The objectives of the environmental audit

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Explores the concept of the environmental audit. Emphasizes its importance as one contribution that attempts to prevent the destruction of the world in which we live. Stresses that it is everyone’s responsibility – that of both individuals and the companies and organizations in which they operate. Describes stages of the audit process that have been successful in practice.

Among the multitude of animals which scamper, fly, burrow and swim around us, man is the only one who is not locked into his environment. His imagination, his reason, his emotional subtlety and toughness, make it possible for him not to accept the environment but to change it. And that series of inventions, by which man from age to age has remade his environment, is a different kind of evolution – not biological, but cultural evolution. I call that brilliant sequence of cultural peaks “The Ascent of Man”[1].

The International Chamber of Commerce has defined environmental audit as “a management tool comprising a systematic, documented, periodic and objective evaluation of how well environmental organization, management and equipment are performing with the aim of helping to safeguard the environment by:
• facilitating management control of environmental protection;
• assessing compliance with company policies which would include meeting regulatory requirements[2].

The advantages of a sound environmental audit are that it will:
• demonstrate company commitment to environmental protection to employees, the public and the authorities;
• provide an environmental database for planning, plant modification and emergency planning;
• safeguard the environment;
• verify compliance with local and national laws;
• indicate current or potential future problems that need to be addressed;
• reduce exposure to litigation, incidents and adverse publicity;
• increase employee awareness of environmental matters;
• assess training programmes and provide data to assist in training;
• enable companies to build on good environmental performance, give credit where appropriate and highlight deficiencies;
• assist the exchange and comparison of information between different plants or subsidiary companies;
• identify potential cost savings, such as from waste minimization.

The advantages are immense. The development of the environmental audit is inexorable. The organization can choose to be part of this exciting development, or let it pass by. There are plenty of other organizations wishing to take the opportunity, with external consultancies springing up with great regularity and internal auditors beginning to tool up. It requires a new approach by the auditors, but not one which is far removed from more familiar territory.

At the very least the auditor will be concerned to ensure compliance with laws and regulations on the environment. In the US context this will be legislation such as the Water Quality Improvement Act of 1970, the Noise Control Act of 1972, the Toxic Substances Control Act of 1976, the Clean Air Act Amendment of 1977, and the Resource Conservation and Recovery Act of 1984. For
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The objectives of the European Community this will be article 130R of the 1987 Single European Act which states that:

1. Action by the Community relating to the environment shall have the following objectives:
   (i) to preserve, protect and improve the quality of the environment;
   (ii) to contribute toward protecting human health;
   (iii) to ensure a prudent and rational utilization of natural resources.
2. Action by the Community relating to the environment shall be based on the principles that preventive action should be taken, that environmental damage should as a priority be rectified at source, and that the polluter should pay. Environmental protection requirements shall be a component of the Community's other policies.

The European Eco-audit

The European Commission has established a Council regulation for a Community-wide, voluntary eco-audit scheme. The version that in 1992 went before the European Council and Parliament for ratification was entitled “Proposal for a Council Regulation allowing voluntary participation in the industry sector in a Community eco-audit scheme”. The reference was COM (91) 459. European member states now need to establish such a voluntary scheme. Companies in certain industrial activities that wish to participate must commit themselves to:

- establishing an internal environmental protection system;
- evaluating objectively the environmental performance of the system;
- informing the public on environmental performance;
- having the public statement verified by an accredited environmental auditor.

The scheme operates with European standards to be developed on environmental management systems and related certification activities. Companies which meet the requirements to be registered may use a logo related to the sites that have been verified under the scheme.

