

Syrian ISO 14001 pioneers anticipate growing pressure for environmental legislation in developing nations

Two Syrian manufacturing companies have pioneered ISO 14001 certification in the absence of national environmental laws, other than little-enforced "end-of-pipe" emissions regulations. However, Habi-Tex textiles and Al-Fares pharmaceuticals sought certification to add credibility to their environmental efforts in the eyes of regulators, the community and policy makers in anticipation of tough new environmental legislation in developing countries like Syria.



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Understanding of man's impact on the environment is increasing dramatically. Environmental matters are now of global concern, as is environmental control itself. In 1987, the Report of the World Commission on Environment and Development – known as the Brundtland Report – introduced the principle of sustainable development. Despite the difficulties of legislating and implementing such a concept, many countries have attached great weight to achieving its aims. Today, sustainable development forms the policy context in which much legislation is being drafted.

On the corporate level, many companies are under pressure to improve their environmental performance. The motivation can arise from legislation, corporate social responsibility, customers and commercial pressures, and public opinion. What is clear from many industry surveys is that the law remains the single most important influence on how environmental improvement programmes are carried out.

Development of environmental legislation

Using the law as a means of protecting health and the environment is not new. In the 1970's, environmental disasters such as the "Love Canal" in the United States and the Seveso accident in Italy had a major impact on public opinion, which ultimately

led to the development of single-issue laws. Subsequently, law making evolved into legislation that focused on the control of industrial pollution in each of the three environmental media: land, air and water.

As a result, such problems were defined not just in terms of localized damage to property and health, but also in terms of their effect on the major ecosystems. Consequently, legislation began to take an increasingly holistic approach to environmental issues. The concept of BATNEEC (Best Available Technique Not Entailing Excessive Cost) and BPEO (Best Practicable Environmental Option) were introduced. These were embodied in legislation, for example, in setting specific conditions (such as

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emission limits). Resulting legislation covered a wide range of issues such as atmospheric emissions, water protection, waste production, control and disposal, noise, hazardous substances installations, site decontamination, site redevelopment, and transport of materials.

Today, it is recognized that regulation by way of prescriptive standards tends to be inflexible. To many, there is no doubt that a mix of measures, both administrative and market-based, are needed to deal with the full range of environmental problems. In fact, the influence of environmental legislation on improving corporate environmental performance is most effective when the following three issues are addressed comprehensively:

- command and control legislation, which prescribes or proscribes conduct, often using a licensing system with criminal and non-criminal sanctions;
- economic instruments, which permit economic penalties and rewards to modify conduct; and,
- civil liability for the reparation of damage, which may arise under legislation or by the operation of the law.

Industry response and ISO 14001

The industrial sector realized that not only do current legislative forces have most influence on environmental performance, but that future environmental legislation would be more strongly driven by societal expectations than almost any other, and therefore would vary dramatically from one country to another.

In the developed nations, companies responded by placing increasing importance on implementing systems that provide information on which to base effective management decisions. The implementation of an envi-

ronmental management system (EMS) is a structured approach to reviewing a company's environmental performance and minimizing its environmental liabilities. Although there are several ways to establish an EMS, ISO 14001, published in September 1996, is by far the most widely implemented EMS standard in the world.



Habi-Tex, the first ISO 14001-certified company in Syria, specializes in knitting, dyeing and sewing cotton garments, mainly for export to Europe and the USA. Seen here is a circular cotton knitting machine.



The Damascus, Syria, headquarters of Habi-Tex

It is defined by an iterative loop of key management activities starting from the policy statement, objectives and targets, planning, implementing and monitoring environmental improvement programmes that can be progressed as the EMS is implemented. To be certified in conformance

Headquarters
offices and
production
facility of
ISO 14001-
certified Zouhbi
Brothers
Pharmaceuticals
Company
(Al-Fares) in
Damascus,
Syria.

The company
develops and
manufactures
solid, semi-solid
and liquid-type
medicines for
local and export
markets.



with ISO 14001, a company must satisfy the standard's requirements, maintain regulatory compliance, and provide evidence of continual EMS improvement leading to improved environmental performance.

In developing nations, where regulators are still struggling with the adoption and enforcement of environmental law, the situation is quite different. In the absence of enforceable legislation, other factors come into play. Following are examples of two Syrian companies that achieved ISO 14001 certification at a time when the Syrian environmental law had not been adopted nor enforced by the national regulatory authorities.

Improving environmental performance in Syrian manufacturing industry

In 1999, cotton textiles manufacturer Habi-Tex¹⁾ became the first ISO 14001-certified company in Syria (audited and certified by BSI²⁾, closely followed in 2000 by Zouhbi Brothers Pharmaceuticals Company (Al-Fares)³⁾ (audited and certified by QMI⁴⁾.

Both organizations achieved certification in the absence of effective national environmental legislation. Current Syrian environmental laws

consist of guidance documents that set specific limits on factory air and water emissions (so-called "end-of-pipe" regulations), but these requirements are not effectively enforced. Economic instruments in the form of penalties and rewards, and civil liabilities for reparation of damage caused by bad environmental practices are non-existent.

