



**Twelve-step transition process
using the ISO 14001:2015 Transition Toolkit**



WHITE PAPER
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1. Purpose

This white paper is intended for users of the ISO 14001 Transition Documentation Toolkit, to help the organization make necessary changes in their EMS (Environmental Management System) documentation and processes.

2. Other useful resources

For more information about the ISO 14001:2015 revision, see these articles:

- [Infographic: ISO 14001:2015 vs. 2004 revision – What has changed?](#)
- [The final draft of ISO 14001:2015 is released!](#)
- [Whitepaper – FDIS ISO 14001:2015 vs. ISO 14001:2004 matrix](#)
- [Risk Management in ISO 14001:2015 – What, why and how?](#)
- [Using internal audits to drive real improvement in ISO 14001:2015](#)
- [The importance of management review in the ISO 14001:2015 process](#)

Or enroll in our free [ISO 14001:2015 Foundations Online Course](#).

3. Timing of the transition

The ISO 14001:2015 standard was published on September 15, 2015. Organizations are granted a three-year transition period from that date to comply with the current version of the standard, at which time the 2004 version and any certification pertaining to it will become obsolete. This effectively means that you can attain certification or receive a surveillance audit on your existing 14001:2004 certification until September 15, 2018, although it is advantageous for any organization to transition well before the due date. It is worth noting that if your organization became certified before September 15, 2015, then your surveillance audit will be based on the 2004 revision, with your recertification audit being based on the 2015 version. However, if you are looking to attain your certification between September 15, 2015, and September 15, 2016, you will be able to be certified against the 2004 version. After that, certification will be against the 2015 revision.

4. Twelve-step transition process

The easiest way to make the upgrade to the 2015 revision is by following these steps:

Before you start

The transition is not only about implementing new requirements, but also about revising the entire system, and it is a great opportunity for improvement. So, just before starting, the people involved in the transition project must first get familiar with the standard and its new requirements in order to assess the existing system and find out what additional changes must be made in order to achieve full compliance with ISO 14001:2015. For that reason, we added to the toolkit the Internal Audit Checklist that contains all requirements of ISO 14001:2015 in the form of “yes or no” questions. Every question with a negative answer will require additional actions that must be included in the transition project.

1) Define the context of the organization

Clause 4 of the 2015 standard is a new requirement and deals directly with defining the “context of the organization.” Organizations are now expected to consider all external and internal issues that may affect the outcomes of the EMS, including any environmental conditions that may affect the organization. This issue should be considered carefully before developing your new EMS and Environmental Policy, and although not specifically prescribed by the 2015 standard, it is highly helpful if the thought process behind this determination is recorded (for example, in your Environmental Policy), as it will be beneficial if you can provide proof of this vital process to the auditor.

To define context of the organization, ISO 14001 does not require the organization to develop a procedure or any other document. However, since this is a completely new concept for ISO 14001 and the Environmental Management System, it is recommended to create a procedure to define what aspects of the organization must be considered in order to determine context of the organization.

In folder 01 Determining context of the organization, you will find the Procedure for Determining Context of the Organization and Interested Parties, with comments that will help you to fill it in.

Read more here: [Determining the context of the organization in ISO 14001](#).

2) List all interested parties

Section 4.2 of the 2015 revision deals with “understanding the needs and expectations of interested parties.” This outlines how the organization must consider all parties that have relevance to the EMS, identify their respective needs, and then decide which of these will become “compliance obligations.” This replaces section 4.3.2 of the 2004 standard, where all statutory, regulatory, and contractual requirements had to be considered, so if you have already listed these for your EMS, then you have completed part of the task.

In folder 02 List of all interested parties, you will find the record named List of Interested Parties, which contains examples and comments that will help you meet this requirement.

Read more here: [How to determine interested parties according to ISO 14001:2015](#).

3) Review the scope of the EMS

The accuracy and effectiveness of your EMS are highly dependent on the organizational boundaries you set. The process of transitioning to the 2015 revision affords organizations an ideal opportunity to redefine the

scope and its boundaries more accurately, ensuring the potential for improved performance and continual improvement. For example, have you considered all the effects that your products and services have on the environment? Do your products and services exert influence on your customers, of which you should be considering the environmental effect?

