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ISO 14001:2015 and Life Cycle Perspective

14th Annual Gatekeeper Regulatory Roundup March 23rd, 2018

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Agenda

- > Intro to Environmental Management Systems
- > Overview of changes in ISO 14001:2015 standard
- > Discussion of key ISO 14001:2015 themes
 - Aspects and impacts
 - Risk Evaluation
 - Life Cycle Perspective
- > Summary

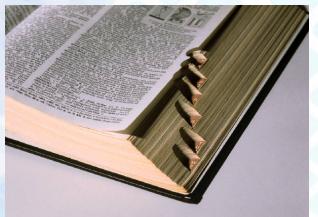


Intro to Environmental Management Systems



Environmental Management System General Definition & Scope

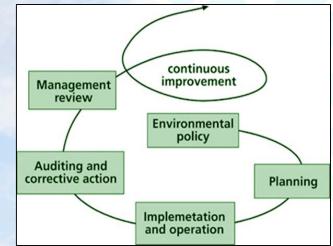
- Set of systematic processes and practices for <u>managing risks &</u> <u>opportunities</u> associated with environmental issues
- Implemented via following a system framework or model
- Integrates environmental <u>awareness and</u> <u>performance mindset</u> into company culture
- Exact nature of system <u>must be tailored</u> to organization's needs and operations





Environmental Management System Purposes

- > An environmental management system helps organizations take a holistic approach to environmental issues by
 - Identifying;
 - Managing;
 - Monitoring; and
 - Controlling
- > Increase performance and minimize risk
- Includes the need for continual improvement of an organization's management system and environmental performance

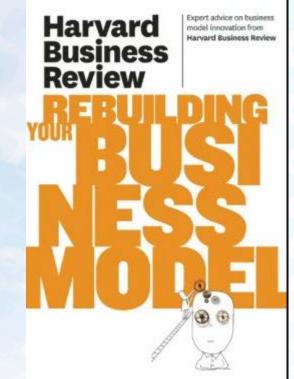




Organizational Benefits from EMS

Management systems can have many benefits to your organization large or small

- > Promote innovation
- > Reduces risks and liabilities
- Increases likelihood of achieving & maintaining regulatory compliance
- > Alignment to company's KPIs
- > Improved change management execution
- > Company branding
- > Increased employee motivation and engagement
- Stakeholder interactions, tracking, and management