Eco-labelling

Eco-labelling is a means of displaying information as to the differential impact on the environment of products which offer similar uses and compete with each other in the market. The aim is to lessen harm to the environment while providing the information to the consumers in making decisions based on environmental performance. The awarding of an eco-label involves consideration of the environmental impact of a product at every stage of its lifecycle, including its manufacture, distribution, use and disposal, and a comparison of that impact as against other products in the same group. Naturally the advantage of the label will be particularly crucial where there is a marked consumer demand for greener products. The principle is that product groups must be selected for application of the label, and criteria adopted and published on the basis of which products in that group can be assessed. The awarding body then determines which products in the group have met the criteria and can achieve the award. A draft regulation to establish an EC eco-label system was first introduced in February 1991, but controversy delayed its implementation. Under the regulation we now have, the Department of the Environment is required to designate a Competent Body for the scheme, and it has been decided that a dedicated non-departmental public body would be the most suitable means to take on this role. In order to demonstrate the authority, and impartiality of the body, and promote the credibility of the scheme, the Department dictated that it should be official, independent and free from ministerial control. Dr Elizabeth Nelson, chair of Addison Consultancy Group plc and the Taylor Nelson Group Ltd, was appointed as the first chair of the UK’s official eco-labelling body.

The environmental aspect to loans

Bankers and other potential lenders now need to add an extra level of scrutiny to their lending decision: an assessment of possible or actual environmental liability. This obviously adds to the cost of the loan, but lenders are becoming extremely cautious with the traditional security of property being more risky with the uncertainties of the property market, and they will not wish to see their loans further at risk from environmental problems. The issue has become critical in the USA under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (Cercla). This act aims to make those who cause pollution liable for the cost of clean-up and perhaps also for damages for injury to the public. This principle of making the polluter pay is also the policy of the UK Government. Accepting that those who control the land carry the primary responsibility, Cercla recognized that lenders who took security over land that subsequently turned out to be polluted, could be left with unfair liability. The Act therefore contained the “secured lender exemption”. This excludes from
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liability those who, without participating in the management of a facility, hold indication of ownership primarily to protect their security interest. The difficulty has been to define what constitutes participating in the management. US courts have ruled that slight acts, such as any prudent lender would take to safeguard security, would be sufficient. Matters progressed further down the slippery slope when the Federal Appeals Court considered such a case for the first time in the case of US v. Fleet Factors. The Appeal Court for the Eleventh Circuit determined that a secured lender who took no part in management decisions, which were previously thought to be safe, might still be found liable if the court could infer that the secured lender could have affected hazardous waste decisions, even if in fact it did not do so. This decision caused shock-horror in the US banking community. Not all subsequent decisions have followed this lead, but the ambiguity of the law does little to calm the anxieties of lenders.

In the UK, the Environmental Protection Act 1990 imposes liability on those who control waste, but generally such liability is not absolute, and if reasonable precautions have been taken, and due care exercised, then liability will be avoided. This is not so in the Draft EC Directive, which in Clause 2(1) (b) stipulates that “the person who had actual control of the waste when the incident giving rise to the damage …, if he is not able within a reasonable time to identify the producer ...” shall be liable. Liability is absolute and dependent on fault. It is not always possible to identify the producer of waste, such as a waste tip informally used by the public over many years.

The law and the company director

Company directors will increasingly face the threat of fines and disqualification. In a landmark case in the summer of 1992 in Lewes Crown Court, for the first ever time a company director was disqualified for committing a health and safety offence. The analogy with environmental offences is extremely close, and it is to be expected that the principles of this case will be reapplied without hesitation to environmental abuses. The miscreant director was the owner of a Kent quarry firm which acted in breach of a prohibition notice issued by the Health and Safety Executive for failure to protect employees from falling rocks. He pleaded guilty to the charge under section 37 of the Health and Safety at Work Act, which makes directors and other senior officers liable for offences committed where they have conspired or connived in the offence, or where it was attributable to their neglect. The assistant recorder at the Crown Court believed that the severity of the offence rendered it insufficient to simply fine the director and the company, and so it made legal history by imposing a two-year ban on holding a company directorship. Section 2 of the Company Directors Disqualification Act 1986 permits a court to disqualify a director for up to 15 years for an indictable offence connected with, inter alia, the management of the company or its property. Never before had this power been exercised in relationship to a health and safety offence. It will only be the next step for the same treatment to be meted out for an environmental offence. The Environmental Protection Act 1990, Water Resources Act 1991, and Water Industry Act 1991, all contain identical stipulations to those of the Health and Safety at Work Act 1974, and allow directors and senior officers to be charged for environmental offences perpetrated by their companies. With a finding of guilt under these statutes, courts may be inclined to follow the lead established by the Lewes Crown Court. This is likely to apply only to blatant and serious cases. However, the closer the director is involved in the day-to-day workings of a company, the more likely it is that he or she might be disqualified. Directors of small companies, with their close operational involvement, need to be particularly vigilant.

