

# ISO 14001:2015 TRANSITION GUIDANCE



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**This document provides an overview of the key changes between the 2004 and 2015 version of ISO 14001 – there are several new requirements in addition to changes to key definitions. You will need to prepare for change and adapt your environmental management system to meet the new requirements and transitional timelines.**

## ISO 14001:2015 TIMESCALES

ISO 14001:2015 was published 15 September 2015 and is the replacement for ISO 14001:2004. For organisations currently using ISO 14001:2004 there will be a three-year transition period 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:

1. Scope
2. Normative References
3. Terms and Definitions
4. Context of the Organisation
5. Leadership
6. Planning
7. Support
8. Operation
9. Performance Evaluation
10. Improvement

## WE ARE HERE TO HELP

We will help you understand the changes, interpret the new concepts and act on the implications.

Keep updated with the changes at [www.nqa.com/change](http://www.nqa.com/change)

Please get in touch if you have any questions – call **0800 052 2424**.

Contact us:  
**0800 052 2424**  
[info@nqa.com](mailto:info@nqa.com)  
[www.nqa.com/change](http://www.nqa.com/change)

**There is a three-year transition period for organisations currently using ISO 14001:2004 to switch to ISO 14001:2015**

# GAP ANALYSIS AND GUIDANCE

## ISO 14001:2015 CLAUSES

## ISO 14001:2004 CLAUSES

## GUIDANCE

### 4 Context of the organisation

4.1	Understanding the organisation and its context	<b>New requirement!</b>	<p>This new concept relates to the factors and conditions affecting organisational operation e.g. regulation, governance and environmental conditions.</p> <p>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.).</p>
4.2	Understanding the needs and expectations of interested parties	<b>New requirement!</b>	<p>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.</p> <p>The needs and expectations of interested parties can become compliance obligations.</p>
4.3	Determining the scope of the environmental management system	<b>4.1 General requirements</b>	<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>It is not permissible to exclude activities, products and services from the control of the environmental management system if included within the identified scope.</p>
4.4	Environmental management system	<b>4.1 General requirements</b>	<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>

### 5 Leadership

5.1	Leadership and commitment	<b>New requirement!</b>	<p>Top management of the organisation are now required to demonstrate leadership and commitment to the EMS in a number of specified ways.</p>
5.2	Environmental policy	<b>4.2 Environmental policy</b>	<p>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, which is to include the prevention of pollution and other issues (such as sustainable resource use, climate change mitigation and adaptation, etc.).</p>
5.3	Organizational roles, responsibilities and authorities	<b>4.4.1 Resources, roles, responsibility and authority</b>	<p>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.</p>

### 6 Planning

6.1	Actions to address risks and opportunities (title only)		
6.1.1	General	<b>New requirement!</b>	<p>Consideration needs to be given to its identified internal and external issues (4.1) and the needs and expectations of its interested parties (4.2) during planning.</p> <p>A new concept of "risks and opportunities" is introduced. Planning now requires the identification of the risks (defined as the effect of uncertainty on objectives) and opportunities related to environmental aspects, compliance obligations and other issues and requirements.</p>
6.1.2	Environmental aspects	<b>4.3.1 Environmental aspects</b>	<p>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.</p>
6.1.3	Compliance obligations	<b>4.3.2 Legal and other requirements</b>	<p>'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.</p>
6.1.4	Planning action	<b>New requirement!</b>	<p>The organisation needs to plan to take actions to address significant environmental aspects, compliance obligations and risks and opportunities.</p>

## 6 Planning

6.2	Environmental objectives and planning to achieve them (title only)	<b>4.3.3 Objectives, targets and programme(s)</b>	
6.2.1	Environmental objectives	<b>4.3.3 Objectives, targets and programme(s)</b>	<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 identified risks 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	<b>4.3.3 Objectives, targets and programme(s)</b>	<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

7.1	Resources	<b>4.4.1 Resources, roles, responsibility and authority</b>	No significant change.
7.2	Competence	<b>4.4.2 Competence, training and awareness</b>	<p>Persons now need to be competent if they can affect the organisation's environmental performance or ability to fulfil its compliance obligations, 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	<b>4.4.2 Competence, training and awareness</b>	This section has been rewritten, however the requirements are largely the same.
7.4	Communication (title only)	<b>4.4.3 Communication</b>	
7.4.1	General	<b>4.4.3 Communication</b>	<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> <p>Communications on the EMS must be responded to.</p>
7.4.2	Internal communication	<b>4.4.3 Communication</b>	The communications process must enable persons working on the organisation's behalf to contribute to continual improvement.
7.4.3	External communication	<b>4.4.3 Communication</b>	The previous requirement on deciding whether to communicate externally about significant environmental aspects is no longer specifically referenced, as this is covered in the overall communications process detailed in 7.4.1.
7.5	Documented information	<b>4.4.4 Documentation</b>	
7.5.1	General (title only)	<b>4.4.4 Documentation</b>	The terms 'documents' and 'records' have been replaced by the term 'documented information'.
7.5.2	Creating and updating	<b>4.4.5 Control of documentation</b>	Specific reference is now made to the need for ensuring appropriate format and media.
		<b>4.5.4 Control of records</b>	
7.5.3	Control of documented information	<b>4.4.5 Control of documentation</b>	Controls now need to ensure that documented information is adequately protected.
		<b>4.5.4 Control of records</b>	The document control activities to be addressed by the system are specified.

