

ISO 14001:2015 GAP GUIDE

PREPARE FOR CHANGE AND ADAPT YOUR ENVIRONMENTAL MANAGEMENT SYSTEM TO MEET THE NEW REQUIREMENTS.

The BPIF are here to help with your transition to the new ISO 14001 standard and advise you of the key changes between the 2004 and 2015 version.

Following publication there will be a three-year transition period for organisations currently using ISO 14001:2004 to switch to ISO 14001:2015.

STRUCTURE OF ISO 14001:2015

The structure of ISO 14001:2015 follows the high level structure being applied to all new and revised ISO management system standards:

- Scope
- Normative References
- Terms and Definitions
- Context of the Organisation
- Leadership
- Planning
- Support
- Operation
- Performance Evaluation
- Continual Improvement

GAP ANALYSIS AND GUIDANCE

ISO 14001:2015 CLAUSES	ISO 14001:2004 CLAUSES	GUIDANCE
4 CONTEXT OF THE ORGANISATION		
4.1 Understanding the organisation and your context	New requirement	This new concept relates to the factors and conditions affecting organisational operation e.g. regulation, governance and environmental conditions.
4.2 Understanding the needs and expectations of interested parties	New requirement	Environmental conditions are the elements of the environment which can be affected by the organisation (air quality, water quality, land use, etc), or those which can affect the organisation (climate change, existing land contamination, etc). Consideration should be given to who the interested parties might be and what their relevant interests might be, e.g. employees, neighbours, customers, shareholders, board members, competitors, regulators, etc.
4.3 Determining the scope of the environmental management system	4.1 General requirements	The needs and expectations of interested parties can become compliance obligations. It is no longer permissible to exclude activities, products and services from the scope of the environmental management system which can have significant environmental aspects.

4.4	Environmental management system	4.1 General requirements	<p>Consideration needs to be given to a number of specified factors when establishing the scope of the EMS. The scope now needs to be available to interested parties.</p> <p>Consideration needs to be given to the knowledge referenced in clause 4.1 on the context of the organisation when establishing and maintaining the environmental management system.</p>
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5 LEADERSHIP

5.1	Leadership and commitment	New requirement	Top management of the organisation are now required to demonstrate leadership and commitment to the EMS in a number of specified ways.
5.2	Environmental policy	4.2 Environmental policy	The policy commitment to the prevention of pollution has been replaced by the need for an overarching policy commitment to the protection of the environment. This is to include the prevention of pollution and other issues (such as sustainable resource use, climate change mitigation and adaption, etc).
5.3	Organisational roles, responsibilities and authorities	4.4.1 Resources, roles, responsibility and authority	There is no longer a need for a management representative(s), however the roles, responsibilities and authorities previously assigned to them still need to be assigned within the organisation.

6 PLANNING

6.1	Actions to address risk associated with threats and opportunities		
6.1.1	General	New requirement	Consideration needs to be given to identified internal and external issues (4.1) and the needs and expectations of interested parties (4.2).
6.1.2	Significant environmental aspects	4.3.1 Environmental aspects	The identification of aspects and impacts now needs to consider a life cycle perspective. It has now been made explicit that this shall also take into account abnormal and emergency situations.
6.1.3	Compliance obligations	4.3.2 Legal and other requirements	'Compliance obligations' is the new term for 'legal and other' requirements – this gives equal weighting to non-legislative mandatory obligations and voluntary obligations as legal requirements. Documented information on compliance obligations must be maintained.
6.1.4	Risk associated with threats and opportunities	New requirement	This is a new concept which requires the identification of the risk (defined as the effect of uncertainty on objectives) associated with threats and opportunities that need to be addressed, whilst maintaining documented information on these.
6.1.5	Planning to take action	New requirement	The organisation needs to plan to take actions to address risk associated with threats and opportunities, significant environmental aspects, and compliance obligations.
6.2	Environmental objectives and planning to achieve them	4.3.3 Objectives, targets and programme(s)	

