Guide to ISO 14001:2015

Interpretation of the requirements of DIN EN ISO 14001:2015
Dear Reader,

There is growing awareness of the environment within society today, coupled with expectations for sustainable development, transparency and accountability. This, along with ever stricter official requirements and environmental standards, necessarily affects the way in which organizations have to operate. The new version of ISO 14001:2015, with its focus on management involvement and commitment, reflects the evolution of environmental considerations throughout the world.

The aim of the revision of the standard was
- greater integration of environmental management into business processes, taking into account the environmental risk, and
- adaptation to current environmental developments, in harmony with the socioeconomic demands of an increasingly dynamic and complex business world.

We would like to keep you informed at all times about the latest developments, and so this Guide has been created to answer the most important questions regarding the new version of the standard.

We are looking forward to speaking to you!

Dr. Klaus Oberste Lehn
Head of the Certification Body

Dr. Ortun Janson-Mundel
Specialist Manager, ISO 14001

Some practical examples of interpretation of the Standard, along with suitable system documents and key indicators, will show how you can meet the changed requirements.

In view of the extended transitional period, which ends on 14.09.2018, you have sufficient time to consider future planning for your environmental management system, and to discuss the role to be played by the new ISO 14001:2015 at leisure with our auditors.

We are looking forward to speaking to you!

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Head of the Certification Body

Dr. Ortun Janson-Mundel
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1. The environmentally aware organization

1.1. How environmental management can help companies develop

The new ISO 14001:2015 provides organizations with a framework for protecting the environment and for continual improvement of the environmental performance of activities, products and services in the context of Industry 4.0.

In comparison with its predecessor, ISO 14001:2004, ISO 14001:2015 places greater emphasis on the following:

- Integration of the environmental management system (EMS) into the business processes of the organization.
- Evaluation and consideration of the needs of interested parties, including public and regulatory authorities.
- Greater focus on compliance with applicable legislation along with commitment and the willingness to take responsibility, in order to fulfill compliance obligations that are binding for organizations.
- Evaluation of risks and opportunities, also in connection with significant environmental aspects and compliance obligations.
- Targeted measurement of environmental performance on the basis of defined performance indicators.
- Integration of life cycle concepts into product development up to the end of the product lifecycle, also in supply chains and outsourced processes.
- Strengthening of internal and external communication.

1.2. Transition schedule after publication of ISO 14001:2015

The revision of international standard ISO 14001 regarding environmental management was started in early 2012 and ISO 14001:2015 was published on 15 September 2015. The International Organization for Standardisation (ISO) and the International Accreditation Forum (IAF) jointly stipulated a 3 year transitional period (Joint IAF-ISO Communiqué on the publication and transition of ISO 9001:2015 and ISO 14001:2015 of 01 October 2015) from use of the old to the new standard. This transitional period will end on 14 September 2018.

Companies certified according to ISO 14001:2004 or to the corrected version of 2009 have to convert their environmental management system in accordance with ISO 14001:2015 until 14 September 2018. During this period, both the old and the new standards are valid. As of 15 September 2018, all certificates issued in accordance with ISO 14001:2004 will be invalid.

Currently, initial certifications in accordance with the old standards are still possible. However, these are no longer recommended for the second half of the transitional period.

Depending on the term of the certificate, different procedures are possible for transition to the new standard:

- Transition within a recertification audit,
- Transition within a surveillance audit or
- Transition within a special audit.

Organizations should begin to adapt their environmental management system to the new requirements in good time. We do not think it will be necessary to make major changes to an existing, effective environmental management system. We therefore recommend that you carry out an internal or thirdparty gap analysis or a special audit to identify strategic and operational gaps between the requirements of the old and new standards before the final transition audit takes place.

After the transition audit, a new certificate, based on ISO 14001:2015, will be issued for the remaining term of the ISO 14001:2004 certificate.
2. What’s new? The main changes in ISO 14001:2015

2.1 Introduction of a “High Level Structure”

The most noticeable change within ISO 14001:2015 is the new structure known as the High Level Structure. This leads to

- Identical structure for all new management systems,
- Uniform structure of the standards,
- Use of uniform core texts,
- Uniform terms,
- Easier understanding of the standard,
- More efficient implementation of further standards within integrated management systems.

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Figure 1 - Overview of High Level Structure
2.2 Changes of content
The new ISO 14001 continues to be based on the Plan-Do-Check-Act model and there is also greater focus on the environmental aspects along the value chain, for example:
- assessment of the environmental impact not only of activities within the organization, but also of upstream and downstream processes (e.g. raw materials, logistics),
- assessment of environmental impacts, taking the life cycle of products and services into consideration,
- determination of risks and opportunities.

The major changes within the relevant clauses are considered in greater detail below.

Context of the organization (Clause 4)
Organizations are required to identify external and internal issues which have a major impact on possible achievement of the objectives of the environmental management system. This refers in particular to environmental conditions which can influence the operation of a company and its products and services.

Organizations therefore need to identify the interested parties that are of relevance to their environmental management system and also to determine the relevant needs and expectations of these interested parties.

Management responsibility (Clause 5.1)
The requirements regarding management involvement and responsibility have been extended. The top management of an organization has to demonstrate management responsibility and commitment with regard to environmental management – for example by considering environmental protection performance parameters within its strategic planning. It must therefore be ensured that the requirements for environmental management are included in the core business processes and that the environmental management requirements lead to the desired results.

Environmental policy (Clause 5.2)
Top management should take more responsibility for the effectiveness of the environmental management system and should integrate the system into the business processes. The environmental policy should contain a commitment to protect the environment beyond the mere corporate boundaries. This can involve:
- sustainable use of resources,
- climate change mitigation (e.g. switching from fossil to renewable energy sources),
- protection of biodiversity and ecosystems.

