



# ISO14001: 2015

Understanding the International Standard



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# Introduction

For more than 20 years, the International Organization for Standardization (ISO) has regularly conducted a survey that is designed to provide an insight into the worldwide adoption of ISO's management system standards.

The latest edition of the survey (2014) reveals a healthy growth across the board for all management system standards as at the end of 2013, with a total of 1.6 million certifications globally. One out of five of these certifications were against ISO 14001:2004 and is only second to ISO 9001. Accordingly, any revision of ISO 14001 will have global implications based simply on numbers alone.

The 2015 release of ISO 14001, however, is set to be particularly significant as a result of fundamental changes to both its structure and its contents and consequently complying with the revised requirements will present new challenges for organizations and environment and audit professionals alike. Additionally, many ISO 14001 certified organizations also operate ISO 9001 compliant management systems. As a new version of ISO 9001 is also to be released in September those working in such organizations are set for a busy time.

On the plus side, as both standards now share a common foundation based on the requirements of Annex SL appendix 2, there is now a real opportunity for organizations to maximize the benefits obtained from the application of both management system standards.

## What has happened?

The CQI has closely followed the work of WG5 within SC1/TC207, and therefore, had a specific insight into not only the contents of the new version but also the intention behind the content.

The International Standard ISO 14001:2015 was published in September 2015.

There has been some debate internationally about the implications of the proposed changes for both quality and audit professionals. Some regard the changes as insignificant, taking the view that ISO 14001:2015 simply introduces a number of requirements that were previously implied in ISO 14001:2004 but that were not mandated.

The CQI and IRCA do not share this position. We remain convinced that those leading, managing and auditing Environmental Management Systems (EMS) will need to revise their current thinking and work in different ways in order to maintain organizational compliance.

## Management system requirements

The changes incorporated into ISO 14001:2015 can essentially be divided into those that have arisen as a result of the adoption of Annex SL as the basis for the standard and those that have arisen as a result of the desire to improve current environmental management specific requirements.

In the preface to the CQI and IRCA Annex SL Briefing Note (available free of charge to CQI and IRCA members), we describe the significance of the introduction of Annex

SL. Its adoption has implications for all those using management system standards, be they organizations, standard writers, auditors or training providers.

The new standard adopts the format and terminology of Annex SL. Annex SL was developed to ensure all future ISO management system standards would share a common format, irrespective of the specific discipline to which they relate. Annex SL prescribes a high level structure, identical core text, and common terms and definitions. This means that even when requirements are essentially unchanged between ISO 14001:2004 and ISO 14001:2015, these are frequently found under a new clause/sub-clause heading.

Life became easier for management system standard writers following the introduction of Annex SL. Building on a prescribed set of generic requirements, they are freed up to concentrate the bulk of their efforts on developing the discipline-specific requirements. Organizations should find life easier too. Those seeking to introduce multiple management systems (for example, Environmental, Health and Safety, Energy, Quality etc) will have less work to do because the structure and the core requirements of these will in future be identical. This will simplify both the initial implementation and the on-going maintenance of such systems.

For management system auditors, the adoption of Annex SL means that there is a generic set of requirements that need to be assessed when conducting management system audits, irrespective of the discipline that is being audited.

However, it should be noted that Annex SL requirements do not constitute a full management system on their own. They are just a core set of requirements that, together with discipline requirements constitute full management systems (environmental, energy, road safety, etc).

As a result of the above, we expect to see training organizations start to offer generic management system auditing courses as alternatives to their currently offered discipline-specific ones. Those auditors wishing to achieve sector-specific registration would then complete secondary modules to top up their earlier generic training.

IRCA has already advised IRCA-Approved Training Organizations to adopt such an approach when designing auditor transition training courses, and has reviewed and re-issued its core Foundation, Internal Auditor, Auditor/Lead Auditor and Auditor Conversion courses.

While the adoption of Annex SL will ultimately benefit all those who make active use of management system standards, in the short term there will be challenges for those concerned with establishing, implementing, managing or auditing against ISO 14001:2015. For those organizations already operating by the spirit of ISO 14001:2004, the transition to ISO 14001:2015 should prove relatively straightforward. Whereas, those organizations that are simply complying with the requirements of ISO 14001:2004 at the most basic level, will be required to address other issues, such as:



- The current culture and operation of the organization at all levels (strategic and operational), and over different time frames (long and short term)
- Its external and internal context
- The requirements of its interested parties
- A risk based approach for prioritizing actions.

Culture can be described as: “The way things are done around here.” However, this culture will have to be reviewed and revised if necessary, as a consequence of the adoption of Annex SL as the basis for ISO 14001:2015. This includes the behaviours of everyone connected with the environmental system, and, in particular, of those operating at the most senior level within an organization.

Culture change can be notoriously difficult to effect and it is primarily for this reason that the CQI and the IRCA have taken the position that ISO 14001:2015 represents such a significant revision.

### **Environmental specific requirements**

WG5 work did not start with a blank page, since Annex SL was already there, establishing the main framework: 10 clauses and several subclauses, some text in them and a set of terms and definitions.