There are corresponding liabilities for the companies themselves. Companies with a presence in the USA need to be aware of the Federal Sentencing Guidelines which became finalized on 1 November 1991. There is an appreciable British presence there. For example, coal-mining in West Virginia is dominated by British companies. The Guidelines provide a formula for sentencing organizations for various types of white-collar crime, based on the gravity of the offence and the degree of culpability. The Guidelines, which are applicable to all organizations, mean that a range of crimes from violations of employment laws, mail and wire fraud, and commercial bribery, to money laundering and environmental offences, will attract fines and sanctions that can amount to hundreds of million of dollars. These sums may seem extreme, but even conservative estimates of the long-term harm some organizations inflict on the environment, would suggest that such sums are in fact an underestimate rather than an overestimate of the sometimes irreversible harm to the planet. The Guidelines do encourage sound commercial practice by allowing for reduced sentences for organizations that can display
Evidence of an “effective program to prevent and detect violations of law”. “Credits” against potential penalties can be accrued if organizations can demonstrate that they have:
• complied with the various due diligence steps outlined in the law;
• investigated and punished wrongdoing; and
• co-operated with government investigators.

In similar vein, but with exclusive reference to environmental concerns, the US Department of Justice issue a policy pronouncement on 11 July 1991 indicating that companies that proactively implement management and compliance programmes will face less criminal enforcement activity than companies which lack such programmes. According to the pronouncement, a company is more likely to qualify for “prosecution leniency” if it can prove through its management system:
• voluntary, prompt, and complete disclosures of matters under investigation;
• full and prompt co-operation; and
• preventive measures and compliance programmes.

Such an approach makes good, prudent sense outside the USA as well. It leads us naturally into the need and value of the environmental audit. If you adopt the optimal approach, there is no standard or legislation that can catch you unawares.

The Litter Code for local authorities

Much of the work of local authorities in removing litter and cleaning roads is subject to both the Local Government Act 1988 and the Environment Protection Act (EPA) 1990. The 1990 Act set higher standards to be adhered to. Section 89 requires local authorities and other specified landowners as far as practicable to keep all land to which the public has access, and which is open to the air, clear of refuse and litter.

The Secretaries of State issued their code of practice, as required by the Act, in January 1991. This Litter Code lists four grades of cleanliness:
1. no litter or refuse (grade A);
2. predominantly free of refuse (grade B);
3. widespread litter and refuse, with minor accumulations (grade C); and
4. heavily littered, with significant accumulations (grade D).

Photographs are included in the Litter Code to illustrate these grades. Eleven categories of land are then identified:
1. town centres, shopping centres and streets, major transport centres, central car parks, and other public places where large numbers of people congregate;
2. high-density residential areas, recreational areas where large numbers of people congregate, and suburban car parks and transport centres;
3. other car parks and transport centres, low-density residential areas, and industrial estates;
4. amenity beaches (above high tide);
5. motorways, and trunk roads whose traffic flows exceed specified levels;
6. all other roads (besides 6, and those included in 1 to 3);
7. land occupied by educational institutions;
8-10. railway embankments and towpaths;
11. all other areas to which the Act applies.

The significance of these categories is that the Code specifies the grades to which land should be restored, and by when, by each category. For example, category 1, with the highest specification, has to be restored to grade A:
• within six hours if it falls to grade B between 6 a.m. and 8 p.m. (or within three hours if it falls to grade C, or within one hour if to grade D); and
• by 8 a.m. if it falls below grade A between 8 p.m. and 6 a.m.

Businesses in industrial estates can invoke the Act, as can those who find the infrastructure of roads and the like is over-littered.

