

## ISO 14001:2015 Interpretations and Evidence of Conformance

### Preface

This document is based on the Final Draft International Standard ISO/FDIS 14001 released on July 2, 2015. ISO 14001:2015 is the third revision to ISO 14001 and replaces the second edition, ISO 14001:2004.

PRI Registrar has established certain expectations for meeting the intent of the standard's requirements for companies who wish to register their environmental management systems to ISO 14001:2015. These expectations are based on our understanding of the standard, gained through our collective experience in auditing environmental management systems.

This document is not intended to add to, minimize, or in any way modify the requirements of the standard. It is meant to be a guidance tool for PRI Registrar auditors, providing common understanding on the intent of the standard and for clarification of text in the standard.

For organizations seeking registration, this document provides insight into the generally accepted practices that many companies have used to achieve registration and to the expectations of PRI Registrar auditors.

Non-conformances may not be written referencing this guidance or the interpretations in this document. However, it may serve as the basis for auditor observations and comments about improvements to an organization's environmental management system.

Each PRI Registrar country office, as appropriate, may attach appendices to this document that specify local requirements, interpretations, legal considerations, etc. If there are documented local requirements, they may take precedence over any PRI Registrar interpretations.

Additional guidance is available from:

ISO 14001: 2015, Annex A

ISO 14004:2004 (under revision)

ISO 19011: 2002

IAF Guidance on ISO/IEC

PRI Registrar terminology may differ with respect to the use of certain terms by some accreditation bodies. However, the PRI Registrar procedures and forms are designed to meet the most stringent of any accreditation requirements for the certificates offered by PRI Registrar.

## Format of ISO 14001:2015

The standard has been revised and reformatted under the High-Level Structure requirements for ISO management system standards, as required ISO Annex SL. In addition to the three introductory clauses, it includes seven basic clauses common to all management system standards. This structure is intended to provide a coherent presentation of requirements rather than a model for documenting the organization's policies, objectives and processes. Therefore, organizations are not required to follow the numbering format and a simple cross-reference sheet may be used, although following the new numbering format may facilitate an easier understanding of how the system is documented. It also facilitates a more useful approach to achieve the integration of management systems, for example ISO 14001 and ISO 9001, with the possibility of adding ISO 45001 (currently OHSAS 18001) in the future.

## Summary of key changes to the 3<sup>rd</sup> Edition of ISO 14001

Besides the new format of the standard based on the High-Level Structure, most of the requirements have been revised; some have been completely re-written and some have remained mostly intact with only a few changes. There are several new requirements that will require organizations to modify their approach to environmental management.

New concepts have been introduced that effectively change the focus of the standard and, potentially the organization's scope. Section A.3 of Annex A provides clarification of these new concepts, some of which are summarized here.

**"Intended outcome"** is a new term that is found throughout the requirements. It refers to the expected result of implementing the EMS. Organizations can add other outcomes if they wish, but at a minimum, the intended outcomes include:

- 1) Enhancement of environmental performance;
- 2) Fulfilment of compliance obligations, and;
- 3) Achievement of environmental objectives.

**"Risks and opportunities"**, is a new term relevant to the planning requirements. Analysis of the organization's context (4.1), its interested parties (4.2), significant aspects (6.1.2) and compliance obligations (6.1.3) form the basis of understanding (6.1.1) to identify risks and opportunities which are incorporated into planning for actions (6.1.4) to help achieve the intended outcome.

**"Documented information"** replaces the terms *documentation, documents, and records* used previously. Retaining documented information refers to records. Maintaining documented information refers to documents other than records, i.e. procedures, processes, instructions, etc.

**"Compliance obligations"** replaces *legal and other requirements to which the organization subscribes*. It means the same thing but is intended to eliminate redundancy.

**"Appropriate"** and **"applicable"** as used in the standard are not interchangeable. Appropriate means suitable and implies flexibility. Applicable means relevant, or, possible to apply, and implies that if it can be done, it needs to be done.

“**Consider**” means it is necessary to think about something, but not a requirement to include it.

“**Take into account**” means to think about something and then include it.

“**Ensure**” means responsibility can be delegated, but not the accountability.

“**Interested party**” is synonymous with stakeholder.

**Section 4.1 – Understanding the organization and its context**, is a new requirement that is fundamental to the change in direction of the standard. It requires the organization to consider the external and internal factors that may affect its ability to achieve the intended outcome. The standard emphasizes the need for an external perspective about those issues the organization does not control that may affect its performance. Internal issues may also have an effect on performance but may, or may not be influenced by the organization. See Annex A. A.4.1.

**Section 4.2 - Understanding the needs and expectations of interested parties**, also requires an understanding of the external perspective of those who affect, are affected by, or perceive they are affected by the organization’s EMS.

Taken together, the implementation of 4.1 and 4.2 provides important input to the planning requirements in Section 6 of the standard, and to management’s understanding of how the organization affects, and is affected by internal and external factors.

**Section 5 – Leadership**, is a new set of requirements that clearly establish accountability for the EMS within top management. This section focuses on the leadership and commitment of top management to ensure that the EMS is fully integrated into the business and that responsibilities are delegated. Auditing these requirements will require much more time to be spent with top management to assess their understanding of the EMS, their role in its success, and other specific responsibilities such as policy, resources and management review. The responsibility no longer rests with one person.

**Section 6 – Planning**, requires organizations to consider, in 6.1.1, the issues identified under Section 4.1 for Context and 4.2 for Interested Parties along with the defined scope from 4.3 and the identified significant environmental aspects, 6.1.2, and compliance obligations, 6.1.3. The purpose of this planning is to identify risks and opportunities which can affect the organization’s EMS and the intended outcome. Risk is the effect of uncertainty for those internal and external issues with potential adverse effects (threats) that the organization should have identified. Managing these risks is a priority for the EMS. Opportunities are those potential beneficial effects of internal and external issues that the organization may decide to act on.

In 6.1.4 the organization is required to develop action plans for the identified risks and opportunities, significant aspects and compliance obligations. These plans are to be integrated within the EMS and other relevant business processes and periodically evaluated for effectiveness. Some of these plans may also result in environmental objectives and programs (6.2.1 and 6.2.2)

**Section 7 – Support**, includes the requirements for resources, competency, awareness, communication and documented information. Significant additions to the communication section will require a more proactive approach to ensure that internal and external environmental communications are effective and reliable.

**Section 8 – Operation**, goes well beyond just the identified significant aspects. It applies to the action plans developed in section 6.1.1 and 6.1.4. Two new concepts are included in operational control:

- 1) Life cycle – controls are required, as appropriate, for the design/development processes for products and services at each stage of their life cycle, including the procurement of products and services, communications with suppliers and contractors, and providing information related to transportation, delivery, use, end-of-life treatment and disposition of products and services (cradle to grave approach).
- 2) Outsourced processes – must be defined within the EMS and controlled or influenced to the extent possible and appropriate. Organizations may not assume that outsourced processes absolve them from any responsibility for environmental aspects and impacts.

**Section 9 – Performance Evaluation**, includes expanded requirements (9.1.1) for monitoring and measurement, to include analysis and evaluation. These requirements extend beyond monitoring/measuring system processes to include evaluation the organization’s environmental performance and the effectiveness of the EMS.

Management review (9.3) is more prescriptive about inputs and outputs, placing more emphasis on top management’s active role in understanding and evaluating the EMS and the being accountable for environmental performance.