Overview of Changes in ISO 14001:2015 Standard

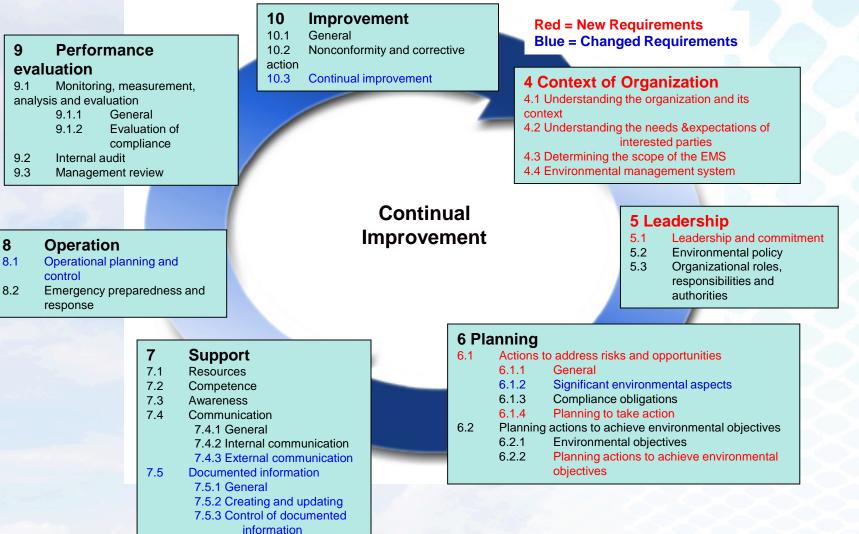


New vs. Old ISO 14001 Comparison

ISO 14001:2015 Section	Key Elements	Relevant ISO 14001: 2004 Section
Context	 Organization and Context Needs and Expectations of Interested Parties Determining the Scope of the EMS EMS Focus 	
Leadership	 Leadership & Commitment Environmental Policy Organization Roles, Responsibilities & Authorities 	Policy Resources, Roles, Responsibility & Authority
Planning	 Actions to Address Risks & Opportunities Significant Environmental Aspects Compliance Obligations Planning Action Environmental Objectives & Planning Actions 	Environmental Aspects Legal & Other Requirements Objectives, Targets, and Programs
Support	 Resources Competence Awareness Communication – Internal & External Documented Information - Creation & Control 	Resources, Roles, Responsibility & Authority Competence, Training, & Awareness Communication Documentation Control of Documents
Operation	 Operational Planning & Control Emergency Preparedness & Response 	Operational Control Emergency Preparedness & Response
Performance Evaluation	 Monitoring, Measurement, Analysis & Evaluation Evaluation of Compliance Internal Audit Management Review 	Monitoring & Measurement Evaluation of Compliance Internal Audit Management Review
Improvement	Nonconformity & Corrective ActionContinual Improvement	Nonconformity, Corrective Action & Preventive Action



ISO 14001:2015



IrinityA

PDCA Structure

ISO 14001 Revisions (1 of 2)

Incorporates ISO's new "high level structure" for all its management system standards (Annex SL)

- Context of the organization
- Leadership
- Planning
- Support
- Operation
- Performance evaluation
- Improvement





ISO 14001 Revisions (2 of 2)

- Increased prominence of environmental management in strategic planning processes;
- > Greater input from leadership; and
- Stronger commitment to proactive initiatives that boost environmental performance.
- Implementation of proactive initiatives to including sustainable resource use and climate change mitigation
- > A focus on life-cycle thinking
- > The addition of a stakeholder-focused communication strategy



Key ISO 14001 Thematic Changes

Area	More emphasis compared to current version of ISO 14001
Strategic environmental management	 Ensuring that environmental issues are addressed in strategic planning Integrating the EMS into the site's business model
Leadership	Increasing accountability among management team
Protecting the environment	 Implementing proactive initiatives – P2, sustainable resource use, climate change mitigation, biodiversity
Environmental performance	 Improving environmental metrics by establishing measurable performance indicators Focusing on outcomes and results Deploying risk based thinking to reduce impacts
Lifecycle thinking	• Examining life cycle impacts of products and services
Communications	 Focusing on identifying stakeholder needs & expectations Improving outreach to address stakeholder concerns
Documentation	 Recognizing the use of electronic systems Flexibility in establishing procedures to ensure effective process control

Aspects and Impacts

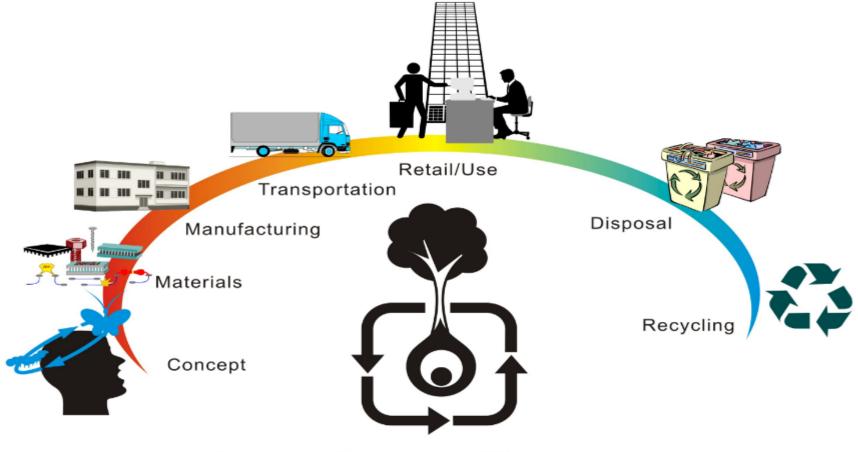


Aspects and Impacts Purpose ISO 14001:2015

- > Core element of EMS
- > They define areas to focus
- > Within the defined scope of its management system an organization shall define the aspects of its activities, products and services that it can control...
- > Develop objectives and targets to address significant aspects and impacts



