NOTE FOR THE ATTENTION OF

MEMBERS OF THE COMMITTEE ESTABLISHED UNDER COUNCIL REGULATION (EC) N°761/2001, ALLOWING VOLUNTARY PARTICIPATION BY ORGANISATIONS IN A COMMUNITY ECO-MANAGEMENT AND AUDIT SCHEME –EMAS–

 SUBJECT: Mandate M/356 EN

CEN and CENELEC were asked by the Commission (Mandate M/356 EN) to draw up a comprehensive standardisation work plan with a view to producing and adopting an EN guidance standard for a staged (step-by-step) approach to implementing an Environmental Management System (EMS) in accordance with the most recent version of the EMAS Regulation and of the EN ISO 14001 standard.

CEN BT approved the EU Mandate to develop that standard last year. Subsequently, CEN asked ISO/TC 207/SC 1 (Environmental Management Systems Subcommittee) to develop the mentioned standard, as this ISO subcommittee already has the structure and experts in place to carry out the work (as it had developed ISO 14001: 2004).

Following the approval of the work item by the ISO subcommittee in November 2005, a working group (WG 3) was set up. This working group, TC 207/SC 1/WG 3, is holding its first meeting from 2-4 March 2006 in Trinidad-Tobago where experts will start the work, using the French guidance FD-X-30 and the British standard BS8555 as base documents.

In this meeting, WG3 will discuss a collection of comments on the French guidance and on the British standards, from different ISO members, in order to prepare a first working draft of the new standard ISO 14005. In those comments some of the ISO members from different States have proposed some changes where all references to EMAS are deleted. This proposal does not fulfil the EU Mandate, which in its point 8 requires that the standardisation work shall be carried out in accordance with the following requirements:

The standardisation work will result in:

a) An EN guidance standard concerning a staged implementation of the requirements established by EMAS and EN ISO 14001. The intermediate stages below EMAS and EN ISO 14001 will not be certifiable.
b) An accompanying informative annex on how to implement the EN guidance standard, taking particular account of the needs of SMEs, unless it is contained within the standard itself.

The standardisation work shall consider:

• Existing staged approaches to formal EMS implementation (e.g. British Standard BS8553, the EMAS SME toolkit, etc.)

• Existing national (e.g. France) and international guides for the implementation of EMAS and EN ISO 14001

• Existing less formal EMS approaches, in particular those identified as good practices in the Best project report 6

• Incorporating environmental performance indicators into the EN guidance standard (e.g. along the lines of BS 8553, EMAS and EN ISO guidelines)

• Describing the requirements of the several stages leading to EN ISO 14001 and EMAS certification/registration.

Taking the above into account and, as some Article14 Members are also members of this ISO committee, I would be very grateful if they could intervene in WG 3 or link up with national members of this W.G.. This would make sure that ISO fulfils the Mandate by ensuring that all the work carried out by that working group to develop the new standard ISO 14005 is done following the requirements of the Mandate.

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