In folder 03 Determine the scope of the EMS, you will find the document called Scope of the Environmental Management System, which contains comments that will help you meet this requirement.

For more information, see: [How to determine the scope of the EMS according to ISO 14001:2015](#).

4) Leadership & review of the Environmental Policy

The requirements of the 2015 standard are similar to the 2004 revision, but with one fundamental difference. There is now a greater emphasis on the incorporation of the EMS into the strategic planning and direction of the organization as a whole. It is vital that this aspect should be considered, actioned, and clarified in your Environmental Policy. **This leads to one of the major changes in the 2015 standard, which is the inclusion of a clause on “leadership.”** This is one of the most fundamentally important clauses of the new standard, in that the top management team now must take responsibility for all aspects of the environmental system within the organization. Leadership needs to be defined and demonstrated, all the way from strategic planning through objective setting, to performance and continual improvement, with all supporting functions in between, including communication. This will require a fundamental change in the way the top team involves themselves in the day-to-day running and performance of the EMS. For this to be successful, careful education and “buy in” from the top team is essential; and, as always, this process must be defined in your EMS documentation.

Clause 5 of ISO 14001:2015 is one of the clauses that cannot be addressed with one single document, but indirectly through providing resources; taking accountability for the EMS effectiveness; promoting a process approach and risk-based thinking; engaging, directing, and supporting persons; promoting improvement; and finally, formulating an Environmental Policy.

Requirements for the Environmental Policy haven't significantly changed; however, there are additional requirements compared to the previous version of the standard. In folder 04 Demonstrate leadership & review of the Environmental Policy, you will find the policy document that contains comments that will help you meet this requirement.

Read more at: [How to demonstrate leadership according to ISO 14001:2015](#).

5) Align EMS objectives with the company's strategy

Section 0.3 of the introduction to the 2015 standard specifically prescribes that environmental management should now be incorporated into the organization's business processes and strategic direction-making processes. For instance, your top team will now need to demonstrate that this is part of the strategic planning of the overall business strategy, so you must ensure that this is documented within the business plan or equivalent document.

In folder 05 Align EMS objectives with the company's strategy, you will find the record for Environmental Objectives, which contains examples and comments that will help you meet this requirement.

Read more at: [How to Use Good Environmental Objectives](#).

6) Assess risks and opportunities and environmental aspects

Section 6.1 addresses risks and opportunities, and is completely new in the 2015 standard. The 2015 standard states that all environmental aspects should be considered, but also other influencing factors such as

compliance obligations and organizational context. On the basis of this, plans should be formulated for tackling these risks and opportunities, with the desired outcome being that the EMS can meet its planned outcomes and display continual improvement. This represents a key change in the 2015 revision, and ensuring this is addressed in your EMS effectively will not only ensure compliance, but improved performance and the gateway to continual improvement.

There are some key changes between the 2004 and 2015 revisions in how you are expected to evaluate your environmental aspects. A “lifecycle perspective” of your products and services now needs to be considered, and potential abnormal and emergency situations need to be taken into account when planning. Again, consideration and plans to demonstrate these considerations must now be built into your EMS documentation. For example, if your product or service range has recently been extended, can you prove that the environmental aspects of these new services have been fully considered and documented, and actions decided upon to mitigate and remove them?

In folder 06 Assess risks and opportunities and environmental aspects, you will find a procedure that will help you implement risk-based thinking and reassess environmental aspects.

Read more here: [ISO 14001 risks and opportunities vs. environmental aspects](#).

7) Revise your communication process

The ISO 14001 standard is specific about how an organization should manage its communications, stating that a procedure should be established for both internal and external communications, and mentioning that a method shall be “established and implemented” should the organization decide to communicate details of its significant environmental aspects externally. Therefore, it is relatively easy to see that communication plays a major part in the management of the Environmental Management System (EMS), in terms of both inward- and outward-facing issues. After all, if your company is a large organization and has an environmental aspect that would have a huge impact if mismanaged (think coal mines, nuclear plants, chemical plants), then it is fairly obvious that a degree of input and cooperation needs to take place between the organization itself and stakeholders, as well as effective internal and external communication.

Folder 07 Revise your communication process contains the procedure for communication and the mandatory communication report. These two documents are enough to meet requirements of the standard.