Developing List of Aspects



LIFE CYCLE THINKING



What to Consider ISO 14001:2015

- > Inputs and outputs
- > Assess controls in place
- > Aspects that have a significant environmental impact
- > Abnormal conditions and reasonable foreseeable emergency situations
- > Can address compliance items but look beyond
- > Things you have control over
- > Update with change
 - Planned or new developments
 - New or modified activities, products or services



Aspects and Impacts Matrix

ENVIRONMENTAL ASPECT SIGNIFICANCE DETERMINATION - SCORING LEGEND

FACTOR	SCORE ¹	REPRESENTS	COMMENTS			
NORMAL OP	ERATING C	ONDITIONS				
Likelihood	1	Low	Likelihood of aspect occurring (Yearly)			
	2	Medium	Likelihood of aspect occurring (Monthly/Weekly)			
	3	High	Likelihood of aspect occurring (Daily)			
Severity	1	Low	Mild to harmless - little or no potential for harm to the environment, easily correctable.			
	2	Medium	Serious to moderate - harmful to the environment, but not potentially fatal (e.g., kill wildlife), correctable.			
	3	High	Severe/catastrophic - very harmful to the environment, or potentially fatal (e.g., kill wildlife); great effort required to correct and recover.			
Views of	1	Low	No inquiries from external interested parties in past year.			
External	2	Medium	One to three inquiries from external interested parties in past year.			
Interested	3	High	Over three inquiries from external interested parties in past year.			
Legal / Regulatory	1	Not controlled by legislation / regulations (i.e., no Federal, State, or Local legislation/regulations annly)				
	2	Federal, State, or Local	e.g., SPCC, TRI, Tier II			
	3	Federal, State, or Local legislation / regulations apply and a permit or license is required/in place	e.g., Title V, NPDES			

Notes:

1. Only use the specified scores. Do **<u>not</u>** use numbers outside the range of 1 - 3.



LCP - ISO 14001:2015

LCP - Aspects and Impacts Scorecard

Product Life Cycle						Cycle			
Environmental Fields		Pre-production	Transportation	Production/Process	Distribution (including packaging)	Utilization	Disposal	Aspect Score	
	Weight%	17%	17%	17%	17%	17%	17%		
Waste burden	11%	2	1	2	1	1	2	6	
Soil pollution and degradation	11%	1	1	1	1	1	1	4	
Water contamination	11%	1	1	1	1	1	1	4	
Air contamination	11%	2	2	2	1	1	1	6	
Noise	11%	2	1	2	1	1	2	6	
Consumption of energy	11%	1	1	3	1	1	1	5	
Consumption of natural resources	11%	1	1	3	1	1	1	5	
Effects on ecosystems	11%	1	2	2	1	1	1	5	
Owner Control	11%	1	1	3	3	3	2	8	

1 Add definitions of product life cycle phases

Assessment Score:



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Risk Evaluation



Risks - ISO 14001:2015

ISO standard provides the following guidance:

- 1. Quantify risks for desired outcome
- 2. Prevent or reduce desired effects
- 3. Achieve continual improvement





Risks - ISO 14001:2015

Consideration of the following potential risks for large and small organizations:

- > Environmental Aspects -> Adverse impacts?
- > Compliance obligations -> Legal obligations Damaged Reputation Beyond Compliance
- > Expectations of interested parties
- > Literacy or Language Barriers
- > Economic Constraints
- Potential Emergency Situations Acts of God (droughts, floods, etc)
- > Nature of processes and hazards handled



Emerging Risks

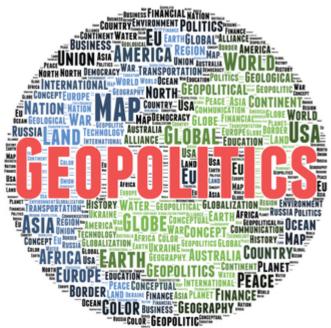
Multi-national organization you want to consider risks on a global scale:

Major Economic Risks

- > Environmental
- > Geopolitical
- > Societal
- > Technological

Global Awareness

- > World Economic Forum
- > Global Emerging Risk Survey
- > GRI





Risk Evaluation

Evaluate risk based on the complexity of your issues.

