ENVIRONMENTAL AUDIT : MANAGEMENT SOLUTIONS FOR EFFECTIVE LEGAL COMPLIANCE

*Arunima Dhar**

I. INTRODUCTION

The era of blind industrialisation set an unfortunate trend of indiscriminate growth, of putting environmental concerns on the back-burner and developing at all costs. In this mindless race for rapid urban and industrial development, environmental quality has come to be subordinated to development and industrial production related goals. The results are too apparent to ignore. Man, today has come to a full circle, where he can no longer afford to take the environment around him and the "abundant" resources for granted. Scarcity of natural resources to cater for a burgeoning population is compounded by the problem of air and water pollution, contamination of land and soil, all of which have corroded the fragile ecological balance of the environment, reaching an 'environmental crisis' of sorts, which, has predictably arisen due to environmental deterioration caused by several forms of pollution, depletion of natural resources because of the rapid rate of their exploitation and the increasing dependance on energy consuming and ecologically damaging technologies, the loss of habitats due to industrial and urban expansion, reduction and loss of ecological populations due to excessive use of toxic herbicides, pesticides and the loss of several species of plants due to monoculture and removal of habitats through forest clearance has now become a matter of global concern.[1]

There are two main anthropogenic sources of pollution : (*a*) Urban and (*b*) Industrial. Urban sources of pollution include untreated sewage, automobile exhaust fumes among other things. Industrial sources contribute a host of pollutants such as sulphur di-oxide, nitrogen oxide emissions, waste water with concentrations of heavy metals like lead, arsenic, mercury etc. also leading to groundwater pollution which is especially possible if the factory is located upon an aquifer, as was observed in the

---

* Student, LL.B. III Year, Law Centre-II, University of Delhi, Delhi.

1. I.A. Khan, ENVIRONMENTAL LAW (2000) at 9-10.

Bichchdi case.[2] In addition to this, industries may also contribute to land contamination if the hazardous wastes generated by the manufacturing process is illegally dumped. They also contribute to noise pollution and have proven to be a potential threat of accidents or man made hazards, particularly when located close to residential areas or sensitive environments of ecological importance (like sanctuaries, national parks, wetlands etc.).

The United Nations Conference on the Human Environment (UNCHE) held at Stockholm in 1972 drew the world's attention towards urgent global environmental problems which needed immediate redressal. Problems like acid rain, global warming, ozone depletion, besides the problems relating to disposal of hazardous wastes demonstrated the absolute importance of making industries accountable for the pollution they caused and for the threat of man made catastrophies they posed . Global conventions like the UNCHE alongwith United Nations Framework Convention for Climate Change, Vienna convention on the protection of the Ozone layer, 1985, Basel Convention on Transboundary Movement of Hazardous Wastes, 1989, United Nations Convention on the Law of the Sea, apart from developing soft law mechanisms on very pertinent issues also created widespread awareness regarding the impact of pollution, especially industrial pollution, on the environment and on man. As a result of this environmental costs' of production are being looked into very seriously and, becoming 'environmentally friendly' has almost become synonymous with the image of a socially responsible company.

A need, therefore, arises for a system that is designed, implemented and works to control the company's significant environmental aspects and achieve regulatory compliance.[3] This is effectively and very successfully done by an Environmental Management System which enables the achievement and systematic control of the level of environmental performance that it (the company) sets itself.[4] An Environmental Audit ensures that the Environmental Management System (EMS) is being implemented in the desired manner as also, checks the extent to which an organisation is complying with existing environmental laws and company policies. An Environmental Audit and a sound Environment Management System (EMS) is further necessitated by several factors like pressure groups, banks and insurance companies which require a guarantee against pollution related closures, competitors

2. *Indian Council for Enviro-legal Action* v. *UOI*, AIR 1996 SC 1446.
3. DNV and EQMS, COURSE MATERIAL FOR EARA, UK, APPROVED LEAD AUDITORS' COURSE, (2000) at 2-3.
4. *Ibid.*

who may be gaining greater market acceptability globally by adhering to more stringent environmental standards and a proactive media which is often unsparing in its attitude towards polluting industries.

II. Environmental Management Systems: Concepts and Constituents

The primary thrust of a wholistic EMS is its concentration on continual improvement of Environmental Quality, and the fact that it is voluntary, which implies that a company can decide its own targets and parameters of improvement keeping in mind, that the mandatory legislative norms have been complied with and that it is a continuous, planned process and not an ad-hoc one.