So what inspired the two companies to implement ISO 14001, and what difficulties did they experience in effecting programmes for continuous environmental improvement in the light of that embryonic legislative climate?

According to the chief executive officers of Habi-Tex and Al-Fares, the need to improve environmental performance had arisen from the environmental impact of their polluting processes, the current level of environmental deterioration and the use of non-renewable resources in Syria. In addition, there was a lack of environmental awareness among the workforces. The reasons given for pursuing ISO 14001 were the following:

- There is an urgent need to conserve non-renewable resources, including energy, and to conserve water especially in view of the severe drought in Syria over recent years.

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- Sound manufacturing practices mandate that pollution resulting from manufacturing processes be minimized, including emissions to air, aqueous effluents, and disposal of hazardous wastes.
- There is an economic advantage in maximizing the recycling or re-use of generated wastes, which in turn reduces the cumulative effects of such wastes on the environment.
- Sound management tools are required in applying systematic methodologies to the most appropriate pollution prevention and/or abatement techniques, and in utilizing cleaner technologies.
- It is important to promote the individual responsibility of employees by environmental education, raising awareness, and encouragement.
- Industry has a moral responsibility to protect health by minimizing risks to the environment arising out of industrial activities, and consequent human exposure.
- There is willingness for open communication with national and regional authorities and local communities, especially to mitigate environmental incidents or emergencies.

Both companies report that these improvements in environmental performance are being achieved by applying sound environmental management practices and appropriate technology. Management tools such as waste minimization and energy management programmes, Good Housekeeping Practices⁵⁾, impact assessments and environmental auditing are all incorporated in the EMS.

Specifically, their environmental policy statements set the framework for EMS objectives and targets.

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Environmental impacts of site activities are evaluated and formulated into environmental improvement programmes. Internal audits and management review meetings are instituted within the system in order to ensure that targets are being achieved. Cost/benefit analyses are used in order to formulate sound management decisions as to which resources could be best utilized.

The driving force

According to Habi-Tex and Al-Fares, the driving force behind these programmes lies in the fact that tomorrow's demands for effective environmental management will be even tougher, with further government and public pressure to provide more detailed environmental reporting. For that reason, both companies have discovered that apart from facilitating good environmental management, a certified ISO 14001 EMS adds credibility to an organization's environmental efforts in the eyes of regulators, the community and policy makers.

In view of the obstacles to continuous environmental improvement in the absence of an effective legal system in Syria, both companies note

(continued overleaf)

Blister packaging of capsules under hygienically and environmentally controlled conditions at Al-Fares pharmaceutical production site.



5) Good Housekeeping Practices are described as "practical measures that organizations can follow to improve productivity, save cost and reduce environmental impact". They form part of the DELTA Programme (Developing Environmental Leadership Towards Action) initiated in 1995 by Sustainable Business Associates (SBA) to promote such principles, and foster business and environmental networks in the Maghreb and Machrek countries.

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the following:

- Although end-of-pipe regulations may be the most easily enforceable form of pollution control in Syria, there are inherent structural and institutional weaknesses here that encourage operators to discharge right up to the emission limits set by the regulator. Consequently, companies have no financial incentives for reducing emissions limits beyond those stated, nor to continually improve environmental performance.
- Pollution and environmental damage arise from the fact that environmental resources are “free” in Syria. By effectively “pricing” environmental resources to reflect the costs of pollution, users would manage them like any other economic resource instead of squandering them. Companies and consumers, rather than regulators, are allowed to decide how best to meet environmental needs, and continually improve environmental performance. Pricing mechanisms could take the form of tax reductions for lowering emissions below specified levels, with subsidies for employing cleaner and generally

more expensive technologies.

- The absence of civil liabilities for environmental damage in the Syrian legal system leaves industry disinclined to commit to continually improving its environmental performance. There is no doubt that the extent to which a polluter is financially liable for the effects of his activities under both criminal and civil law would influence his behaviour.

Conclusions

Regulation by way of prescriptive standards tends to be inflexible. In the absence of a mix of both administrative and market-based measures, companies face tough decisions in allocating resources for environmental performance improvement.

In response to developing trends in legislation, industry in developed nations has embraced EMS principles within the company structure in order to provide information on which effective management decisions can be based.

In developing nations, where regulators are still struggling with the adoption and enforcement of environmental law, the most environmentally aware companies are already well advanced in improving manufacturing efficiencies and minimizing waste.

The driving force behind these environmental improvement programmes lies in their belief that effective environmental management is crucial for survival in response to mounting government and public pressure for more detailed environmental disclosure. In fact, Habi-Tex and Al-Fares sought ISO 14001 EMS certification for precisely that reason – to add credibility to their environmental efforts in the eyes of regulators, the community

The Omayade Mosque in Damascus, the world's oldest continuously inhabited city, and home to Habi-Tex and Al-Fares, the first ISO 14001-certified companies in Syria.