Key Elements of Risk Evaluation:

- > Assign responsibility and accountability
- > Conduct Research
- > Consult External Subject Management Expert
- > Benchmark
- > Summarize and Report



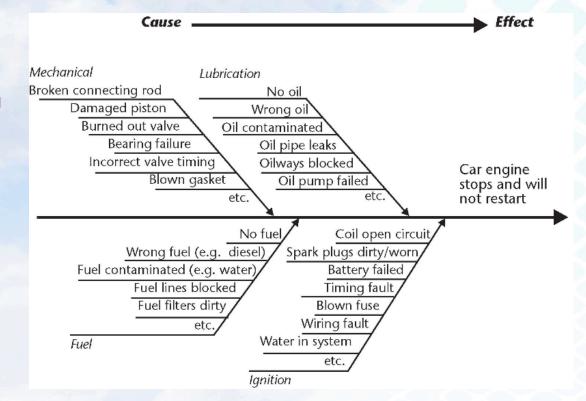
Risk Management Tools

> Risk matrix

Consequence						Increasing Annu	al Frequency			
50					0	А	В	С	D	Е
/ Ratin	People	Assets	Environment	Reputation	Practically non credible failure	Rare Failure	Credible	e Failure	Probable Failure	Frequent Failure
Severity Rating	Рес	Ass	Enviro	Reput	Could occur but has not necessarily been observed in industry	Has rarely occurred in industry	Has occurred several times in industry	Has occurred in operating company	May occur several times a year in operating company	Will occur routinely in an individual plant
0	Zero Injury	Zero Damage	Zero Effect	Zero Impact					_	
1	Slight Injury	Slight Damage	Slight Effect	Slight Impact		Low Risk		_		
2	Minor Injuries	Minor Effect	Minor Effect	Minor Impact				Impact Reduc	ction	
3	Major Injuries	Local Damage	Local Effect	Considerable Impact						
4	Single Fatality	Major Damage	Major Effect	Major National Impact					High Risk	
5	Multiple Fatalities	Extensive Damage	Extensive Effect	Major International Impact						

Implementation of Risk Management

- > Other risk management/tools to consider:
 - Fish Bone
 - FMEA
 - Fence Diagram





Risk Management Implementation

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>



- Based on Identified Aspects
 - > Identify the system
 - > Identify hazards and possible harms
 - Compliance Objectives, Interested Parties, Economic Constraints etc.
- Develop risk assessment based on significant aspects (probability/severity)
- > Compare risk with acceptance criteria
- > Accept or reject risk
- > Estimate costs of migration
- Management of change (MOC) procedure to assist with prevention
- > Define and take actions for mitigation
- > Evaluate aspects on a periodic basis
- > Develop risk levels of aspects
- Update objective and targets and take action
 TripityA

Can MOC Improve Risk Management Implementation?

- MOC is central to risk assessment and management
 - Lack of change management is a root cause of many environmental incidents, i.e., change can have a "domino effect" with unwanted implications
 - Best in class EMS have robust change management components





Why is Management of Change Important?

> MOC should be essential part of an EMS

- An EMS allows a facility/an organization to operate at an acceptable level of risk (or compliance) and improve aspects of operation based on system performance and feedback
- Change management keeps the system at the desired level of risk





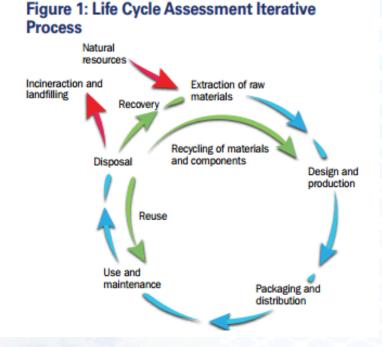
Life Cycle Perspective



What is Life Cycle Assessment (LCA)? What is an LCA?