The International Standard specifies the requirement of an Environmental Management System. It has been written to be applicable to all types and sizes of organisations and to accomodate diverse geographical, cultural and social conditions. The success of the system depends on commitment from all levels and functions, especially from the top management. A system of this kind enables an organisation to establish and assess the effectiveness of procedures to set an environmental policy, and objectives, achieve conformance with them and demonstrate such conformance to others. The overall aim is to support environmental protection and prevention of pollution in balance with socio-economic needs. The International Standard takes into account legislative requirements and information about specific and significant environmental impacts. It applies to those environmental aspects which the organisation can control and over which it can be expected to have an influence. The essential constituents of a sound Environmental Management System are discussed briefly hereunder.

Firstly, a clear and concise Environmental policy which establishes an overall sense of direction and sets the principles of action for an organisation. It is essential for the policy to be implemented, documented and communicated to the employees and the public. The policy ought to be appropriate to the nature, scale and the environmental impacts of the company and should particularly address the identified significant aspects that the company seeks to address through an effective Environmental Management System. The policy also represents a commitment to comply with relevant environmental legislation and other requirements to which the organization subscribes. The environmental policy sets the overall environmental responsibility and performance required of the organisation, against which all of its subsequent actions will be judged.

Secondly, the organisation shall establish and maintain (*i*) procedure(s) to identify the environmental aspects especially those that have significant impact on the environment and which the company seeks to address; (*ii*) documented environmental objectives and targets at each relevant function and level within the organisation; (*iii*) programme(s) for achieving its objectives and targets, which shall include the delegation of responsibility and the time frame within which it has to be carried out; (*iv*) a procedure to identify and have access to legal and other requirements to which the organisation subscribes.

Thirdly, training needs are to be identified and comprehensive environmental awareness training needs to be provided to all employees in addition to job specific training pertaining to the relevant environmental impacts of his job/function. Apart from this, the organisation shall ensure the prevalence of a strong internal communication system between various levels and functions of the organisation and a comprehensive procedure for receiving, documenting and responding to relevant communication from external interested parties. Besides, efforts should be made to formulate a comprehensive Environmental Management Programme that ensures proper implementation of the formulated strategies for continual improvement.

Fourthly, information regarding core elements of the management system should be documented. Apart from this, the organisation shall establish and maintain procedures for the identification, maintenance and disposal of environmental records. These records shall include training needs and the results of audits and reviews.

Fifthly, and very importantly, the organisation shall establish and maintain procedures to identify potential for and respond to accidents and emergency situations and for preventing and mitigating the environmental impacts that may be associated with them. Also, there ought to be provisions for the reviews and revision of these procedures on a regular basis especially after an accident and the same should be periodically practiced by way of mock drills.

Sixthly, continual monitoring is a very vital requirement for the effective implementation of the Environmental Management System and not only should there be documented procedures to monitor and measure the key characteristics of its operations and activities that can have a significant impact on the environment but, it should also be ensured that monitoring equipment is caliberated and maintained alongwith records of the process. There should ideally be a frequently monitored procedure for evaluating compliance with environmental legislation and regulations.

Lastly, it is imperative for the organisation to establish and maintain programme(s) and procedure(s) to carry out periodic Environmental Management System Audits to ensure proper implementation of the system, to observe the conformance of the system to the standard and to legal norms. In order to be comprehensive, the audit procedures shall cover scope of the audit, frequency and methodologies, as well as the responsibilities and requirements for conducting audits and reporting results. And subsequently, the organisation's top management shall at regular intervals review the environmental management system to determine its relevance, adequacy and effectiveness.

The Environmental Management System most importantly should have an inherent capability to achieve regulatory compliance and strive towards continual improvement of environmental performance of the organisation.

III. Legal Mechanism

Much of the national environmental law in India and elsewhere is derived from provisions of international conventions which manifest themselves once a country becomes a party to the convention. When the signatory in question ratifies the convention, the item becomes a part of national law through the country producing its own statute to implement the obligatory provisions of the international legislation.