**Section 10 – Improvement**, includes corrective action (10.1) and continual improvement (10.2) requirements. There is no explicit requirement for preventive action but it is now implicit in the handling of corrective actions and risk-based thinking. Continual improvement specifically refers to the suitability, adequacy and effectiveness of the EMS in order to enhance environmental performance.

## Conduct of Audits to ISO 14001:2015

During the Stage 1 EMS audit, auditors must verify, at a minimum, the following requirements have been addressed and that appropriate documentation is available:

- The scope of the EMS is documented (section 4.3)
- The EMS is documented according to the requirements of section 7.5
- A valid environmental policy (section 5.2) has been established and documented,
- The organization has determined issues related to context (4.1) and identified the needs and expectations of interested parties (4.2).
- Planning requirements in sections 6.1.1 and 6.1.4 have been implemented.
- Environmental aspects/impacts (section 6.1.2) have been identified and evaluated for significance,
- Compliance obligations have been identified and incorporated into EMS planning (section 6.1.3)
- Environmental objectives have been established (section 6.2.1)
- The internal audit program has been implemented and at least one complete internal audit of the environmental management system has taken place (section 9.2),
- Findings from the internal audit have been addressed under corrective action (section 10.2),

- There has been at least one management review (section 9.3),
- The EMS is established and capable of undergoing a complete system audit in Stage 2.

During the Stage 2 Audit, all the requirements of the standard will be assessed in full. The expectation is that evidence of conformance is available for each requirement.

The management system must be fully functional in order to verify that an organization has met the intent of the standard and that the requirements have been implemented and maintained in an effective manner. PRI Registrar strongly recommends that organizations seeking registration should operate their management system for at least three months prior to the Stage 1 Audit. Auditors will look for evidence of continual improvement throughout the surveillance audit schedule and at the renewal audit.

For a multi-site management system, the organization must specify the centralized functions responsible for establishing and maintaining the system requirements common to all sites. The sites that comprise the management system are responsible to implement the common requirements of the system as defined by system documentation.

For organizations with existing registration to ISO 14001:2004, the path to upgrade to the new standard will parallel the process to upgrade to ISO 9001:2015. At any future scheduled surveillance or renewal audit, the organization can elect to be audited to the new standard. When this is successful, the organization will be provided with a new certificate that will have a 3 year validity. The ISO 14001:2004 certificate will then be withdrawn.

The organization can continue registration to the 2004 revision either throughout their current contract period, or at renewal but certificates will only have a validity until September 15 2018. ISO 14001:2004 will become obsolete in 2018 so upgrade to the 3<sup>rd</sup> edition must occur by that time. Registered companies should communicate directly with their contract manager in Houston to discuss their plan to upgrade.

### **Terms, definitions and concepts**

Any terms defined in section 3 of ISO 14001:2015 cannot be redefined or modified when used within the documented information in the EMS.

Annex A includes a Clarification of Concepts section in A.3 that provides additional insight for some of the terms and concepts incorporated in ISO 14001:2015 that are not defined in section 3.

## **EMS Requirements (Clauses 4-10)**

Each requirement of the standard is presented in bold text, followed by a discussion of intent and suggestions for what evidence may be available to demonstrate conformance.

Text of the standard in ***Bold Italics***.

All new requirements are indicated with a double asterisk (\*\*).

Changed requirements are indicated with a single asterisk (\*).

## **4. Context of the organization \*\***

### **4.1 Understanding the organization and its context \*\***

***The organization shall determine external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended outcomes of its environmental management system. Such issues shall include environmental conditions being affected by or capable of affecting the organization.***

The intent of 4.1 is to ensure that the organization has a high-level understanding of the external and internal factors that may impact the EMS and its ability to deliver intended outcomes. Examples of factors that may be relevant to the organization are:

- Environmental conditions such as air quality, water, climate change, land use, contamination, natural resource availability, biodiversity, and sustainability concerns.
- Circumstances related to cultural, social, political, legal, financial, technological, economic, and competitive issues.
- Internal characteristics of the organization's activities, products and services, its resources and capabilities.

The issues identified under this requirement are to be considered in the identification of risks and opportunities that need to be addressed and managed under the Planning requirements in section 6.1.1 and 6.1.4.

While there is no requirement to document the process or the results of meeting this requirement, organizations must demonstrate that they have developed an understanding about the organization's context and have included the results in how they plan and implement the EMS.

#### **Evidence of conformance**

Evidence for meeting this requirement may be obtained through interviews with top management and those directly responsible for implementing and maintaining the EMS. Additionally, the planning requirements in section 6.1.1 require these identified issues to be included in planning the EMS and that the processes needed to carry out this planning are documented (6.1.4). Some organizations will elect to have documented information about their context.

References:

*3.2.1 Environment*

*3.2.3 Environmental Condition*

*Annex A, A.3 Clarification of Concepts,*

*Annex A, A.4.1 Understanding the organization and its context*

#### **4.2 Understanding the needs and expectations of interested parties \*\***

**The organization shall determine:**

- a) The interested parties that are relevant to the environmental management system;**
- b) The relevant needs and expectations (i.e. requirements) of these interested parties;**
- c) Which of these needs and expectations become its compliance obligations?**

Organizations are required to identify and understand the needs of interested parties, also known as the organization's stakeholders. These stakeholders include the legal and regulatory organizations that mandate compliance to external obligations and any other parties "that can affect, be affected by, or perceive itself to be affected by..." the decisions or activities of the organization. Examples may include customers, suppliers, regulators, NGOs, investors, employees, landlords, local communities, neighbors, etc.

The results of the process to identify these interested parties and their needs can be used to further the understanding of the organization's context (4.1). Additionally, the results will help determine which of these needs become compliance obligations (6.1.3).

There is no requirement to document this process or the results. However, the organization must demonstrate that it has identified its interested parties and understands their needs and expectations.

#### **Evidence of conformance**

Evidence for meeting this requirement may be obtained through interviews with top management, those directly responsible for implementing the EMS, or in the documentation related to planning (6.1.1 and 6.1.4). Some organizations will elect to have documented information about their interested parties.

References:

*3.1.6 Interested party*

*3.2.9 Compliance obligations*

*Annex A, A.3*

*Annex A, A.4.2*

#### **4.3 Determining the scope of the environmental management system \*\***

**The organization shall determine the boundaries and applicability of the environmental management system to establish its scope.**

**When determining this scope, the organization shall consider:**

- a) The external and internal issues referred to in 4.1;**
- b) The compliance obligations referred to in 4.2;**
- c) Its organizational unit(s), function(s), and physical boundaries;**
- d) Its activities, products and services;**



***e) Its authority and ability to exercise control and influence.***

***Once the scope is defined, all activities, products and services of the organization within that scope need to be included in the environmental management system.***

This requirement has been expanded to include specific considerations necessary to determine the scope of the organization's EMS. Notably, the organization must now consider its own authority and ability to exercise control and influence, particularly with respect to the life cycle perspective in sections 6.1.2 and 8.1.a-d, and the management of outsourced processes in 8.1.

The scope must be documented, maintained and made available to interested parties.

**Evidence of conformance**

Evidence that this requirement has been met may include the documented scope and evidence that all the required inputs to the scope have been considered. This may be obtained through interviews with top management and those directly responsible for the implementation of the EMS.