Other aspects of the Environmental Protection Act 1990

The impetus for this act came from EC legislation and policy as well as from domestic institutions such as the Royal Commission on Environmental Pollution and Parliamentary Committees. The act represents the beginnings of the practical manifestation of the principle that the polluter pays. It also introduced the notion of integrated pollution control. Previously each component of the environment – air, land and water – had its own separate laws and systems of control. Now Her Majesty’s Inspectorate of Pollution will control all releases of air, water, and land from most polluting industrial processes. The Inspectorate was formed in 1987 through the merger of the three existing inspectorates of industrial air pollution, radioactive substances, and hazardous wastes, together with the addition of new responsibilities in relation to water pollution. Companies have to meet the charges of the Inspectorate, and will pay penalties for breaking the specified emission limits. There is a requirement for
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The following stages have proved to be successful in practice.

The pre-audit

If this type of audit is new to the organization, then it will be worthwhile to make a quick scan across the activities contained in the section on “areas to audit” below. This will highlight areas requiring attention, suggest how the audits will fit in with other work, what resources may be needed, and the training involved for all those who will participate, both auditors and auditees. This situation will also pertain to a multinational company wishing to expand home audits to subsidiaries abroad. If the audit is part of a continuing programme, then a review of past achievement against plan and new needs, will suggest areas for attention.

Setting objectives

Define goals

From the pre-audit the major audit concerns will have emerged. It is now necessary to determine where change is feasible, and the

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Prince Charles, heir to the British Throne, speaking on British television on 23 May 1990 on a programme he produced on the environment, emphasized the need for proper audit and accountability. He reinforced the message in his keynote address to the World Commission on Environment and Development (The Brundtland Commission) on 22 April 1992, and in subsequent conversation with the writer. In his speech, he urged the need to seek to live in harmony and balance with the rest of creation, even if we cannot discern any direct and immediate material benefit to ourselves in the process.

This, of course, points to the need for a fundamental shift in attitudes. We have all been taught to think in a linear way; with a beginning, a middle and an end. Linearity is the concept we use to devise industrial processes in terms of inputs, processes, and outputs, with waste and pollution as unintended (and, until recently, little considered) outputs. The solution to pollution is still, too often, dilution. Our linear way of thinking has been a triumph in the relative short term. But now, with the doubling of world population in prospect, with increasing demands for a higher and higher material standard of living, and with the added need to strive for sustainability, we must start to think again.

It is always encouraging to have royal support to the audit cause.

The content of the audit

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impact is greatest per unit of expenditure. Four basic questions should set the tone:
1 What are we doing?
2 Can we improve?
3 Can we do more?
4 Can we do it more cheaply?

The aim will be to optimize the trade-off between company efficiency and negative impact on the environment.

Decide audit scope
The focus may be on the entire organization (comprehensive audit), a department (activity audit) or site by site (site audit). The pre-audit will have given some idea as to which of this, or mixture of these, would be worthwhile.

Ascertain regulations, standards and state-of-the-art technology
Apart from present regulations and standards it is also important to consider those that may be in gestation. Professional, government, environmental and trade bodies, as well as line managers, will be sources of information.

Recent technological and product developments that can improve environmental performance also need to be accessed. The organization can then be judged against this benchmark.

Priority setting
It is realistic to start with projects where either the risk and materiality are high, or the payback period is quickest. Energy conservation and tariffs are an example. The cost of water may well rise sharply, and conservation here is increasingly necessary. Such projects will establish credibility, and looking after the cents will take care of the dollars, and lead to the audit of the larger and sometimes more intractable issues.

Preparation
Select the audit team
It is important to form an interdisciplinary team which together can tackle the science and technology involved, as well as having a knowledge of departments implicated in the audits. With internal audit's roving commission, it may be considered that it is suitable to place the co-ordination role here. This is an opportunity for internal audit to grab, since it will not automatically come this way, and in many reported cases it has not, and internal audit involvement is minimal or non-existent.