Evaluation of impacts throughout a product's entire lifespan including the following steps:

- 1. Extraction and Processing of raw materials
- 2. Design and Production
- 3. Transportation and Distribution
- 4. Use and Maintenance
- 5. Recycling and Disposal





Why Conduct an LCA?

Applications:

- Production process impact and optimization: Identify the part of a production process to focus optimization efforts.
- Supply Chain Engagement: Large branded companies prompting manufacturers to conduct LCAs and provide carbon/energy data
- > Waste management: Used to select a sustainable approach.
- Product and packaging development: Draw on LCA methods in product and packaging design.
- > Green marketing: Communicating with customers about environmental performance and progress.
- Strategy and risk management: Improve understanding of their dependence on critical raw materials, the availability of alternative sources and the impacts of those sources.
- Sustainability goals: Support meeting internal or public sustainability goals.
- > ISO 14001:2015: Element of the new ISO EMS Standard

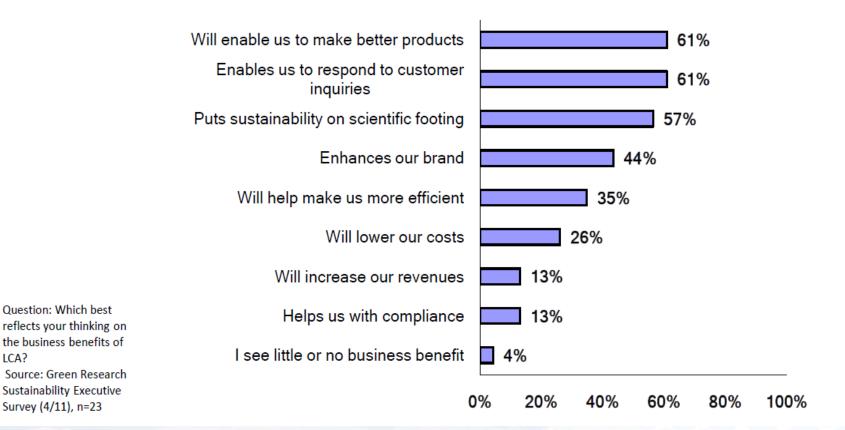


Business Benefits of LCA

Product and Project Companies Must Incorporate Life Cycle Thinking

Figure 3 Business Benefits of LCA

ICA?





Who is Doing LCAs?



Where Simple Goodness Begins."







Walmart : Johnson Johnson Dissep

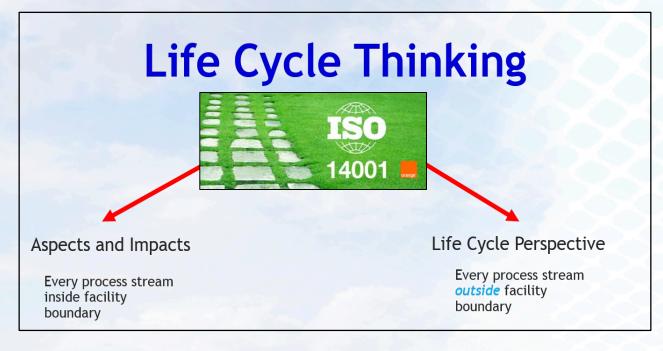
Environmental Solutions



EXAMPENDER S I O N A L*

ISO standards and LCAs

- > ISO 14001:2015
 - Introduces Life Cycle Thinking as a requisite of the standard
 - Future standards may include "Life Cycle Assessments"
- > ISO 14040:2006 and ISO 14044:2006 Standard
 - Provides a guidance on how to conduct an LCA





Life Cycle Perspective in ISO 14001: 2015

ISO 14001:2015 Standard provides a succinct definition of "Life Cycle Assessment"