References:

3.1.4 Organization

3.3.3 Life cycle

3.3.4 Outsource

Annex A, A.4.3

***4.4 Environmental management system \****

***To achieve the intended outcomes, including enhancing its environmental performance, the organization shall establish, implement, maintain and continually improve an environmental management system, including the processes needed and their interactions, in accordance with the requirements of this International Standard.***

***The organization shall consider the knowledge gained in 4.1 and 4.2 when establishing and maintaining the environmental management system.***

The changes to this requirement make it more specific to include "the processes needed and their interactions", and the use of information developed to meet the requirements for understanding the context of the organization and identifying the interested parties and their needs.

The requirements section of the ISO 14001:2015 standard (sections 4-10) is designed to facilitate an understanding of environmental management systems and the linkage between the elements of the standard. The elements of the standard are not stand-alone requirements, but must be established, documented, implemented and maintained in a manner that demonstrates a systems approach to environmental management with the goal of continual improvement.

The organization may combine ISO 14001 system requirements with other management systems (i.e.,



quality, safety & health) as appropriate. However, there must be clear evidence of conformance for each requirement in the ISO 14001 standard.

### **Evidence of conformance**

Evidence for meeting this requirement may include the required system documentation, observations from interviews with top management and those directly responsible for implementing the EMS.

References:

3.1.1 Management system

3.1.2 Environmental management system

3.3.2 Documented information

## **5 Leadership \*\***

### **5.1 Leadership and commitment**

***Top management shall demonstrate leadership and commitment with respect to the environmental management system by:***

- a) Taking accountability for the effectiveness of the environmental management system***
- b) Ensuring that the environmental policy and environmental objectives are established and are compatible with the strategic direction and the context of the organization;***
- c) Ensuring the integration of the environmental management system requirements into the organization's business processes;***
- d) Ensuring that the resources needed for the environmental management system are available;***
- e) Communicating the importance of effective environmental management and of conforming to the environmental management system requirements;***
- f) Ensuring that the environmental management system achieves its intended outcomes;***
- g) Directing and supporting persons to contribute to the effectiveness of the environmental management system;***
- h) Promoting continual improvement;***
- i) Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.***

This requirement places accountability for the effectiveness of the EMS on top management and places direct responsibility for achieving results (intended outcomes) on them. It requires proactive leadership and direct involvement in the EMS by those who lead the organization, ensuring that environmental risk is aligned with the policy and objectives and that the EMS is integrated with other business processes. They provide leadership to others in the organization, delegating to them, as necessary, the responsibility for implementation and maintenance of the EMS, but not giving up the overall accountability.

Four of the requirements in section 5.1 indicate top management must ensure that certain functions are carried out. These functions may be delegated, but accountability remains with top management. The

other listed requirements are specific to top management and the responsibility remains with top management.

There is no specific requirement for a management representative but organizations may continue to structure the EMS in that way if they choose. However, the intent is to empower top management's direct role and demonstrate leadership and commitment.

It will be necessary to schedule a significant amount of audit time with top management to determine how well they understand their role. In most cases, these interviews should be conducted at the beginning of the audit to help the auditor understand how top management cascades authority and responsibility for the EMS throughout the organization.

### **Evidence of conformance**

Evidence to demonstrate top management's leadership and commitment will be indicated by their ability to discuss the key components of the EMS, including the context, risks and opportunities, policy, EMS structure, resources, significant aspects, objectives, action plans and other issues that impact the organization's progress on achieving its intended outcomes.

Additional evidence may be obtained through interviews with others who play a role in the EMS and their perspective on the leadership and commitment from top management.

References:

3.1.3 Environmental Policy

3.1.5 Top management

3.4.5 Continual improvement

3.4.6 Effectiveness

3.4.11 Environmental performance

Annex A, A.5.1

### **5.2 Environmental policy \***

***Top management shall establish, implement and maintain an environmental policy that, within the defined scope of its environmental management system:***

- a) Is appropriate to the purpose and context of the organization, including the nature, scale and environmental impacts of its activities, products and services;***

If the policy is a corporate or other higher level policy, and the registration is at a single site, the policy may be adopted by the site as long as all statements, claims and commitments are appropriate to the site. If not, the site may define their own environmental policy, linking it to, and maintaining consistency with any higher level policies. Higher level policies should be identified as "other requirements" in this circumstance. A multi-site system should have a single environmental policy,

applicable to all sites operating within the management system.

The auditor will evaluate how appropriate the environmental policy is, based on an understanding of the organization's business structure, context, and its activities, products, and services as defined in the scope. The organization should avoid the use of misleading statements or claims that cannot be verified through the audit.

***b) Provides a framework for setting environmental objectives;***

There should be clear linkage between the policy and the environmental objectives and targets. Typically, the policy contains general statements about the environmental goals of the organization, creating the framework for the documented environmental objectives.

***c) Includes a commitment to the protection of the environment, including prevention of pollution and other specific commitment(s) relevant to the context of the organization;***

***d) Includes a commitment to fulfil its compliance obligations;***

A commitment to comply does not mean an organization will always achieve 100% compliance. It commits the organization to implement a management system that is capable of achieving compliance. This includes the resources necessary to work toward compliance and the appropriate mechanisms in place to address regulatory issues. This commitment extends to regulatory requirements and those that the organization identified as needs and expectations of other interested parties that become compliance obligations.

***e) Includes a commitment to continual improvement of the environmental management system to enhance environmental performance.***

The expectation for continual improvement is in line with the definitions in the standard. Continual improvement of the environmental management system has an intended long-term result – improvement of environmental performance. Auditors expect that organizations will, over time, be able to demonstrate that the EMS has resulted in environmental performance improvements with specific examples.

***The environmental policy shall:***

- ***Be maintained as documented information;***
- ***Be communicated within the organization;***
- ***Be available to interested parties.***

The environmental policy is a required controlled document in the EMS. It is to be communicated within the organization (the defined scope – see 4.3) and available to all interested parties. There is no requirement to distribute the policy to the public or post it on a website.

**Evidence of conformance**

Evidence that the environmental policy meets the requirements will be in the form of a documented policy statement, traceable to top management, which has been communicated throughout the organization and is available to interested parties.

References:

- 3.1.3 Environmental policy
  - 3.1.5 Top management
  - 3.2.7 Prevention of pollution
  - 3.2.9 Compliance obligations
  - 3.4.5 Continual improvement
- Annex A, A.5.2

### ***5.3 Organizational roles, responsibilities and authorities \****

***Top management shall ensure the responsibilities and authorities for relevant roles are assigned and communicated within the organization.***

***Top management shall assign the responsibility and authority for:***

- a) Ensuring that the environmental management system conforms to the requirements of this International Standard;***
- b) Reporting on the performance of the environmental management system, including environmental performance, to top management.***

The organization should clearly define and document the roles of those involved in the management system, their specific responsibilities, and the specific authority that may be associated with the role or responsibility. This information should be communicated in a way that ensures the effective operation of the management system. Top management can delegate these responsibilities but retains accountability for them.

#### **Evidence of conformance**

Evidence for meeting this requirement may be obtained through interviews with top management and those directly responsible for implementing and maintaining the EMS. Some organizations may choose to document the management structure. A management representative is not required but many organizations may choose to structure their EMS by designating one or more individuals with this responsibility and authority.

