ASQ Technical Communities Conference
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Anticipated Revisions to ISO 14001

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Introduction

- ## Who am I?

  - Member of U.S. TAG to TC 207 and former TAG Secretary

  - Chair of the Z1 Audit Subcommittee

  - Observer in the TC 207 International Meetings in Rochester, NY and Panama

  - U.S. Expert for ISO 45001 – the new OH&S ISO Management System Standard

  - Part of the OHSAS 18001 Project Group that wrote OHSAS 18001 & OHSAS 18002

Topics Covered

- Current Revision Status
- Discussion of Impacts of New Requirements
- Suggestions for What to Do Now

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What is ISO 14001?

- Originally published in 1996, revised in 2004

- Title – *Environmental management systems – Requirements with guidance for use*

- Part of a "family" of ISO management system standards (currently 33) – *several of which focus on determining the environmental footprint of organizations based on a "life cycle perspective"*

http://www.iso.org/iso/home/standards_development/list_of_iso_technical_committees .htm

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How is ISO 14001 Used?

- Global Standard – used in 155 countries (85 of which are Participating Members of TC 207)

- Provides Basis for 3rd Party Certification

- Referenced in Contracts & Other Certification Schemes – *increasingly a supply chain requirement*

Reference – ISO 2010 Survey

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ISO 14001 Revision Status

- Started in February 2012

- Currently comments are being developed on a Draft International Standard (DIS) – due to ISO on 11/28/2014

- Publication scheduled for June/July 2015

The standard is already being referred to as ISO 14001:2015

2 Drivers for This Revision

1. Must conform with the ISO "Annex SL" directive

2. Address the 11 Themes identified in the "Future Challenges" report

Annex SL Impacts

- **Purpose** – Structure all ISO standards the same to facilitate management system integration

- Results in three types of changes to ISO 14001 –
  - **Structural Changes** resulting from <u>required</u> high level structure (common top-level elements)
  - **Definitional Changes** resulting from <u>mandatory</u> definitions
  - **Substantive Changes** resulting from <u>identical</u> requirements (common "shall" clauses)

NOTE - ISO Directives are available to the public on the ISO website at www.iso.org in the "Standards Development" area. Link is also at www.ISO14001expert.com under Resources tab.

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"Structural" Changes

ISO 14001:2004	ISO 14001:xxxx
• **6 Top-Level Elements** (Based on PDCA) – General – Policy – Planning – Implementation & Operation – Checking – Management Review	• **7 Top-Level Elements** (New "Arrangement") – Context of the Organization – Leadership – Planning – Support – Operation – Performance Evaluation – Improvement

"Structural" Changes

ISO 14001:2004	ISO 14001:xxxx

- **6 Top-Level Elements** (Based on PDCA)
  - General
  - Policy
  - Planning
  - Implementation & Operation
  - Checking
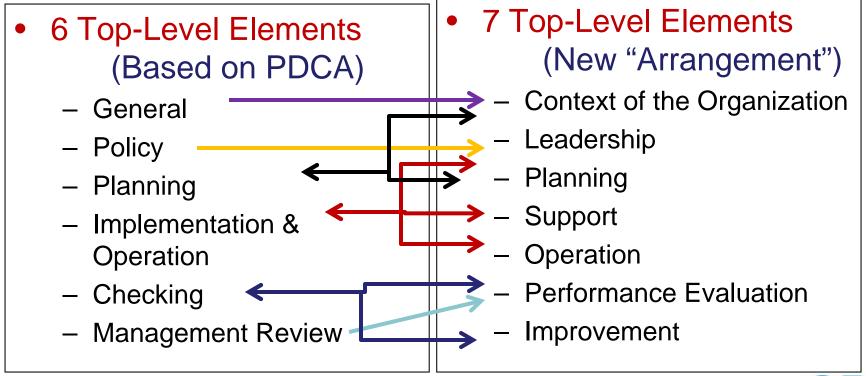 - Management Review

- **7 Top-Level Elements** (New "Arrangement")
  - Context of the Organization
  - Leadership
  - Planning
  - Support
  - Operation
  - Performance Evaluation
  - Improvement

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Impact of the Future Challenges Report

- Eleven Themes were identified in the report – with ISO 14001 revision recommendations for each theme

- Examples –
  - Address "demonstration of commitment to compliance"
  - Strengthen linkage to strategic planning
  - Address life-cycle thinking

NOTE - Link to download a copy of this report can be found on www.ISO14001expert.com under the Resources tab.

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Impacts of the Revision

10 Areas of Significant Impacts

1. Expansion in EMS Coverage & Scope

2. Required Interactions with External Parties

3. New Requirements for Leadership Engagement

4. Expanded Legal Compliance Requirements

5. Need for Risk-Based Planning and Controls

6. New Documentation Requirements

7. Expanded Operational Control Requirements

8. Changes in Competence & Awareness Requirements

9. Impacts on the Internal Audit Program

10. Increased Certification Costs

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Key Revision Impact #1

Expansion of EMS Scope

Scope Requirement #1

ISO 14001:2004	ISO 14001:2015
The organization shall define and document the scope of its environmental management system.	When determining this scope, the organization shall consider: • the external and internal issues referred to in 4.1; • the compliance obligations referred to in 4.2; • its organizational unit(s), function(s), and physical boundaries; • its activities, products and services; • its authority and ability to exercise control and influence.

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Scope Requirement #2

Once the scope is defined, activities, products and services that can have significant environmental aspects shall be included within the scope of the environmental management system.

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Once the scope is defined, activities, products and services that can have significant environmental aspects shall be included within the scope of the environmental management system (EMS).

