ISO 14001
TRANSITION GUIDELINES

PREPARING FOR THE CHANGE FROM ISO 14001:2004

TO ISO 14001:2015

BSCIC

> **The purpose of this International Standard is to provide organizations with a framework to protect the environment and respond to changing environmental conditions in balance with socio-economic needs. It specifies requirements that enable an organization to achieve the intended outcomes it sets for its Environmental Management System.**
>
> **Reference- ISO 14001:2015**

AIM OF THE DOCUMENT

This aim of this Transition Guideline document is facilitating your meeting the requirements of the new international standard for Environmental Management System (EMS) ISO 14001:2015, which replaces the previous version ISO 14001:2004.

WHY THE CHANGE??

As per ISO, All ISO standards are reviewed every five years to establish if a revision is required in order to keep it current and relevant for the marketplace. ISO 14001:2015 is designed to respond to latest trends and ensure it is compatible with other management system standards.

There are a number of objectives associated with this revision, but the following are considered most critical.

- Increased prominence of environmental management within the organization's strategic planning processes.

- Greater focus on leadership

- Addition of proactive initiatives to protect the environment from harm and degradation, such as sustainable resource use and climate change mitigation.

- Improving environmental performance added.

- Lifecycle thinking when considering environmental aspects.

- Addition of a communications strategy

In addition, the revised standard follows a common structure, with the same terms and definitions as a number of other management system standards such as ISO 9001. This makes them easier, cheaper and quicker for those companies who use more than one, not to mention helping out the auditors.

The revision was conducted by an ISO technical committee called ISO/TC 207/SC 1, which is comprised of experts nominated by their National Standards Bodies and liaison organizations.

An ISO 14001 Environmental Management System will help you to monitor and manage your resources and environmental impacts whether you run a single site operation or a global business. As the world's first environmental management system, it helps you identify and control how your business affects the environment and helps put in place robust policies to conserve your resources and save money. A systematic approach to environmental management can provide top management with information to build success over the long term and create options for contributing to sustainable development.

FIGURE 1- WHY EMS??

COMPARING ISO 14001:2004 WITH ISO 14001:2015

Both old and new standards cover essentially the same topics. However, there are some important differences. Some of these are discussed below:

STRUCTURE OF STANDARD

Perhaps the biggest difference between the old and the new standard is the structure. This is because the new edition uses the new Annex SL template. According to ISO, all future management system standards (MSSs) will use this new layout and share the same basic requirements. As a result, all new MSSs will have the same look and feel.

A common structure is possible because basic concepts such as management, requirements, policy, planning, performance, process, control, monitoring, measurement, auditing, decision making, corrective action, and nonconformity are common to all management system standards. A common structure should make it easier for organizations to implement multiple standards because they will all share the same basic language and the same basic requirements.

CONTEXT OF THE ORGANIZATION

Unlike the old standard, the new one expects you to understand your organization's external context before you establish its environmental management system (EMS). This means that you need to identify and understand the external issues and the external environmental conditions that could influence your organization's EMS and the results that it intends to achieve. It also means that you need to identify and understand the internal issues

and internal environmental conditions that could influence your EMS.

The new ISO 14001:2015 standard also expects you to identify the interested parties that are relevant to your EMS and to identify their needs and expectations. Once you've done this, it expects you to study these needs and expectations and to figure out which ones have become compliance obligations.

But why is all this necessary? It's necessary because your EMS will need to be able to manage all of these influences. Once you understand your context, you're expected to use this knowledge to help you define your EMS and the challenges it must deal with.

RISK PLANNING

Unlike the old standard, the new ISO 14001 standard expects you to determine "risks and opportunities". So what does this mean and what does the new standard expect you to do?

It expects you to start by establishing a risk planning process. It then expects you to use this process to identify risks and opportunities related to your organization's unique context, its interested parties, its compliance obligations, and its environmental aspects. It then expects you to define actions to address all of these risks and opportunities.

And to make sure that these actions will actually be carried out, it asks you to make these actions an integral part of your EMS processes, and then to implement, control, evaluate, and review the effectiveness of these actions and these processes.

While risk planning is now an integral part of the new ISO 14001 standard, it does not actually expect you to implement a formal risk management process.