Measures for handling risks and opportunities (Clause 6.1)
Determination of the risks and opportunities associated with significant environmental aspects and compliance
obligations is intended to ensure that the organization can achieve the intended results of its environmental management system and also prevent or reduce unwanted impacts. A further important aspect is the need for continual improvement.

There are no requirements for a formal risk management system or a documented risk management process. It is up to the organization itself to select the method it will use for determining the risks and opportunities.

**Environmental aspects (Clause 6.1.2)**
Environmental assessment includes consideration of environmental aspects over the whole life cycle (raw materials winning, development, production, transport, use and disposal). This life cycle perspective, however, does not mean that an environmental life cycle assessment according to ISO 14040 and ISO 14044 has to be prepared.

**Compliance obligations (Clause 6.1.3)**
Clause 4.3.2 “Legal and other requirements” of ISO 14001:2004 has been replaced by “Compliance obligations”. The main difference is that organizations can choose now freely other interested party requirements which the organization has to or chooses to adopt, for example:

- agreements with the client,
- guidelines formulated outside and beyond the regulatory framework,
- voluntary principles or good corporate practice, voluntary environment seals,
- product responsibility commitments,
- requirements of retail associations,
- agreements with common interest groups or nongovernmental organizations (NGOs),
- corporate policy requirements.

**Environmental objectives and planning to achieve them (Clause 6.2)**
Measurable environmental objectives and performance indicators, to the extent “that is practicable”, should be specified by the top management at the strategic, tactical and operational levels. When environmental objectives and performance indicators are stipulated, it should be taken into account that there may be situations where it is not possible to measure an environmental objective but it is still important for the organization to be able to identify whether an environmental objective has been achieved or not.

**Communication (Clause 7.4)**
There are new requirements to draft a communication strategy (about what, when, with whom and how to communicate). Within the framework of external communication, the organization is required to externally communicate information relevant to the environmental management system, as established by the organization’s communication process(es) and as required by its compliance obligations.

**Documented information (Clause 7.5)**
Based on the intention to make a management system and its documentation more flexible, only the term “documented information” is used in place of the common terms “documentation”, “document” and “records” which were in use previously. In practical terms, this means that little documentation is mandatory within an environmental management system. It is the duty of the organization itself to define its own documentation rules in order to ensure the effectiveness of the system based on appropriate documentation.

**Operational planning and control (Clause 8.1)**
Control of sequence and operational flow depends on the type of processes within the organization, risks and opportunities, important environmental aspects and compliance obligations. An organization may define its process control methods flexibly according to its own particular circumstances. However, it must be ensured that the methods are effective and the desired results are achieved.

Important new requirements are:

- control of changes,
- control of or influence on outsourced processes,
- consideration of the important environmental impacts of the organization in all phases of the product life cycle. The typical life cycle phases of a product (or a service) include raw materials procurement, development, production, transport/delivery, use, treatment at the end of the life cycle and final disposal.

**Improvement (Clause 10)**
ISO 14001:2015 does not specify explicit rules with regard to preventive actions. One of the main purposes of an environmental management system is in any case to take preventive action.

For more detailed information, an overview of the clauses of the standard, and also a summary of requirements and the types of evidence that can be effectively presented by your company, please refer to Clause 4 of this document.
The table below shows the difference between the structure of ISO 14001:2004 and the new ISO 14001:2015.

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4. ISO 14001:2015 – Interpretation of requirements

4.1 How to use this guide
In this guide we use a consistent scheme, and on the following pages, every clause or subclause of the standard is represented in the following way.

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<th>Requirement of the Standard</th>
<th>Examples of Documentation/Evidences</th>
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</table>

The column **Requirement of the Standard** lists the basic requirements of the respective clause or subclause of the standard.

The column **Examples of Documentation/Evidences** lists possible verification documents to demonstrate fulfilment of the requirements of the standard.

The final column contains practical **Examples of Key Indicators**. However, the examples are not exhaustive, as in practice different significant performance indicators or performance indicator systems are used in different types of organizations.

4.2 Interpretations of clauses

Clause 4: Context of the organization

4.1 Understanding the organization and its context

Identify, which external and internal issues are important for the environmental objectives and strategy of the organization and monitor and evaluate these continuously. The goal is to define and evaluate the issues which influence the capability of the environmental management system and are therefore relevant for the results which are to be achieved (e.g., implementation of environmental requirements).

**External issues:**
- Legal requirements, changes and planned changes
- Technical developments
- Market analyses, competition
- Supply chain, resources
- Ecological environment (e.g. flood risk, sensitive ecosystems)
- Neighbourhood
- Public interest

**Internal issues:**
- Strategy, leadership and structures
- Performance indicators
- Communication and cultural issues (e.g. China)
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<thead>
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<td>Requirement of the Standard</td>
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</table>

### Clause 4: Context of the organization

#### 4.2 Understand the needs and expectations of interested parties

Determinations of the interested parties that are relevant to the environmental management system and their needs and expectations.

The next step is to determine their influence on environmental performance and then to define the specific obligations that result.

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<tr>
<th>List of the interested parties and their needs and requirements:</th>
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<tr>
<td>Authorities</td>
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<tr>
<td>Employees</td>
</tr>
<tr>
<td>Neighbours</td>
</tr>
<tr>
<td>General public</td>
</tr>
<tr>
<td>Banks</td>
</tr>
<tr>
<td>Suppliers</td>
</tr>
<tr>
<td>Partners</td>
</tr>
<tr>
<td>Universities</td>
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<tr>
<td>Associations</td>
</tr>
</tbody>
</table>

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

- Determination of the scope of the environmental system and its boundaries.
- Determination of the scope, taking into consideration the external and internal issues of the organization and the requirements of the interested parties.
- 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.

<table>
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<th>Excerpt from the commercial register</th>
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<td>Organization charts</td>
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<td>Process descriptions</td>
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<td>Procedures and other applicable documents</td>
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<tr>
<td>Website</td>
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<tr>
<td>Environmental report</td>
</tr>
</tbody>
</table>

#### 4.4 Environmental management system

Requirements for the environmental management system:

- Establishment, implementation, maintenance and continual improvement of the environmental management system
- Determination and application of the required processes and their interactions.