References:

- 3.1.5 Top management
- Annex A, A.5.3

## **6. Planning \*\***

### **6.1 Actions to address risks and opportunities**

#### **6.1.1 General \*\***

***The organization shall establish, implement and maintain the processes needed to meet the requirements in 6.1.1 to 6.1.4.***

***When planning for the environmental management system, the organization shall consider:***

- ***The issues referred to in 4.1;***
- ***The requirements referred to in 4.2;***
- ***The scope of its environmental management system;***

***And determine the risks and opportunities, related to its;***

- ***Environmental aspects (see 6.1.2);***
- ***Compliance obligations (see 6.1.3);***
- ***Other issues and requirements, identified in 4.1. and 4.2;***

***That need to be addressed to:***

- ***Give assurance that the environmental management system can achieve its intended outcomes;***
- ***Prevent, or reduce, undesired effects, including the potential for external environmental conditions to affect the organization;***
- ***Achieve continual improvement.***

***Within the scope of the environmental management system, the organization shall determine potential emergency situations, including those than can have an environmental impact.***

***The organization shall maintain documented information of its;***

- ***Risks and opportunities that need to be addressed;***
- ***Processes needed in 6.1.1 to 6.1.4 to the extent necessary to have confidence that they are carried out as planned.***

The standard requires an established and documented process for satisfying the requirements of 6.1.1 through 6.1.4, "to the extent necessary...".

With a focus on achieving the intended outcomes of the EMS, preventing or minimizing undesired effects, and achieving continual improvement, the organization must consider the potential adverse effects (risks) and potential beneficial effects (opportunities) of the organization's significant environmental aspects (6.1.2), compliance obligations (6.1.3), and issues related to its context (4.1) and identified requirements of its interested parties (4.2), with respect to the documented scope (4.3).

The risks and opportunities that need to be addressed must be documented. The planning process to address 6.1.1 through 6.1.4 must be documented. There is no requirement that formal risk identification and assessment methods be used to meet these requirements although some organizations may benefit

from their use. Planning for risks and opportunities may also be seen as planning for preventive action.

Under the defined scope of the EMS, potential emergency situations that can result in adverse environmental impacts must be identified and incorporated into the planning for risks and opportunities. These potential emergency situations are subject to further response planning in section 8.2.

#### **Evidence of conformance**

Evidence of meeting these requirements may be found in the documented risks and opportunities that are the output of the documented process. The extent and sophistication of the processes used to meet these requirements are dependent on the organization's overall environmental risks and the complexity of its operations. The need for documentation should be commensurate with the level of risk.

References:

3.2.2 Environmental aspect

3.2.4 Environmental impact

3.2.9 Compliance obligations

3.2.10 Risk

3.2.11 Risks and opportunities

Annex A, A.6.1.1

#### **6.1.2 Environmental aspects \***

***Within the defined scope of the environmental management system, the organization shall determine the environmental aspects of its activities, products and services that it can control and those that it can influence, and their associated environmental impacts, considering a life cycle perspective.***

***When determining environmental aspects, the organization shall take into account:***

- a) Change, including planned or new developments, and new or modified activities, products and services;***
- b) Abnormal conditions and reasonably foreseeable emergency situations.***

***The organization shall determine those aspects that have or can have a significant environmental impact, i.e. significant environmental aspects, by using established criteria.***

***The organization shall communicate its significant environmental aspects among the various levels and functions of the organization, as appropriate.***

***The organization shall maintain documented information of its;***

- Environmental aspects and associated environmental impacts;***
- Criteria used to determine its significant environmental aspects;***
- Significant environmental aspects.***

The organization must have a clearly identifiable and documented process (see 6.1.1) to identify environmental aspects and their related impacts that it can control and/or influence. This process should also specify how the organization will evaluate changes to its activities, products and services, and any abnormal operating conditions and emergency situations.

The intent of this process is to achieve a thorough, reasonable, and justifiable analysis of the organization's activities, products and services that can interact with the environment, including those that it identifies using a life cycle perspective. The standard does not require a formal life cycle study or analysis, but does require that organization identify those life cycle aspects and impacts that it can control or influence and then evaluate their significance.

To incorporate a life cycle perspective, the organization should consider the environmental aspects that it can control or influence for all stages of product and service design, development, resource procurement, transportation, manufacture, distribution, end use, end of life treatment and final disposition. The organization should be able to justify the exclusion of any environmental aspects that are evident but not included in the evaluation. The identification process should include the method by which the organization will manage change with regard to the identified environmental aspects and how it will identify and address any new or changed aspects.

The organization must have a defined methodology to determine the organization's significant environmental aspects, prior to the application of any operational controls that prevent or reduce impacts. An environmental aspect becomes significant because its environmental impact, actual or potential, is determined to be significant using the defined methodology.

Significant environmental aspects are to be considered when planning actions to address risks and opportunities (see 6.1.1 and 6.1.4). The standard identifies and specifically calls out for the identification of opportunities which may be the result of adverse or beneficial impacts on the environments. The process used in 6.1.2 should specify how beneficial, or potentially beneficial impacts are identified.

The methodology for determining significance may be quantified, based on objective criteria, or it can be a subjective process with sound rationale. The auditor must determine if the methodology used achieves a reasonable and justifiable result. There is no maximum or minimum number of significant aspects that must be identified. Each organization should be evaluated on the basis of what is reasonable for them. If there are too many significant aspects identified, the organization may not have sufficient resources to actively manage them under all the applicable requirements of the standard. If there are too few, the implementation of this requirement may not have been effective, or the organization may not have dedicated enough resources to demonstrate effective environmental management.

An organization may not declare that it has no significant environmental aspects. The end result of evaluating environmental aspects is to prioritize them so that the organization can allocate resources effectively. Evaluation tools that arbitrarily eliminate aspects from becoming significant, or that have outcomes that are unjustifiable for a given industrial code, are not considered to be effective.

Significant aspects are determined based on criteria that identifies the aspects that pose the greatest risks to the organization's ability to achieve its intended outcomes, i.e. enhancing environmental performance, fulfilment of compliance obligations, and achievement of environmental objectives. A comparison of significant aspects to other organizations is not a relevant criterion for determining the



significance of any aspect.

If an organization has applicable legal/regulatory obligations that require permits, licenses, or place it in a highly regulated category, these may become significant aspects because of the importance that a regulatory body has placed on them. If an organization dedicates significant resources for the control of an environmental aspect, it follows that the aspect may be significant because of the high level of resource commitment.

For multi-site systems, the centralized function may identify corporate level significant aspects, which may then become significant for all sites covered by the EMS. It is appropriate for the sites to also identify and manage any significant environmental aspects that are unique to each site.

### **Evidence of conformance**

Evidence of meeting these requirements may be found in the documented process, the documented environmental aspects and impacts, the documented criteria for determining significance, and a documented list of significant environmental aspects. Additionally, any changes to the organization's activities, products and services should result in an update to the results of these processes as appropriate.

References:

3.2.2 Environmental aspect

3.2.4 Environmental impact

Annex A, A.6.1.2

### **6.1.3 Compliance obligations \***

***The organization shall:***

- a) Determine and have access to the compliance obligations related to its environmental aspects;***
- b) Determine how these compliance obligations apply to the organization;***
- c) Take these compliance obligations into account when establishing, implementing, maintaining and continually improving its environmental management system.***

***The organization shall maintain documented information of its compliance obligations.***

In ISO 14001:2015, Compliance obligations are those legal requirements applicable to the organization, and any other requirements (voluntary or otherwise required) that complies with, including any requirements identified in 4.2.

