondents from companies who are in the process of implementing EMSs. This points to them being driven by expediency rather than a real belief in EMSs' ability to deliver performance improvement.

Asked whether or not EMSs result in reduced environmental risks for companies in terms of non-compliance, reputational and financial issues, more than half of respondents said that performance varies between firms. This view is held particularly strongly by consultants, only a third of whom believe that EMSs normally reduce environmental risk.

Furthermore, most respondents appear to believe that EMSs do not in themselves drive firms to identify resource efficiencies. More than half said that other drivers were more important. Only 28% agreed with the statement that EMSs deliver resource efficiencies which would not otherwise have been identified or pursued.

Both ISO14001 and EMAS require a corporate commitment to comply with applicable legislation. Yet our survey revealed that one in four participants felt that EMSs made little difference to legal compliance – either in terms of the frequency and scope of checks, or performance against permits and other legal requirements.

One respondent commented that he did not think it mattered if EMSs do not by themselves result in such benefits. He argued that they play a role alongside a host of other drivers and should be viewed as part of a package of measures.

But management often turns this argument on its head and asks environmental managers to justify the allocation of the substantial resources required to achieve and maintain EMS certification, particularly if other drivers can effect similar performance improvements. Regulators, too, have asked why they should offer benefits to companies with certified EMSs in preference to those without.

Variable picture

A number of respondents were responsible for the environmental performance of large corporations comprising many sites. Most of them reported that the level of improvement achieved by implementing

“A certified EMS is only as good as the company implementing it”

– Respondent from certification body

EMSs varied considerably.

Jonathan Garrett of Smiths engineering group, which is in the process of certifying 80 sites to ISO14001 worldwide, commented that “improvement in performance is variable....Some businesses make great improvement, others none at all and some in between.”

He believes that two of the key factors determining the level of benefit which a site achieves from its EMS are the degree of management commitment at the site and the quality of the staff available to implement it. One site where the managing director had taken a keen interest in results delivered “huge improvements in performance.” Other multi-site corporations cited the same factors. He expressed surprise that third party certification had not made the outcomes more consistent.

However, Mr Garrett said he believed that the decision to obtain ISO14001 certification had acted as a catalyst for change in the organisation, given a previous lack of focus on the environment. “Overall, for the group as a whole, we are confident that performance has improved and will improve still further in the future.”

Motivation

The survey also examined the drivers for companies implementing certified or verified EMSs. Respondents were asked to choose any of five potential drivers.

The findings suggest that internal motivation is the biggest single driver for certification – pointing to a sincere desire to want to improve performance on the part of many. This is followed closely by supply chain and competitive pressures.

Regulatory pressure was also said to be significant but few cited public pressure as a reason.

Conversely, more than half of respondents felt that other factors were more significant in determining companies’ environmental reputations than whether they had ISO14001 or EMAS.

This low credibility appears to be translated into purchasing policy. Few say they would be willing to take ISO14001 certification or EMAS verification at face value when it comes to judging the environmental credentials of their own potential suppliers.

Around half said they would also ask for other evidence of performance while a further 38% said it would make little difference to them whether or not a supplier had ISO14001 or EMAS (see Table 2).

One environmental consultancy commented that its major clients had recently begun to ask for other evidence of environmental performance from suppliers. However, others suggested that in practice these still represent a minority.

Guy Balcon of plastics converter Huhtamaki UK commented: “We get innumerable questionnaires demanding achievement of various standards without any follow through or demand for specific performance criteria.”

Disquiet over certification

The survey also sought views on the way certification and verification of EMSs are carried out. It revealed even more disquiet and attracted the most

comments from respondents, the majority of them critical – including some from certification bodies themselves.

Nearly half of respondents do not believe that certification bodies or verifiers are sufficiently competent. A quarter felt they lacked knowledge of their clients’ business operations, 13% said they did not have enough environmental knowledge, and 11% said they did not have enough of either (see Table 3).

In addition, four in ten respondents felt that certification bodies employed different approaches to their work and that this meant that the outcome was neither consistent nor comparable.

This view appears to be shared by some in the certification community itself. One individual from a large mainstream UK certification body who declined to be named commented: “A certified EMS is only as good as the company implementing it. If the top management just want a greenwash or a badge on the wall then there are certification bodies out there that will do that – i.e., give certification based on intent rather than actual evidence.”

He added: “Pressure should be put on the UK Accreditation Service to name and shame the poor performing certification bodies rather than dragging us all down with them.”

Another participant from a different certification body said he had seen the full spectrum of EMSs – from those where companies had been driven to investigate resource or waste reduction to the “flat and uninspired EMS”. However, he argued, “certification bodies can help to push organisations but they cannot force them.”

A manager from a company with several ISO14001-certified sites said that certification bodies appeared to “rubber stamp average performance” on some sites. Another commented that “it is possible to get the certificate on the wall and effect very little environmental improvement.”

Adam Faiers, a policy officer at South Northants Council who oversaw its certification body selection process, revealed that the cost estimates submitted by eight certification bodies ranged from £12,000 to £38,000, which he described as “inordinate.” He said that the bids were similar in terms of planned auditing time and auditor skills, but in some cases were inflated by “hidden” fees such as expenses and management fees.

