THE GREEN ASPECT OF ACQUISITION REFORM

Fast, Furious, and Accelerating

George P. Noble III

Acquisition reform is a multi-faceted and wide reaching initiative. Its thrust is to modernize the complex and costly process of providing America's fighting forces with needed weapon systems and equipment. The Department of Defense (DoD) is well aware that the acquisition system does not operate in a vacuum. Even with post-Cold War drawdown, the size and scope of DoD acquisition impacts on many aspects of American life. Not the least of these impacted areas is the environment in which we all work and live.

Recognizing America's commitments around the world, including stationing of military forces overseas, it is readily apparent that DoD's environmental impact is an issue of global magnitude. Weapon system development, production, testing, deployment, operation and disposal (every phase of the life cycle) include both products and processes that can potentially harm the environment. The DoD is pursuing numerous initiatives to eliminate or minimize these adverse potentials. Emphasis must be maintained, as part of the ongoing reform initiatives, on improving environmental performance at every opportunity.

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Photos by Richard Mattox

Many environmentally unfriendly industrial processes are used in shipbuilding.

In the past 12 months, several events transpired that will cause positive change on the acquisition process as it relates to environmental protection. These events range from Presidential Directive to relatively simple, but highly significant, administrative changes.

Executive Order 12856

The 3 August 1993 Executive Order 12856, "Federal Compliance With Right-to-Know and Pollution Prevention Requirements,"[1] provided direction to the Federal Government to plan and carry out a vigorous pollution prevention strategy. The Order required the establishment of toxic chemical or toxic pollutant reduction goals. It also established an annual progress reporting requirement to monitor compliance.

Of particular note to the acquisition community is Section 3-303 of the Executive Order, which speaks to acquisition and procurement of toxic chemicals and hazardous substances. The acquisition community will achieve reductions in acquisition of these substances through changes in what we buy and use, as well as changes in manufacturing, maintenance and other processes in DoD facilities. The Order also specifically directed that DoD review their standardized documents, including Military Specifications and Standards, and identify opportunities to eliminate the use of toxic and pollutant substances.

The requirements of the Order are obviously far reaching in scope and will affect virtually every area of the

Emissions associated with military equipment are just one of a number of environmental operational issues.

acquisition process. Efforts to eliminate toxic and pollutant substances are to be an inherent and integral part of the process in developing, contracting, producing and maintaining weapon systems. A key point is that the emphasis is to be on source reduction of toxics and pollutants, not recycling, remediation or disposal. This requires up-front consideration of pollution prevention opportunities in every process.

Secretary of Defense Perry signed a memorandum on 11 August 1994,[2] which spelled out the Department's pollution prevention strategy. A number of the strategy's objectives focus on the acquisition community and process. Pollution prevention is to be integrated into educational and training programs. Likewise, pollution prevention and other environmental concerns are to be integrated into the entire life cycle of acquisition programs. Stated goals of the strategy include the following actions: developing environmental life-cycle cost estimating tools; implementing revised Military Standard 499B, "Systems Engineering"; and changing environmentally oriented specifications and standards, acquisition regulations and contract documentation. This strategy sets the stage for a number of initiatives to be accomplished in 1995.

A shipyard is a prime example of military industrial activity with great potential to impact the environment.

NAS 411

Industry has been an active and pro-active partner with DoD in meeting environmental challenges associated with acquisition. One leading initiative on Industry's part — specifically the Aerospace Industries Association — was the development and publication of National Aerospace Standard (NAS) 411, "Hazardous Materials Management Program."[3] This standard has been a work in progress for some time. It represents a comprehensive attempt to define and assure consideration of the elimination/reduction of hazardous materials and the proper control of hazardous materials that must, of necessity, be used in an acquisition product or process.

The standard provides general requirements for conduct of a Hazardous Materials Management Program (HMMP), as well as specific planning requirements to describe and accomplish an HMMP in the performance of an acquisition contract. The Services previously used NAS 411 on a limited basis. However, DoD recently formally adopted the standard and anticipates its increasingly widespread use. The DoD expects to issue official written notification of the standard's adoption at any time.

DoDIG Audit Report No. 94-020

In December 1993, The Department of Defense Inspector General (DoDIG) issued an Audit Report[4] that addressed the effectiveness of DoD environmental consequence analyses of major Defense acquisition programs. The report culminated an audit that evaluated nine major programs — two Army, five Navy, and two Air Force — and covered the period June 1992 to April 1993. There were three major findings:

The military operates in many environmentally fragile areas such as the desert.

- Environmental oversight was not fully effective.
- There was a failure to assess programmatic environmental tradeoffs when conducting Cost and Operational Effectiveness Analyses.
- An accurate estimate for environmental clean-up and remediation liabilities at Defense contractors has not been fully developed.

The findings are of concern to everyone in the DoD environmental and acquisition communities. Since the issuance of the report, acquisition planners are working to clarify the procedures involved, better define the requirements concerned, and develop responsive courses of action. While much may yet need to be worked out in the details, there appears to be general agreement that environmental concerns and issues need to be fully integrated into the acquisition decision making process. Key players in effecting this integration must be the responsible program managers and their supporting environmental management staff elements.

Environmental Awareness

The task of integrating environmental management into the acquisition process recently received top-level DoD attention. At the January 1994 National Security Industries Association (NSIA) Environmental Seminar, and again at the March 1994 American Defense Preparedness Association (ADPA) Environmental Conference, a major theme echoed by many speakers was the need to integrate acquisition and environmental processes. Deputy Under Secretary of Defense for Environmental Security DUSD(ES) Sherri Goodman made the point that 80 percent of DoD's pollution problems and concerns can be traced to some form of acquisition action or activity. Environmental concerns must be addressed early; it's too late to realize an environmental problem exists when a program has already entered production.