Determine the need for external assistance
Where internal audit or the organization lack the expertise, a mixture of in-house staff and independent external consultants needs to be considered. Some large companies use special dedicated in-house staff only, and have environmental audit groups. Others, such as Union Carbide and Allied-Signal, while having their own specialist teams, include an independent consultant on most of their audits.

Establish the terms of reference
This provides an authorization to proceed, as well as a notification to all employees, who should then be encouraged to participate.

Agree timescale, and budget
This places bounds on the audit in relation to the projected benefits and the perceptions of top management, and provides a target for the environmental audit manager to aim for.

Draw up audit documentation
Data need to be collected in a common format wherever possible, and interview and other questionnaires constructed. Computerized processing will also necessitate form design. Standardized documentation could also encourage self-audits, and become part of the normal managerial processes.

Areas to audit
These will vary from organization to organization, but here we give example areas likely to be common to most organizations, and which are currently the subject of environmental audit attention. We have devised three major headings: organization strategy, functional areas, and operational factors, and we deal with each in turn.

Organization strategy
Under organization strategy, there are three main areas to consider:
1 Overall environmental policy:
   • Does it exist?
   • Has it the support of the board of directors, top management and workforce?
   • Is it a regular agenda item for board and other meetings?
   • Has a senior executive been given the responsibility to ensure implementation of the policy throughout the organization?
   • Does this senior executive report directly to board level?

   • Have environmental liaison officers been appointed for each major area of the business?
   • Do they have the resources and authority to monitor compliance with and achieve implementation of organization-wide environmental policy?
• Are the co-ordination mechanisms between the liaison officers and the senior executive adequate?
• Are there means within the policy of resolving conflict between the environmental policy and other organization policy?
• Is the policy communicated with shareholders, employees, customers, suppliers, local politicians, neighbours and control authorities?
• Did it take their views into account?
• Is the policy document dated?
• Is it revised periodically and as soon as internal or external change dictates?
• Are all interested parties consulted?
• Is there a consistent ecological strategy for the organization?
• Are the organization's objectives set with due regard for ecological factors?

2 Staff training and participation:
• Is every employee issued with a copy of the environmental policy document, updates, and new editions?
• Is the personal accountability of every individual employee made clear?
• Are contact points indicated to which the employee may turn for more advice?
• Is the environmental policy a routine part of induction training?
• Are employees required to sign a statement that they have read, understood, and agree to abide with the policy?
• Are staff tested on their knowledge of the policy?
• Is such compliance a part of the staff appraisal system?
• Are summaries of the policy on prominent display around the workplace?
• Is there a system for informing staff about ways to improve environmental performance?
• Are there training programmes, suggestion schemes, quality circles, performance targets, operational and maintenance schedules?
• Is environmental training designed with professional help?
• Is it integrated with other types of training?
• Is there a register of all those who should receive training?
• Are trainees encouraged to apply their newly acquired knowledge and skills?
• Are they monitored to discover the after math of the course, and reasons why they may not be using the fruits of the course?
• Are refresher and follow-up courses supplied as need dictates?
• What motivation and training methods should be employed, and how are they evaluated?
• Are environmental matters raised as part of social occasions, for example open days, to show what the organization is doing?
• Is there a recognition system for staff?
• Are staff encouraged to become involved in environmental projects?

3 Accident and emergency procedures:
• Are there adequate contingency plans for dealing with accidents and emergencies?
• Is the public relations department ready to communicate with employees, neighbours, the Press and others?
• Are there controls to ensure that only PR statements that will stand up to independent scrutiny are permitted to be issued?

Functional areas
There are several areas to be considered here:

1 Marketing:
• Do marketing initiatives create or reinforce the organization's image and reputation for its concern with environmental issues?
• Are products marked to draw attention to their environmentally positive features?
• Is the packaging made from environmentally acceptable materials?
• Are marketing channels set up by agreement between manufacturers and distribution to make recycling systems possible?
• If higher prices are attributable to ecological factors, are the price differentials due to the ecological factors highlighted?

