

# Green Lead Bulletin

Number 1 - February 2007

## Pilots Sharpen Assessment Tool

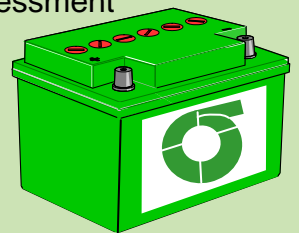
Following the London Workshop in 2005, the Green Lead Work Group were charged with the responsibility of setting up a Pilot Scheme to develop a straightforward process to provide a comprehensive assessment of compliance with the Green Lead Protocols.

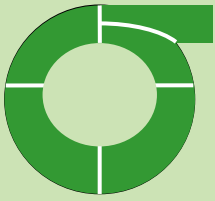
The objectives agreed for the one year Pilot Scheme were that the Assessment Tool should:

- Assess the levels of environmental, safety and occupational health performance, community engagement and the relationships between immediate suppliers and customers.
- Be designed to be used by either members of the Green Lead Work Group or Independent third party Assessors for an external Assessment, or in a self-assessment mode as an *"in-house"* guide to a company's compliance.
- Require the compilation of information about operations one up and one down the product life cycle, where appropriate.
- Highlight shortcoming in Protocol compliance and prioritise *"Action Points"* to facilitate conformity.
- Be *"user friendly"* so that Assessments could be undertaken and information collected and collated without an Assessor having to know and understand every aspect of the Green Lead Protocols.
- Be adaptable so that the same assessment process can be applied to any stage of the product life cycle.
- Be quick to use and require no more than a day to complete the assessment for the majority of operations.
- Provide instant feedback about compliance levels where possible.
- Be available in English and Spanish.

The Work Group were also tasked to determine whether ISO 14001 or OHSAS 18001 Certification could provide appropriate exemptions from the Green Lead Assessment and Audit requirements for the Environmental and Safety Protocols.

Internet Resource: [www.greenlead.com](http://www.greenlead.com) 1.





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From the outset it was also agreed that the Pilot Scheme would facilitate the field testing of the Assessment Process in as real a situation as possible.

The draft Assessment Tool was designed as a questionnaire that would seek to procure sufficient information about operations, safety procedures, customer client relationships, supply chain management and so on, in order to indicate whether or not a company complies with the Green Lead Protocols.

Field trials of the first draft of the Assessment Tool were undertaken in January 2006 at a used lead acid battery recycling plant and a battery manufacturer in the Americas.

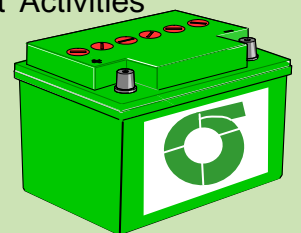
Whilst the trial of the first draft was completed successfully, it was also apparent that the information gathering process relied heavily on a good understanding of the Green Lead Protocols. This point, together with feedback from the Companies involved in the initial stage of the Pilot Scheme, and comments from the Green Lead Work Group, lead to a complete revision of the Questionnaire in February 2006.

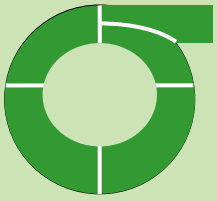
The “new” Assessment Form comprised a series of questions that targeted the key elements of each of the Green Lead Protocols providing a most efficient method of acquiring information that would immediately show the levels of Protocol compliance. The new form also provided for guidance notes and priority Action Points.

This modified Assessment Form was field tested in mining and smelting operations in Australia and a used lead acid battery collection facility in the Caribbean through to the end of 2006.

All those involved with this second phase of the Pilot Scheme agreed that the modified Assessment Form was easier to use and provided very helpful feedback to the Operations Management Team clearly identifying any areas of performance where improvements needed to be made. At the end of each exercise it was possible to provide the Companies participating in the Pilot Scheme with a check list of Compliant Activities and an Action Check List.