The established context (4.1) and the established interested parties (4.2) must be taken into account.

<table>
<thead>
<tr>
<th>Diagram of the interaction of the processes (e.g. process model)</th>
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<tbody>
<tr>
<td>List of the process owners</td>
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<tr>
<td>Job descriptions, role description of process owners</td>
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<tr>
<td>Performance indicators for measuring the effectiveness of the processes</td>
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<td>Assignment of performance indicators to the processes</td>
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<tr>
<td>Measurement, monitoring and assessment of the processes</td>
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</table>

| Performance indicators for process performance |
| Performance indicators for process costs      |
| Performance indicators for resources/usage   |
| Performance indicators for achieving goals   |
## Interpretation/Activities

<table>
<thead>
<tr>
<th>Requirement of the Standard</th>
<th>Examples of Documentation/Evidences</th>
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<tr>
<td><strong>Clause 4: Context of the organization</strong></td>
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</tbody>
</table>
| **4.4 Environmental management system** | - Linking of processes with further documents (procedures, work instructions)  
- Available resources  
- Analysis of the processes with regard to risks and opportunities and the associated planning, implementation and assessment of measures  
- List of the documents necessary for carrying out the processes and for their control and safeguarding | |
| **Clause 5: Leadership** | | |
| **5.1 Leadership and commitment** | - Management reviews  
- Performance charts  
- Environmental objectives  
- Environmental policy and communication  
- Action plans if results or objectives are not achieved  
- Reports from the environmental representatives  
- Employee information (notices, agenda of information events) to ensure the effectiveness of the environmental management system  
- Employee development plans  
- Employee recruitment  
- Performance reviews, feedback sessions  
- Records regarding targets  
- Project plans  
- Investment plans  
- Company agreements  
- Continual improvement projects  
- Results from management meetings  
- Company guidelines  
- Mission statements | - Extent of achievement of environmental objectives  
- Qualifications of staff  
- Amount and utilisation of training budget  
- Level of planned investments and implementation  
- Fluctuation rate  
- Employee satisfaction |
### Clause 5: Leadership

#### 5.2 Environmental policy

The environmental policy shall:
- be appropriate and must provide a framework for the stipulation of environmental objectives,
- include a commitment to the protection of the environment, including prevention of pollution and other specific commitment(s) relevant to the context of the organization,
- include a commitment to fulfil its compliance obligations and to the process of continual improvement,
- be maintained as documented information,
- be communicated, understood and applied within the organization,
- be available to interested parties.

Examples of Documentation/Evidences:
- Written version of the environmental policy
- Communication, publication for internal and external use (e.g. website, notice board)
- Suitability of the environmental policy
- Evidence of fulfilment of compliance obligations

### 5.3 Organizational roles, responsibilities and authorities

Top management shall ensure that the responsibilities and authorities for relevant roles are assigned and communicated within the organization. Top management shall assign the responsibility and authority for:
- ensuring that the environmental management system conforms to the requirements of ISO 14001:2015
- reporting on the environmental management system, including environmental performance, to top management.

Examples of Documentation/Evidences:
- Organization chart
- Job/role descriptions
- Stipulation of members of management team
- Letters of appointment/transfers of tasks
- Rights of intervention
- Contracts with external service providers
- Requirement profiles
- Process owners
- Key Account Manager, client advisor
- Change management
- Status reports/annual reports of the delegated representatives
- Reports on internal audits
- Legal compliance
- Statistical analyses
- Management reviews
- Innovation projects
- Planning of change projects

Examples of Key Indicators:
- Performance indicators on the effectiveness of the environmental management system
- Extent of completion of performance reviews
- Extent of achievement of environmental objectives
- Extent of achievement of desired process results
- Fluctuation rate
### Clause 6: Planning

#### 6.1 Actions to address risks and opportunities

##### 6.1.1 General

The objective is to plan the environmental management system in such a way that –
- taking into consideration internal and external issues, requirements of the interested parties and the identified risks and opportunities –
- the environmental management system achieves the intended results,
- adverse effects are prevented or reduced,
- desired effects are promoted and encouraged,
- a process of continual improvement is achieved.

##### 6.1.2 Environmental aspects

- 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. Changes and emergency situations must also be considered.
- Significant environmental aspects must be documented and the criteria for determining them must be defined.
- Both risks and opportunities can result from the environmental aspects.

##### 6.1.3 Compliance obligations

The organization shall
- determine and have access to the compliance obligations related to its environmental aspects
- determine how these compliance obligations apply to the organization,
- 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.
### 6.1 Actions to address risks and opportunities

#### 6.1.4 Planning action

- Based on the significant environmental aspects, the consideration of risks and opportunities, and also the compliance obligations, measures must be planned and integrated into the processes.
- The effectiveness of the measures must be evaluated.
- In planning these measures, the organization must consider its technological options and its financial, operational and social requirements.

### 6.2 Environmental objectives and planning to achieve them

#### 6.2.1 Environmental objectives

Environmental objectives shall be stipulated for relevant functions, levels and processes. The significant environmental aspects, the obligations of the organization, as well as the risks and opportunities, must be considered.

Environmental objectives must:
- be commensurate with the environmental policy,
- be measurable,
- be monitored,
- be communicated,
- be updated when required,
- be documented and retained.