Smiths Group has employed three certification bodies to certify its 80 sites. Based on this experience, Jonathan Garrett believes that “the key to delivering environmental performance improvement through ISO14001 lies with the certification body. If the body is focused on performance and outcomes as opposed to system documentation...then environmental improvement is much more likely.”

Indeed, four out of ten respondents felt that certifiers and verifiers do not spend sufficient time assessing companies’ performance outcomes as opposed to documented policies and procedures. Some two-thirds of those working for consultancies feel this way.

Respondents were also asked about their experiences of legal compliance assessments by certification bodies and verifiers. One third said that in their experience this simply involved checking for the

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– Respondent from certification body

existence of documented procedures. Less than half of respondents had experienced any additional on-site evaluation of compliance.

Costs and benefits

Respondents were equivocal about whether the benefits of certification or verification outweighed the costs. Half felt that they did. Roughly one in six felt that they did not. The rest said the costs and benefits were evenly matched.

In selecting certification or verification bodies, the two most frequently applied criteria appear to be reputation and previous knowledge of the certification body from quality certification.

A quarter of respondents cited each of these factors. One in six based their choice on cost and a similar proportion on whether or not the body had relevant sector knowledge.

Some respondents expressed concern about the trend towards integrated audits for quality, health, safety and environmental systems.

David Symons, associate director of WS Atkins, commented: "There are few expert quality auditors who are also really sound in environmental matters and this provides real challenges to certification bodies where the client is also pushing hard for an integrated ISO9000/14000 audit."

He concluded: "Some certification audits of my clients' sites have been really exceptional and value added. Others have been a complete waste of time with the auditor starting at Clause 4.1 and working through on a clause by clause basis."

Strong signals

There will be some who will be put on the defensive by the survey findings. Indeed, some participants complained that people with a grievance would be more likely to respond. That said, others feared that people trying to sell a positive image for EMSs would be more likely to participate.

Some will argue that the survey only relates people's perceptions rather than constituting hard evidence. This is undeniable. But the results convey a strong signal about the credibility of EMSs based on the direct experience of professionals working in companies, certification bodies and consultancies. The findings must be viewed in conjunction with the empirical evidence from the SPRU and PSI studies.

It is also true that many respondents were positive about the benefits of EMSs: two-thirds felt that EMSs did deliver sustained environmental performance improvement over and above that which would have been achieved by other drivers. One half believed that the benefits of certification outweighed the costs. Mr Garrett's views on the catalyst effect of EMSs were shared by others.

But a signal that cannot be escaped is that the survey has revealed a significant lack of confidence in EMSs. Two years ago, UKAS dismissed a complaint by the chief executive of one certification body concerning the quality of the industry's work as "one emotional overview". Our survey suggests that many others feel the same way as this chief executive, and the scale of discontent – especially in relation to certification – means that it can no longer be

glossed over.

Indeed, our survey sample included representatives of just under a quarter of the EMS certification bodies accredited by UKAS. Perhaps predictably, their responses are generally more positive than those of the overall pool. For instance, they all feel that the time spent on assessment of organisations is appropriate to their size and complexity.

But in some areas, there is clearly a little doubt. For instance, many of them do not believe that the approaches of their counterparts delivers a consistent or comparable outcome. Most also say they would not trust an EMS certificate on its own merits when making purchasing decisions and would look for other evidence of environmental performance.

The EMS national forum of 3 December may prove to have been a pivotal moment for EMS certification in the UK – if it gives birth to a movement to address the inadequacies in the current system. IEMA technical director Martin Baxter believes that the survey findings provide "a mandate for action for the different stakeholders in the process."

However, the impetus for change might yet fizzle out in argument over culpability and perceptions – in which case the future for certified EMSs, despite their evident ability to help companies improve environmental performance if applied and certified with the right mindset, would look bleak.

¹ ENDS would like to thank all those who took part in the survey. A full set of figures illustrating the results is available at:

www.endsreport.com/emssurvey

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Table 1: Environmental performance

Breakdown of responses:

67%	"EMSs provide the basis for achieving significant environmental performance improvement that otherwise would not have been achieved"
17%	"EMSs make a short-term difference in environmental performance at the time of implementation but this is not sustained"
16%	"EMSs make no real difference to environmental performance over and above that which would have been achieved as a result of other drivers of efficiency or the need for legislative compliance"

Table 2: Customer demand

Breakdown of responses:

	"Whether or not an organisation has ISO14001 or EMAS..."
56%	"...has some influence but we would also want other evidence of environmental performance"
38%	"...makes little difference to whether or not we purchase products/services from them"
6%	"...is the main environmental factor in deciding whether or not we purchase products and/or services from them"

Table 3: Competence

Breakdown of responses:

52%	"Certifiers/verifiers are usually sufficiently familiar with business operations and the identification and measurement of environmental impacts associated with them"
13%	"Certifiers/verifiers usually have sufficient knowledge of business operations but lack adequate environmental knowledge/understanding"
24%	"Certifiers/verifiers frequently do not have sufficient knowledge of business operations but do have an adequate understanding of the environmental factors of relevance"
11%	"Certifiers/verifiers frequently do not have sufficient knowledge of business operations nor an adequate understanding of the environmental factors of relevance"