Environmental laws in India are at their infancy and leave much to be desired in terms of statutory stringency towards polluters. The few laws that do lay down mandatory standards lack effective implementation. In this part an effort has been made to briefly outline Indian laws that are relevant for the purpose of prevention of Industrial Pollution. They are, needless to say, mandatory in nature and non-compliance with the standards and norms laid down by these acts would incur upon the company, fines, punishment and even closure of the factory in certain cases. Legal compliance therefore, is the backbone of any system of environmental management and it is absolutely essential for industries to adhere to the standards prescribed under these acts.

The first act in India to address the problem of pollution exclusively was Water (Prevention and Control of Pollution) Act, 1974 (Amended upto 1988). The Act seeks to address the problem of water pollution and is particularly pertinent to industries given fact that only 300,000 factories using and contaminating water in their manufacturing processes adequately treat water prior to its release into a natural water body.

Industrial waste water contains toxic substances like lead, arsenic, mercury, cynide, oil, offensive colour and odour, acids and alkalies that

affects fish and aquatic life, inorganic substances like carbonate, chloride and nitrogen that renders water unfit for use and organic substances that deplete oxygen content and increase the Biological Oxygen Demand (BOD) content.

The Water Act aims at prevention of water pollution and maintaining and restoring the wholesomeness of water. The Act and Rules define the formation of State and Central Pollution Control Boards, their constitution, authorities, responsibilities and obligations.

The Act and Rules also provide the permission for industries to establish their factories. Further, there are renewable permissions for operations, these permits are called consents. The consents normally are given to the industry for specific periods and are to be renewed prior to the lapse of the consent. In *MC Mehta* v. *Union of India*[5], the Supreme Court held that whenever applications to establish new industries are made, such applications shall be refused unless adequate provisions has been made for the treatment of trade effluents flowing out of the factories. Immediate action should be taken against existing industries if they are found responsible for pollution of water.

The Water Act, 1974 empowers the petitioner to move the court to enforce statutory provisions of the Act. It also gives any official of the State Pollution Control Board, empowered by it, the power to obtain information and collect and test samples according to the procedure specified in section 21[6]. The powers of the PCBs (Pollution Control Boards) include ordering closures, prohibition of an operation or process. It can also include stoppage of electricity and water supply to the industry. In the Ganga Pollution case, *MC Mehta* v. *Union of India*,[7] the Supreme Court held that the financial capacity of the tanneries should be considered irrelevant while requiring them to establish primary effluent treatment plants. Just like an industry which cannot pay minimum wages to its workers cannot be allowed to exist, a tannery which cannot set up a primary effluent treatment plant cannot be permitted to continue to be in existence for the adverse effect on the public at large. Failure to comply with the directions given under section 20(2) (Information regarding constitution, installation or operation of any establishment or any disposal system etc.) within the time specified in the direction would on conviction, be punishable with imprisonment for three months or with fine upto

5. AIR 1988 SC1115 at 1127.
6. Water (Prevention and Control of Pollution) Act, 1974.
7. AIR 1988 SC 1037 at 1045-46.

Rs. 10,000 or with both. While the failure continues, a fine of Rs.5000 for each day of continuance is also leviable.

The Water Act prescribes minimal national standards as well as standards for the small scale industry which are different. These standards are covered in a more comprehensive manner under the Environment (Protection) Act, 1986. Standards can be relaxed in cases where the water will be treated subsequently in a Terminal Treatment plant. The Water (Prevention and Control of Pollution) Cess Act, 1977 is mainly to levy and collect a cess on water consumed to augment resources for PCBs. The benefits which result from the prevention of water pollution are many. Abatement of pollution also aids in cutting costs, for example, the recovery of valuable commercial ingredients during the treatment of industrial waste water, which yields by-products which to some extent assist in offsetting the cost of treatment.

The Air (Prevention and Control of Pollution) Act, 1981 is similar to the Water Act and provides for the prevention, control and abatement of air pollution. Under the act the Central and State Boards constituted under the Water Act have now been given additional responsibilities of combating air pollution. The State Government has to declare certain areas as 'Air Pollution Control' Areas.[8] In these areas there are restrictions on the operation of certain industries. The levels of pollution are to be determined by the PCBs. Industries operating in the Air Pollution Control Areas must have a consent to establish and a consent to operate prior to commencing operations for emissions. As in the Water Act, emission standards, that are specified in this Act and Rules[9] are to be viewed together with the Environment Protection Act, 1986 which could have more exact and demanding requirements.