For more information, see: [How to perform communication related to the EMS](#).

8) Control documented information

Documents and records are both now referred to as “documented information.” You will now need to align your existing procedures to the new clause numbers, and this also provides an opportunity to improve your documentation at the same time. For example, the requirement for preventive action has been removed due to it being absorbed into the risk assessment process, so your preventive action process document and form will no longer be required, and can be deleted. As another example, it is good practice to check and ensure that the risk assessment process does accurately reflect the change mentioned.

The new version of the standard combines requirements for documents and records control into a single clause, treating them in the same way. Although many companies already have a well-defined document and record control process, the new ISO 14001 prescribes rules for each phase in document and record control – from creating and updating, to storage, preservation, retention, and disposition. The previous version of our Procedure for Document and Record Control has already fulfilled most of the requirements of the new ISO 14001 standard, so most of the changes are not visible through track changes, but through comments explaining the requirements and how they are met with the procedure.

In folder 07 Control documented information, you will find the procedure along with the records needed to make it work.

Read more here: [A new approach to documented information in ISO 14001:2015.](#)

9) Operational control

In the 2015 version, “operational control” becomes “operational planning and control,” and the scope of this clause is expanded. The context of the organization, risks and opportunities, environmental aspects, and compliance obligations all must now be considered when specifying methods of operational control. This should lead to defined methods of operational control, performed by specified and competent individuals, with the goal being that the EMS performs within the predicted parameters. Again, these changes must be planned and documented within the appropriate places in your EMS. For instance, can you show evidence that your responsible person is trained and “competent”?

In folder 09 Operational control, you will find the Procedure for Operational Control of Significant Environmental Aspects, with clearly marked changes that need to be made along with records needed for full compliance with ISO 14001:2015 clause 8.1.

For more information, see: [Defining and implementing operational control in ISO 14001:2015.](#)

10) Environmental performance

The 2015 revision also makes a point of the importance of measuring and monitoring to environmental performance. There is also specific mention of the measurement of external, procurement, and outsourced services, so the message is clear: the organization remains responsible for outsourced and external processes and the subsequent conformance or nonconformance to objectives and targets. Again, this process will need to be defined, documented, and followed through in order for your EMS to conform to the 2015 revision.

Folder 10 Environmental performance contains records needed for establishing, monitoring, and measuring of environmental performance in your EMS.

For more information, see: [How to define EMS key performance indicators \(KPIs\) according to ISO 14001.](#)

11) Measuring and reporting

There is a general improvement of reporting requirements in the 2015 standard. We have mentioned environmental performance above, but other functions such as Management Review and internal audit are also mentioned, specifically in terms of being reported “to top management.” This change makes it clear that top management, who are directly responsible for strategic planning and the integration of the EMS into the organization’s strategic direction, must be made aware of and make decisions on the basis of these results. Again, it is advised that the importance and process steps of this are documented as well as implemented in your EMS.

In folder 11 Measuring and reporting you will find the procedure for management review, which contains all additional inputs required by the 2015 revision of ISO 14001, with track changes that mark updates compared to the previous version of this document.

For more information, see: [The importance of management review in the ISO 14001:2015 process.](#)

12) Continual improvement

One of the main principles behind implementing an Environmental Management System using the requirements of ISO 14001 is the need for continual improvement within your EMS. However, it is sometimes confusing to figure out the best way to work toward continual improvement and gain the benefits that this gives to your organization. The tools used for enabling continual improvement are corrective actions

that should remove not only the nonconformity, but also its cause, and drive the system towards the improvement.

Folder 12 Continual improvement contains the procedure for management of nonconformities and corrective actions, which can help you achieve continual improvement of your EMS.

For more information, see: [How to achieve continual improvement of your EMS according to ISO 14001:2015.](#)

13) Wrap up the project

Although the Environmental Manual is not a mandatory document according to ISO 14001:2015, many organizations find it useful and decided to keep it as a part of their Environmental Management System – for that reason, we decided to include the Environmental Manual in our Transition toolkit. In the folder called Wrap up the project, you will find a completely revised Environmental Manual, aligned with ISO 14001:2015 with comments on each clause and an explanation of changes compared to the previous version of ISO 14001.

Read more at [What is an environmental management system manual ?](#).



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