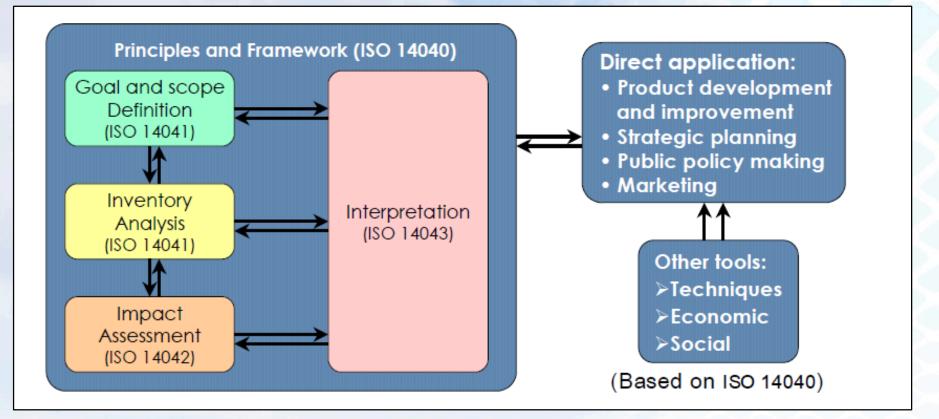
A *perspective* for assessing the environmental aspects and potential impacts associated with a product including

- Compiling an inventory of relative inputs and outputs of a product system;
- > Evaluating the potential environmental impacts associated with those inputs and outputs; and
- Interpreting the results of the Inventory Analysis and Impact Assessment phases



Steps to Developing an LCA

Developing an LCA Involves Four (4) Key Steps:





Establishing Boundaries

> Establish Boundaries for the Life Cycle Perspective (LCP)

> Importance of your Established Boundary:

- The credibility of the Environmental Management System (EMS) depends upon the choice of the organizational boundaries.
- Do not want to exclude activities, products, services or facilities that have significant environmental aspects.



Boundary Example

> E.g.

- The boundary of the system under consideration would begin at procurement of raw materials and end at transportation of final product to the contracted landfill and/or hazardous waste transportation.
- Company ABC has determined that it will not be able to evaluate any LCP impacts beyond that point due to unavailability of data and no influence over supply chain beyond this point.



LCP Analysis - Main Components

> Environmental Aspects Register

 Want to determine environmental aspects of activities, products or services that can be controlled and/or influenced.

> Established Controls

- What controls are established, ensuring that environmental requirements are being addressed. in the design and development process for the product or service.
- > Exerted Influence
 - How much influence is currently being exerted over external service providers?



LCP Analysis -Aspects Register Example

Life Cycle Perspective Analysis / Aspects Register						
Author EHS Director						
Document ID						
Revision Number 1.0						
SO Standard Ref. 6.1.2 and 8.1						

Section 6.1.2 to Evaluate Significance and Controls Section 8.1. Determine Controls

	Life Cycle Perspective (LCP) Analysis - Template										
							Operational Influence				
IC	Service/ Material Provided	Upstream, Downstream, or Other?*	Aspect	Impact Category	Impact	Control	Significant? (Yes/No)	Degree of Influence	lf None, Explain	lf None, Can Company ABC Exert Any Influence?	Initiatives
1.	Bulk Raw Materials	Upstream	Transportation	Receive Bulk Raw Materials	Fuel consumption associated with transportation of raw materials	Company ABC has historically selected facility locations based on proximity of raw materials to minimize fuel consumption from transportation.	No	High			Reduce environmental impact associated with transportation
2.	Pulp	Upstream	Land	Receive Bulk Raw Materials	Potential destruction of forests through unsustainable forestry	Obtain certification of sustainable forestry from pulp suppliers	Yes	High			Ensure pulp meets European Union Timber Regulation (EUTR) certification and is obtained from suppliers performing sustainable forestry
2.:	Pulp	Downstream	Land	Waste Generation	Generation of waste at the filter press	Company ABC has managed to create a byproduct out of the additional waste generated. This byproduct is managed and used as a landfill liner during landfilling, which occurs downstream of the process.	Yes	High			Company ABC Corporate Key Performance Indicators (KPIs) to reduce waste streams
3.1	Sand	Upstream	Land	Receive Bulk Raw Materials	Impacts to land and water as a result of the supplier not mining in accordance with its mining permit	Notify to sand supplier to maintain compliance.	No	Low			N/A



LCP Analysis -Aspects Register Example

- Mapping Aspects Outside of your Facility
 - Upstream:
 - Raw materials acquisitions
 - Transportation, etc.
 - Downstream:
 - End-of-life treatment
 - Final disposal, etc.
- Reference your Aspects Register
 - Reference established controls and influence associated with environmental aspects outside of your facility.