### Interpretation/Activities

<table>
<thead>
<tr>
<th>Requirement of the Standard</th>
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<th>Examples of Key Indicators</th>
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<tbody>
<tr>
<td><strong>6.1 Actions to address risks and opportunities</strong></td>
<td><strong>6.1.4 Planning action</strong></td>
<td></td>
</tr>
<tr>
<td>- Based on the significant environmental aspects, the consideration of risks and opportunities, and also the compliance obligations, measures must be planned and integrated into the processes.</td>
<td>- Action plans</td>
<td>- Customer-related environmental objectives: volume of packaging, no. of reusable packages, type of transport</td>
</tr>
<tr>
<td>- The effectiveness of the measures must be evaluated.</td>
<td>- Measuring/monitoring plans</td>
<td>- Product-related environmental objectives: effective material utilisation and utilisation rate, attempts to substitute environmentally friendly materials, utilisation rate of machinery, rework rate, reject rate, stock levels,</td>
</tr>
<tr>
<td>- In planning these measures, the organization must consider its technological options and its financial, operational and social requirements.</td>
<td>- Audit results</td>
<td>- External service providers: Assessment of environmental performance</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>6.2 Environmental objectives and planning to achieve them</strong></th>
<th><strong>6.2.1 Environmental objectives</strong></th>
<th><strong>Extent of achievement of environmental objectives</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental objectives shall be stipulated for relevant functions, levels and processes. The significant environmental aspects, the obligations of the organization, as well as the risks and opportunities, must be considered.</td>
<td>Environmental objectives must:</td>
<td>- Customer-related environmental objectives: volume of packaging, no. of reusable packages, type of transport</td>
</tr>
<tr>
<td>- be commensurate with the environmental policy,</td>
<td>- be measurable,</td>
<td>- Product-related environmental objectives: effective material utilisation and utilisation rate, attempts to substitute environmentally friendly materials, utilisation rate of machinery, rework rate, reject rate, stock levels,</td>
</tr>
<tr>
<td>- be measurable,</td>
<td>- be monitored,</td>
<td>- External service providers: Assessment of environmental performance</td>
</tr>
<tr>
<td>- be monitored,</td>
<td>- be communicated,</td>
<td>- Interested parties: No of complaints</td>
</tr>
<tr>
<td>- be communicated,</td>
<td>- be updated when required,</td>
<td>Contacts with neighbours and official authorities, general public</td>
</tr>
<tr>
<td>- be updated when required,</td>
<td>- be documented and retained.</td>
<td></td>
</tr>
</tbody>
</table>
### Interpreted/Activities

<table>
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<td><strong>6.2 Environmental goals and planning their achievement</strong></td>
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</tr>
<tr>
<td><strong>6.2.2. Planning actions to achieve environmental objectives</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>In planning how to achieve its objectives, the organization shall establish:</td>
<td>Measures</td>
<td></td>
</tr>
<tr>
<td>• What must be done.</td>
<td>Evaluation results</td>
<td></td>
</tr>
<tr>
<td>• What resources will be required.</td>
<td>Analysis of performance indicators</td>
<td></td>
</tr>
<tr>
<td>• Who will be responsible.</td>
<td>Reports of the delegated representatives</td>
<td></td>
</tr>
<tr>
<td>• When it will be completed.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• How the results will be evaluated.</td>
<td></td>
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</tr>
<tr>
<td><strong>Clause 7: Support</strong></td>
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<td></td>
</tr>
<tr>
<td><strong>7.1 Resources</strong></td>
<td></td>
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</tr>
<tr>
<td>The organization shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the environmental management system.</td>
<td>Investment plans</td>
<td></td>
</tr>
<tr>
<td>• for staff</td>
<td>Resources</td>
<td></td>
</tr>
<tr>
<td>• for equipment</td>
<td>Utilisation rate of staff involved</td>
<td></td>
</tr>
<tr>
<td>• for properties/factories</td>
<td>Risk assessment/redundancy planning</td>
<td></td>
</tr>
<tr>
<td>• Resources for the environmental management system</td>
<td>Illness and rate of absenteeism</td>
<td></td>
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<tr>
<td>• Position planning</td>
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<td></td>
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<tr>
<td>• Role descriptions</td>
<td></td>
<td></td>
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<tr>
<td>• Shortages and actions</td>
<td></td>
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<tr>
<td>• External Suppliers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Service agreements</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Employees’ time budget</td>
<td></td>
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</tr>
<tr>
<td><strong>7.2 Competence</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The organization shall:</td>
<td>Records on qualification requirements</td>
<td></td>
</tr>
<tr>
<td>• determine the necessary competence of the person(s) doing work under its control that affects its environmental performance and its ability to fulfil its compliance obligations,</td>
<td>Job/role descriptions</td>
<td></td>
</tr>
<tr>
<td>• ensure that these persons are competent on the basis of appropriate education, training or experience,</td>
<td>Training plan for new employees</td>
<td></td>
</tr>
<tr>
<td>• where applicable, undertake actions to acquire the necessary competence, and evaluate the effectiveness of the actions taken,</td>
<td>Records on performance reviews</td>
<td></td>
</tr>
<tr>
<td>• retain appropriate documented information as evidence of competence.</td>
<td>Training plans</td>
<td></td>
</tr>
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<td></td>
<td>Training certificates</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Qualifications matrix</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Records of assessment of effectiveness of training courses</td>
<td></td>
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<tr>
<td></td>
<td>Verification of competence measurement/testing</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Letter of appointment/compulsory training of delegated representatives</td>
<td></td>
</tr>
</tbody>
</table>
### Chapter 7 on standards: Support

#### 7.3 Awareness

Staff who work under the supervision of the organization should be aware of:
- the environmental policy,
- the significance of environmental aspects and the environmental influences of their work,
- their contribution to the effectiveness of the environmental management system and the consequences of nonfulfilment of binding obligations.

- Regular participation in discussions on the performance and effectiveness of the environmental management system
- Instruction/training certificates
- Verification of knowledge of environmental policy, environmental goals
- Reports of the delegated representatives

#### 7.4 Communication

##### 7.4.1 General

Process(es) needed for internal and external communications relevant to the environmental management system, have to be established, implemented and maintained including:
- on what to communicate
- when to communicate
- with whom to communicate (responsible persons)
- how to communicate

The compliance obligations must be considered and the information communicated must be reliable. The organization shall respond to relevant communications on its environmental management system. Communications must be documented appropriately.

