



# GUIDANCE ON THE IDENTIFICATION OF ENVIRONMENTAL ASPECTS AND ASSESSMENT OF THEIR SIGNIFICANCE

## 1. OBJECTIVE OF THE GUIDANCE

| The purpose of this document is to give guidance for the identification of significant environmental aspects arising from activities, products and services over which an organisation applying EMAS has management control or influence according to Annex VI. Under EMAS, significant environmental aspects are at the centre of attention of an organisation's environmental management system and of the evaluation and improvement of its environmental performance by setting objectives and targets as well as of the ongoing review process. Significant environmental aspects and impacts are also relevant within the environmental statement according to Annex III.

## 2. RELATIONSHIP BETWEEN ENVIRONMENTAL ASPECTS, SIGNIFICANT ENVIRONMENTAL ASPECTS AND SIGNIFICANT ENVIRONMENTAL IMPACTS

| The principle in EMAS is that the environmental aspects (Article 2(f) of Regulation (EC) No 761/2001) of organisations' operations result in environmental impacts (Article 2(g)). If an environmental aspect of the organisation gives

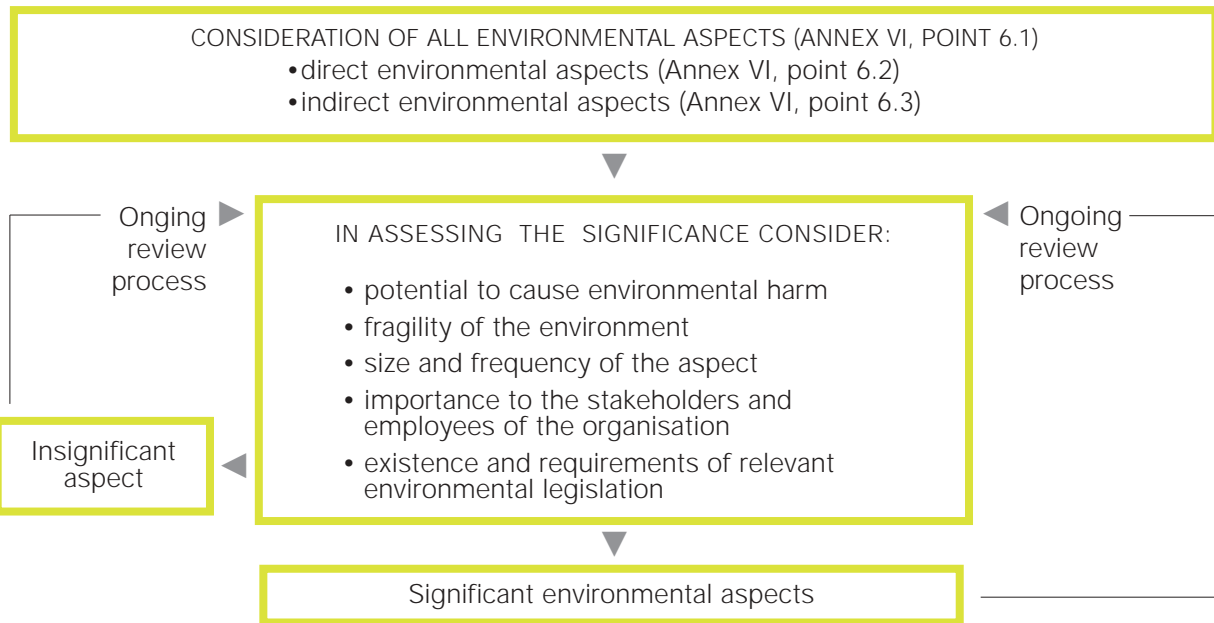
rise to a significant environmental impact then that aspect must be considered significant and be incorporated into the environmental management system.

