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GUIDANCE TO VERIFIERS ON THE VERIFICATION OF SMALL AND MEDIUM-SIZED ENTERPRISES (SMEs) PARTICULARLY SMALL AND MICRO-BUSINESSES

1. INTRODUCTION

| There is a perceived problem that SMEs have difficulty in implementing management systems such as ISO 9001, ISO 14001 and EMAS. The systems are seen as too bureaucratic and time consuming. The problem is not in understanding the requirements of these management systems but in being able to provide the physical and financial resources to implement and maintain them. Of particular difficulty is the traditional reliance on controlled documentation as the only means of demonstrating that a management system is performing in accordance with the requirements of the management systems defined in standards and regulations. The maintenance and control of such systems is time consuming and often contrary to the working practices of small companies.

| Small companies are characterised by short reporting lines, multifunctional staff, on-the-job training and the ability to adapt rapidly to change. The task of the verifier is to recognise the strengths and weaknesses of such organisations and to conduct the verification in such a way as not to impose unnecessary burdens on small organisations. This guidance is designed to apply to small organisations and in some instances will only apply to micro-businesses. The verifier should use his experience to ascertain the applicability of this guidance to the organisation being verified in relation to the resources available to the organisation.

2. DOCUMENTATION

| The purpose of documentation in a management system is to ensure that an organisation can consistently carry out its operations in accordance with the way it wishes to manage. Thus written procedures may be employed to ensure that any operation is performed consistently irrespective of the operator. Documentation is also used to provide evidence that particular operations or procedures have been carried out correctly, e.g. data from monitoring to show legal compliance.

| When performing verifications at SMEs, verifiers should remember the following:

- NOT ALL PROCEDURES NEED TO BE DOCUMENTED
Verbal procedures and on-the-job training are often used in small organisations. The task of the verifier is to find evidence that the procedure works.



Example: A site may have a procedure to segregate different types of waste. The evidence required would be twofold:

- ▶ Does the operator understand what he is doing
- ▶ Waste segregation is working at a practical level

→ • PROCEDURES SHOULD BE PROPORTIONAL

The size and complexity of the operation, the nature of the associated environmental impacts and the competence of the operators should be taken into account when deciding on the adequacy of procedures. Simple flow charts, pictograms, notices and matrices may be the most effective.

3. DOCUMENT CONTROL

| The essence of document control is to ensure that the appropriate documents are in the possession of those who need them. In its simplest form all this requires is a list of the documents and who should have them. The verification that the system works would simply be to see if the people had the documents they should.

Example

Procedure

Employee	Purchasing	Report writing	Data collection	Emission monitoring	Travel arrangement
	Rev. 1	Rev. 2	Rev. 1	Rev. 2	Rev. 3
Employee 1	✘			✘	
Employee 2					✘
Employee 3			✘		
Employee 4		✘			
Employee 5					✘

To verify that this is in place the verifier would need to see for example that employee 3 had and was using revision 1 of the procedure for data collection.

4. PROOF

| At all times a verifier should be looking for objective evidence that a system works without excessive amounts of paperwork; thus in small organisations it is often easier to check the effectiveness of procedures by the outcome.



– TEMPERATURE CONTROL

A verifier would not have to check written procedures to see that control of temperature was effective provided that the records were complete and showed that the control was within effective limits. The verifier would also need to ensure the understanding of the employee responsible for this process. If non-conformances with the control requirements were shown by the records then the organisation should be able to demonstrate effective corrective action.

– RECYCLING

An organisation with a policy of recycling paper would need to demonstrate that the appropriate facilities were in place (recycling bins etc.) and that employees knew how to use them. The effectiveness of a policy of using only recycled paper could be demonstrated through the labelling on the packaging of the paper used.

5. REPORTS

| The requirement for a public statement under EMAS should not be interpreted as a requirement to produce and have printed a glossy report. The requirement is intended to ensure that stakeholders are informed of the performance of an organisation. In the case of small organisations this major audience will usually be those in close proximity to the site and an organisation may choose to respond by the provision of photocopied information or similar. EMAS should not be seen as providing unnecessary burdens on small companies.

6. AUDITS AND REVIEW

| In most small businesses it will be possible to find someone within the organisation sufficiently independent to carry out the audit function. In very small organisations (micro-businesses) however this may not be possible. In order to avoid the necessity of employing an outside company to carry out the audit the verifier may wish to accept some alternatives:

- audits from the local chambers of craft/trade, organisations of SMEs or other similar organisations
- partnerships between two or more micro-businesses in one location sharing resources and expertise in the performing of audits
- the combining of audit and management review in one exercise thus saving time and resources.