- Communication matrix
- Meeting routines/records
- Reporting system
- Key Account Manager
- Account executive/authorities’ contact person
- Information actively provided to service providers/suppliers
- Website of organization
- Meetings, assignment of electronic resources, teleconferences
- Enquiries from interest groups/interested parties
- Complaints

##### 7.4.2 Internal communication

Determination, communication and continual improvement of the relevant information for environmental management between the different levels and functional areas of the organization.

- Information to employees/Notice board
- Meeting routines/records
- Reporting systems
- Key Account Managers
- Account executives
- Meetings, assignment of electronic resources, teleconferences
## 7.4 Communication

### 7.4.3 External communication

The information relevant for the environmental management system and the implementation of compliance obligations has to be communicated externally.

- Contacts with relevant authorities/routine discussions
- List of contact persons
- Information of the neighbourhood
- Website, Extranet
- PR projects
- Information on service providers

## 7.5 Documented information

### 7.5.1 General

The environmental management system shall include:

- documented information required by ISO 14001
- further documented information which the organization considers necessary for the effectiveness of the environmental management system

See Clause 5.

### 7.5.2 Creating and updating

Documented information shall

- be identified and must be assignable (Title, date, author, reference number etc.),
- have an appropriate format (language, software compatibility and graphics) and medium (paper or electronic),
- be subject to review and approval for suitability and adequacy.

- Stipulation of identification method
- Coding, number key, title, date
- Stipulations on format, medium
- Language, software, graphics, paper, electronic media
- Assignment of responsibility for examination and approval
### Interpretation/Activities

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<tr>
<td><strong>7.5 Documented information</strong></td>
<td><strong>7.5.3 Control of documented information</strong></td>
<td><strong>Control cycle</strong></td>
</tr>
</tbody>
</table>
| The documented information must be monitored and controlled to ensure that it | - Document management system  
- List of valid documents  
- Distribution key  
- Sending and proof of receipt  
- Revision lists  
- Amendment procedure  
- Approval procedure  
- Authorisations in environmental management system (electronic/paper)  
- Handling rules  
- Electronic security  
- Electronic security of documents  
- Archiving rules  
- List of external documents required  
- Control and marking of external documents (e.g. laws, standards, customer specifications, records) | - Information procurement costs (laws, guidelines, standards, etc.) |
| is available when required, | | |
| is adequately protected (loss of confidentiality, improper use or loss of integrity). | | |
| The control of the documents must fulfil the following requirements (if applicable): | | |
| distribution, access, retrieval and use, | | |
| storage and preservation, including preservation of legibility, | | |
| control of changes (e.g. version control), | | |
| retention (archiving) time, disposal. | | |

### Clause 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,
- controlling planned changes and reviewing the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary
- controlling outsourced processes and defining the type of control.

The life cycle must be considered so that environmental requirements are considered in the development process and in procurement. External suppliers as well as customers must be informed.

<p>| | | |</p>
<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Records on risk assessments and process evaluations (technical, economic, environmental)</td>
<td>Number of processes</td>
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<tr>
<td>Acceptance criteria</td>
<td>Process lead time</td>
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<td>Product requirements</td>
<td>Process capability index</td>
<td></td>
</tr>
<tr>
<td>Customer requirements, external documents</td>
<td>Performance indicators for process resources</td>
<td></td>
</tr>
</tbody>
</table>
### 8.2 Emergency preparedness and response

The organization shall establish, implement and maintain the process(es) needed to prepare for and respond to potential emergency situations. The organization shall:

- prepare to respond by planning actions to prevent or mitigate adverse environmental impacts from emergency situations,
- respond to actual emergency situations,
- take action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impact;
- periodically test the planned response actions, where practicable;
- periodically review and revise the process(es) and planned response actions, in particular after the occurrence of emergency situations or tests;
- 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.

#### Examples of Documentation/Evidences

- Emergency plans/fire protection plans
- Emergency drills (fire protection, chemical accidents, etc.)
- Evaluation of drills/measures
- Instructions for malfunctions/incident plans
- Fire brigade operational plans
- Evacuation plans/assembly points
- Information of the neighbourhood
- Instruction of visitors/contractors
# Guidelines on ISO 14001:2015

## Clause 9: Performance evaluation

### 9.1 Monitoring, measurement, analysis and evaluation

#### 9.1.1 General

- It has to be determined:
  - what needs to be monitored and measured,
  - The methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results,
  - when the monitoring and measuring shall be performed,
  - when the results from monitoring and measurement shall be analysed and evaluated.

The monitoring and measurement activities must be implemented and kept as documented information as verification of the results.

The environmental performance and effectiveness of the environmental management system shall be evaluated.

#### 9.1.2 Evaluation of compliance

- The organization shall establish, implement and maintain the process(es) needed to evaluate fulfilment of its compliance obligations.

The organization shall determine how often compliance will be evaluated, what actions will be taken and how the status of obligations is recorded.

The results of the assessment shall be documented.

### 9.2 Internal audit

#### 9.2.1 General

Internal audits shall be carried out at scheduled intervals to verify that the environmental management system meets the requirements of ISO 14001, is effective and being maintained.

