

Extract of report prepared by LIFE audit group, April 2006

Comparison of EMAS and Dogme

Introduction

The project group has conducted a systematic comparison of EMAS and Dogme. The analysis was conducted by juxtaposing the two systems. Offset was taken in the EMAS systematics. This means that the requirements in the part of the EMAS statutory order, which deals with the system part (corresponding to ISO 14.001), have been divided into the different activity sections. In addition, relevant sections and annexes from the EMAS statutory order have been entered in the table. The contribution to the Dogma part is the cooperation agreement and the Dogma document (annexed). The comparison of EMAS and Dogme has formed the basis of a number of discussions in the project group. In addition, the project group has sparred with an expert in environmental management systems.

The comparative analysis is attached as annex A.

Analysis results

The comparison of the two systems shows that in a large number of areas requirements in EMAS and Dogme are similar, despite the fact that the two concepts basically differ. Both systems build on progress and quantifiability of improvements. Both EMAS and Dogme have focus on environmental targets and areas for effort, but the difference between the systems is found in the approach. In EMAS the organisation has a wide scope for setting up environmental targets and associated environmental activities. Dogme, in contrast, sets up specific areas for effort that the municipalities must work towards.

The comparison also shows that EMAS covers areas where the Dogma document has no specific requirements. This is, for example, document management, operational management, emergency and requirements for registration and evaluation of deviations. In addition, EMAS describes more specifically what to consider in the communication of the organisation. However, it should be mentioned that this does not mean that no activities take place in the municipalities in relation to Dogme, resembling the activities in the EMAS areas of document management, operational management, registration and evaluation.

Similarly, there are elements in Dogme that are not covered in EMAS. This covers mainly the concept for the entire cooperation, containing an obligation for working in a

wide sphere, cultivating new topics and environmental targets jointly, and the wish of having more municipalities entering the cooperation.

In the following, six selected focus areas are described in view of finding elements or activities in the systems that with benefit could give inspiration for EMAS and Dogme respectively.

Selected focus areas

Based on the systematic comparison of EMAS and Dogme the working group has selected six focus areas where the two systems in particular may learn from each other. The six focus areas are

1. Communication
2. Legislation
3. Management review
4. Agenda 21 plans and holism in the environmental efforts
5. Committed environmental cooperation
6. Management elements

Communication

The EMAS regulation commits the organisation to set up procedures for communication in the organisation. This covers communication internally in the organisation and communication to external stakeholders. There is a requirement that the communication is incorporated systematically as part of the environment work of the organisation and that the organisation draws up procedures for environmental communication, but the choice of how to solve the communication task is free. EMAS furthermore requires that the organisation regularly prepares an environmental statement directed at the surroundings of the organisation.

There is no specific section about communication in the Dogma document or the cooperation agreement, apart from the requirement for preparing annual green accounts in each municipality, and this is in a way a communication medium.

The Dogma steering committee has prepared a communication strategy for 2003 - 2006. Further to this strategy much communication at cooperation level has taken place through the Dogma secretariat in connection with the Dogma conference and granting of the common environmental award. In addition, each working group under the Dogma cooperation is invited to take the initiative in writing articles in magazines and news media. This has been done a few times. So focus has primarily been on external communication directed at the public at large.

The working group assesses that communication is an important element in the work of anchorage and dissemination of knowledge about Dogme. Communication efforts may be strengthened and directed at new areas. Here, we specifically think about the internal communication in the individual municipality and the part of the concept that deals with continuously to recruit new municipalities for the Dogma cooperation. It may be considered whether it is expedient to learn from EMAS and strengthen the requirement for communication in the Dogma document.

The working group also finds that the EMAS requirement for an annual environmental statement may ensure that the Dogma municipalities demonstrate their efforts and the results of the Dogma cooperation, and not least an assessment from (top) management in the individual municipality about progress. In principle, it does not need to be yet another publication from the municipality. It may be chosen to incorporate it in the existing green accounts.