The Air (Prevention and Control of Pollution) Rules, 1982 and 1983, elucidate the National Ambient Air Quality standards which have different permissible levels of air pollution for Industrial, Residential and Sensitive areas and the standards are with regard to certain pollutants only like Sulphur dioxide, Oxides of Nitrogen, Suspended Particulate Matter (SPM), Respirable Particulate matter (less than 10 micron) Lead and Carbon Monoxide. The National Ambient Air Quality standards also specify the frequency and information on how it is applied.

The Environment (Protection) Act, 1986 is an umbrella legislation which provides for the protection and improvement of the environment.

---

8. Air (Prevention and Control of Pollution) Act, 1981, section 19.
9. Air (Prevention and Control of Pollution) Rules, 1982 & 1983.

The act came about as a direct consequence of the bitter lessons learnt from the Bhopal Gas tragedy. The Act gives wide powers to the Central Government to take necessary measures for the protection and improvement of the quality of environment and the prevention, control and abatement of pollution.[10] The Central Government also has the power to make rules, by notification in the Official Gazette, on all or any of the subjects listed out in Section 3.[11] Apart from this the Central Government may also lay down standards for quality of environmental emission and discharges and restrictions and on areas for certain industries.

The 1986 Act lays down safeguards to prevent accidents which could lead to environmental pollution and lays down safeguards for handling of hazardous substances. In this Act laying down of standards have been done in a very clear and practical manner which is relatively simple. The standards related to source measurements, load based standards, equipment based standards and standards based on the receiving environment. The Act provides for inspection of industries by authorised officials who may also take samples,[12] the act also provides for the establishment and recognition of environmental laboratories.

Section 15 provides that contravention of any of the provisions of the Act or any rules, orders or directions issued thereunder shall be punishable with imprisonment upto 5 years or with fine upto Rs. 1 lakh or with both, in respect of each contravention. However, a gaping lacuna that remains in this otherwise promising section is that in case the offence in question is also covered under any other act, the penalty shall be as recommended thereunder.

The Environment (Protection) Rules, 1986 provides standards in Schedule I which are fairly comprehensive and clear. The rules have notifications for environmentally sensitive areas. There is a list of industries that are coded with the colours, green, orange and red according to their degrees of safety with the red category of industries being prohibited from operating in notified areas. The Rules lay down certain guidelines to be followed by the State Boards wherein the industry is encouraged to reuse and recycle and use Best Available Technology (BAT) while treating waste water. Rule 14 of the EP Rules 1986 inserted with effect from 13th March, 1992 provides for submission of environmental audit report by every person carrying on an industry, operation or process

10. Environment (Protection) Act, 1986, section 3.
11. Environment (Protection) Act, 1986, section 6.
12. Environment (Protection) Act, 1986, section 10.

requiring consent under Section 25 of the Water Act or Section 2 of the Air Act or both, or an authorisation under the Hazardous Wastes (Management and Handling) Rules, 1989 would be required to submit an environmental audit report in Form V for the financial year ending on 31st March every year to the concerned SPCB. Apart from rule discussed above there are other important notifications under the 1986 Act like (*i*) the ban on benzidine dyes and chemicals (*ii*) declaration of Coastal Regulation Zone (*iii*) Environmental Impact Assessment and (*iv*) Environmental clearance of projects.

Under the Hazardous Wastes (Management and Handling) Rules 1989 industries generating hazardous wastes and having facilities for collection, reception, transport, storage and disposal will have to get authorisation from the State Pollution Control Board. This applies in case of any operation as well for the collection, treatment, storage, transport and disposal of hazardous wastes. Hazardous wastes must be clearly labelled and appropriately packed before transportation to the site. The state government is responsible for identifying hazardous waste disposal sites. An impact Assessment must be done before the site is so declared. The philosophy behind it is the idea propagated during the Basel Convention i.e. "Cradle to grave" monitoring, and keeping the same spirit alive is the provision of prohibition for import of waste for dumping. In addition to this, accidents at sites are to be reported to the State Pollution Control Board and that State Government is required to maintain an inventory of hazardous wastes and where they are stored. These rules have also specified 684[13] chemicals with threshold quantities, it also requires Material Safety Data sheets.

Manufacture, Storage and Import of Hazardous Chemical Rules 1989 also specify the quantity of certain hazardous chemicals which need to be handled and stored in an appropriate manner. Safeguards are required to be evolved, such as an on-site as well as an offsite emergency plan. A list of 184 chemicals has been released as maximum polluting industries. Apart from this, a safety report is to be submitted and the likely people to be affected are to be informed of the hazards and methods of safety.

