



GUIDANCE ON EMPLOYEE PARTICIPATION WITHIN THE FRAMEWORK OF EMAS

1. INTRODUCTION

The guidance on employee participation within the framework of EMAS is based on the following:

Article 1(2) of Regulation (EC) No 761/2001 which states:

The objective of EMAS shall be to promote continual improvements in the environmental performance of organisations by:

...

(d) the active involvement of employees in the organisation and appropriate initial and advanced training that makes active participation in the tasks referred to under (a) possible. Where they so request, any employee representatives shall also be involved.'

Annex I to Regulation (EC) No 761/2001 which states:

The organisation shall identify training needs. It shall require that all personnel whose work may create a significant impact upon the environment, have received appropriate training. It shall establish and maintain procedures to make its employees or members at each relevant function and level aware of:

(a) the importance of conformance with the environmental policy and procedures and with the requirements of the environmental management system;

(b) the significant environmental impacts, actual or potential, of their work activities and the environmental benefits of improved personal performance;

(c) their roles and responsibilities in achieving conformance with the environmental policy and procedures and with the requirements of the environmental management system, including emergency preparedness and response requirements;

(d) the potential consequences of departure from specified operating procedures.

Personnel performing the tasks which can cause significant environmental impacts shall be competent on the basis of appropriate education, training and/or experience. (Annex I-A.4.2).'

In addition to the requirements in Annex I – Section A employees shall be involved in the process aimed at continually improving the organisations' environmental performance. Appropriate forms of participation like the suggestion-book system or project-based group works or environmental committees should be used for this purpose. Organisations shall take note of Commission guidance on best practice in this field. Where they so request, any employee representatives shall also be involved. (Annex I-B.4).'



| Involvement of all in the environmental work is a chance and an opportunity to work in a more effective way and is the prerequisite for success. The active involvement of employees in the process of continual improvement of the organisations' environmental performance should not be seen as a burden. This guidance tries to emphasise the opposite.

| This guidance shows ways and means of actively involving employees that will make the work more effective, that will put less burden on both management and employees and that will assure good implementation of EMAS.

| The work with the environmental issues must be continuous. Without the active involvement and participation of everybody (management and employees) in an organisation this will not happen.

| To have everyone in the organisation involved in the work is also the right way to keep a management system alive and fresh. Experience has shown that management systems that do not actively involve everyone tend to become bureaucratic and do not function well.

| It is important to make the employees see the environmental work, not as a threat but as an opportunity to, among other things, improve working conditions and create pride for working in an environmentally good organisation.

| Research, auditing of EMAS organisations and experience on the issue of change of organisation of work in general, have shown that when all employees are continuously actively involved, and in particular when their representatives are taking an active part in the work, the outcome is better.

| Experience has also shown that the fatigue that can occur after a period of work with systems like EMAS and EN ISO 14001 can be avoided by the active involvement of employees.

2. PROVISIONS

2.1. General

| The organisation should acknowledge that active employee involvement is a driving force and a prerequisite for continuous and successful environmental improvements as well as being a key resource in the improvement of environmental performance. The organisation should acknowledge that the active involvement of the employees in an active manner is the right method to anchor the environmental management and audit system in the organisation in a successful way.

| The organisation should acknowledge that the term 'employee participation' includes both participation of, and information to, the individual employee and his representatives, according to national systems. Therefore, there should be an employee participation scheme at all levels.

| Means should be introduced for active employee involvement.

| Evidence that this happens should be available to verifiers. Such evidence could, for example, be:

- minutes from meetings with unions, works councils or other organisations representing the employees or other meetings within the organisation
- availability of appropriate education, training and information
- facilities for employees to make suggestions (suggestion-book system)
- availability of environmental committees
- meetings between management and workers' representatives on environmental performance
- creation of environmental teams or working groups or project-based groups
- regularity of information given to employees and existing representatives
- contacts between verifiers and employees and their representatives
- active involvement, information and participation between environmental officer/management representative and employees and their representatives

| The organisation should acknowledge that commitment, responsiveness and active support from the side of the management is a prerequisite for the success of those processes. In this context the necessity of feedback from the management to the employees must be stressed.

2.2. Education and training

| The organisation should acknowledge the need for continuous staff information and training on environmental issues. Basic information and training should be given to all employees. Training of management is also an essential part in managing changes.

| Employees who are more directly involved in the environmental management of the organisation through for example participation in joint working groups should be given a more extensive upgrading of their qualifications. Such an upgrading should consist of, but not be limited to, EMAS, environmental policies, best practices and communication.

2.3. Levels of involvement

| The organisation should acknowledge that employee participation is important and necessary on all levels and in all stages from day one of the environmental management work. Therefore organisations should involve employees actively in:

- the formulation of environmental policies of the organisation,
- the initial environmental review and in the analysis of the state of the art and in collecting and verifying information,
- the establishment and implementation of an environmental management and audit system improving environmental performance,
- environmental committees to gather information and to ensure the participation of environmental officer/management representatives and employees and their representatives,
- joint working groups for the environmental action programme and environmental auditing,
- the elaboration of the environmental statements.

2.4. Employee suggestions and reward systems

| The organisation should see that there exists simple ways for employees to make suggestions for improving the environment. This should, for example, be done by installing suggestion-boxes.

| When actions taken by employees lead to improved economic and/or environmental performance of the organisation employees should be rewarded. Both financial and other types of reward systems can be used.