Dogme can learn from EMAS in relation to internal and external communication

Recommendations:

- To include in the Dogma document that the Dogma cooperation and the individual Dogma municipality describe how to manage internal and external communication associated with the Dogma cooperation. And that the efforts are evaluated at regular intervals.
- That the individual municipality publishes an environmental statement informing the surroundings about the Dogma efforts, real progress based on the audit results, and management evaluation.

Legislation

The EMAS regulation requires that it is assessed regularly whether the organisation complies with current legislation. In the Dogma cooperation there is no requirement directed specifically at compliance with legislation and political decisions. Implicitly, this is an issue that is assumed to be in order. The Dogma municipalities will more than the ordinary environment work that Danish municipalities are under the obligation to carry out.

The working group assesses that so far this has not caused problems, but it should be noticed that this may change. Here we think about the dissemination of the Dogma concept to local authorities in other countries. The working group has no overview of how local environmental authorities work in the other EU Member States, but in Denmark there is a culture and a number of instruments, for example in the form of

reporting of supervision, requirement for preparation of various sector plans etc., ensuring that there is follow-up on current legislation.

To be on the safe side, the working group assesses that it will be advantageous to include that the municipalities must comply with current environmental legislation and other relevant political decisions, ensuring that the Dogma efforts do not cause other environmental requirements to get less priority.

Dogme can learn from EMAS in relation to a clarification that current environmental legislation as a minimum must be complied with.

Recommendation

- To include a requirement in the Dogma document that the municipalities must comply with current environmental legislation.

Management review

EMAS obliges management at regular intervals to carry out what is called management review. Here, top management determines whether the system works expediently, whether the targets are correct and valuable, and management may give recommendations for improvements and efficiency enhancement of the system or the efforts.

Dogme has no direct requirement for "management review". In practice, this is done to a certain extent in the Dogma cooperation, since the political steering committee for the Dogma cooperation discusses annually the results of the external audit of the environment work in the different municipalities. This audit is made in each municipality by an accredited environmental auditor. Furthermore the results of the audit are discussed in the different municipalities. Who discusses the audit results and what is discussed is individual.

The working group finds that it may strengthen the Dogma cooperation to set up more precise requirements for a management review, both at municipal level and in the political steering committee or the civil servant group of Dogme.

By conducting a "management review" once annually in each municipality, the municipality will systematically relate to its Dogma work and determine whether efforts are sufficient. The responsibility may in principle be vested in the local council, the technical and environmental committee or with the top administrator responsible for the environmental area. Whether a management review is better made before or after the external audit has not been clarified.

The working group finds that a management review at Dogma cooperation level may function as a strategic tool in the Dogma management. A management review will ensure that dynamic and constructive work is carried out and that new targets for Dogme will be set up, matching the challenges to be faced by the municipalities in terms of environmental policy. Discussions of this type are already taking place in the Dogma cooperation, but they can be formalised and supported.

The steering committee or the civil servant group can benefit from carrying out a management review once every year after the external audits have been completed in the different Dogma municipalities. Here they have to determine whether they support work at a sufficient level and whether it is necessary to change the Dogma documents.

It will not be possible to change the Dogma wording every year, but a four-year interval for rewording of the Dogma documents may be realistic. If the Dogma documents are changed, this must be approved by the local councils in all Dogma municipalities.

Dogme can learn from the EMAS in relation to "management review"

Recommendations

- That an explicit requirement is set up in the Dogma cooperation for a "management review" in the Dogme 2000 cooperation agreement. The requirement is to ensure that the political steering committee or the civil servant group at regular intervals evaluate whether the cooperation still works efficiently and is progressing, and determine any adjustments of the Dogma cooperation.
- That the different municipalities also carry out an annual management review.

Agenda 21 plans and holism in the environmental efforts

A key focal point in Dogme is the drawing up of Agenda 21 plans. The requirement for an Agenda 21 plan can be described as the umbrella for the other efforts in Dogme. Agenda 21 is seen in wide terms in Dogme. Emphasis is given to the fact that all three target groups are involved: 1) The municipality's own enterprise, 2) The business community, 3) Citizens. For example, it is clarified that residential areas must be involved in Dogme. The broad target groups show that Dogme works with the entire civil society in the municipality, and the environmental cooperation is conceived broader and as more than just the traditional authority tasks. The preparation of Agenda

21 plans contributes to increased intersectoral thinking and holism in the environment work.