Life Cycle Perspective Analysis / Aspects Register						
Author	EHS Director					
Document ID						
Revision Number	1.0					
ISO Standard Ref.	6.1.2 and 8.1					

Section 6.1.2 to Evaluate Significance and Controls Section 8.1. Operational Planning and Controls

Life Cycle Perspective (LCP) Analysis - Template								
Area	Туре	ID	Service/Material	Upstream	Downstream			
					Incinerator			
		12	Primer (Coating)	Raw Material Received	Landfill (Primer Solids)			
					Sewer			
		10	ED(Oration)	Daw Material Descined	Incinerator			
		12	EP(Coating)	Raw Material Received	Sewer			
		12	Paint (Coating)	Raw Material Received	Sewer			
	Raw Materials				Landfill (Paint Solids)			
					Emissions			
		38	Polypropylene	Material Received	Recycled			
		N/A	Lube	Material Received	N/A			
MCT		39	Calcium Carbonate	Material Received	N/A			
		N/A	Part A	N/A	Rejects to Landfill			
		N/A	Part B	N/A	Rejects to Landfill			
		21 N/A	Ink	Raw Material Received	Incinerator			
	Chemicals –		IIIK	Naw Matchar Received	Fugitive Emissions			
	Unerhildels		Cleaning Solvents	Solvent Received	Incinerator			
			Cleaning Solvents	Solvent Received	Fugitive Emissions			

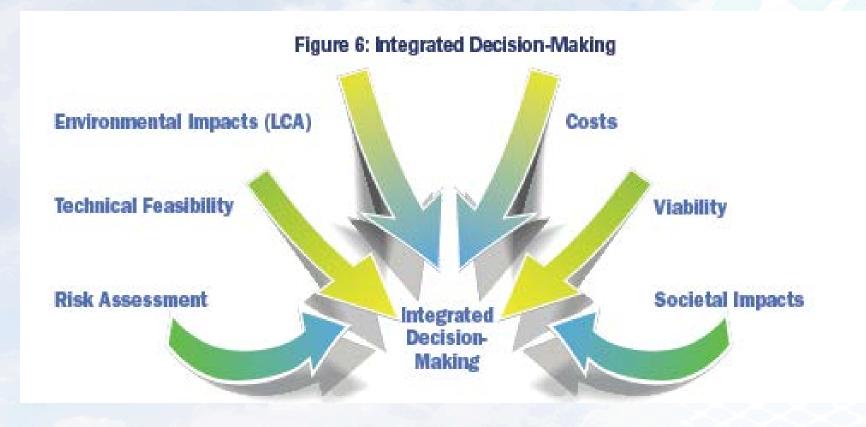


Summary

- > Understanding Life Cycle Perspective (LCP) very important to getting ISO certified.
- > LCP can also increase operational efficiency.
- > No clear methodology on how to approach LCP.
- > Talk to your ISO auditor on his/her expectations.



Effective EMS Overview





Questions & Discussion

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Technical

o Develops permit applications for clients in the cement, mining, aerospace, and refining industries across multiple states such as Arizona, Texas, Colorado, California and Utah. o Performs multi-media environmental compliance audits resulting in violation-free agency inspections.

o Performs air dispersion modeling (AERMOD) for permitting applications.

o Develops Emission Inventories, TRI Inventories, and support clients on other reporting obligations.

o Supports implementation of Environmental Management Information Systems (EMIS).

o Develops Risk Management Plan (RMP) elements.

o Coordinates ownership transfer of environmental permits for clients across multiple states. o Supports permitting and compliance obligations for semiconductor, steel, and power industries.

Management

o Serves as a project manager for over 13+ projects till date.

o Manages revenue as a manager/lead consultant on projects worth more than \$500,000 till date.

o Co-Instructs the 'Clean Air Act for the Mining Industry' Course.

o Trains and supports development of new hires