The organization must have a documented process (see 6.1.1) for updating this information to ensure that any relevant changes or additions are incorporated into the management system and communicated to those who should be aware of new information about compliance obligations.

The standard calls for a process to accomplish the following;

- 1) Identify all applicable compliance obligations related to the environmental aspects
- 2) Provide for access to these same requirements.
- 3) Determine how these requirements apply to the organization,
- 4) Ensure the compliance obligations are incorporated into the EMS.

It is appropriate for the organization to directly associate these legal requirements with the environmental aspects of its activities, products and services. Additional requirements may include those related to health, safety, security, etc., if they are related to the environmental aspects.

The organization should determine how its compliance obligations apply to the identified environmental aspects. If an organization identifies an applicable legal requirement, it is because it has an environmental aspect making it relevant.

It is not acceptable for the organization to offer “affirmative statements” or “self-declaration statements” concerning the identification of, or compliance with legal requirements. Auditors must verify the requirements of the standard with objective evidence. Legal opinions are not evidence of conformance to a requirement of the standard or compliance with a legal requirement.

For multi-site systems there may be a centralized function to identify compliance obligations or it can be done at the site level or by any combination. In either case, the identification of compliance obligations must include all applicable jurisdictions and levels of regulation for the sites within the scope of the EMS, including local, state, regional, federal and international.

The organization should update this information as necessary to ensure that any relevant changes or additions are incorporated into the management system and communicated to those who should be aware of new information about compliance obligations.

### **Evidence of conformance**

Evidence of meeting these requirements may be found in the documented process and documented information about the identified compliance obligations, including the process and the results.

References:

3.2.8 Requirement

3.2.9 Compliance obligations

Annex A, A.6.1.3

### **6.1.4 Planning action \*\***

***The organization shall plan:***

- a) To take actions to address its:***
  - 1) Significant environmental aspects;***
  - 2) Compliance obligations;***

**3) Risks and opportunities identified in 6.1.1**

**b) How to:**

- 1) Integrate and implement the actions into its environmental management system processes (see 6.2, Clause 7, Clause 8 and 9.1), or other business processes;**
- 2) Evaluate the effectiveness of these actions (see 9.2.1)**

**When planning these actions, the organization shall consider its technological options and its financial, operational and business requirements.**

ISO 14001:2015 places a significant focus on system planning to ensure that all relevant issues affecting the organization's environmental performance and its ability to achieve intended outcomes are anticipated, addressed and evaluated.

The organization must plan the actions to be taken within the EMS to address the significant environmental aspects (6.1.2), compliance obligations (6.1.3), and the identified risks and opportunities (6.1.1) that affect the organizations ability to achieve its intended outcomes.

These plans may be incorporated into a single planning document that includes all required areas of concern (6.1.1 through 6.1.4) and provides direction on how these actions will be carried out, integrated within the organization, and how they will be evaluated for effectiveness. Some of these plans may include the environmental objectives (6.2.1) and actions to achieve objectives (6.2.2).

**Evidence of conformance**

Evidence for meeting these requirements may be found in the documented plans, environmental objectives and plans (6.2), linkage to other requirements (4.1.1, 4.1.2, 6.1.1, 6.1.2, 6.1.3), and the actions related to the Support (section 7), Operation (section 8), and Performance evaluation (section 9) requirements in the standard.

References:

Annex A, A.6.1.4

**6.2 Environmental objectives and planning to achieve them \***

**6.2.1 Environmental objectives**

**The organization shall establish environmental objectives at relevant functions and levels, taking into account the organization's significant environmental aspects and associated compliance obligations, and considering its risks and opportunities.**

**The environmental objectives shall be:**

- a) Consistent with the environmental policy;**
- b) Measurable (if practicable);**
- c) Monitored;**
- d) Communicated;**

***e) Updated as appropriate.***

***The organization shall maintain documented information on the environmental objectives.***

Environmental objectives are established within the organization at any level where it is appropriate to do so, with consideration of its significant environmental aspects, compliance obligations and the identified risks and opportunities. It is not required that an objective be set for every significant aspect, compliance obligation or risk and opportunity, however these areas of concern should have a high priority for setting objectives.

Stated objectives for simply maintaining compliance with the organization's compliance obligations are usually not appropriate unless there may have been historical issues with meeting these obligations. Legal compliance is a requirement; it is not voluntary, nor is it subject to resource availability. Objectives for going beyond compliance, and objectives related to achieving compliance with new or changed legal requirements are acceptable. The organization chooses its objectives voluntarily, based on its commitment to continual improvement, achieving its intended outcomes, and the availability of resources.

Auditors should verify consistency between the environmental objectives and the environmental policy, especially the commitment to continual improvement. Objectives are measurable when there are quantitative or qualitative methods available to evaluate progress. If not, then the organization must have indicated how it will determine if an environmental objective has been achieved.

Environmental objectives must be communicated to all personnel under the organization's scope who have the ability to affect achievement of the objectives.

**Evidence of conformance:**

Evidence of meeting these requirements may include documented environmental objectives, evidence of communication about the objectives with relevant personnel, records of review and updating objectives, records of progress toward achieving objectives.

References:

- 3.2.5 Objective
- 3.2.6 Environmental objective
- Annex A, A.6.2

***6.2.2 Planning actions to achieve environmental objectives \****

***When planning how to achieve its environmental objectives, the organization shall determine:***

- a) What will be done;***
- b) What resources will be required;***
- c) Who will be responsible;***
- d) When it will be completed;***
- e) How the results will be evaluated, including indicators for monitoring progress toward achievement of its measurable environmental objectives (see 9.1.1).***

***The organization shall consider how actions to achieve its environmental objectives can be integrated into the organization's business processes.***

Each environmental objective must have a plan in place describing how it will be achieved, including a clear description of what is to be done, the required resources, assignment of responsibility, timing and completion targets, and what information will be needed to indicate successful achievement of the objective. The organization should be prepared to demonstrate progress toward each objective through measuring or monitoring information associated with the objective.

If the organization finds that an objective is not achievable in the time frame specified or by the means identified, the plan must be amended to reflect the changes.

**Evidence of conformance:**

Evidence of meeting these requirements may include progress reports, measuring and monitoring information, management review results and other communications that indicate how the organization is meeting its objectives.

References:

3.2.6 Environmental objective

3.4.8 Monitoring

3.4.9 Measurement

3.4.10 Performance

Annex A, A.6.2

## **7 Support**

### **7.1 Resources \***

***The organization shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the environmental management system.***

Personnel, organizational, financial, and technological resources should be adequate to establish and maintain the requirements of the standard. Management's role is to ensure they are available. It is appropriate to verify how resource planning occurs and how resources are provided. Continual improvement of the EMS is directly related to the provision of resources.

**Evidence of conformance:**

Evidence for meeting this requirement may include budgets, budget planning documents, documentation of capital needs, training needs, and any other information that supports how resources are obtained and allocated for the EMS.

References:

Annex A. A.7.1

### **7.2 Competence \***

***The organization shall:***

- a) Determine the necessary competence of person(s) doing work under its control that affects its environmental performance and its ability to fulfil its compliance obligations;***
- b) Ensure that these persons are competent on the basis of appropriate education, training or experience;***
- c) Determine training needs associated with its environmental aspects and its environmental management system;***
- d) Where applicable, take actions to acquire the necessary competence, and evaluate the effectiveness of the actions taken.***

The organization must demonstrate that anyone working for it that can affect environmental performance or its compliance obligations is competent to perform assigned tasks. Competency is defined by the organization, based on the need for training, education or experience.