2 Public relations:
• Are environmentalist groups accepted as legitimate albeit critical challengers to the organization?
• Is there an open dialogue with environmental groups without a pretence of being greener than is the case?
• Are deals avoided with environmental groups which could be misconstrued as bribes?
• Is account taken of the existence of the differing and sometimes conflicting opinions among the Green movement?
• Are developments and shifts within the agendas of the constituents of the Green movement tracked?
• Are contacts sought with community activities, and is support provided by the organization?
• Is there a multi-lateral dialogue with trade unions, local authorities, political parties, churches, citizen action groups, conservation groups, and other interested parties?
• Is there an acting together with the business community through chambers of commerce, employers’ associations, the Confederation of British Industry, the Institute of Directors and the like?
• Are there ongoing public relations activities to include:
  – the issue of information brochures;
  – the organizing of round tables;
  – invitations for factory or other visits;
  – regular discussions with pressure groups;
  – reporting and encouragement of employee involvement in environmental initiatives;
  – information packs and programmes for different target groups in the community, such as schoolchildren, students, workers, professional bodies, women, and retired people;
  – regular liaison with the press?

3 Finance
• Is environmental impact taken into account in all investment decisions?
• Are ethical and green investments chosen wherever feasible?
• If an investment is likely to increase pollution, has it been investigated whether there is a lower-pollution alternative or whether the likely costs have been included in the project costing?
• Is short-termism avoided, where a longer term perspective will lead to higher environmental dividends?

4 Production:
• Has the earlier replacement of existing production plant and the acquisition of new, non-polluting machinery been considered?
• Are ecological materials and processes in use?
• Are clean technologies, with better input-output ratios, in use?
• Are useful materials and heat recovered?
• Are emissions minimized by post-production environmental protection measures?
• Can raw material specifications be altered without unduly affecting product quality and to improve environmental aspects?

5 Insurance
• Check what intrinsic damage could ensue from environmental risks.
• Check possible risks to third parties caused by damage to the environment.
• Assess the risk management strategy, and that there is a suitable mix of assumption of risk, transfer of risk and insurance cover.
• Is there adequate insurance cover for:
  – business interruption and consequent loss;
  – borrowing need as a result of stoppage;
  – repair and replacement costs;
  – clean-up costs
  – off-site environmental damage;
  – staff claims;
  – public claims;
  – legal fees;
  – the death, incapacity or imprisonment of key staff vital to the smooth operation of the organization?

6 International business divisions:
• Are exports, imports and foreign production environment-oriented?
• Bring pressure to achieve change?

7 Legal department:
• Are all steps taken to comply with official regulations?
• Are environmental damage and liability risks kept to a minimum?
• Are solicitors or barristers employed who are specialists in environmental law?
• If not, are such resources readily available through the organization’s external legal advisers?

Operational factors
Under operational factors, we should consider:

1 Discharges (including air, water and noise):
• Are process controls and management systems adequate to ensure compliance with legislation, future objectives as well as to avoid complaints?

2 Sit tidiness:
• Are measures taken to eliminate litter and sources of untidiness inside buildings, outside and in the immediate surroundings?
• Has suitable landscaping been considered to improve the appearance of the site?
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3 Transport:
• Are staff encouraged to use public transport and could you increase the availability of public transport by providing additional company-funded services?
• Is there an inventory of all means of transport used by the organization?
• Is the organization using the most efficient and environmentally sound systems for transporting goods, people and materials?
• Are only low-pollution vehicles purchased?
• Are existing vehicles re-equipped and serviced with environmental considerations in mind?

4 Water use:
• Is there a water management policy?
• Is there a water management officer responsible for implementation?
• Is water used efficiently?
• Are regular reviews carried out to determine water consumption, leakage, and wastewater patterns?
• Are there permanent monitors installed to assess usage?
• Are ever tighter targets set for the future management of water?
• Is there evidence of achievement and improvement?
• Can you reduce consumption by using alternative cooling methods or controlling leakages more effectively?
• Are there alternative supplies available that could reduce metered costs:
  - surface water abstraction;
  - use of a borehole;
  - local groundwater;
  - cheaper non-potable water from a local water utility?
• Where possible, is inferior quality reused/treated water used for industrial uses such as washing, pre-rinsing or indirect cooling of a product?
• Is such water non-corrosive and non-scale producing?
• Is pipework strengthened where there are high pressures or temperatures?
• Is pipework insulated where there are extremes of temperature?
• Is soft or softened water – with its reduced heating costs – used where appropriate?
• Is water stored on site as a risk-management tactic against interruption of supply?
• If so are conditions in place such as to safeguard against contamination by micro-organisms and other sources?