## 8 Operation

8.1	Operational planning and control	<b>4.4.6 Operational control</b>	<p>Specific reference is now made to the planning of operations, as well as their control.</p> <p>Controls for processes should now be implemented to prevent deviation from compliance obligations, as well as from the policy and objectives.</p> <p>There are requirements for the control of planned changes and the review of unintended changes. It is now specified that outsourced processes are to be controlled or influenced.</p> <p>There is now a need to determine requirements for procurement activities and considering requirements in design activities, consider the need to provide information on product / service delivery, use and end-of-life treatment, taking into account a life cycle perspective.</p>
8.2	Emergency preparedness and response	<b>4.4.7 Emergency preparedness and response</b>	<p>There is now a specific requirement to plan actions to prevent or mitigate the impacts of an emergency situation.</p> <p>The review and revision of the procedure should now also take place in particular after tests.</p>

## 9 Performance evaluation

9.1	Monitoring, measurement, analysis and evaluation (title only)	<b>4.5.1 Monitoring and measurement (title only)</b>	
9.1.1	General	<b>4.5.1 Monitoring and measurement</b>	<p>Greater detail on requirements for monitoring and measurement activities is specified.</p> <p>There is a specific requirement for the evaluation of performance and the use of indicators.</p>
9.1.2	Evaluation of compliance	<b>4.5.2 Evaluation of compliance</b>	<p>There is now a requirement to maintain knowledge and understanding of the organisation's compliance status.</p>
9.2	Internal audit (title only)	<b>4.5.5 Internal audit</b>	
9.2.1	General	<b>4.5.5 Internal audit</b>	No significant change.
9.2.2	Internal audit programme	<b>4.5.5 Internal audit</b>	<p>The internal audit programme shall take into consideration changes affecting the organisation.</p>
9.3	Management review	<b>4.6 Management review</b>	<p>Changes in external and internal issues, the needs and expectations of interested parties, and risks and opportunities now need to be considered during the management review process.</p> <p>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.</p> <p>Review is required of opportunities for continual improvement, rather than recommendations for improvement.</p> <p>The outputs of the management review shall now include opportunities to improve the integration of the environmental management system with other business processes and any implications for the organisation's strategic direction.</p>

## 10 Improvement

10.1	General		<p>The organisation needs to determine opportunities for improvement and implement actions needed to achieve the intended outcomes of the environmental management system.</p>
10.2	Nonconformity and corrective action	<b>4.5.3 Nonconformity, corrective action and preventive action</b>	<p>The specific requirement for preventive action has been removed. The entire management system should be a tool for preventive action, and the concept of preventative action is now captured in clauses 4.1 Understanding the organisation and its context and 6.1 Actions to address risks and opportunities.</p> <p>Actions to prevent recurrence of nonconformities shall specifically include a determination of whether similar nonconformities exist or could potentially occur.</p>
10.3	Continual improvement	<b>New requirement!</b>	<p>The EMS needs to be continually improved in order to enhance environmental performance.</p>

# 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 also needs to identify the interested parties to the EMS and any requirements they have.

### Tip:

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

## Leadership

There is an explicit requirement for top management to demonstrate leadership and commitment relating to 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 may need to be devoted to discussions with the organisation's leaders.**

## Risk and Opportunities

This is a new concept introduced in the 'planning' section of the standard. It requires the organisation to identify the risks and opportunities associated with aspects and impacts, compliance obligations (previously known as legal and other requirements), and other necessary issues or requirements, and take action to address them.

### Tip:

**"Risk and opportunities" can be thought of as potential adverse deviations from the expected (threats) or potential beneficial deviations from the expected (opportunities).**

## 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 need to 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 for the procurement of products and services and for consideration during design activities for 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 monitoring, 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 conformity 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 because of this, but the end result would be more value being able to be added to the organisation as a whole from the audit process.

## CONCLUSION

ISO 14001:2015 incorporates 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 improvement.

# 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:

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



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### Contact us

NQA, Warwick House, Houghton Hall Park, Houghton Regis, Dunstable, LU5 5ZX, United Kingdom  
**0800 052 2424** [info@nqa.com](mailto:info@nqa.com) [www.nqa.com/change](http://www.nqa.com/change)