## 3. STEP-BY-STEP PROCEDURE TO IDENTIFY SIGNIFICANT ENVIRONMENTAL ASPECTS

| In Annex VI examples of 'direct' and 'indirect' environmental aspects are given. This list is non-comprehensive. In the initial environmental review and the following ongoing review process it is essential for an organisation to look in an open-minded, unbiased and comprehensive way at the specific environmental aspects of its activities, products and services. There may be cases where it may be difficult to classify an identified environmental aspect as 'direct' or 'indirect'. In this case it should be borne in mind that the main concern of the identification of environmental aspects is to get a complete overview on the environmental relevance of the organisations' activities, products and services and to address all existing environmental aspects. The important issue is not to categorise an issue as direct or indirect but to make sure that all aspects are identified so that they can be managed by the management system. The procedure of identifying significant environmental aspects can be summarised as follows:

- **Step 1** Identification of all environmental aspects
- **Step 2** Definition of the significance criteria by the organisation, taking into account Community legislation
- **Step 3** Identification of the significant environmental aspects on the basis of the significance criteria referred to under step 2





#### 4. HOW TO IDENTIFY DIRECT ENVIRONMENTAL ASPECTS

Direct environmental aspects are associated with activities, products and services of the organisation itself over which it has direct management control. All organisations have to consider the direct aspects of their operations. However, for non-industrial organisations the focus will often be on indirect environmental aspects of their activities, products and services.



Purchasing policy – Emissions to water and air – Waste – Resource use – Energy – Local issues – Land use and contamination – Historical issues – Transport

#### 5. INDIRECT ENVIRONMENTAL ASPECTS AND HOW TO INFLUENCE THEM (ANNEX VI, point 6.3)

Annex VI, point 6.3 places indirect environmental aspects on an equal footing with direct environmental aspects pursuant to Annex VI, point 6.2. Indirect environmental aspects can result from the interaction of an organisation with third parties which can to a reasonable degree be influenced by



- Talk to employees
- Walk the site and its neighbourhood
- Talk to stakeholders
- Review documents (e.g. safety data sheets, licences)
- Look at legislation (e.g. substantive law, technical requirements such as mandatory monitoring of pollutants)
- Look at eco-label criteria
- Check information from chambers of commerce etc.
- Talk to other EMAS companies
- Look at material flows
- Look at existing performance indicators
- Look at all parts and infrastructure of the organisation (e.g. pipelines, power lines, rail tracks)



- Talk to (sub)contractors and suppliers (e.g. service companies, landlords)
- Talk to customers
- Look at use and disposal of products
- Look at activities of (sub)contractors
- Look at eco-label criteria
- Check information from chambers of commerce etc.
- Talk to other EMAS companies
- Talk to NGOs and other stakeholders
- Look at information on supplied products and services



Product issues – Contracts – Transport – New markets for existing products – Financial products – Product range – Tourism – Services

the organisation seeking EMAS registration. For non-industrial organisations, such as local authorities or financial institutions, it is essential that they consider also the environmental aspects associated with their core business. An inventory limited to the environmental aspects of an organisation's site and facilities is insufficient.

| Direct environmental aspects can be controlled by internal management decisions. Whereas indirect environmental aspects require an organisation to use its influence on (sub)contractors, suppliers, customers and users of their products and services to gain environmental benefits. This



Customer education (e.g. on use and disposal of products, advice in order to decrease environmental hazards)

'Green' procurement policy

Preferential treatment for 'Green' companies, e.g. EMAS companies (loans, insurance)

'Green' investments

Product take-back schemes

'Green' clauses in contracts

will require an organisation to be creative in how it uses its influence. On the basis of Annex VI, point 6.3(a) to (g), the management of indirect environmental aspects may include, but is not limited to:

**(a) product related issues (design, development, packaging, transportation, use and waste recovery/disposal)**

Organisations may wish to consider:

- available results of life-cycle assessment of their products
- results of the development and use of environmental performance indicators
- environmental aspects of supplied products, of the processing of their products
- effects of a foreseeable misuse, an inadmissible recovery or disposal of their products
- customer/consumer and supplier information needs and additional customer education (e.g. on use and disposal of products)

- durability and reparability of products, compatibility of existing products with new product series and replacement parts

**(b) capital investments, granting loans and insurance services**

Organisations may wish to consider:

- the admission policy and insurance premiums (e.g. preferential treatment for 'green' companies, EMAS organisations)
- investment policy (green investments)
- assessment procedures (environmental risk reduction)
- loaning policy (e.g. preferential treatment for 'green' companies, EMAS organisations)
- product range (e.g. green funds)