Translation – An organization can NOT exclude activities, products and services from its scope of certification if they should be included (i.e. they are within the "functions" of the organization that is being certified).

Scope Requirement #3

The organization shall ensure that <u>outsourced processes</u> are controlled or influenced. The type and degree of control or influence to be applied to these processes shall be defined within the EMS.

Outsourced processes are defined as processes where an arrangement is made for an external organization to perform part of an organization's function or process. (3.3.2)

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Translation – A process is <u>NOT</u> excluded from the EMS simply because it is performed by someone else.

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Scope Requirement #4

The scope shall be maintained as documented information and be available to interested parties.

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The scope shall be maintained as documented information and be available to interested parties.

Translation – The organization is required to make its third-party certificate, with a clear statement of _the boundaries, products, services and activities covered_, available to the public.

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Key Revision Impact #5

Need for Risk-Based Planning & Controls

Requirement for Risk-Based Planning

ISO 14001:2004	ISO 14001:2015
None	Clause 6.1.4 – Determine the risk that needs to be addressed to give assurance that the EMS can achieve its intended outcomes, prevent undesired effects and achieve continual improvement

Clause 6.1.5 – Plan to take actions to address the risks that have been identified and how it will evaluate the effectiveness of these actions |

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What does this mean?

Translation

You must assess the risks related to the following –

- Meeting your EMS compliance obligations
- Managing your environmental aspects
- Dealing with risk associated with environmental conditions

For any risks that are identified, the organization must develop "risk action plans" and determine how it will evaluate the effectiveness of any actions taken to address these risks.

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Key Revision Impact #7

Expansion of Operational Control Requirements

Expansion of Operational Controls #1

ISO 14001:2004	ISO 14001:2015
Clause 4.4.6 - The organization shall identify and plan those operations that are associated with the identified significant environmental aspects …in order to ensure that they are carried out under specified conditions, by • a) establishing, implementing and maintaining a documented procedure(s) to control situations where their absence could lead to deviation from the environmental policy, objectives and targets….	Clause 8.1 – The organization shall plan, implement and control the processes needed to meet EMS requirements, and to implement the actions determined in 6.1 and 6.2,

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What does this mean?

Translation

You must implement those "risk action plans" you developed to meet the requirements set out in 6.1.5

Criteria must be established for determining whether the controls implemented are effective.

Note – The controls required may include engineering controls as well as administrative controls (e.g. procedures).

Expansion of Operational Controls #2

The organization shall control planned changes and review the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary.

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Translation – The organization shall implement "management of change" procedures.

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Outsourced processes are defined as processes where an arrangement is made for an external organization to perform part of an organization's function or process. (3.3.2)

Expansion of Operational Controls #3

The organization shall ensure that <u>outsourced processes</u> are controlled or influenced. The type and degree of control or influence to be applied to these processes shall be defined within the EMS.

Outsourced processes are defined as processes where an arrangement is made for an external organization to perform part of an organization's function or process. (3.3.2)

Translation – The organization has to implement controls for its outsourced processes.

Expansion of Operational Controls #4

ISO 14001:2004	ISO 14001:2015
Clause 4.4.6 - The organization shall establish, implement and maintain procedures related to the identified significant aspects of goods and services used by the organization [to ensure they are carried out under specified conditions]	Clause 8.1 – Consistent with a life cycle perspective, the organization shall … determine environmental requirements for the procurement of products and services, as appropriate

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Translation

Organizations will be required to expand their procurement controls beyond those related to significant environmental aspects to those needed from a "life cycle perspective"

Expansion of Operational Controls #5

Consistent with a life cycle perspective, the organization shall: ….b) establish controls to ensure that environmental requirements are considered in the design process for the development, delivery, use and end-of-life treatment of its products and services, as appropriate

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Expansion of Operational Controls #5

Consistent with a life cycle perspective, the organization shall: ….b) establish controls to ensure that environmental requirements are considered in the design process for the development, delivery, use and end-of-life treatment of its products and services, as appropriate

Translation – Organization will be required to undertake "environmentally conscious design"

(See ISO 14006:2011 - *Environmental management systems -- Guidelines for incorporating ecodesign*)

Expansion of Operational Controls #6

ISO 14001:2004	ISO 14001:2015
Clause 4.4.6 - The organization shall establish, implement and maintain procedures related to the identified significant aspects of goods and services used by the organization and communicate applicable procedures and requirements to suppliers, including contractors	Clause 8.1 – Consistent with a life cycle perspective, the organization shall … c) communicate relevant environmental requirement(s) to external providers, including contractors; and d) consider the need to provide information about potential significant environmental impacts during the delivery of the products or services and during use and end-of-life treatment of the product.

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Translation

Organizations will be required to expand their communication of information about significant environmental aspects to external parties – particularly information about environmental impacts associated with the uses of their products [or services] and any end-of-life treatment requirements for preventing environmental impacts.

Certification Impacts

- Publication scheduled for June/July 2015 (maybe later)

- Transition Period already set for 3 years for existing certification

- New certifications have to conform to the new requirements (after 18 months)

There will be increased certification costs.

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What should you do now?

What should you do now?

1. Review the ISO/DIS 14001 and evaluate the impacts the revision changes may have on your organization

2. Put together a prioritized action plan for addressing the proposed changes and determine the resources that you will need to make the transition

3. Start talking to senior management <u>now</u> about the resources you will need and when they can be available (if you wait until 2017 to start it may be too late)

   For more information about the other revision impacts and a tool that can help you with your analysis, go to www.iso14001expert.com

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Contact Information

- Blogs
    - www.managementsystemexpert.com
    - www.iso14001expert.com

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