

# Summary of ISO 14001:2015 New and Changed Requirements

This is a summary of the new and changed ISO 14001:2015 requirements compared to ISO 14001:2004.

## 4. Context of the Organization

### 4.1 Changes – Understanding the Organization and its Context

New requirement on context of organization. High-level, conceptual understanding of the important issues that affect the way the organization manages its environmental responsibilities.

These issues are:

- important topics,
- problems for debate and discussion, or
- changing circumstances that affect ability to achieve intended outcomes.

Issues affecting the intended outcomes may be:

External: cultural, social, political, legal, regulatory, financial, technological, economic, natural, and competitive issues, whether local, regional, national, or international.

Internal: activities, products, services, strategic direction, culture, and capabilities (i.e., people, knowledge, processes, and systems).

Issues can result in risks and opportunities.

Environmental conditions that may affect, or be affected by, the organization include:

- climate; air quality; water quality;
- land use; existing contamination;
- natural resource availability; biodiversity.

### 4.2 Changes – Understanding the Needs and Expectations of Interested parties

- New dedicated clause on interested parties
- Must decide which needs and expectations become “compliance obligations” (see 6.1.3)  
For example, all relevant:
  - Laws, regulations, permits, and licenses;
  - Contracts and corporate requirements;
  - Requirements of relevant interested parties the organization decides to comply with, and which become organizational requirements.

### 4.3 Changes – Determining the Scope of the Environmental Management System

- Defining and documenting the scope is not new
- What is new is adding specific topics to consider when determining the scope
- Clarifies physical and organizational boundaries (scope) for application of EMS (especially if part of a larger organization)

Freedom and flexibility to define boundaries:

- May choose to implement ISO 14001 throughout organization, or only in specific parts
- EMS credibility depends on boundary choice

## Summary of ISO 14001:2015 New and Changed Requirements

- Do not exclude activities, products, services, or facilities with significant environmental aspects or to evade compliance obligations
- Adds that scope must be available to interested parties
- Scope is a factual and representative statement that should not mislead interested parties

### 4.4 Changes – Environmental Management System

- Replaces old 4.1 on general requirements
- Adds to include needed processes and their interactions
- Adds achieving intended outcomes and enhancing environmental performance
- Adds considering knowledge from 4.1 and 4.2 when establishing and maintaining EMS

Organization retains authority and accountability to decide how it will meet ISO 14001 requirements for integration with business functions and inclusion of issues and interested party requirements.

## 5. Leadership

### 5.1 Changes - Leadership and Commitment

- New clause on leadership and commitment
- Identifies actions for top management's personal involvement, direction, and support
- Adds to ensure policy and objectives are compatible with "strategic direction"
- Adds to ensure EMS requirements integrated into business processes
- Top management is critical to EMS success
- May delegate some responsibilities, but still accountable to ensure they are performed
- Adds to Annex SL that top management must take accountability for EMS effectiveness
- Expect more top management questions from auditors

### 5.2 Changes – Policy

- Replaces old clause 4.2 on policy
- Adds environmental policy must be appropriate to purpose and context of organization
- Use of "target" dropped; captured in "objective"
- Adds NOTE on environmental commitments
- Introduces new term "compliance obligations"
- Adds to enhance environmental performance
- Policy was to be made available to public; now must make it available to interested parties

### 5.3 Changes – Organizational Roles, Responsibilities, and Authorities

- Replaces old clause 4.4.1 on resources, roles, responsibility, and authority
- Resources are now covered in 7.1, Resources
- Drops need for Management Representative (could retain for reporting on EMS performance)
- Old duties can be spread among top managers
- Registrars will still need a nominated contact

# Summary of ISO 14001:2015 New and Changed Requirements

## 6. Planning

### 6.1 Actions to Address Risks and Opportunities

#### 6.1.1 Changes - General

- New clause on risks and opportunities
- Adds to consider internal and external issues from 4.1
- Adds to consider requirements of interested parties from 4.2
- Adds to document risks and opportunities
- Must document processes for 6.1 to extent needed for confidence carried out as planned
- Auditors don't determine risks or opportunities; they assess application of risk methodology

ISO 14001:2004 in 4.1 - 4.6 does not mention "risk". ISO 14001:2015 in 4 - 10 mentions "risk" 8 times.