PREVENTIVE ACTION

The new ISO 14001 standard no longer uses the term preventive action. We're now expected to use risk planning concepts and to think of the entire EMS as a system of preventive action. ISO 14001 2015 section A.10.1 says there is no longer a single clause on preventive action because "One of the key purposes of an Environmental Management System is to act as a preventive tool. This concept of preventive action is now captured in 4.1 (i.e. understanding the organization and its context) and 6.1 (i.e., actions to address risks and opportunities)."

So, according to the new standard, these two sets of requirements cover the old concept of preventive action. Evidently, once we realize that the entire EMS can be used to manage risks and opportunities, we no longer need a separate clause on preventive action. It's redundant.

DOCUMENTED INFORMATION

The new ISO 14001: 2015 standard has also eliminated the long standing distinction *between* documents and records. Now they are both referred to as *"documented information"*.

PROCEDURES

The old ISO 14001 standard asked organizations to establish a wide range of procedures. These included an environmental aspects procedure, a legal requirements management procedure, an awareness procedure, a communications procedure, a documents procedure, an operational procedure, an emergency preparedness and response procedure, a monitoring and measurement procedure, a compliance evaluation procedure, a

nonconformity management procedure, a record keeping procedure, and an audit procedure.

Now, only one procedure is left. The new ISO 14001 2015 standard asks you to establish an emergency preparedness and response procedure in section 8.2, and that's the only one.

Instead of asking you to write procedures, the new standard expects you to maintain and control a wide range of documents (i.e., documented information). Since the new standard doesn't tell you what to call these documents, you can call them procedures if you like.

And, of course, you still need to have documents except that now they're called "documented information". So, while on the surface this looks like a radical change, it probably isn't.

OTHER CLARIFICATIONS AND MODIFICATIONS

The old ISO 14001 standard asked you to *"define and document the scope of its* environmental management system" (4.1), but it didn't say anything about how this should be done. The new ISO standard clarifies how this ought to be done (4.3). It now asks you to consider your compliance obligations, your corporate context, your physical boundaries, your products and services, your activities and functions, and your authorities and abilities when you define the scope of your EMS. And it asks you to include all products, services, and activities that have significant environmental aspects. The new term "compliance obligation" has replaced the rather cumbersome phrase: *"legal requirements and other requirements to which the organization subscribes"*. However, the meaning is the same. There are two kinds of compliance

obligations: mandatory compliance obligations and voluntary compliance obligations. Mandatory compliance obligations include laws and regulations while voluntary compliance obligations include contractual commitments, community and industry standards, ethical codes of conduct, and good governance guidelines. A voluntary obligation becomes mandatory once you decide to comply with it.

The new standard no longer refers to environmental targets. According to section A.6.2, *"The concept of "target" used in prior editions of this International Standard is captured within the definition of "environmental objective".* You can, of course, still set targets and call them targets if you wish. The only real difference is that the new ISO 14001 standard thinks of a target as a type of objective.

Life cycle considerations were largely ignored by the old standard. Now they're central. ISO 14001 now expects you to use a life cycle perspective to *"identify the environmental aspects and associated environmental impacts of its activities, products and services that it can control and those that it can influence"* (section 6.1.2).

The term "management representative" has been officially dropped. The management duties and responsibilities that were previously assigned to someone called a "management representative" may now be assigned either to one person or to many. Of course, you may continue to use this job title if you wish.

TRANSITION GUIDANCE

1. FOR EXISTING BSCIC CLIENTS:

Please note the 3 year transition period**.**

2015   2016   2017   2018

Published on September 15; 2015	15 September 2015 start of three years transition period to 15 September 2018

Please note that no certificate of EMS shall bear the expiry date later than 15th Sept' 2018 as all the ISO 14001:2004 certificates will be invalid after this particular date i.e. 15th Sept' 2018.

May you still want to opt for ISO 14001:2004, transition to new standard i.e. 14001:2015 will be required in between to keep the certificate valid. However BSCIC appreciates & encourages current users of ISO 14001:2004 to implement ISO 14001:2015 at an early stage.

