



United States Environmental Protection Agency

Environmental Management Systems

Incorporating DfE Into Your Environmental Policy—DRAFT

The commitments made in your company's environmental policy guide your EMS. Therefore, it is important that you include DfE principles in your environmental policy, including preventing pollution, using resources wisely, and reducing risks to humans and the environment.

Most companies with EMS experience have an environmental policy drafted or signed, but many of these policies may not explicitly incorporate DfE principles. If you wish to integrate these principles into your environmental policy as you undertake a review or update, the DfE considerations listed below should help. The DfE considerations are divided into the same categories that are discussed by most environmental policies—the environmental goals the company hopes to achieve, how far the goals extend, and how to achieve them.

Environmental Goals

Central DfE principles include:

- ! Improving worker safety, public health, and environmental health while maintaining or improving performance and product quality. Another way of putting this is reducing risk to workers, the public, and the environment.
- ! Using resources wisely.
- ! Incorporating environmental considerations into the design and redesign of products, processes, and technical and management systems.

Extending Your Goals

One of the most important choices that you will make as you develop or modify your environmental policy is how far it extends. The DfE approach encourages you to extend your company's commitments to include:

Consideration of the environmental effects of your company's products throughout their life cycle, including your supply base and the use and disposal of your products by your customers (or their customers). (see figure on next page)

Achieving Your Goals

DfE supports the following methodologies:

- İ Evaluating your company's processes and chemical use to achieve cleaner production and safer use of chemicals.
- İ Focusing on pollution prevention and cleaner process technologies as a principal means of achieving continual product and process improvements.
- İ Incorporating environmental considerations into business decisions.

Focus on Internal **Processes** Environmenal Health/Safety **Function** Engineering Purchasing Manufacturing Sales and Customer Use Design and Supply and Distribution Disposition Extension of Commitments To Suppliers and Customers

Extending Your Environmental Policy and EMS

Companies can choose to focus their environmental policy and EMS on their internal manufacturing processes (including the traditional compliance functions of the EH&S group) or on operations throughout the life-cycle of their product, from product design and supply-chain management to the product's use and disposition at the hands of the customer. Many companies are beginning to extend their commitments proactively to include suppliers and customers, as indicated in the sample environmental policy on the following page.

Sample Environmental Policy

Sample Policy Statement

Protecting our shared environment is of fundamental importance to Company X, as it is to our employees, customers, and other stakeholders. To support this common goal, we will:

- Comply with applicable local, state, and federal environmental regulations;
- Continually improve the environmental performance of our products and processes;
- Protect the health and safety of our employees and the surrounding human communities and ecosystems;
- Use natural resources, including raw materials, energy, and water, as efficiently as possible.

We will work to achieve these commitments by:

- Requiring environmental awareness training of all our employees and more specific environmental training where appropriate;
- Evaluating products and processes from the point of view of chemical risk, dedicating ourselves to finding better alternatives based on preventing pollution in the first place.
- Considering the risks of our raw materials and products at all stages of our product's life, placing priority on risks present during our production process and during our customers' use of our products.
- Working collaboratively with our customers, suppliers, and the surrounding community on environmental issues.

We will make every effort to ensure that environmental performance is an integral part of Company X's performance and of the performance of all of our employees. To this end, we will measure and periodically report on our progress in realizing these commitments.

Signed, Plant Manager or Company Owner