The organization must identify the necessary education, training or experience for personnel who work directly with any of the identified environmental aspects or have responsibilities in the EMS.

If competencies are lacking, or the need arises for new or additional competencies, the organization must act to acquire these competencies and evaluate if these actions have been effective.

#### **Evidence of conformance:**

Evidence for meeting these requirements may be found in personnel evaluations, training records, training plans, or other documentation that address competency needs.

References:

Annex A, A.7.2

### **7.3 Awareness \***

***The organization shall ensure that persons doing work under the organization's control are aware of:***

- a) The environmental policy;***
- b) The significant environmental aspects and related actual or potential environmental impacts associated with their work;***
- c) Their contribution to the effectiveness of the environmental management system, including the benefits of enhanced environmental performance;***
- d) The implications of not conforming with the environmental management system requirements, including not fulfilling the organization's compliance obligations.***

The organization must ensure that all personnel doing work under its control are aware of the environmental policy, significant environmental aspects, and how their work performance affects, or is affected by this knowledge. For those who are directly involved with the significant environmental impacts, the level of knowledge and awareness should be higher, appropriate to the environmental risks and with respect to the organization's compliance obligations. All personnel should also be aware of the emergency response procedures.

**Evidence of conformance:**

Evidence of meeting these requirements may be obtained through interviews with relevant personnel who are doing work under the control of the organization to assess their knowledge of the environmental policy, the significant aspects and the impacts associated with their work, their own contribution to the effectiveness of the EMS, and what can happen when the EMS is not followed, particularly with respect to compliance obligations.

References:

Annex A, A.7.3

## **7.4 Communication**

### **7.4.1 General \*\***

***The organization shall establish, implement and maintain the processes needed for the internal and external communications relevant to the environmental management system, including:***

- a) On what it will communicate;***
- b) When to communicate***
- c) With whom to communicate;***
- d) How to communicate.***

***When establishing its communications process(es), the organization shall:***

- Take into account its compliance obligations:***
- Ensure that environmental information communicated is consistent with information generated within the environmental management system, and is reliable.***

***The organization shall respond to relevant communications on its environmental management system.***

***The organization shall retain documented information as evidence of its communications, as appropriate.***

The expectation is that organizations will have a defined process for communications, internal and external, about the EMS. This approach will define what is to be communicated, to whom, when and how it will be done. The organization will need to ensure that any environmental information it communicates is consistent with information generated by the EMS and can be demonstrated as being reliable.



#### **7.4.2 Internal communication \***

**The organization shall:**

- a) Internally communicate information relevant to the environmental management system among the various levels and functions of the organization, including changes to the environmental management system, as appropriate;**
- b) Ensure its communication process(es) enable(s) persons doing work under the organizations' control to contribute to continual improvement.**

Internal communications about the EMS should be focused on personnel at all levels and ensure that personnel are able to contribute to continual improvement. Some organizations will choose to include the training that results from meeting sections 7.2 and 7.3 as evidence of internal communication promoting continual improvement. Information about emergency response may also be identified as internal communications. The organization must demonstrate that internally communicated environmental information is reliable.

#### **7.4.3 External communication \***

**The organization shall externally communicate information relevant to the environmental management system, as established by the organization's communication process(es) and a required by its compliance obligations.**

The organization's external communications, especially with respect to compliance obligations, will follow the requirements in its own processes in 7.4.1.

#### **Evidence of conformance:**

Evidence of meeting the communications requirements may be found in the defined processes for internal and external communication and any of the following: communication logs, posted environmental information, training records, web-based information, performance results, email, and all other forms of communication, including regulatory reporting.

The organization must demonstrate that any externally communicated environmental information is reliable. This can be achieved through, for example, peer review of information, internal audits, external assurance, management review, etc.

References:

Annex A, A.7.4

### **7.5 Documented information \***

#### **7.5.1 General**

**The organization's environmental management system shall include:**

- a) Documented information required by this International Standard**

- b) Documented information determined by the organization as being necessary for the effectiveness of the environmental management system.**

#### **7.5.2 Creating and updating**

**When creating and updating documented information, the organization shall ensure appropriate:**

- a) Identification and description (e.g. a title, date, author, or reference number);**
- b) Format (e.g. language, software version, graphics) and media (e.g. paper, electronic);**
- c) Review and approval for suitability and adequacy.**

#### **7.5.3 Control of documented information**

**Documented information required by the environmental management system and by this International Standard shall be controlled to ensure:**

- a) It is available and suitable for use, where and when it is needed:**
- b) It is adequately protected (e.g. from loss of confidentiality, improper use, or loss of integrity).**

**For the control of documented information, the organization shall address the following activities as applicable:**

- Distribution, access, retrieval and use;**
- Storage and preservation, including preservation of legibility;**
- Control of changes (e.g. version control)**
- Retention and disposition.**

**Documented information of external origin determined by the organization to be necessary for the planning and operation of the environmental management system shall be identified, as appropriate and controlled.**

Documented information includes all procedures, process documents, records, and all other information that can appear in hard copy, electronic or other formats. Beyond documents required by the standard, the organization chooses what is appropriate and necessary to exist as documented information.

There is no requirement for an EMS manual. It is up to the organization to determine the most effective way to document the system, as defined in section 4.4.4.

Any document required by the standard, or any document that becomes part of the EMS used to describe or demonstrate conformance to a requirement, must be controlled. This control extends to documents of external origin such as manuals, permits, legal requirements, or any other external information the organization has determined it must maintain.

#### **Evidence of conformance:**

Evidence of meeting these requirements may be found in document inventories, the use of document control systems (hard copy or electronic) and by observing the use of documents during the audit.

If the organization has combined the documentation of the environmental management system with other management systems documentation (i.e., quality, safety & health), there must be a method to

clearly identify the EMS requirements within the documentation.

References:

3.3.2 Documented information

A.7.5

## **8 Operation \*\***

### **8.1 Operational planning and control**

***The organization shall establish, implement, control and maintain the processes needed to meet environmental management system requirements, and to implement the actions identified in 6.1 and 6.2 by:***

- ***Establishing operating criteria for the process(es);***
- ***Implementing control of the process(es), in accordance with the operating criteria.***

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

***The organization shall ensure that (an) outsourced process(es) is (are) controlled or influenced. The type and extent of control or influence to be applied to the process(es) shall be defined within the environmental management system.***

***Consistent with a life cycle perspective, the organization shall:***

- a) Establish controls, as appropriate, to ensure that its environmental requirement(s) is (are) addressed in the design and development process for the product or service, considering each stage of its life cycle;***
- b) Determine its environmental requirement(s) for the procurement of products and services, as appropriate;***
- c) Communicate its relevant environmental requirement(s) to external providers, including contractors;***
- d) Consider the need to provide information about potential significant environmental impacts associated with the transportation or delivery, use, end-of-life treatment and final disposal of its products and services.***

***The organization shall maintain documented information to the extent necessary to have confidence that the process(es) has (have) been carried out as planned.***

The type and extent of operational controls depend on the nature of operations, risk and opportunities, significant environmental aspects and compliance obligations. The organization has flexibility to develop operational controls that it determines are necessary to ensure that processes are effectively controlled to minimize the adverse impacts that would occur without controls.