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<th>Requirement of the Standard</th>
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<td><strong>9.1 Monitoring, measurement, analysis and evaluation</strong></td>
<td><strong>9.1.1 General</strong></td>
<td><strong>9.1.2 Evaluation of compliance</strong></td>
</tr>
</tbody>
</table>

- Compliance obligations
- Measuring plans/instructions
- Measuring records
- Environmental reports
- Statistical analyses
- Operational logs
- Notifications for authorities

- Procedures
- Evaluation/ evidence

- Performance Indicators for environmental objectives
- Capability of processes
- Comparison with competitors

- Level of compliance in relation to customers, official authorities, neighbours, the general public
- Process capabilities
- Supplier assessment
- Customer satisfaction index
- Comparison figures with the competition (Benchmark) – environmentally relevant and economic indicators

- Audit planning
- Audit reports

- Number/length of audits per operating unit
## 9.2 Internal audit

### 9.2.2 Internal audit programme

With regard to the internal audit, the organization shall establish, implement and maintain (an) internal audit programme(s), including the frequency, methods, responsibilities, planning requirements and reporting of its internal audits. The environmental significance and the results of previous audits must be taken into account.

The organization shall:
- define the audit criteria and scope for each audit,
- select auditors and conduct audits to ensure objectivity and the impartiality of the audit process;
- retain documented information as evidence of the implementation of the audit programme and the audit results.

<table>
<thead>
<tr>
<th>Requirement of the Standard</th>
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<th>Examples of Key Indicators</th>
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</thead>
<tbody>
<tr>
<td>Internal audit procedure</td>
<td>Audit plans</td>
<td>Level of fulfilment of requirements</td>
</tr>
<tr>
<td>Audit criteria</td>
<td>Audit reports</td>
<td>Level of implementation of internal audits</td>
</tr>
<tr>
<td>Nonconformity reports</td>
<td>Measures to introduce corrections and corrective actions</td>
<td></td>
</tr>
<tr>
<td>Reports regarding the effectiveness of the corrections and corrective actions</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proof of auditors’ qualifications</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### 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:
- status of actions from previous management reviews and changes in:
  - external and internal issues that are relevant to the environmental management system,
  - the needs and expectations of interested parties, including compliance obligations,
  - significant environmental aspects,
  - risks and opportunities,
- the extent to which environmental objectives have been achieved;
- information on the organization’s environmental performance, including trends in:
  - non-conformities and corrective actions,
  - monitoring and measurement results,
  - fulfilment of its compliance obligations,
  - audit results,
  - adequacy of resources,
  - relevant communications from interested parties, including complaints, opportunities for continual improvement.

<table>
<thead>
<tr>
<th>Requirement of the Standard</th>
<th>Examples of Documentation/Evidences</th>
<th>Examples of Key Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>Management review report</td>
<td>Reports</td>
<td>Environmental performance indicators</td>
</tr>
<tr>
<td>Reports</td>
<td>– internal audits</td>
<td>Benchmark comparison figures (environmental KPI’s)</td>
</tr>
<tr>
<td>– process audits</td>
<td>Status of corrective actions</td>
<td>Achievement of objectives</td>
</tr>
<tr>
<td>– product audits</td>
<td>Resource requirement and assignment plans</td>
<td></td>
</tr>
<tr>
<td>Status of corrective actions</td>
<td>Risk analysis (technical/economic)</td>
<td></td>
</tr>
<tr>
<td>Resource requirement and assignment plans</td>
<td></td>
<td></td>
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<tr>
<td>Assessment of environmental performance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>See above and</td>
<td>Environmental performance indicators</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Benchmark comparison figures (environmental KPI’s)</td>
<td></td>
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<tr>
<td></td>
<td>Achievement of objectives</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Level of compliance</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Duration of measures for corrective actions</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Trend analyses</td>
<td></td>
</tr>
</tbody>
</table>
### 9.3 Management review

The results 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,
- actions, 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 reviews.

### Clause 10: Improvement

#### 10.1 General

Opportunities for improvement must be determined and necessary actions to achieve the intended outcomes of the environmental management system have to be planned and implemented.

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<th>Examples of Key Indicators</th>
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<tr>
<td>9.3 Management review</td>
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<tr>
<td>The results of the management review shall include:</td>
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<tr>
<td>- conclusions on the continuing suitability, adequacy and effectiveness of the environmental management system,</td>
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<tr>
<td>- decisions related to continual improvement opportunities,</td>
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<tr>
<td>- decisions related to any need for changes to the environmental management system, including resources,</td>
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<tr>
<td>- actions, if needed, when environmental objectives have not been achieved,</td>
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<tr>
<td>- opportunities to improve integration of the environmental management system with other business processes, if needed,</td>
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<tr>
<td>- any implications for the strategic direction of the organization. The organization shall retain documented information as evidence of the results of management reviews</td>
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<tr>
<td>Opportunities for improvement must be determined and necessary actions to achieve the intended outcomes of the environmental management system have to be planned and implemented.</td>
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<tr>
<td>Improvement projects</td>
<td>Emissions performance indicators</td>
<td></td>
</tr>
<tr>
<td>Rules for the implementation of improvement projects</td>
<td>Volumes of waste generated</td>
<td></td>
</tr>
<tr>
<td>CIP database</td>
<td>Use of resources (related to defined factors such as turnover, units produced)</td>
<td></td>
</tr>
<tr>
<td>Environmental management plans</td>
<td>“Ecological footprint” (related to individual units)</td>
<td></td>
</tr>
<tr>
<td>Project plans</td>
<td>Life cycle KPIs</td>
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<tr>
<td>Records on targets</td>
<td>Risk, performance indicators</td>
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</tr>
<tr>
<td>Progress reports</td>
<td>Comparison figures with the competition</td>
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</tr>
<tr>
<td>Management reviews</td>
<td>Reject and rework costs and times</td>
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</tr>
<tr>
<td>Corrective action plans</td>
<td>Benchmarking results</td>
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<td></td>
<td>Total costs</td>
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<td></td>
<td>Downtime costs</td>
<td></td>
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<td></td>
<td>Number of proposals/number of employees</td>
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</tr>
<tr>
<td>Requirement of the Standard</td>
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<tr>
<td>Clause 10: Improvement</td>
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<tr>
<td>10.1 General</td>
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</tr>
</tbody>
</table>

### Chapter 10 on standards: Improvement

#### 10.2 Nonconformity and corrective action

When a nonconformity occurs, the organization shall react to the nonconformity and, as applicable:
- take action to control and correct it,
- deal with the consequences, including mitigating adverse environmental impacts,
- determine the causes
- determine if similar nonconformities exist, or could potentially occur,
- implement any action needed, review the effectiveness of any corrective action taken,
- make changes to the environmental management system, if necessary.

