

Checklist for ISO14001:2004 (compared with 14001:1996) Standard Clause/Section

Key Change(s) Organization Checklist Definitions

Revised standard contains new terms & definitions to increase compatibility with ISO9001 including:

- auditor
- continual improvement
- corrective action
- document
- internal audit
- nonconformity
- preventive action
- procedure
- record

Revised standard removes definition of: EMS Audit Check existing documentation for consistency in terminology.

4.1 General Requirements & Scope

Revised standard contains more specific requirements for the organization to clearly define and document the scope of its EMS, continually improve the EMS and to determine how it will fulfill the requirements.

A well implemented and established EMS is likely to already meet this. However the organization should check that the scope, and how it will fulfill the requirements, is fully defined and documented. The organization also needs to consider that the revised standard is more explicit regarding *continual improvement*

4.2 Environmental Policy

Revised standard requires that the Policy is consistent with the scope of the EMS (i.e. that it covers all activities, products and services within scope). In addition the standard requires that the Policy be communicated to “all persons working for or on its behalf”, and not just “employees”.

The organization will need to:

- review Policy to check that it is consistent with the scope of the EMS; &
- ensure contractors and temporary staff are included in communication regarding the Policy.

4.3 Planning

4.3.1 Environmental Aspects

Revised standard is more specific to:

- identify aspects of “**activities, products and services**” that it can control and those it can influence. Clarifications to ensure no activities, products, or services are excluded from aspects assessment. This provides organizations with flexibility to define scope but they cannot include only activities and exclude services & products. It also implies that the organization will need to consider those it can influence (i.e. aspects relating to most requirements should already be met however review should be conducted on existing documentation to check that :
 - **all activities, products and services** that the organization has control or influence are assessed.

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- all new developments, new or modified activities, products and services are assessed
- all assessment details are documented (goods provided through the supply chain)
- identify aspects for new developments, or new or modified activities, products and services. This is to ensure changes in operations are evaluated appropriately and aspects identified.
- consider significant aspects in *establishing, implementing and maintaining its EMS*. This extends the previous standard requirement which required significant environmental aspects to be considered in developing objectives and targets. Document the information from the identification & evaluation process. Clarifies existing requirement, &
- clear requirement for the information from the process is documented.

Changes clarifies that the intent of an EMS is for identifying and managing significant aspects

4.3.2 Legal & Other environmental requirements

More specific to:

- determine the legal and other requirements relevant to the organizations environmental aspects and how these apply
- ensure that the environmental legal and other requirements are considered in developing, implementing and maintaining its EMS

The changes are to clarify that the organization needs to establish and understand the applicable requirements and not just have access to them. The revised standard eliminates the direct reference to environmental requirements. The purpose of this is to remove the potential for misinterpretation that only those requirements from environmental agencies/bodies are relevant (i.e. requirements from OH&S requirements may contain relevant requirements).

Most requirements should already be met but organization should check that the legal and other requirements have not only being identified but that the processes clearly ensures that the applicable requirements are interpreted adequately and applied as appropriate.

The organization also needs to ensure that legal and other requirements are taken into consideration in establishing, implementing and maintaining their EMS.

The changes also increase the emphasis on compliance by stating that the requirements are taken into account in establishing, implementing and maintaining the EMS.

4.3.3 Objectives, targets & program(s)

The requirements of the 1996 Standard Clause 4.3.3 (Objectives & Targets) and 4.3.4 (Environmental Management Program(s)) are now incorporated in Clause 4.3.3 of revised Standard. The structure change is to improve the links between the goal setting and program/planning processes to achieve these goals. The revised standard now requires that objectives and targets are to be measurable (where practical) and consistent with all the Policy commitments - including those of compliance with legal and other environmental requirements and continual improvement, and not just those related to the prevention of pollution. The changes also require that significant aspects and legal and other requirements must be taken into account rather than just considered in developing objectives and targets. Organization should review objectives and targets, and EMP to consider if changes are required in order to meet:

- requirements for measurable objectives & targets
- clear requirement to take into account significant aspects and legal and other requirements

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4.4 Implementation & Operation

4.4.1 Resources, roles, responsibility & authority

Revised standard requires that resources (provided by management) be provided for establishing, implementing, maintaining and improving the EMS.

The revised standard includes the phrase "*improving the EMS*" in order to strengthen and facilitate the intent of continual improvement. It also includes "*organizational infrastructure*" as a resource along with human resources. The changes are essentially text changes however organizations should review current resources and allocation of roles and responsibility to ensure conformance with standard.

4.4.2 Competence, training & awareness

Revised standard clarifies that *any person(s) performing tasks on its behalf that have the potential to* Review existing processes for determining competence and training requirements to ensure that "all persons" *cause significant environmental impacts*" shall be competent.

Persons now specifically includes contractors, temp staff etc.

(Note - 1996 Standard refers to "Personnel")

The inclusion of "**competence**" as the first word in the title increases the emphasis on competence.

Other changes are terminology and structure of the clause.

Review existing for determining competence and training required to ensure that "all persons" working for the organization are included, assessed and trained as required.

4.4.3 Communication

The revised standard requires that if the organization decides to communicate externally about its significant environmental aspects, it shall document the decision and establish method(s) for the external communication.

Review existing processes to ensure that the decision regarding external communication is documented and that as necessary a procedure for external communication of significant aspects is established and implemented.

4.4.4 Documentation

The Title of clause in the revised standard has been amended to Documentation. This is to reflect alignment with ISO9001:2000.

