

What to Consider in Choosing an ISO 14001 Registrar

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For a number of organizations that are subject to federal and state regulatory requirements, developing a functional environmental management system (EMS) makes a lot of sense. Here's something you may want to consider to help you make the decision to go with an EMS: There is a good indication that some EPA regions and states may make EMSs the norm rather than the exception for regulated organizations.

Take EPA's Region 1, for example. They have already taken a step forward to help jump start the EMS process a notch higher by mandating that companies and other entities include developing an EMS among the conditions of administrative enforcement actions against them. With such regulatory pressures under way, how long before these pressures join up with the existing pressures companies face, such as customer demands by the Big Three and other major manufacturing industries, before widespread development of EMSs become commonplace? And if that becomes the business case, how far behind will the push for more organizations to certify to ISO 14001 be?

Let's stop and reflect a moment. We really shouldn't look at the concept of EMS and ISO 14001 in such draconian terms. Rather, having an EMS that conforms to the tenets of ISO 14001 and can be certified as such by an accredited outside party, can have tangible value to the organization in a number of ways, from streamlined

processes that can generate cost savings to detailed procedures and work instructions that can provide for consistency in the workforce, and hence, minimize the possibility of product defects and waste, that can be a drain on an organization's resources.

Also, depending upon the industry sector, such as the automotive and computer industries, ISO 14001 certification is part of the cost of doing business and can mean the difference between having enough work contracts in the pipeline to stay in business, or possibly having to lay off production staff as a means to make fiscal end meet.

When we begin to view an EMS and the elements of ISO 14001 in this light, having the two in sync does bode well for a business organization. Now that we have made that argument, let's look closer at the registration process.

The registrar: a necessary evil

Somewhere along the way, between trying to stay in compliance and operating as a world-class business, lies the environmental management system that has been designed to conform with the elements of ISO 14001, specifically Clause 4 of ISO 14001. Organizations that aspire to maintain an EMS that conforms to these elements are under no mandate to have a third party, such as a registrar, certify their EMS, although their credibility and bragging rights increase dramatically with third-party certification. That's where the registrars come in

and, just like consultants, no two are alike.

As with consultants, the organization seeking ISO certification is the client and, therefore, the registrars are working for you. This means you can exert some control over them, to a point.

Consider exercising this control during the interview or registrar selection process, during which you leave the fluff questions behind. It is at this point to ask some hard questions of the registrar's representatives brought to your facility for the interview to get a feel for how they will interact with you over the next three-plus years.

What you as the interviewer need to determine is what services they will provide, how they will provide them and how they will address unanticipated events in the process. Too often, registrars will send their Business Development Manager to answer pointed questions and be totally unprepared, or fail to provide you with a qualifications package that includes the resumes of auditors that closely match your industry, or fail to bring the most qualified auditor along for the interview.

Another key point that some companies fail to bring up during the interview has to do with a particular auditor or auditors that the facility likes. If they connect with such persons, facility representatives need to make it clear up front that they want specific auditors for the duration of the audit period. The point here is why should facilities pay another auditor to become familiar

with the facility—usually an extra day—when they were perfectly happy with their first choice, who may be unavailable during a follow-on surveillance audit. It's better to get such issues ironed out first before a contract is signed, than afterwards—all sorts of excuses can pop up. But for those organizations that can hit it off with their prospective registrars, relationships can flourish and be of value to both parties. In any event, if an organization desires to obtain the coveted ISO 14001 certification, then it must choose a registrar to help it achieve that goal since the organization cannot do it alone.

One company's perspective: Acushnet Rubber Company

I posed the question of what a company looks for in choosing an ISO registrar to Jack Bailey, the director of safety, health and environmental affairs at Acushnet Rubber. Being no stranger to my interviews, Jack laid out his master plan for what he calls his "strategic considerations" in selecting a registrar. These include:

1. The registrar needs to be respected by the industry it serves as well as by the marketplace.

2. His company needs to show its customers that it was world class by registering with a registrar known by its overseas customers (in Madison Avenue parlance brand recognition).

3. Acushnet was not interested in a registrar's market share (as depicted on a yearly basis by some), but rather how well the registrars were liked by their clients. He interviewed a number of various registrars' clients and based on their responses, whittled down his "short list."

4. Once this list was whittled down, he invited a number of prospective registrars to his facility to get a feel for its layout, and more importantly, to interact with his line employees to have them get a feel for the registrars.

Passing this gauntlet, Jack also likes to discuss several key issues with registrars. We'll

call them the registrar six-pack quiz that focus on the following:

1. **Flexibility**—Can the auditors be flexible to meet your timeframe?

2. **Availability**—Are the auditors available when you want them, not the other way around?

3. **Industry knowledge**—Are they familiar with your industry, and how processes fit?

4. **Client support**—Do they show genuine interest or do they just go through the motions?

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5. **Budding partnership**—Do they recognize that you are both forming a long-term partnership versus switching registrars regularly, which can telegraph a bad signal about both parties?

6. **The catch-all other duties**—What else could the registrar provide to make you feel proud of your relationship? Is there value in free subscriptions to trade publications, or would some other perk show you the registrar cares?

Those registrars that make it this far can expect a contract with Acushnet Rubber. To date, only one registrar has made it, and they are TUV Management Services. I was fortunate to have helped Jack prepare for his facility's re-certification to ISO 14001 in 1999. Jack assured me his auditor was tough, but his facility passed and was re-certified.

If you would like to read more about these organizations, their respective Web sites are: www.acushnet.com and www.tuvam.com. If

any readers are interested in sharing their experience with registrars, please let us know. One of my future installments will deal with issues during the registrar's audit, such as whether nonconformity really is one, whether a call was nitpicky, or other issues from the Front Line. **PE**

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