To meet such contingencies, a new indigenous rule of absolute liability has been formulated which is a distinct contrast to the *Rylands* v. *Fletcher*[14] rule. In *M.C. Mehta* v. *Union of India*,[15] the Supreme Court held:

---

13. Hazardous Wastes (Management and Handling) Rules, 1989 as amended in 2000.
14. *Rylands* v *Fletcher*, (1886) LR and HR.
15. AIR 1987 SC 1086 at 1099.

> (W)here an enterprise is engaged in a hazardously or inherently dangerous activities and harm results to any one on account of an accident in the operation of such hazardous and inherently dangerous activity - the enterprise is strictly and absolutely liable to compensate all those who are affected by the accident and such liability is not subject to any of the operations which operates vis-a-vis the tortious principle of strict liability in *Rylands* v. *Fletcher*."

It was also held that the measure of compensation must be co-related to the magnitude and capacity of the enterprise so that the compensation has a deterrant effect.

The growth of hazardous industries, processes and operations in India has been accompanied by the growing risks of accidents, not only to the workmen employed in such undertakings but also to the members of the public in the vicinity. For the purpose of providing immediate relief to the persons affected by the occurrence of the accident while handling any hazardous substance and for matters connected therewith or incidental thereto, the Public Liability Insurance Act, 1991 was enacted.

This Act provides for mandatory Public Liability Insurance for installations handling hazardous substances to provide minimum relief to the victims. Such an insurance apart from safeguarding the interests of the victims of the accidents also provide cover and enable the industry to discharge its liability to settle large claims arising out of major accidents. The mandatory public liability insurance has been based on the principle of no fault liability' as it is limited to only relief on a limited scale.[16]

To say that compliance of standards that lie at the heart of any environment management system, is the key to effective and efficient environmental, rather wholistic management, would be an understatement. However, to keep a check on the implementation of the environmental management system and legal compliance there exists a series of planned inspections called Environmental Audit.

IV. Environmental Audit

A full environmental audit comprises of a complete examination of all aspects of a company's interaction with the Government. It is designed to examine performance in terms of (*i*) management (*ii*) compliance with policies and regulation (*iii*) the information is then subsequently disclosed to the public. The methodology of environmental audit can generally be

16. G.S. Karkaria, Environmental Law (1999) at 22-23.

categoriesed into three broad audit stages. The first stage is the stage of document review when the auditor reviews the environmental policy, the objectives and targets, the aspects impacts register. The auditor also reads through the list of relevant legislation that is applicable. This stage of audit is generally done off site.

The second stage of audit is carried on, onsite, where the auditor checks whether the environmental management system is based on the identification and evaluation of environmental aspects, and in case of an external auditor, a thorough inspection is carried out as regards the internal audit of the company, the auditor may even ask for an internal audit report.

The third stage also conducted on site and is used for deciphering whether the procedures are being followed. This can be inferred by interaction with the employees or carrying out a mock drill. The auditor may also request for samples for analysis or he may check to see the condition of the effluent treatment plant and observe the outfall to get the true picture. The auditor then comes to a conclusion regarding whether or not the Environmental Management System is capable of delivering performance improvement and regulatory compliance.

As has been mentioned earlier, environmental audit may be conducted internally[17] or alternatively by an external auditor who would conduct the audit for certification of the company as being ISO 14001 compliant. The ISO 14001 certificate is a prominent external communication that speaks volumes regarding the work culture, ethics, social responsibility and management systems, and besides the existence of a properly implemented, sound environmental management system would also ensure timely compliance with all required legislative norms pertaining to them, which is always a state that most industries would strive to reach. The certification also shows commitment on part of the company towards a better environment and a work culture that is capable of achieving the same.

There are various modes of certification besides the ISO 14001, like Eco Management and Audit scheme also known as EMAS, which is adopted by the European Commission. It is extremely stringent with its requisite, standardised provisions and on completion of the audit, the auditor is required to file in an environmental statement. The other certificate standard is BS 7750 or British Standard 7750 which follows

17. Now made mandatory by Rule 14 of the Environment (Protection) Rules, 1986, inserted with effect from March 13, 1992.

EMAS and prefers public disclosure of environmental performance information (Policy and Objectives). BS 7750 however, is not so widely used now and it seems to be a trifle redundant. Environmental audit therefore, is a multifaceted option that companies may choose to ensure a streamlined management system and proper legal compliance.