As a result of increasing awareness in the environmental area, at least perhaps in part due to the DoDIG Audit Report, a number of changes were proposed or are under consideration in the acquisition policy arena. That changes are occurring at the same time as the overall acquisition reform effort is propitious, and serves to emphasize the integral importance and influence of environmental issues on the acquisition process. At a recent Defense Acquisition Board (DAB), discussion focused an elevating the DUSD(ES) from a special advisor status to full-fledged membership. When fully accomplished, this action will serve to focus the deserved level of attention on environmental issues.

Effort at the DoD level is also underway to improve the guidance relative to conduct of Programmatic Environmental Analyses (PEA) as prescribed in the 5000-series documents. More definitive information in this area should allay many program office concerns in their attempts to accomplish progressive management and decision making for their programs.

Environmental Ethic

The need for increased training, improved technical staff support, and the development of a DoD "environmental ethic" has long been recognized.[5] Several efforts in the DoD and the Services are underway to improve performance in these critical areas. Acquisition planners across the Services developed courses focusing on various aspects of environmental management and directed them at virtually every level of command, from flag/general officer rank, down to the individual worker.

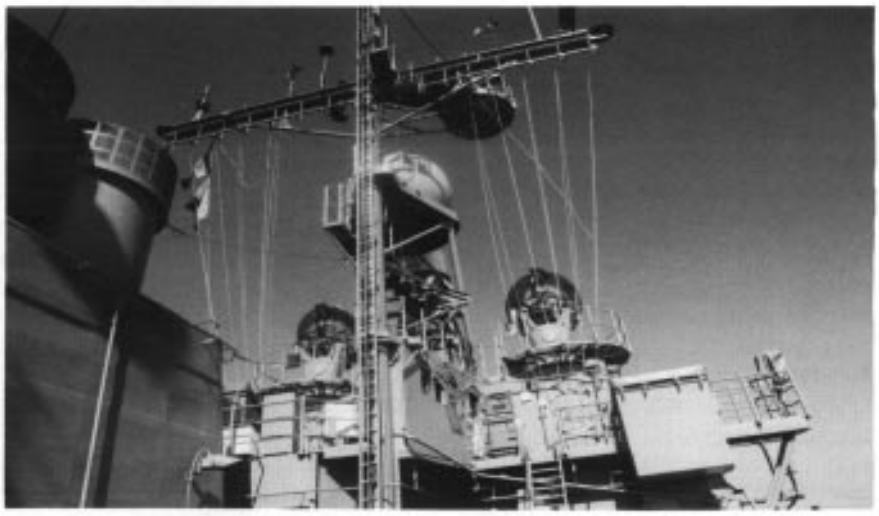
The acquisition community also introduced environmental concerns in acquisition training (environmental competence is recognized by the Acquisition Management Functional Board as a requirement), but coverage needs to be expanded. The goal of total integration, an "environmental ethic," throughout the acquisition process has yet to be achieved.

Technical Assistance

For specific technical assistance, DoD acquisition program managers now have several sources. The National Defense Center for Environmental Excellence, located in Johnstown, Pa., is a unique national asset focused on identifying and implementing environmentally acceptable solutions for virtually the entire gamut of industrial operations associated with acquisition. The emphasis is on pollution prevention. The

services offered include Baseline Surveys, Technical/Investment Analyses, Technology Demonstration, Technology Transition Services, and Information Services.[6] Current efforts focus on ozone-depleting chemicals (ODC), volatile organic compound (VOC) emissions, and reductions in heavy metal discharges — all top priority concerns for DoD acquisition program managers.

In addition, all the Services now operate established centers or staff elements with the expertise to assist with environmental requirements. Examples include the Air Force Center for Environmental Excellence, the Army's Acquisition Pollution Prevention Support Office, the Production Base Modernization Activity, and the various elements of the Naval Environmental Protection Support Services. A broader base of technical support is growing, and indications are that capabilities in this area will continue to increase. Program managers should be aggressive in searching out the help they need!



Environmental challenges and mitigation can range from the simple to the complex. Pictured on the left is a ship's rat guard; to the right is an example of radar and electromagnetic interference.

Summary

The DoD elevated environmental security, as an area of DoD policy and concern, to the Deputy Under Secretary level in March 1993. The components of environmental security are basic: clean-up, compliance, conservation and pollution prevention.[7] While affected to some degree by each component, evidence confirms that compliance and pollution prevention need to be prime concerns of the DoD acquisition program manager. Throughout the entire DoD acquisition community, action in the green aspect of acquisition reform is fast and furious, and is accelerating. The environment and its protection will continue to be high on the National agenda and a key component of acquisition reform.

Endnotes

1. Executive Order 12856, August 3, 1993, "Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements," *Federal Register*, Volume 58, No. 150, August 6, 1993.

2. Secretary of Defense Memorandum, "Comprehensive Pollution Prevention Strategy," 11 August 1994.

3. National Aerospace Standard (NAS) 411, "Hazardous Materials Management Program," Aerospace Industries Association, Washington, D.C., July 1993.

4. Office of the Department of Defense Inspector General, "Environmental Consequence Analyses of Major Defense Acquisition Programs," Audit Report No. 94-020, December 20, 1993.

5. Office of the Department of Defense Inspector General, "Hazardous Waste Minimization," Inspection Report No. 93-INS-06, December 28, 1992.

6. National Defense Center for Environmental Excellence, "Capabilities Summary," Fall 1993.

7. *Defense Issues*, "DoD's New Approach to Environmental Security," Vol. 8, No. 26, May 1993.