Internet Resource: [www.greenlead.com](http://www.greenlead.com) 2.



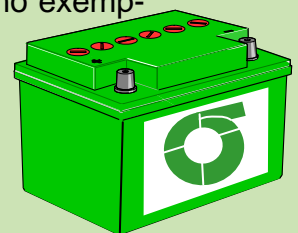


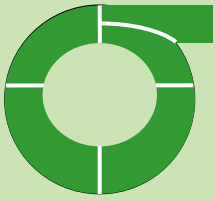
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It is important to bear in mind that the Pilot Scheme was field testing the Assessment Form and the process required to complete the exercise and not the operations of those companies participating in the Pilot Scheme. Hence anonymity was granted to those organizations taking part in the field trials.

However, the work Group are pleased to confirm that all the companies involved in the Pilot Scheme thought that the Assessment Process provided them with a very helpful, constructive and above all non confrontational insight into their environmental and safety performance, achievements in occupational health and attitudes between them and their customers and the general public.

The Pilot Scheme also attempted to determine whether certification to ISO 14001 and/or OHSAS 18001 could provide a company with an audit exemption of the environmental, safety and health protocols (as appropriate) as part of Green Lead Certification. The scheme also explored the possibility of considering other recognised certifications that the company may have attained (e.g. national or inter-company certifications), including its level of compliance with internal company EHS standards, as part of this exemption. Whilst there is no doubt that ISO 14001 is currently the most widely recognised environmental management standard, variations in environmental performance of ISO 14001 certified companies were identified during the field trials. There is also the question as to what degree ISO 14001 certified companies are looking “beyond” the gates of a site and into the supply chain and customer product use and disposal. What was clear from the Pilot Scheme is that the Green Lead Assessment Tool provides a high-level characterisation of key Environmental, Safety and Health Management aspects of the company. However, given the variations in scope and performance of companies certified to ISO 14001 and OHSAS 18001, it was concluded that a general exemption from any Green Lead Audit for the Environmental, Safety and Health Protocols has to be considered on a “case by case” basis. The decision as to whether to approve an audit exemption should be considered by an independent panel that would review available information on the company, including information obtained using the Green Lead Assessment tool. In this respect, it is imperative therefore, that no exemptions should be considered for the use of the Green Lead Assessment tool.





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Feedback from those companies participating in the Pilot Scheme also emphasized that the cost of Green Lead Assessments and Audits would be a critical factor in any decision to proceed with Green Lead Certification, regardless of its potential contribution to environmental protection and the welfare of workers and the general public. In this respect, the fact that the revised Assessment Form could be used by companies “in-house” as a guide to their suitability for a full Green Lead Audit, was welcomed as was the confirmation that certain ISO and OHSAS Certifications could be considered as an exemption from part of the full Green Lead Audit.

It is plain to the members of the Green Lead Work Group that the Green Lead Project must be seen as a benefit to the Lead Industry as well as Environmental Groups and other NGOs.

Interestingly, companies in the Lead Industry based in the Developing World quite often stated to the Work Group that they would welcome the introduction of a Green Lead Certification system that kept Lead Acid Batteries within the Green Lead Community, because the “*informal*” sector would be denied access to the used lead acid batteries, thereby eliminating their environmentally unsound recovery procedures at a stroke.

Guidelines for the use and application of the Green Lead Assessment Form have also been prepared and the latest versions of the Assessment Form and the Guide can be downloaded from the Green Lead web site:

English: <http://www.greenlead.com/Procedures.html>

Spanish: [http://www.greenlead.com/Spanish\\_Procedures.html](http://www.greenlead.com/Spanish_Procedures.html)

Comments on the Green Lead Assessment Form and any aspect of the Process are welcome. Just double click on the Green Lead Battery at the bottom of the page to send a commentary to the Work Group.

This Bulletin has been prepared and published by the Green Lead Work Group.

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