EMAS can learn from the broad stakeholder involvement in the Dogma cooperation and from the holistic plans. The untraditional paths, intersectoral thinking and the conception of the task of environmental improvements go far beyond your own organisation. This is not the case for EMAS today, since it is far more directed at individual organisations and their own production, and only to a limited extent involves and anchors the efforts in the value chain of the enterprise (suppliers), with stakeholders in the local community or among other stakeholders of the enterprise.

EMAS can learn from Dogme in relation to holistic plans for the environment work

Recommendations:

- EMAS at enterprise level can benefit from increasing the cooperation with the stakeholders/relations of the enterprise as well as the local community such as neighbours, citizens, trade unions, suppliers, financial actors. (As in Corporate Social Responsibility)
- In the development of EMAS at city level EMAS can learn from the Dogma cooperation's *methods* for involvement and anchorage of the environmental efforts in the entire civil society.
- EMAS can learn from the sectoral integration in Dogme and local Agenda 21. The environmental plans of the enterprise can be integrated with other policies of the enterprise, such as staff policy, enterprise plans, health policy.

Committed environmental cooperation

Dogme has its strength in the committed environmental cooperation: "all for one and one for all". When you are a member of the club and work for the same overall objectives, we come far, but on the other hand it may make the cooperation heavy. The Dogma document is like an EU Treaty: there are many cooperation partners and therefore an extensive decision chain behind changes to the Dogma document. Therefore, the Dogma document has not been changed since 2000 and is not expected to be revised until we have the results of the LIFE project in 2008.

"The committed environment work" is the cornerstone of Dogme 2000, where the municipalities both cooperate and compete in being best at solving the task. The committed element is not only at the methodological level, for example that the

municipalities are to prepare green accounts and Agenda 21 plans. There are also commitments under Dogme in relation to concrete environmental objectives: for example the target of zero pesticides and 75% organic food in the municipalities are ambitious environmental targets that the municipalities are committed to working towards.

EMAS, with inspiration from Dogme, could establish a network among EMAS enterprises (or cities under EMAS at city level), formulating common targets for their EMAS efforts, exchanging experience and benchmarking the efforts.

EMAS can learn from Dogme 2000 in relation to "Committed environmental cooperation"

Recommendation:

- EMAS can get inspiration from Dogme in relation to the establishment of committed networks among cities, working with EMAS at city level in the future. Networks can be established among the EMAS cities, exchanging experience, defining common targets and benchmarking their efforts.

Management elements

EMAS is a classic environmental management system, and therefore the management elements of the system are very clearly worded. Dogme 2000 is a cooperation and development project having focused on action instead of bureaucracy. Now the Dogma cooperation has existed for seven years, and the working group assesses that Dogme can benefit from the management elements of EMAS, so that there will be more visibility and transparency in the procedures under the cooperation.

Examples could be:

The Dogma working groups should have a clearer mandate, and their efforts and results may be reported more clearly. At the moment it is required that all working groups have a plan of action, but follow-up of the plans of action is lagging behind. The working groups should describe and document their progress annually. Before the audit, the working groups could carry out a self-evaluation of the efforts of the year.

When the LIFE project has been completed the working groups will naturally regain a clearer role, and it will be relevant to focus on management and expectations to the working groups. Here, there will be basis for a professionalisation of the working groups.

In the work with the analysis it has been found difficult to find documents and previous decisions.

Dogme can learn from the EMAS management elements

Recommendations:

- That Dogme develops a document outline, gaining control of latest versions of the documents, including decisions under the Dogma cooperation. Describe requirements and procedures in terms of document management. One example could be that all working groups place their minutes in the common file folder.

- That Dogme 2000 clarifies the mandate for the different working groups. Formulate precise reporting requirements for the working groups as to their efforts and results.