5 Recycling:
• Are all opportunities considered?
• Could redundant, used products be recycled?

6 Waste:
• Are steps taken to minimize, eliminate or recycle it?
• Are recycling opportunities being lost by failure to segregate different types of waste?
• Is waste disposed of responsibly?

7 Energy use:
• Are electricity, steam, water and gas metered at the major points of use, and targets set to reduce their usage?
• Is full use made of alternative energy sources, such as landfill gas, waste-derived fuel, solar and wind energy, and combined heat and power?
• Are energy conservation schemes in existence and adequate?
• Are buildings and plant properly insulated?
• Can savings be made in heating and lighting costs?

8 Canteen food:
• Is healthy eating encouraged, and health education provided?
• Is nutritional information provided?
• Is an improved range of healthy dishes and drinks provided?
• Are there safeguards to ensure food hygiene?

9 Occupational health and safety:
• Is there an occupational health department?
• Does it provide advice on practical accident and injury prevention?
• Does it look after employees’ psychological needs?
• Does it advise on health education in home and family?
Data processing
The data collected need to be analysed, and then presented in a form easily understood and from which clear conclusions may be drawn. Possible conclusions should be discussed wherever possible with the staff directly involved.

Reporting
Significant defects, as soon as identified, need to be reported immediately to the chief executive officer for quick action. The more routine findings should be presented to the board of directors as an “executive summary” and with clear recommendations for action. These should include an estimate of cost, resource needs, the optimum time for introduction, and when the next review should take place. The board should be invited to agree the recommendations, and authorize implementation.

Implementation
The decisions now become part of corporate policy as an agreed action plan. This needs to be publicized extensively internally and employees made aware of the implications in their everyday working practices. The action plan will include deadlines for action.

Post-audit review
A periodic check will be made that the board decisions have been fully implemented, with any non-compliance reported back to the board. The opportunity will also be taken to undertake a quality assurance review of the audit process itself.

British Standard 7750 - environmental management systems
The world’s first environmental management system was published in March 1992. It is related to British Standard 5750/ISO 9000, the quality management standard, and there is a transition route between BS 5750 and BS 7750. Equally it can stand alone for those not registered under BS 5750. Just as BS 5750 was subsequently adopted worldwide, it is possible that the same could occur here. BS 7750 provides a detailed generic model of environmental management that an organization can use to develop its own internal management systems. It is a single document which includes:

- An introduction which indicates the objectives of the standard and a schematic approach to implementation.
- A specification which defines the system requirements, from environmental management system documentation and implementation, through to audit and management review.
- Three annexes giving clause by clause guidance to the specification requirements (including the initial or preliminary environmental review), a link table to BS 5750, and a link table to the EC eco audit regulation.

BS 7750 is consistent with the EC eco-audit system, and may be regarded as a first step towards it. Shortly after the launch of BS 7750, a pilot programme was set up, with feedback in July 1993 which led to further modifications. Companies need to consider the advantages of using this standard as a means of achieving their environmental management objectives, and receiving objective external audit evidence of their fulfilment.

Conclusion
Environmental management is the equivalent to the sanitary movement in the Victorian period to which so much of the improvement of the health of the population was owed. Although we now have a tolerable sanitation system, and mass epidemics from this source have been eradicated, there has been a neglect of environmental concerns. The consequences of neglect here will be much more serious than the early neglect of sanitation, which impacted on the poorest of the human population. What now threatens is the destruction of the entire world on which we live. The environmental audit outlined is one contribution that attempts to prevent this. This is everybody’s responsibility – that of both individuals and the companies and organizations in which they operate.

References
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