

Gap Analysis & Transition Guide

ISO 14001:2015 Self-assessment

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1 Introduction

The purpose of this document is to outline a potential integrated management system to meet the requirements of ISO 14001:2015. The environmental management system is designed to be implemented to function within current business practices and serves as an effective tool to help your business grow and improve.

You may decide to keep your current environmental management systems and simply amend them where necessary. Some of you may take this as an opportunity for a complete revamp of the management system. Both courses of action are entirely reasonable, and this guidance document will guide you through what the essential elements that you need to address in order become certified.

The integrated management system includes the processes and procedures required to achieve compliance to environmental requirements, as well as, highlight their interaction with other support processes. Top management must take responsibility for leadership, commitment and take active involvement for developing and maintaining the management system. It is necessary to have well defined processes, both operational and support, to be able to realize the product or service.

The implementation of a formal management system is best handled as a specific project that is led by someone with project management experience. Ideally they should be a key member of the organization's management team and have sufficient authority and trust of the personnel involved. In the ideal situation this person will also be the Management Representative, but skills in project management are highly beneficial.

Integration itself is not difficult to implement but rather, the concepts themselves are sometimes difficult to interpret and can therefore be difficult to apply in the real world. For instance, concepts such as non-conformances, hazards, impacts and corrective action systems might seem burdensome at first but the outputs of these concepts will soon be an invaluable source of information that should be used to drive your corporate objectives. In order implement the integrated management system, we recommend that you follow the steps in this guidance documents.

1.1 Implementation & Development

Begin with the assumption that you are already doing most of what ISO requires, you probably are! Many people talk about the high cost of implementing management systems but this is a false assumption. If you do it right and understand the standards, then implementation should not be a problem since 75% of your management system is already in place. Here are some initial review tasks to consider:

1. Identify legal and regulatory compliance requirements related to EMS performance;
2. Compare actual performance with external standards, regulations, codes of practice and guidelines;
3. Identify activities, products, services that cause impacts on the environment and/or pose legal risks;
4. Identify activities, products, services that can create health and safety risks and/or pose legal risks;
5. Review existing management procedures;
6. Compare actual operations with internal policies and procedures;
7. Identify policies and procedures dealing with external contracts for services and suppliers;
8. Review investigations of previous incidents, accidents and 'near misses';
9. Gather the views of internal and external interested parties;

1.7 Team Meetings

After the Implementation Team members have been selected, an initial orientation meeting should be held. At the meeting, everyone involved should be informed of the organization's planned implementation as well as team members' new responsibilities.

The initial orientation meetings will get the programme off to a good start, but many more meetings will be necessary. While the primary activities taking place during the early meetings will involve system development and implementation, the Team Leader may also wish to use this time to provide team members with some training.

The Implementation Team should meet on a regular basis to resolve problems and to report progress. Meeting minutes should be documented as they may prove helpful when working with Certification Auditors. In some cases, auditors' questions may be answered by the documented meeting notes.

1.8 Choosing your Registrar

The registrar is a third party certification auditor who will formally assess your management system and issue a certificate if the system meets the requirements of ISO 14001:2015. When choosing a registrar, you should consider their industry experience, geographic coverage, price and service level offered. The key is to find a registrar who can meet your requirements and who is able to certify against all three standards. For further information regarding accredited certification bodies, please see the following:

Worldwide: www.iso.org/iso/en/info/ISODirectory/countries.html

Within the UK: www.ukas.org

www.irca.org

Different organizations look at their registrations differently; some organizations prefer to have multiple business units or locations on a single certificate. You can register one location in an organization or you can register the entire organization.

You can even, theoretically, register one part of an individual facility. You should address this issue in your registration scope statement. You should discuss the scope of registration very early in your contact with the registrar, prior to or during the selection process.

The scope of registration and certification will need to reflect precisely and clearly the activities covered by your organization's EMS; any exclusion to non-applicable requirements of the standards should be documented and justified in the EMS manual. No single business related activity should exist outside of the scope.

1.9 Benefits of Transitioning

Since ISO 14001 was revised to meet the needs of today's business world, we recommend that you update your environmental management system to fit the new version. This section will help you get started on the journey.

ISO 14001:2004 certified organizations have until September 2018 to transition to the revised standard. You can either use the recertification audit to transition to a 2015 certificate, or use the surveillance audits to phase the recertification process.

Clause	Documentation Requirement
9.1.1	Retain appropriate documented information as evidence of the monitoring, measurement, analysis and evaluation results.
9.1.2	Retain documented information as evidence of the compliance evaluation result(s)
9.2.2	Retain documented information as evidence of the implementation of the audit programme and the audit results.
9.3	Retain documented information as evidence of the results of management reviews.
10.2	Retain documented information as evidence of: (a) the nature of the non-conformities and any subsequent action taken, and (b) the results of any corrective action.

3 How to Make the Changes

Purchase copies of ISO 14001:2015 and ISO 14004:2016. Read them both and make yourself familiar with their language and concepts. Although it is written in a dense, formal language, the clause titles in ISO 14001:2015 are fairly self-explanatory.

We suggest that you use the familiar Plan-Do-Check-Act (PDCA) methodology to manage your organization's transition from the old to the new requirements. The following guidance provides nine simple steps to make the transition, using the PDCA approach:



1. **Plan:** Undertake a gap analysis to understand how the requirements affect your EMS and then prepare the transition plan based on the results.
2. **Do:** Implement the transition plan by ensuring that the new requirements are embedded in to your EMS and your processes.
3. **Check:** Evaluate the effectiveness of the newly implemented aspects by performing a full system (element) audit, review the findings and implement any corrective actions.
4. **Act:** Take action to address transition any problems and improve the EMS before beginning process auditing.

4 EMS Audit Approach

4.1 General Processes

When evaluating an organization's EMS, there are basic questions that should be asked of every process, for example:

1. Is the process appropriately determined?
2. Is the process identified and appropriately defined, including for example process inputs, outputs, resources and controls?
3. Are *Process Owner* and *Process User* responsibilities assigned?