**(c) new markets**

The introduction of existing products into new markets may well give rise to new environmental aspects. With respect to that, organisations may for example look at:

- the existing infrastructure, e.g. for recycling or handling of hazardous wastes, transport and handling of problematic substances, treatment of wastewater, for cases of emergency
- technological and educational standards
- awareness of environmental issues in the new market

**(d) choice and composition of services (e.g. transport or the catering trade)**

Organisations may for example look at the environmental management of service providers, such as:

- accommodation services (hotels, conference centres)
- transfer or hauling services (environmentally friendly modes of transport, efficient organisation of transport, technological standards and fuel consumption of vehicles)
- product range, green purchasing policy, use of reusable and compostable dishes, waste management of catering services

**(e) administrative and planning decisions**

Organisations may for example look at:

- aspects arising from the execution of planning decisions in the future
- results of experimental games or computerised modelling
- experience gained from the implementation of similar projects

**(f) product range compositions**

This is relevant to organisations selling or distributing products supplied by third parties, they may for example:

- develop a 'green' procurement policy with respect to contractors and products
- give preference to products sold under a product take-back scheme
- look for products bearing commonly accepted eco-labels within their product range



(g) the environmental performance and practices of contractors, subcontractors and suppliers  
Organisations may for example:

- inquire of (sub)contractors and suppliers about the environmental performance of their activities and products
- analyse safety data sheets, product line analyses or relevant excerpts therefrom provided by contractors
- train (sub)contractors and suppliers (e.g. provide advice to decrease environmental hazards)
- incorporate 'green clauses' into their contracts.

## 6. HOW TO CARRY OUT THE SIGNIFICANCE ASSESSMENT

| In order to decide whether they are significant all environmental aspects identified need to be examined and evaluated. Environmental aspects which have been identified as significant must be incorporated into the environmental management system and the ongoing review process. Those identified as not significant should also be reviewed to take into account changing circumstances. To assess the significance of the environmental aspects in question, the organisation defines its own individual set of criteria. According to Regulation (EC) No 761/2001, the criteria 'shall be comprehensive, reproducible and capable of independent checking' (Annex VI, point 6.4) and shall take account of Community legislation (Annex VI, point 6.1). Annex VI, point 6.4(a) to (g), gives some of the criteria an organisation may consider when deciding on the significance of its environmental aspects.

| Basically an organisation should consider the following issues in assessing the significance of an environmental aspect:

- potential to cause environmental harm
- fragility of the local, regional or global environment
- size, number, frequency and reversibility of the aspect or impact
- existence and requirements of relevant environmental legislation
- importance to the stakeholders and employees of the organisation.

| These issues and the criteria selected can be taken as questions to be answered with 'yes' or 'no', or they can be used in a more differentiated way in order to assess the significance of the organisation's environmental aspects in a first step and to create a priority list for action in a second step (e.g. by classifying in 'high', 'medium', 'low' or 'very important', 'less important', 'not important').

| In undertaking the assessment the organisation shall also look at start-up and shutdown conditions and at reasonably foreseeable emergency conditions. Furthermore, past, present and planned activities shall be taken into account.

| Useful sources of information for performing the assessment may be permits, relevant regulations (e.g. on quantified limits or monitoring of pollutants), national action plans, local agendas, monitoring records or scientific studies. Regulatory agencies, customers and suppliers, environmental groups, trade or craft associations, industrial associations, chambers of commerce and scientific institutions might also provide useful information to support the assessment.



- Accumulated pollutants
- Climate change (greenhouse gases, depletion of the ozone layer)
- Acidification of water and soil
- Eutrophication of water and nitrogen saturation of soil
- Bio-diversity, pressures on areas of special conservation interests (e.g. cutting up habitats)
- Introduction and spread of alien organisms
- Effect of metals
- Photochemical oxidants and ground level ozone
- Effects of (hazardous) chemicals including persistent organic pollutants
- Inappropriate use of land and water resources
- Urban air pollution and noise
- Non-cyclic material flows, wastes and environmental residues