

WHY ENVIRONMENTAL MANAGEMENT SYSTEMS DON'T WORK

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Will Management Systems Reshape the Future of EHS Auditing?
The Auditing Roundtable
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6 COMMON REASONS WHY EMSs FAIL

1. Wrong objective for obtaining EMS
2. Over-emphasis on documentation, under-emphasis on field interviews
3. Evaluation of what system is likely to provide, not what it has consistently provided

6 COMMON REASONS WHY EMSs FAIL

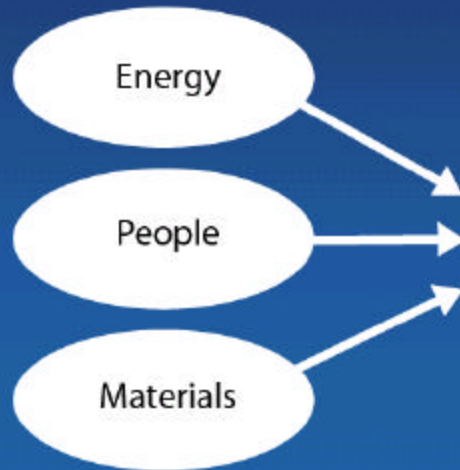
4.Focus on continuous improvement, not absolute performance vs. benchmarks

5.Lack of good professional judgment of outputs

6.Failure to spot and address overarching root causes

EMS AS A MACHINE

INPUTS



PROCESS



OUTPUTS



1. EMS OUTPUTS: ARE THEY GOOD?

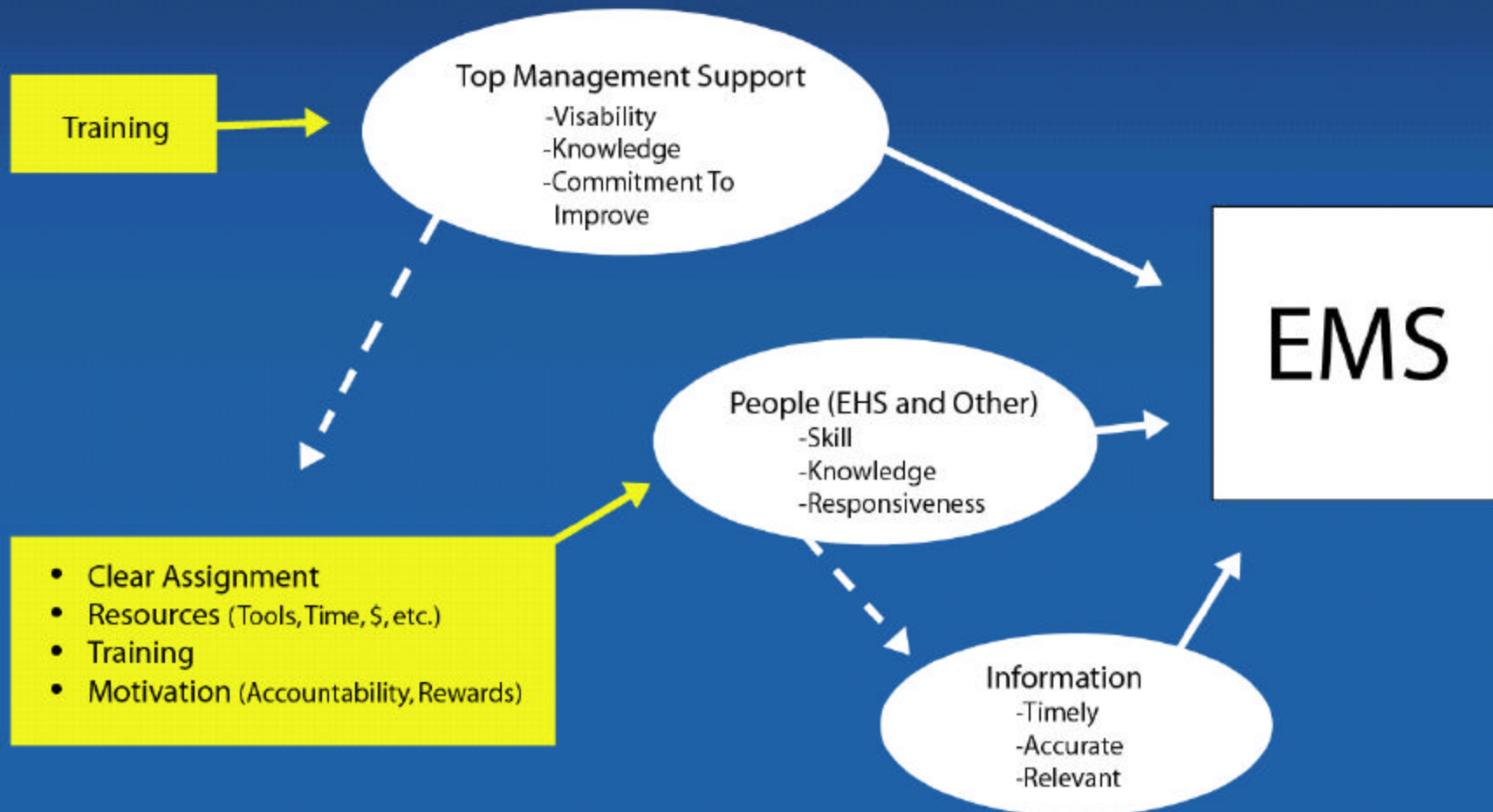
EMS



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graph LR; A[EMS] --> B[Compliance, Risk Management, Waste and Accident Prevention];
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- **Compliance**
 - Country, State, Local?
 - Where Production Sold?
 - Customer Expectations?
 - Consistency?
- **Risk Management**
 - Right Issues?
 - Good Judgement (Qualified Evaluator)?
 - Company Standards?
- **Waste and Accident Prevention**
 - Good vs Benchmark?
 - Right Direction?

2. EMS INPUTS: ARE THEY CONSISTENTLY ADEQUATE?



KATTARS Root-cause Criteria

- KNOWLEDGE : Is someone at the site aware that there is such a requirement?
- ASSIGNMENT: Has someone been clearly designated as responsible for the issue (management and operations; primary and backup)?
- TOOLS: Are the appropriate hand tools, protective devices, procedures, checklists, etc. available?
- TRAINING: Have the appropriate people been properly trained? Was the training effective?

KATTARS Root-cause Criteria

- ACCOUNTABILITY: Are disciplinary procedures; compensation, promotion and termination decisions; etc. being used properly to encourage performance at the operations and management levels?
- RESOURCES: Do people have the time, money, and headcount to perform?
- SELF-ASSESSMENT: Are facility self-assessment processes adequate?

KATTARS Root-cause Criteria : Special Notes

- *KATTARS represents the common systemic weaknesses that often undermine performance. This is not an exclusive list of root causes, but none are as important as these.*
- *A single nonconformity often involves several KATTARS criteria.*
- *Each overarching KATTARS trend should be a separate action item. This avoids spot-patching a fundamental weakness.*

CRITICAL POINTS:

- EMSs as a Machine:

Use requirements and benchmarked or defined performance comparisons to assess outputs; field interviews and KATTARS to assess inputs.

- EMSs as a Trojan Horse:

Withhold EMS certification/recognition until the site consistently gets it right!