Other inputs for the revision were:

- “Internal brainstorming” among WG5 members to find a common agreement on what the new edition should contain
- A users world-wide survey to determine their needs and expectations, and
- The 2004 edition, to build upon its requirements.

The main environmental specific additions were related to:

- A clear definition of the intended outcomes of the EMS
- Internal and external communication
- Life-cycle thinking
- Stress on the need to improve the environmental performance of the organization

### **ISO 14001:2004 to ISO 14001:2015**

In this section, the key changes are briefly described. We do not identify whether these came from Annex SL, from the WG5 or from both.

- **CONTEXT** (Clause 4) The organization is required to identify any external and internal issues that may impact their EMS’s to deliver its intended outcomes. These issues include any environmental condition that may affect or be affected by the organization. The organization is also required to determine the relevant needs and expectations of the relevant interested parties – that is, those individuals and organizations that can affect, be affected by, the organisation’s decisions or activities.
- **LEADERSHIP** (Clause 5). Top management are required to demonstrate that they engage in key EMS activities as opposed to simply ensuring that these activities occur. This means there is a need for top management to be actively involved in the operation of their EMS and be accountable for its results. The removal of references to the role of “management representative” reinforces the requirement to see the EMS embedded into strategic

and operational business operations, rather than being operated as an independent system in its own right with its own specific management structure and processes.

- **RISK-BASED THINKING** (Clause 6) The organization must evidence that they have determined, considered and, where necessary, taken action to address any risks and opportunities that may impact (either positively or negatively) their EMS's ability to deliver its intended outcomes. References to preventive action have disappeared. However, the core concept of identifying and addressing potential mistakes before they happen very much remains.
- **COMMUNICATION** (Clause 7) The communication with interested parties play an important role in an effective EMS. The organization needs to be sure that the information provided is consistent with the information generated within the EMS.
- **LIFE CYCLE THINKING** (Clause 8) The organization needs to a) ensure that products are designed in an environmentally friendly manner, b) determine environmental requirements on products and services to be purchase and communicate them to the suppliers, and c) provide relevant information to customers and users. There is no need to carry out a formal and thorough life cycle assessment.
- **IMPROVEMENT** (Clause 10) This has been an issue in the previous editions of ISO 14001; organisation's have to improve their EMS in order to improve

their environmental performance. Now, it is clear that these are two independent improvement actions: the performance can be improved by just operating the EMS, not necessarily improving it. A note also recognises that incremental (continual) improvement is not the only improvement profile. Improvement can also arise as a result of periodic breakthroughs, reactive change or innovation.

- **TERMINOLOGY** (Clause 3) This clause contains the terms and definitions used in the standard, whether coming from Annex SL or added by WG5. However, ISO has made available the terms and definitions available online: [www.iso.org/obp](http://www.iso.org/obp).
- **ANNEXES** ISO 14001:2015 has two informative annexes. Annex A provides guidance on use of the standard; in particular, Clause A3 provides guidance on the use of common English terms throughout the standard. Annex B provides the correspondence between the 2015 and 2004 editions.
- **DOCUMENTED INFORMATION** References to requirements for documents and records have been replaced by the term "documented Information", which has to be "maintained" in the case of documents and "retained" in the case of records.
- **CLARITY** There has been a conscious attempt to revisit the wording of the standard with a view to making the requirements easier to understand and to aid its translation.

### Organizations do not need to:

**REMOVE** their management representatives. While there is no requirement in ISO 14001:2015 for a management representative, this does not prevent organizations from choosing to retain this role if they so wish. Be aware, however, that some of the duties (responsibilities) traditionally assigned to the management representative by top management will, in future, need to be undertaken directly by top management themselves.

- **RELEGATE** their manuals and documented procedures to the dustbin. While ISO 14001:2015 has no requirement for organizations to have and use either an environmental manual or documented procedures, if this documentation is in place, needed and working well, there is no need for it to be withdrawn.
- **RENUMBER** or rename existing EMS documentation to correspond to the new clause references. Although an organization may choose to carry out a renumbering/renaming exercise, it is up to them to determine whether the benefits gained from renumbering/renaming will exceed the effort involved in actioning the change.
- **RESTRUCTURE** their management systems to follow the sequence of requirements as set out in the standard. Providing all of the requirements contained in the standard are met, the organisation's EMS will be compliant.

- **REFRESH** existing practices to use the new terms and definitions contained within 14001:2015. Once again, organizations are free to make the judgement as to whether this effort would be worthwhile. If organizations are more comfortable using their own terminology, for example, “records” instead of “documented information”, or “supplier” rather than “external provider”, then this is perfectly acceptable.

### Interpretation

The interpretations of requirements contained within this document are those of the CQI and IRCA – other organizations may interpret the requirements of ISO 14001:2015 differently. As such, this document should not be viewed as the definitive reference source for this International Standard. Indeed, only documentation sourced by ISO/TC 176 can fulfil this purpose.

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