The objective is to ensure that nonconformities do not recur or occur in another location or situation.

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.

<table>
<thead>
<tr>
<th>Records of registration and reporting</th>
<th>Records of results</th>
<th>Instructions regarding corrective actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evaluations</td>
<td>Root cause analysis</td>
<td>Training plans</td>
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<td>Evaluations</td>
<td>Training certificates</td>
<td>Training certificates</td>
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<tr>
<td>Instructions regarding corrective actions</td>
<td>Agreements</td>
<td></td>
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<tr>
<td>Records of management review</td>
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</tr>
</tbody>
</table>

- Processing times
- Time and cost of non-conformity processing

- Cost saving for every proposal
- Costs for the implementation of every proposal
- Extent of completion of goals in CIP
- Number of higher level improvement projects/groups
### Chapter 10 on standards: Improvement

#### 10.3 Continual Improvement

The suitability, adequacy and effectiveness of the environmental management system have to be improved continually.

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<td>Extent of achievement of objectives</td>
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<td>Progress reports</td>
<td>Benchmarking/ranking index</td>
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<td>Management reviews</td>
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<td>Improvement suggestion scheme</td>
<td>Relationship between costs/benefits</td>
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<td>Reaction and implementation time</td>
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## 5. Documentation requirements – documented information

The following overview contains the requirements for the documented information.

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| 4.3 Determining the scope of the environmental management system
  The scope of the environmental management system (boundaries and applicability) must be established and maintained as documented information and be available to interested parties. |
| 5.2 Environmental policy
  The environmental policy shall
  - be maintained as documented information;
  - be communicated within the organization;
  - be available to interested parties. |
| 6.1.1 General
  The organization shall maintain documented information of its
  - risks and opportunities that need to be addressed;
  - process(es) needed in 6.1.1 to 6.1.4 to the extent necessary to have confidence they are carried out as planned. |
| 6.1.2 Environmental aspects
  The organization shall maintain documented information on the following:
  - its environmental aspects and the associated environmental impacts;
  - its criteria which have been used to determine its significant environmental aspects;
  - its significant environmental aspects |
| 6.1.3 Binding obligations
  The organization shall maintain documented information on its compliance obligations. |
| 6.2.1 Environmental objectives
  The organization shall maintain documented information on the environmental objectives. |
| 7.2 Competence
  The organization shall retain appropriate documented information as evidence of competence. |
| 7.4 Communication
  The organization shall retain documented information as evidence of its communications, as appropriate. |
| 7.5 Documented information
  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.
  NOTE The extent of documented information for an environmental management system can differ from one organization to another, due to:
  - the size of organization and its type of activities, processes, products and services;
  - the need to demonstrate fulfilment of its compliance obligations;
  - the complexity of processes and their interactions;
  - the competence of persons doing work under the organization's control. |
### 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.

### 8.1 Operational planning and control

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

### 8.2 Emergency precautions and emergency response

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

### 9.1 Monitoring, measurement, analysis and evaluation

#### 9.1.1 General

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

#### 9.1.2 Evaluation of compliance

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

### 9.2 Internal audit programme

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

### 9.3 Management review

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

### 10.2 Nonconformity and corrective action

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.

### A.2 Clarification of structure and terminology

There is no requirement in this international standard for its clause structure or terminology to be applied to an organization’s environmental management system documentation. There is no requirement to replace the terms used by an organization with the terms used in this international standard. Organizations can choose to use terms that suit their business, e.g. “records”, “documentation” or “protocols” rather than “documented information”.

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**Guidelines on ISO 14001:2015**

- **Rev. 01/10.16**

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**Section of ISO 14001:2015**

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### A.3

“Documented information” replaces the nouns “documentation”, “documents” and “records” used in previous editions of this international standard. To distinguish the intent of the generic term “documented information”, this international standard now uses the phrase “retain documented information as evidence of...” to mean records and “maintain documented information” to mean documentation other than records. The phrase “as evidence of” is not a requirement to meet legal evidenciary requirements; its intent is only to indicate that objective evidence needs to be retained.

### A.7.5

**Documented information**

An organization should create and maintain documented information in a manner sufficient to ensure a suitable, adequate and effective environmental management system. The primary focus should be on the implementation of the environmental management system and on environmental performance, not on a complex, documented information control system.

In addition to the documented information, required in specific clauses of this international standard, an organization may choose to create additional documented information for purposes of transparency, accountability, continuity, consistency, training or ease in auditing.

Documented information, originally created for purposes other than the environmental management system may be used. The documented information associated with the environmental management system may be integrated with other information management systems implemented by the organization. It does not have to be in the form of a manual.

### A.8.1

**Operational planning and control**

The type and extent of operational control(s) depend on the nature of the operations, the risks and opportunities, significant environmental aspects and compliance obligations. An organization has the flexibility to select the type of operational control methods, individually or in combination, that are necessary to make sure the process(es) is/are effective and achieve(s) the desired results. Such methods can include:

- [..]

  f) determining the use and amount of documented information necessary.
Important questions on the new version of ISO 14001

1. When was the standard published?
Following publication of the English language version of ISO 14001:2015 on 15/09/2015, DIN EN ISO 14001:2015 was published in November. The transition period is based on the date of publication of ISO 14001:2015.

2. From when can the new standards be certified?
Audits can be carried out as from the date of publication of ISO 14001:2015.

3. How long is the transition period?

4. From when can certificates according to ISO 14001:2015 be issued?
Due to the change in the accreditation procedure for all certification bodies by DAkkS, ISO 14001:2015 certificates can be issued as from 30/10/2015 (grant of accreditation).