#### 6.1.2 Changes - Environmental Aspects

- Replaces 4.3.1 on Environmental Aspects.
- Adds reference to "life cycle perspective"
- Adds to consider "abnormal conditions" and "reasonably foreseeable emergency situations"
- Adds to communicate significant aspects within organization, as appropriate.
- Adds use of "established criteria" to determine significant aspects
- Adds to document criteria used to determine aspects
- Adds NOTE on adverse impacts (threats) and beneficial impacts (opportunities)

#### 6.1.3 Changes - Compliance Obligations

- Replaces 4.3.2 on Legal and other Requirements.
- Adds to document compliance obligations

#### 6.1.4 Changes - Planning Action

- 6.1.4 on Planning Action is a new clause
- Plan actions to address risks and opportunities
- Adds to integrate and implement actions into EMS and business processes.
- Includes technological options, and financial, operational, business requirements from old 4.3.3

### 6.2 Changes - Environmental Objectives and Planning to Achieve Them

- Replaces 4.3.3 - Objectives, Targets, Programs
- Use of "target" dropped; captured in "objective"
- Adds to consider risks and opportunities
- Uses the new term "compliance obligations"
- Adds more focus on specific planning steps to achieve environmental objectives (what resources will be required and how results will be evaluated)
- Adds indicators for monitoring progress
- Adds integration of actions into business processes

# Summary of ISO 14001:2015 New and Changed Requirements

## 7. Support

### 7.1 Changes - Resources

- Accepts Annex SL text without change
- Replaces old clause 4.4.1 on Resources, Roles, Responsibility, and Authority
- Management Representative not required
- Resources can include:
  - human resources (specialized skills and knowledge);
  - natural resources; technology; financial resources;
  - infrastructure (buildings, equipment, underground tanks, and drainage system).

### 7.2 Changes – Competence

- Replaces “Competence” part of old 4.4.2 on Competence, Training, and Awareness
- Changes from persons must be competent if can cause an environmental impact, to if they affect environmental performance or ability to fulfill compliance requirements
- Adds NOTE on examples of actions (training, mentoring, reassignment, hiring, contracting)

Competence is defined in 3.3.1 as ability to apply knowledge and skills to achieve intended results.

### 7.3 Changes - Awareness

- Elevates “Awareness” in 4.4.2 on Competence, Training, and Awareness to its own clause
- Adds awareness of the benefits of enhanced environmental performance
- Policy awareness means aware of its existence, purpose, and role in meeting commitments
- Does not mean that they have personal copy of policy or that it needs to be memorized

### 7.4 Changes - Communication

- Replaces old 4.4.3 on Communication
- More explicit: What, When, Whom, and How
- Adds need for consistent and reliable information
- Adds to communicate changes to system
- Adds to communicate per communications process and compliance obligations
- Adds to keep records of communications as evidence, as appropriate

### 7.5 Documented Information

#### 7.5.1 Changes - General

- Replaces parts of old 4.4.4 on Documentation
- Adds NOTE that extent of documented information for system can differ from one organization to another
- No longer documented:
  - Targets (old 4.4.4.a) - Now Objectives
  - Roles, Responsibilities, and Authorities (old 4.4.1)
  - Description of main EMS elements (old 4.4.4.c)
- If working well, no need to withdraw documents

# Summary of ISO 14001:2015 New and Changed Requirements

## 7.5.2 Changes - Creating and Updating

- Uses Annex SL text without change
- Relates to old clause 4.4.5 on Control of Documents and 4.5.4 on Control of Records
- Adds description, format, and media examples

## 7.5.3 Changes - Control of Documented Information

- Uses Annex SL text without change
- Replaces old 4.4.5 on Control of Documents
- Includes requirements from old 4.5.4 on Control of Records
- Adds examples of the need for protection:
  - loss of confidentiality
  - improper use
  - loss of integrity
- Adds NOTE on types of access to documented information

Prepare to audit EMS with limited documentation.