6.2.1 Environmental objectives	4.3.3 Objectives, targets and programme(s)	<p>The term 'targets' is no longer used, however the requirements for what would be known as targets are included in clause 6.2.2.</p> <p>When setting objectives consideration now needs to be given to the risk associated with threats and opportunities.</p> <p>The standard no longer includes a specific need to consider the views of interested parties when establishing objectives and targets, however these will still be covered if any compliance obligations (which do still need to be considered) have been set based on the needs and expectations of these interested parties.</p> <p>There are now specific requirements for the objectives to be monitored, communicated and updated as appropriate.</p>
6.2.2 Planning actions to achieve environmental objectives	4.3.3 Objectives, targets and programme(s)	<p>The term 'programme' is no longer used and the standard talks about planning how to achieve environmental objectives instead. This planning now needs to include details on what resources will be required and how the results will be achieved.</p>

7 SUPPORT

		4.4 Implementation and operation	
7.1 Resources		4.4.1 Resources, roles, responsibility and authority	No significant change.
7.2 Competence		4.4.2 Competence, training and awareness	<p>Persons now need to be competent if they can affect the organisation's environmental performance, rather than if they have the potential to cause a significant environmental impact.</p> <p>The need for training has been expanded into a wider need for taking actions to acquire necessary competences, which can also include mentoring, re-assignment or hiring / contracting activities.</p>
7.3 Awareness		4.4.2 Competence, training and awareness	This section has been rewritten, however the requirements are largely the same.
7.4 Communication		4.4.3 Communication	
7.4.1		4.4.3 Communication	<p>Requirements are now more prescriptive as to what the process for communications (internal and external) shall be. New requirements include the need to ensure that it is planned what, when, how and with who communications are made, and that the communications take into account compliance obligations, are consistent with the EMS and are reliable.</p>
7.4.2 Internal communication		4.4.3 Communication	<p>Communications on the EMS must be responded to.</p> <p>The communications process must enable persons working on the organisation's behalf to contribute to continual improvement.</p>

7.4.3	External communication	4.4.3 Communication	The previous requirement on deciding whether to communicate externally about significant environmental aspects is no longer specific referenced, as this is covered in the overall communications process detailed in 7.4.1.
7.5	Documented information	4.4.3 Documentation	
7.5.1	General	4.4.3 Documentation	The terms 'documents' and 'records' have been replaced by the term 'documented information'.
7.5.2	Creating and updating	4.4.5 Control of documentation 4.5.4 Control of records	Specific reference is now made to the need for ensuring appropriate format and media.
7.5.3	Creating and updating	4.4.5 Control of documentation 4.5.4 Control of records	Controls now need to ensure that documented information is adequately protected.
			The document control activities to be addressed by the system are specified.

8 OPERATION

		4.4 Implementation and operation	
8.1	Organisational planning and control	4.4.6 Operational control	Specific reference is now made to the planning of operations, as well as their control.
			Controls for processes should now be implemented to prevent deviation from compliance obligations, as well as from the policy and objectives.
			There are requirements for the control of planned changes and the review of unintended changes. It is now specified that outsourced processes are controlled or influenced.
			There are now requirements for determining procurement activities and considering requirements in design activities, taking into account a life cycle perspective.
8.2	Emergency preparedness and response	4.4.7 Emergency preparedness and response	There is now a specific requirement to prevent the occurrence of emergency situations and accidents.
			The review and revision of the procedure should now also take place in particular after tests.

9 PERFORMANCE EVALUATION

		4.5 Checking	
9.1	Monitoring, measurement, analysis and evaluation	4.5.1 Monitoring and measurement	
9.1.1	General	4.5.1 Monitoring and measurement	Greater detail on requirements for monitoring and measurement activities is specified.
			There is a specific requirement for the evaluation of performance and the use of indicators.

9.3 Management review

4.6 Management review

Changes in risk associated with threats and opportunities need to be considered during the management review process.

The consideration of the organisation's environmental performance now needs to include trends in nonconformities and corrective actions, monitoring and measurement results, conformity with compliance obligations and audit results.

Review is required of opportunities for continual improvement, rather than recommendations for improvement.

The outputs of the management review shall include any implications for the organisation's strategic direction.