5. What advantages does the new standard have?
The new High Level Structure creates greater harmony between the ISO management system standards, making it easier to extend existing systems into an integrated whole. Documentation requirements are flexible, and the direct responsibility of organizations is emphasised much more strongly than before. More emphasis is placed on communication, measurable environmental performance and the establishment of environmental aspects.

6. What is the structure of the standards?
ISO 14001:2015 has a new structure, the so-called “High Level Structure”. This is intended to provide the same binding structure for all the management system standards and results in two very important benefits: Firstly, the same terms, definitions and structures can be used for all the standards and secondly, standards are easier to understand and synergies are possible when different standards and certifications are combined. In detail, the structure of the ten clauses is as follows:

   1. Scope
   2. Normative references
   3. Terms and definitions
   4. Context of the organization
   5. Leadership
   6. Planning
   7. Support
   8. Operation
   9. Performance evaluation
  10. Improvement

7. What must be taken into consideration with regard to risks and opportunities?
The treatment of risks plays a more central role in the planning section of the standard than previously. Although a specific risk management system as such is not demanded, organizations should be capable of identifying risks and taking them into consideration in an appropriate way. However, there is no specific requirement for preventive measures. Companies profit from this new way of seeing things, as they have the chance to recognise risks early on and take corresponding action.

8. What is the relationship to stakeholders in the new standard?
The new version of the standard also requires companies to consider the outside world in a wider sense. They will not only have to fulfil legal requirements and the expectations of customers, but will also need to engage with other interested parties. This means that the complexity of today’s working and social environment is taken into account, and also offers opportunities to achieve desired improvements and minimise risks.

9. Who specified the additional time needed for the upgrade to DIN EN ISO 14001:2015?
10. How much is the transition cost within the surveillance audit?
The additional time to upgrade to the requirements of ISO 14001:2015 within the framework of a surveillance audit is at least 20 per cent of the audit time for the surveillance audit, but at least 0.5 audit days on site.

11. Are certificates issued during a transition within a surveillance audit?
After the surveillance audit is complete, you receive the certificates in accordance with ISO 14001:2015. The term of the certificate does not change, i.e. it corresponds to the term of the original certificates.

12. How much extra time is needed to upgrade within the recertification audit?
The additional time to upgrade to the requirements of ISO 14001:2015 within a recertification audit is at least 10 percent of the audit time for the recertification audit, but at least 0.25 audit days on site.

13. What must be taken into consideration regarding the certificates for the upgrade during recertification?
After completion of the recertification procedure, you will receive the certificates according to ISO 14001:2015 with a validity of three years. The term of validity follows on from the previous certificate. This means that the expiry date corresponds to the previous 3 year time interval (expiry date of the old certificate plus 3 years), if the recertification procedure is performed in good time or if the performance of the audit and the NC (nonconformity) management are completed in good time (by the due date).

14. Is an upgrade within the framework of the recertification audit more favourable?
For some sizes of organization, the additional time needed can be less for a recertification audit than for a surveillance audit. An example for an organization with 60 employees and medium environmental relevance and a certificate valid until 30/04/2017:
- Upgrade in the recertification audit with 4.0 audit days means additional time of 0.4 audit days on site.
- The new certificate is valid from 01/05/2017 – 30/04/2020.
- Upgrade in the 2nd surveillance audit in 2016 with 2.0 audit days means additional time of 0.5 audit days on site.
- The new certificate is valid from the date of the certification decision up to 30/04/2017.

15. Why is upgrade in the recertification audit recommended?
The new requirements of the standard affect almost all areas of the organization. This means that the extra time needed for the organization to prepare and the number of representatives that have to be present is just as great as in the case of recertification.

16. If the upgrade does not take place in the recertification or the surveillance audit, what are the other possibilities?
It is possible to carry out the upgrade in a special audit. This is an additional audit date between the regular audits. The additional time and cost is greater than for the surveillance or recertification audit. This is because of the extra time needed for preparation and follow up and possible consideration of changes since the last audit. Travel costs are also charged.
17. What must companies do in order to be able to make the transition to the new standard in the next recertification audit?

The notice of the date for the recertification audit, which is sent to you in good time before the audit date, already contains a reminder for the upgrade to the new standard. If you wish the upgrade to take place during a surveillance audit, we ask you to let us know as soon as possible, but at the latest three months before the planned audit date, as we also have to plan for the additional time. Please note that we recommend that the upgrade takes place during the recertification audit.

18. How much more expensive is first (initial) certification, if an organization upgrades directly to the new standard?

Basically, the same manday table applies as before, i.e. it is not more expensive if you undertake certification to the new standard in a first (initial) certification.

19. Is it recommended only to consider the new standard in first (initial) certifications?

If the organization begins now with the implementation of the environmental management system, it seems useful if the organization concerns itself directly with the new ISO 9001:2015 and 14001:2015. If certification is absolutely required within a short time, it can be helpful to undertake certification according to ISO 14001:2009 and to make the upgrade within the transition period. The transition period is three years from the date when the new standard is published.

20. When will it no longer be possible to undertake certifications according to the old version of the standard?

First certifications according to the old version are no longer possible after expiry of the transition period of three years.

21. What is the procedure in the case of transfer from another certification body?

It is possible to upgrade to the new standard within the transfer audit. The same rules for additional time apply as for upgrade during a recertification, surveillance or special audit.

22. Is it possible to carry out the transfer with the old version and then to upgrade in the surveillance audit?

Yes, it is possible. It is even a good way to make the upgrade, as the auditor, the audit procedure and many other details already change for the customer during the transfer. If the upgrade is made in the surveillance audit, the customer does not have to handle everything at the same time.

23. Are transfer costs covered with the upgrade, if the company moves to another certification provider within the transfer?

No, the times and costs have to be added together.