Rely on interviews and observation of activities.

## 8. Operation

### 8.1 Changes - Operational Planning and Control

- Replaces old 4.4.6 on Operational Control
- Introduces the term “life cycle perspective”
- Adds to determine environmental requirements for procurement of products and services
- Adds to consider providing information on potential significant environmental impacts during
  - transportation or delivery;
  - use and end-of-life treatment;
  - final disposal of products and services.
- Introduces the term “outsourced” process and need to define extent of control or influence
- Adds to control “planned” changes and review consequences of “unintended” change, and to act to mitigate adverse effects
- Adds NOTE that controls can include engineering controls and procedures, and can be implemented following a hierarchy (e.g., elimination, substitution, administrative)

### 8.2 Changes - Emergency Preparedness and Response

- Basically, the same as old clause 4.4.7 on Emergency Preparedness and Response
- Adds to act to prevent or mitigate consequences of emergency situations, appropriate to magnitude of emergency and potential environmental impact
- Adds to provide relevant information and training to relevant interested parties and persons working under organization’s control
- Relocates identifying potential emergencies and accidents to 6.1.1 and 6.1.2.b under Actions to Address Risk and Opportunities

# Summary of ISO 14001:2015 New and Changed Requirements

## 9. Performance Evaluation

### 9.1 Monitoring, Measurement, Analysis, and Evaluation

#### 9.1.1 Changes – General

- Replaces old 4.5.1 on Monitoring and Measurement
- Adds to communicate environmental performance and effectiveness of EMS
- Adds to determine criteria for evaluating environmental performance (and indicators)
- Adds “what” and “when” for monitoring and measurement
- Adds “when” for analysis and evaluation

#### 9.1.2 Changes - Evaluation of Compliance

- Replaces old 4.5.2 on Evaluation of Compliance
- Previously was compliance with legal and other requirements; now “compliance obligations”
- Adds to determine frequency of evaluations
- Adds to maintain knowledge and understanding of compliance status
- Clarifies documented information is retained as evidence of compliance evaluation results

### 9.2 Changes - Internal Audit

- Replaces old clause 4.5.5 on Internal Audits
- Now considers changes affecting organization
- Revised from determining if EMS “properly” implemented to “effectively” implemented
- Clarifies audit frequency and audit methods are planned for “audit program”; audit criteria and audit scope are defined for “each audit”
- Adds need for documented information as evidence of audit program implementation

### 9.3 Changes - Management Review

- Replaces old 4.6 on Management Review
- Moves follow-up actions to top of review inputs
- Adds changes in internal and external issues
- Adds changes in needs and expectations of interested parties
- Adds changes in risks and opportunities
- Adds environmental performance to include trends
- Adds adequacy of resources to maintain EMS
- Drops review of “preventive action” for “risks”
- Adds output on conclusions on EMS effectiveness
- Adds output on decisions on resource needs
- Adds output on actions if objectives not achieved
- Adds output on implications for strategic direction

# Summary of ISO 14001:2015 New and Changed Requirements

## 10. Improvement

### 10.1 Changes – General

New clause. Improvements determined by:

- monitoring, measuring, analysis, evaluation (9.1)
- internal audit (9.2)
- management review (9.3)

Take actions to achieve “intended outcomes” referenced in 4.1, 4.4, 5.1.f, and 6.1.1.

### 10.2 Changes - Nonconformity and Corrective Action

- Replaces old 4.5.3 on Nonconformity, Corrective Action, and Preventive Action
- Drops need for separate preventive action
- Preventive concept covered by 4.1 and 6.1
- Adds to deal with consequences of a nonconformity
- See if similar nonconformities exist or could potentially occur
- Adds to keep evidence of “nature” of nonconformity and any subsequent actions taken

### 10.3 Changes - Continual Improvement

- Added as separate clause to match Annex SL
- Adds reason for continual improvement is to enhance environmental performance

Rate, extent, and timescale of actions to support improvement are determined by organization.

May be value in improving EMS, but intended outcome of actions is to enhance performance.