10 IMPROVEMENT

10.1 Nonconformity and corrective action

4.5.3 Nonconformity, corrective action and preventive action

The specific requirement for preventive action has been removed – the entire management system should be a tool for preventive action.

Actions to prevent recurrence of nonconformities shall specifically include a determination of whether similar nonconformities exist or could potentially occur.

10.2 Continual Improvement

New requirement

The EMS needs to be continually improved in order to enhance environmental performance.

KEY CONCEPTS

Context of the Organisation

This is a new requirement to identify the internal and external factors and conditions that affect an organisation. Examples of internal issues could include an organisation's culture and capabilities, whilst external issues could include the effects of climate change, flooding and the availability of natural resources to name but a few.

The organisation needs to identify the stakeholders of its EMS and any requirements they have.

Tip: The context will influence the type and complexity of management system needed.

Leadership

There is an explicit and enhanced requirement for top management to demonstrate leadership and engage directly with the system. This is an enhanced requirement relating to top management.

Tip: Top management will need to take accountability for the effectiveness of the EMS and provide support and resources as necessary.

Strategic Environmental Management

Top management needs to ensure that the environmental policy and environmental objectives are consistent with the overall business strategy, and that management review outputs include any implications for the strategic direction of the organisation.

Tip: This will be new territory for ISO 14001 audits and in conjunction with the above, more audit time is expected to be devoted to discussions with the organisation's leaders.

Risk Associated with Threats and Opportunities

This is a new concept introduced in the 'planning' section of the standard. It requires the organisation to identify the effect of uncertainty ("risk") associated with its threats and opportunities and take action to address them.

Tip: Threats and opportunities can include the negative or positive impacts associated with environmental aspects or compliance obligations (previously known as legal or other requirements).

Life-cycle Perspective

The identification of aspects and impacts should now be done whilst considering a life cycle perspective, i.e. from raw material acquisition, or generation from natural resources to end-of-life treatment.

A life cycle perspective should also be taken when establishing value chain controls (see below).

Tip: A life-cycle perspective does not require a detailed life cycle assessment; a simple consideration of the life cycle stages which can be controlled or influenced would be sufficient.

Value Chain Control and Influence

Environmental requirements need to be established and considered throughout the procurement and design activities of the organisation's products and services.

Tip: Design processes would include development, delivery, use and end-of-life treatment.

Performance evaluation

There is a new emphasis on the need for evaluation in addition to the current requirements for measurement and analysis.

Tip: Evaluation is the interpretation of results and analysis. This is not new to managers but is made explicit in the standard for the first time. Processes may be well defined and effective, but do they yield optimum results? This may be a new challenge for internal audits.

AUDITING

The standard is written for the benefit of organisations, not auditors. Auditors will need to understand and recognise the extent and type of evidence that would be acceptable to confirm compliance to the 2015 requirements.

ISO 14001:2015 auditors will be engaging in dialogue with business leaders, seeking understanding and explanations from them about policy, strategy and environmental objectives, and ensuring these are compatible.

The audit experience from the client perspective is likely to be different, but revisions to the audit process will deliver more added value to the organisations being audited.

CONCLUSION

ISO 14001:2015 is expected to incorporate more business management terminology and concepts and will ensure that systems will be integrated into the organisation's overall business processes rather than being separate entities.

The changes will require effort from organisations to implement, however the overall result will be a more effective management system capable of achieving better results in environmental performance.

GAP ANALYSIS AND GUIDANCE

MAJOR DIFFERENCES IN TERMINOLOGY

You will find that some of the familiar terminology of ISO 14001:2004 has either been changed or removed. Here are the highlights, but please also refer to the key concepts above for additional guidance:

ISO 14001:2004 TERMINOLOGY	ISO 14001:2015 TERMINOLOGY
Legal and other requirements	Compliance obligations
Documents; records	Documented information
Management representative	Term not used
Preventive action	Term not used
Term not used	Leadership
Term not used	Risk
Term not used	Threat
Term not used	Opportunity
Term not used	Environmental conditions
Term not used	Life cycle