ISO 14001- Environmental Management System - Transition Guideline

Purpose of the document

This purpose 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.

The publication of ISO 14001:2015 in September 2015 is the final stage in the revision process of the standard. This version replaces ISO 14001:2004, though there is a three-year transition period.

ISO 14001:2015 – the main changes

The ISO 14001:2015 adopts the High Level Structure specified in ISO Annex SL. This structure is now the required framework for all new and revised management system standards.

The ISO team responsible for the revision process (subcommittee ISO/TC 207/SC1) has identified the following emerging changes as a result of their revision.

1. 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.

2. Strategic environmental management

There is a new requirement to understand the context of an organization when determining external and internal issues relating to its activities and the environment. Actions to address these issues within the Environmental Management System (EMS) are also required.

3. Leadership

A new clause has been added with particular responsibilities for top-level management to express their leadership and commitment to environmental management. Top-level management may assign this responsibility to others, but will retain accountability.

4. Protecting the environment
Environmental policy shall incorporate a commitment to the 'protection of the environment', this includes 'prevention of pollution' and 'other' commitments, such as sustainable resource use, climate change mitigation and adaptation, protection of biodiversity and ecosystems.

5. Environmental performance
The key focus is on improving performance related to the management of environmental aspects. The organization shall decide on criteria to evaluate its environmental performance, using correct indicators

6. Lifecycle Thinking

The organization will need to extend its control and influence of its environmental impacts from raw material acquisition/generation to end-of-life treatment. This does not imply a requirement to perform a lifecycle assessment (LCA), however the organization will need to carefully consider the stages of product/service that can be controlled or influenced.

7. Communication

Emphasis on internal and external communication, and equal treatment of both, has been added. The decision to communicate externally is retained by the organization while taking into account its compliance obligations.

8. Documentation

The term 'documented information' is used instead of 'documents' and 'records'. The organization has the flexibility to conclude when 'procedures' are required. Any format (paper, cloud, etc.) would be valid.

TRANSITION GUIDANCE

Existing PCMS Clients:

ISO 14001: 2004 Transition

Organizations already certified to ISO 14001:2004 have three years from publication of the new version in which to transfer. This transition period ends in September 2018. 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 PCMS 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, PCMS operational 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, PCMS 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.

PCMS will accept a client undergoing surveillance with ISO 14001:2004 version only till 31st march 2017. We are sending out this communiqué 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 up to 31st march 2017, we may consider the client till 15th September 2017.

Please note that 1st July 2016 onwards PCMS shall be ready to take up any client which requests its certification/surveillance against ISO 14001:2015.

Certification assessment as per ISO 14001:2015 will be conducted in two stages (Stage-1 and stage-2). Stage-1 audit (Document conformity assessment) and stage-2 audit (Compliance assessment) will be conducted onsite.

Surveillance /transition audit will be conducted in two stages (Stage-1 and stage-2). Please note that the Stage-1 of the transition audit will be offsite and stage-2 will be onsite at client premises.

Recertification under ISO-14001:2008 is valid till 15th September 2016. Thereafter first surveillance audit will be conducted as transition audit to ISO 14001:2015 on or before 15th September 2017.

New client

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

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

The expiration date on any ISO 14001:2004 certificate issued after the publication of ISO 14001:2015 will be 15th September 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 PCMS 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. PCMS ensures that the evaluation of your conformance to the new requirements during the transition phase does not interfere with your ongoing conformance to ISO 14001:2004.