The revised standard more specifically identifies the documentation required to be included in the EMS as:

- Environmental Policy, objectives & targets
- Scope of EMS
- Description of main elements of the EMS and their interaction and reference to related documents and
- All documents/records required by the standard

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- All documents/records needed to demonstrate the effective planning, operation and control of processes that related to significant aspects.

Requirements should already be covered under existing EMS however organization should review that current EMS documentation meets requirements.

4.4.5 Control of Documents

The title & clause text of the revised standard have been changed to reflect alignment with ISO9001:2000.

The revised standard includes more specific requirements to control documents from external origin/sources which are relevant to the EMS.

Note: reference to “documented procedure” in 1996 standard has been replaced with “procedure.”

Requirements should already be covered under existing EMS however organization should review existing procedures to check whether all requirements, particularly those relating to external origin, and all documents specifically required by the standard are controlled.

4.4.6 Operational control

The text of the revised standard has been changed for clarification however the intent remains the same.

The clause now includes the term “*implementation*” with respect to procedures to strengthen the intent (for controlling significant aspects and continual improvement)

Requirements should already be covered under existing EMS however organization should review existing procedures to check whether all requirements are met.

4.4.7 Emergency preparedness and response

The revised standard contains an additional specific requirement requiring the organizations to respond to emergencies and mitigate or prevent adverse environmental impacts. The 1996 standard contained requirements for establishing and maintaining, and reviewing and revising procedures, but was not explicit regarding the need to respond.

Requirements should already be covered under existing EMS however organization should review existing procedures to check whether all requirements are met.

4.5 Checking

4.5.1 Monitoring & Measurements

The revised standard requires “*documenting of information to monitor performance...*” The 1996 standard requirement was “recording” this information.

The revised standard also now requires a procedure to document information required to monitor performance, applicable operational controls and conformity with objectives & targets.

The intent is to strengthen the monitoring element which is essential for facilitating improvement.

Note: The 1996 requirements to evaluate compliance with applicable environmental legislation and other requirements is separated into it's own clause (Clause 4.5.2) – refer below

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Organizations should check existing procedures and revise as necessary to ensure that there is a documented procedure which ensures information required to monitor performance, applicable operational controls and conformity with objectives and targets is documented.

4.5.2 Evaluation of Compliance

(New clause and most obvious change to revised standard)

This clause has been prepared from the last paragraph of 4.5.1 in the 1996 standard version. It requires a procedure for periodically evaluating compliance for both **legal environmental requirements and other applicable requirements** and that record of the evaluation are kept.

By including a separate clause covering "other requirements" it emphasizes the increase in scope from purely "environmental requirements" to all "other requirements"

Organizations should review existing evaluation processes and expand as necessary to meet standard requirements regarding compliance evaluation. The organization will need to ensure that records of the evaluation are kept.

4.5.3 Non conformity, corrective and preventive actions

The revised standard clarifies the requirement to have a procedure to:

- investigate and determine causes of actual non conformities and to take action to prevent recurrence, • investigate potential non conformities and assess the need for implementing preventive actions
- review effectiveness of corrective and preventative actions.

The definition of "non conformity" as "non fulfillment of requirement" increases the scope of what a non conformity covers, as this now implies non compliance is a non conformity, in addition to failing to meet an EMS requirement.

Review existing processes and amend as necessary to meet standard requirements. The definition of non conformance should also be considered.

4.5.4 Control of Records

The text of the revised standard has been rearranged in which the specific records required are no longer listed.

Instead the clause contains a requirement to have "Records as necessary to demonstrate conformity to the requirements of its EMS and the Standard" Records which are required specifically are identified under the relevant clause (including evaluation of compliance, monitoring and measurement).

Organization should review the records currently maintained to determine if they are sufficient to demonstrate that the EMS is operating as defined and meets ISO14001 requirements. The majority of required records should, under an existing effective system already be kept and maintained.

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4.5.5 Internal Audit

The title of the revised standard has been amended to reflect alignment with ISO9001:2000. The revised standard requires that:

- auditors selected are competent to ensure an objective and impartial audit
- the audit program is maintained –i.e. updated if scheduled audits are not conducted as scheduled (i.e. slippage in schedule) or are rescheduled.

Organizations should review the processes for establishing and maintaining audit programs to ensure that auditors are competent, and that the schedule is updated if required.

Note: Annex A now refers to ISO19011:2002 for additional guidance.

4.6 Management Review

Rewording of the clause to reflect alignment with ISO9001:2000.

The amendment specifies that the review is required to include assessing opportunities for improvement and the need for changes to the system. The revised Standard also clearly identifies inputs to and outputs from the management review process. *The inputs include:*

- *results of internal audits and evaluations of compliance with legal requirements and with other requirements to which the organization subscribes;*
- *communication(s) from external interested parties, including complaints;*
- *the environmental performance of the organization;*
- *the extent to which objectives and targets have been met;*
- *status of corrective and preventive actions;*
- *follow-up actions from previous management reviews;*
- *changing circumstances including developments in legal and other requirements related to its environmental aspects; and* • *recommendations for improvement.*

The outputs from the process include decision and actions related to possible changes to any elements of the EMS, including the policy, consistent with the commitment to continual improvement.

The existing process should likely address the requirements however process should be reviewed and relevant documents amended as necessary to cover the specific input and output requirements.

Annex A

Some of the information/guidance provided for some of the clauses has been improved, including references to ISO14004 and ISO190011.