Please note that if your organization does not have a transition audit prior to the end of the transition period/obsolescence date of ISO 14001:2004, and then you will no longer be certified as of the end of the transition period. In order to become certified to ISO 14001:2015, you will need to start over with an initial audit (Stage 1 and Stage 2).

However in this journey of transition, BSCIC's Assessment Scheduling Department will work with you to ensure the timely scheduling of any transition audits that occur later in the transition period to avoid any unfortunate situation.

Based on the agreement with you, BSCIC is in a potential to conduct transition activities during a routine surveillance, recertification audit or a special audit.

Please note that the new standard was published on September 15, 2015. This means that the ISO 14001:2004 standard will become obsolete on September 15, 2018. As a result, All ISO 14001:2004 certifications issued in late 2015 and beyond will have to bear an expiry date September 15, 2018.

- BSCIC will accept a client undergoing surveillance with ISO 14001:2004 version only till APRIL 1; 2016. We are sending out this communiqué 6 months in advance so that you may prepare well.

- However if a client on special request puts up a request not to be able to entertain ISO 14001:2015 version in the year 2016, we may consider the client in 2017.

- Please note that 7th JANUARY 2016 onwards BSCIC shall be ready to take up any client which requests its surveillance against ISO 14001:2015. Clients are welcome to state that they want the surveillance assessment to be a transition & BSCIC shall

perform it against ISO 14001:2015.However we are not imposing the same upon the client.

- If you take up your surveillance against ISO 14001:2015, we will however not raise NCRs against the new requirements. Any finding shall be raised as 'OBSERVATION'. This will continue up to SEPTEMBER 15; 2017.

- From SEPTEMBER 15; 2017 to SEPTEMBER 15; 2018- Any finding which accounts to a NON CONFORMITY will be raised as a Non-Conformity however be kept as MINOR NON-CONFORMITY so that it doesn't impact the certification status of the client.

- This will continue up to SEPTEMBER 15; 2018 post which the ISO 14001:2015 requirements become MANDATORY.

- All clients shall be notified that they are required to close their CAPs by June 2018. BSCIC plans to transition all its clients to ISO 9001:2015 by JULY 07; 2018.

If you have a Recertification audit in early 2016, it will be your strategic decision that to choose the version, but there are a few key points to bear in mind. If you have had a chance to examine your quality system against the revised requirements and feel that you are ready, you can certainly request that a transition audit to ISO 14001:2015 be performed. Timing the transition to its regular recertification audit is ideal, but not in any way mandatory. You may certainly perform 2016 Recertification Audit to ISO 14001:2004, and then complete a transition audit to ISO 9001:2015 in 2017.

2. **FOR FRESH ENQUIRIES-**

If an organization is not yet certified & has been working at implementing ISO 14001:2004 for a while, BSCIC appreciates that a lot of work may have gone into preparing for certification to ISO 14001:2004. BSCIC will allow initial audits to the 2008 version of the standard HOWEVER keeping in mind that ISO 14001:2004 will be obsolete on September 15, 2018.

- Since for new applicants, BSCIC needs to decide about the cutoff date beyond which old standard's application shall not be accepted, BSCIC has kept the cutoff as SEPTEMBER 15;2016.

- The expiration date on any 2008 certificate issued after the publication of ISO 14001:2015 will be September 15, 2018. Thus, it may appear that you are not being granted a full, three-year certificate. However, after successful transition to ISO 14001:2015, the expiry date of your

certificate will be amended to reflect a full three-year certification.

In any of the cases, it is important to avoid waiting until the last minute.

Please support BSCIC to ensure the following during Transition activities:

I.   All issues that require your action for compliance with the new requirements be clearly identified and raised as documented findings.

II. Only when all identified outstanding issues have been appropriately addressed and the effectiveness of the management system demonstrated, the auditors recommend certification to the published ISO 14001:2015 standard for your organization.

III. Your Environmental Management System's Records be verified to demonstrate that all prior transition audit findings have been evaluated for corrective action and compliance before any recommendation for approval to ISO 14001:2015 be made.

IV. BSCIC ensures that the evaluation of your conformance to the new requirements during the transition phase does not interfere with your on-going conformance to ISO 14001:2004.

May you have any queries or any issues you may want to discuss with us during the course of transition, please feel free to write in/ call on the following contact details:

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