Operational controls must be applied to the processes needed to meet EMS requirements and for the actions identified in sections 6.1 (actions to address risks and opportunities) and 6.2 (environmental objectives and planning to achieve them). These controls are based on operating criteria established by the organization and used to control the identified processes. The organization will also plan for changes and review the consequences of unplanned changes in the processes to ensure adverse effects are mitigated.

Outsourced processes must be controlled to the extent they can be controlled or influenced. These controls must be defined within the EMS. Organizations will evaluate their potential to control or influence over outsourced processes and ensure that, as appropriate, environmental aspects are properly managed.

The organization will apply a life cycle perspective to operational controls that take into account the design and development process for products and services. This perspective will address supply chain environmental requirements, communication of environmental requirements to suppliers and contractors, and communication about potential significant environmental impacts resulting from the delivery, use, and disposition of its products and services.

The controls, plans, operating criteria and other relevant information must be documented, as appropriate to ensure that processes are carried out as planned.

**Evidence of conformance:**

Evidence of meeting these requirements may include the documented information about controls, criteria, plans, operational records, monitoring records, etc. that support operational control. This will include information specific to the life cycle perspective, as appropriate, and information about outsourced processes that the organization controls or influences.

References:

3.3.3 Life cycle

3.3.4 Outsource

3.3.5 Process

Annex A, A.8.1

**8.2 Emergency preparedness and response \***

***The organization shall establish, implement and maintain the processes needed to prepare for and respond to potential emergency situations identified in 6.1.1.***

***The organization shall:***

- a) Prepare to respond by planning actions to prevent or mitigate adverse environmental impacts from emergency situations;***
- b) Respond to actual emergency situations;***

- c) Take action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impact;*
- d) Periodically test the planned response actions, where practicable;*
- e) Periodically review and revise the process(es) and planned response actions, in particular after the occurrence of emergency situations or tests;*
- f) Provide relevant information and training related to emergency preparedness and response, as appropriate, to relevant interested parties, including persons working under its control;*

***The organization shall maintain documented information to the extent necessary to have confidence that the process(es) is (are) carried out as planned.***

The identification of potential emergency situations occurs in the planning requirements of section 6.1.1. Many emergency plans are driven by regulatory requirements. These plans should clearly outline the situations where accidents and emergencies can occur and how the organization will respond. The plans should include information about mitigation of the adverse environmental impacts from any accident or emergency.

Alarms and other emergency testing/monitoring equipment may fall under calibration requirements. Periodic testing should be conducted at least annually whenever practicable. After an actual accident or emergency, a review of the incident and the response activity is appropriate to consider the need for corrective action and the need to revise procedures.

#### **Evidence of conformance**

Evidence of meeting these requirements may be found in documented emergency response plans, plans that identify potential emergency situations (6.1.1), training records, records of emergencies, actions taken, corrective action, and emergency drill and testing records.

References:

Annex A, A.8.2

## **9 Performance evaluation**

### **9.1 1 Monitoring, measurement, analysis and evaluation**

#### **9.1.1 General**

***The organization shall monitor, measure, analyze and evaluate its environmental performance.***

***The organization shall determine:***

- a) What needs to be monitored and measured;*
- b) The methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;*



- c) *The criteria against which the organization will evaluate its environmental performance, and appropriate indicators;*
- d) *When the monitoring and measuring shall be performed;*
- e) *When the results from monitoring and measurement shall be analyzed and evaluated.*

*The organization shall ensure that calibrated or verified monitoring and measurement equipment is used and maintained, as appropriate.*

*The organization shall evaluate its environmental performance and the effectiveness of the environmental management system.*

*The organization shall communicate relevant environmental performance information both internally and externally, as identified in its communication process(es) and as required by its compliance obligations.*

*The organization shall retain appropriate documented information as evidence of the monitoring, measurement, analysis and evaluation results.*

The organization must identify the key characteristics of the EMS it will monitor, measure, analyze and evaluate in order to indicate its environmental performance. The organization should take into account operational controls, environmental objectives and targets, actions related to its planning, significant aspects, compliance obligations, and other performance measures. The organization will communicate relevant information about environmental performance according to its communications processes and compliance obligations.

PRI REGISTRAR recommends the use of ISO 14031 as guidance to help organizations develop environmental performance measurements.

For multi-site systems, the monitoring and measuring at sites for system characteristics (i.e., total waste volume) should be rolled up to the centralized function as appropriate.

Devices that measure or monitor activity associated with the key characteristics should be calibrated and maintained.

### **Evidence of conformance**

Evidence to demonstrate conformance with these requirements may include; any needed procedures or processes for monitoring, measuring, analysis and evaluation; any records or reports indicating the results of these processes, and any calibration records for associated monitoring or measuring equipment. Additionally, any communication records, internal or external, that provide information on environmental performance.

References:

#### 3.4.7 Indicator

3.4.8 Monitoring

3.4.9 Measurement

3.4.11 Environmental performance

Annex A. A.9.1.1

### **9.1.2 Evaluation of compliance**

***The organization shall establish, implement and maintain the processes needed to evaluate fulfilment of its compliance obligations.***

***The organization shall:***

- a) Determine the frequency that compliance will be evaluated;***
- b) Evaluate compliance and take action if needed;***
- c) Maintain knowledge and understanding of its compliance status.***

***The organization shall retain documented information as evidence of the compliance evaluation result(s).***

There are many ways to conform to this requirement and the organization should be given flexibility in doing so. Compliance auditing exceeds the requirement for compliance evaluation. The method chosen for compliance evaluation should be effective in reviewing the organization's status with respect to all applicable compliance obligations.

Auditors may not accept "affirmative statements" or "self-declaration statements" as evidence of compliance with legal requirements or for the evaluation of compliance. Objective evidence must be presented to demonstrate the organization effectively evaluates compliance with all identified all its compliance obligations. There should also be evidence of corrective action when compliance issues have been identified. If self-reporting for a compliance issue is required, there should be evidence it has taken place.

Periodic evaluation should be conducted at least annually to be effective. The evaluation may be internal, external or a combination of both. In either case, the organization should review and respond to the results of the evaluation. Information about the results of compliance obligation evaluation should be retained.

#### **Evidence of conformance:**

Evidence of meeting these requirements may include a schedule of compliance evaluations, internal reports and findings, and records of any actions taken to correct issues. Additionally, there should be evidence that the results have been included in management review.

References:

Annex A. A.9.1.2



## **9.2 Internal audit**

### **9.2.1 General**

***The organization shall conduct internal audits at planned intervals to provide information on whether the environmental management system:***

- a) Conforms to:***
  - 1) The organization's own requirements for its environmental management system***
  - 2) the requirements of this International Standard;***
- b) Is effectively implemented and maintained.***

PRI Registrar requires the organization to have completed at least one full round of internal EMS audits prior to beginning the registration process (Stage 1). Internal audits should be scheduled to clearly indicate that all requirements of the standard have been included and the requirements of the EMS are covered.

Organizations should include internal auditor qualifications, training and competency as part of the audit program. Appropriate levels of regulatory knowledge should be considered when selecting internal auditors. PRI Registrar NA, Inc. recommends that organizations follow the guidance of ISO 19011 in developing and implementing their audit program and procedures.