V. Environmental Impact Assessment

This is necessary to ensure that new developments take into account environmental consideration at the planning stage. The results of EIA are embodied in the Environmental Impact Statement (EIS) which is now, often required by law and which should contain the following information. Firstly, a description of the development proposed the site, design, size and scale of development, and the data necessary to identify and assess the main effects that the development is likely to have on the environment.

Secondly, a description of the likely significant direct and indirect effects of the development by reference to its possible impacts on human beings, flora, fauna, soil water, air climate, landscape, cultural heritage, employment, transport, education resources, housing etc. and where significant adverse effects are identified and a description of the measures envisaged in order to avoid, reduce or remedy these. And finally, a summary in non-technical language for public consumption.

Environmental impact assessment is not an easy task. Prior to taking up the work, a set of guidelines and some set of directions for the analysis of the development work should be available. Usually, an environment impact assessment should be made either before or during the project planning and designing stages and thereby have a futuristic view of the impacts. Efforts should be made to integrate environmentally sound and efficient technologies at the planning stage itself so that environmental preparedness is inbuilt in the system. The other important considerations are those of the legal parameters regarding the location in question, human settlements around the industry, whether the host environment is of a 'sensitive' category that would magnify any environmental impact of the company's activities manifold. Furthermore, if adverse environmental impacts are not taken into consideration, at their infancy stage of implementation and planning, the long term costs of remedial measures due to such omission could be greater than short term benefits of the projects.

The basic thrust of Environmental Impact Assessment is foreseeability and thorough follow ups. Infact, it was because of poor environmental impact assessment, sheer lack of forseeability and apparent carelessness that the Bhopal gas leakage in 1985 happened.

Since prevention is indeed better than care, a thorough environmental impact assessment will be the first step in the direction of identifying the significant aspects of a company's activities and prioritising the same to derive sound environmental management system. With a thorough Environmental Impact Assessment, the company holds a better chance to plan and implement environmentally impeccable systems in the prescribed manner.

Thirdly, an environmental impact assessment, given its inbuilt resistance, may address environmental needs problems and the working of an Environment Management System in a better manner thereby ensuring complete compliance with the legal norms and a wholistic and positive attitude.

VI. Conclusions

In the face of rapid deterioration of the global environment, the need of the hour is a practical balanced approach to addressing industrial pollution related problems. It is imperative also to consider the following summarised deductions while attempting to induce greater accountability among industries.

Firstly, there could be incentives for utilisation of environmentally clean technologies, recycling and reuse of waste and conservation of natural resources.

Secondly, operationalisation of the 'polluter pays principle', by levying an effluent tax and fiscal incentives for small scale industries for pollution control and reduction of wastes.

Thirdly, location of industries ought to be as per the environmental guidelines for setting of industries, but even then preference ought to be given to compatible industries where wastes from one may be used as raw material for the other, thereby, reducing the net pollution.

Fourthly, and very importantly, introduction of Environmental Audits and reports thereof to focus on environment related topics, and preparation of onsite and offsite emergency plans. Environmental Impact Assessment should be insisted upon from the planning stage.

Fifthly, dissemination of awareness among employees, local community and children with specific references to pollution control and waste management.

Finally, collective efforts of installation and operation of common effluent treatment facilities in industrial estates and in areas with industrial clusters.[18]

18. M.C. Mehta, rev., Water and Air Pollution and Environmental (Protection) Laws (4th Edition).

Careful implementation of environmental management system and a sound process of periodic Environmental Audit can actually assist industries in cutting production costs by reduction in power consumption, recycling reusable wastes as raw material, streamlining preventive measures through a process of monitoring and an effective existing emergency preparedness plan lesser the possibility of any impending accidents, spillage and wastage. In other words achieving legal compliance and continual improvement is not impossible. It requires cooperation, dedication and commitment at all levels especially at the level of the top management.

It is possible that the solution to most major pollution related problems of the industries could be an effective Environment Management System and frequent Environmental Audits. Much of the damage to the environment may be irreversible, yet its never to late to make a beginning. Environmental Management System and Environmental Audit may just be the twin solutions that the industry was looking for, as a practical answer to all its environmental dilemmas.