Auditors should not be assigned to audit areas of their own direct responsibility or authority within the EMS.

Audit reports from a PRI Registrar NA, Inc. pre-assessment are not acceptable as evidence of an internal audit having been conducted.

### **9.2.2 Internal audit program**

***The organization shall establish, implement and maintain an internal audit program, including the frequency, methods, responsibilities, planning requirements and reporting of its internal audits.***

***When establishing the internal audit program, the organization shall take into consideration the environmental importance of the processes concerned, changes affecting the organization and the results of previous audits.***

***The organization shall:***

- a) Define the audit criteria and scope for each audit;***
- b) Select auditors and conduct audits to ensure objectivity and the impartiality of the audit process;***
- c) Ensure that the results of the audits are reported to the relevant management.***

***The organization shall retain documented information as evidence of the implementation of the audit program and the audit results.***

The internal environmental audit schedule must be based on the criteria as stated in the standard – “environmental importance of the process concerned, changes affecting the organization and the results of previous audits.” An audit schedule based solely on time is not acceptable. It is expected that the organization will audit the full management system over a reasonable period of time, focusing on the environmentally important areas.

Persons inside or outside the organization (second parties) may conduct internal audits, provided they meet the organization’s requirements for auditor qualifications. In any case, the organization must ensure the impartiality and objectivity of the audits.

Results from internal audits must be submitted for appropriate review and, if necessary, corrective action. The results of the audits must be reported to management, typically in management review.

PRI Registrar auditors must annually review the effectiveness of the internal audit program to assess the degree of confidence that can be placed on it. Audits by PRI Registrar to assess ongoing registration may not be considered as internal audits to satisfy these requirements.

For multi-site systems, each site may conduct their own internal audits or the audits can be done by a centralized audit function. In either case, the audit results should be reviewed at the system management level.

#### **Evidence of conformance**

Evidence for meeting these requirements may be found in documented information about the internal audit schedule, planning, audit reports, summarized results given to management, and interviews with internal auditors. Additionally, the organization should demonstrate how it audits the internal audit program in a way that maintains impartiality.

References:

Annex A. 9.2

#### **9.3 Management review**

***Top management shall review the organization’s environmental management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness.***

***The management review shall include consideration of:***

- a) The status of actions from previous management reviews:***
- b) Changes in:***
  - 1) External and internal issues that are relevant to the environmental management system;***
  - 2) The needs and expectations of interested parties, including the compliance obligations;***
  - 3) Its significant environmental aspects;***

- 4) *Risks and opportunities;*
- c) *The extent to which environmental objectives have been achieved;*
- d) *Information on the organization's environmental performance, including trends in:*
  - 1) *Nonconformities and corrective actions;*
  - 2) *Monitoring and measurement results;*
  - 3) *Fulfilment of its compliance obligations;*
  - 4) *Audit results;*
- e) *Adequacy of resources*
- f) *Relevant communication(s) from interested parties, including complaints;*
- g) *Opportunities for continual improvement.*

*The outputs of the management review shall include:*

- *Conclusions on the continuing suitability, adequacy and effectiveness of the environmental management system*
- *Decisions related to continual improvement opportunities;*
- *Decisions related to any need for changes to the environmental management system, including resources;*
- *Action, if needed, when environmental objectives have not been achieved;*
- *Opportunities to improve integration of the environmental management system with other business processes, if needed;*
- *Any implications for the strategic direction of the organization.*

***The organization shall retain documented information as evidence of the results of management review.***

At least one management review must be completed before the Stage 1 Audit. There must be sufficient system history to conduct an effective management review. Management should review system information as appropriate to make reasonable determinations and conclusions concerning the management system's suitability, adequacy and effectiveness. It is appropriate to evaluate the environmental competency of those participating in management review.

Management review must take place at least once annually in order to be effective. It is admissible for organizations to conduct management review in a series of meetings over a period of time. For multi-site systems, management review may also be conducted at the site level and rolled up to a system level review.

The inputs section of 9.3, a-g may be considered as an agenda for management review. Auditors should review the required outputs to ensure that management has made appropriate conclusions and decisions about what has been presented to them.

#### **Evidence of conformance**

Evidence of meeting these requirements may be found in the documented information supporting the agenda, minutes, and conclusions and decisions from management review. Additionally, interviews with those who participated may provide additional insight. It is imperative that top management personally attend and participate in management review in order to further their demonstration of EMS leadership

and commitment.

References:

Annex A. 9.3

## **10 Improvement**

### **10.1 General**

***The organization shall determine opportunities for improvement (see 9.1, 9.2, and 9.3) and implement necessary actions to achieve the intended outcomes of its environmental management system.***

After reviewing the results of the its:

- monitoring, measurement, analysis and evaluation activities;
- the results of its evaluation of compliance;
- the internal audit results; and
- the management review,

the organization must determine what opportunities for improvement there are and take action to ensure that the intended outcomes of the EMS are achieved. These action may include corrective action and/or actions to continually improve the EMS in order to enhance environmental performance.

### **10.2 Nonconformity and corrective action**

***When a nonconformity occurs, the organization shall:***

- a) React to the nonconformity and, as applicable:***
  - 1) Take action to control and correct it;***
  - 2) Deal with the consequences, including mitigating adverse environmental impacts;***
- b) Evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by:***
  - 1) Reviewing the nonconformity***
  - 2) Determining the causes of the nonconformity***
  - 3) Determining if similar nonconformities exist, or could potentially occur;***
- c) Implement any action needed;***
- d) Review the effectiveness of any corrective action taken;***
- e) Make changes to the environmental management system, if necessary.***

***Corrective actions shall be appropriate to the significance of the effects of the nonconformities encountered, including the environmental impact(s).***

***The organization shall retain documented information as evidence of:***

- ***The nature of the nonconformities and any subsequent actions taken;***

- ***The results of any corrective action.***

The standard no longer requires an explicit preventive action process. Instead it is implicit in the handling of corrective action to consider the preventive component.

The organization may use corrective action processes associated with other management systems, provided they address each step outlined in 10.2, including the action to mitigate adverse environmental impacts. Multi-site systems must have a centralized corrective/preventive action function that will, at a minimum, review corrective and preventive actions from the sites for common problems and systemic issues.

At the time of registration there should be evidence to verify that the corrective and preventive action process is functional with documented information indicating effective completion of corrective actions. Corrective actions include the identification of responsibility, root cause determination, actions taken, and the verification of effectiveness for actions taken. PRI Registrar auditors may not accept evidence of corrective action that references actions to be taken in the future. Future actions are evidence of a corrective action plan and cannot be verified as effective until they are completed. PRI Registrar recommends corrective action reports be written in the past tense.

**Evidence of conformance**

Evidence of meeting these requirements may include the process for corrective action, records of corrective actions evaluated for effectiveness and closed, any changes to the EMS as a result of corrective actions, and any actions taken to mitigate adverse impacts.

References:

Annex A. 10.2

**10.3 Continual improvement**

***The organization shall continually improve the suitability, adequacy and effectiveness of the environmental management system to enhance environmental performance.***

**Evidence of conformance**

Evidence of meeting this requirement may be found in the results of management review, corrective actions, environmental performance results, compliance performance, and other indicators the organization chooses to demonstrate its continual improvement. In addition, the results of preventive actions planned and completed as a result of identifying risks and opportunities may indicate continual improvement.

References:

Annex A. 10.3