

**The revised standard ISO 14001:2015 has been with us for little under three months and the breadth and range of the standard's interrelationships is beginning to sink in. What questions are being asked as organisations begin to get to grips with the new requirements?**

As the standard is analysed and digested by interested parties - auditors, certification bodies, consultants, corporate management, environmental professionals and training organisations – opinions as to the implications of the revisions vary greatly.

Some consider the revisions to be too complicated, too far reaching and difficult to evaluate; whilst others who have an existing and comprehensive ISO 14001:2004 environmental management system (EMS) welcome the new version and are already largely in compliance.

This discussion paper will look at some of the challenges that auditors and organisations are facing in the transition to ISO 14001:2015 and the concerns that are being raised in these early days.

### Defining Context

Clause 4.1 of the standard: *Understanding the organisation and its context* is a new requirement requiring a “conceptual understanding of the important issues that can affect, either positively or negatively, the way the organization manages its environmental responsibilities.” (ISO 14001:2015, A.4.1).



The general consensus when commencing the transition to the new standard is that it begins with the determination, if it doesn't already exist, of the organisation's understanding of itself and its context. This will need to be a cross functional exercise, and

potentially a wide reaching one, evidence of which will be required for certification.

Those organisations that have addressed the management review item *g) changing circumstances*, in the 2004 version will likely be well prepared for this task.

This requirement has already generated much debate as to its meaning and a fair amount of concern within supply chain organisations with limited knowledge and resources. It may be useful to consider that the everyday concerns and discussions that we as a

population have, are in all probability the social, economic and environmental make-up of their context.

### Leadership Requirements

The new standard brings a renewed emphasis on leadership, particularly in regards to promoting environmental management within the organisation.

Even before the process of defining organisational context is undertaken, it is essential for the top management team to thoroughly understand the standard's leadership requirements. Not only do they need to ensure that their environmental management system has to now be incorporated at the strategic level, but that they will be required to discuss this with their certification body's auditor and be able to substantiate their involvement.

Reaction to this has been sceptical, prompting comments around the virtual impossibility of getting the whole top management team together! “They [top management] are never in the country at the same time” is a commonly voiced concern.

For those organisations that are part of a group that is itself part of another international organisation, a key question has been “how far up the management chain are we expected to go?”

Also being raised is whether the interpretation in the Annex will enable top management to sidestep this scenario.

If a management team is not prepared to fulfil this leadership requirement and ensure that the previous ‘bolt on’ EMS is now incorporated into the strategic plan, the question must be asked whether the organisation continues with their EMS certification. It has already been predicted in recent discussions that potentially up to 30% of management will not go along with this and therefore drop out of the certification process.

### The Auditor's Role

As with ISO 9001:2015, the relationship between the Auditor and Top Management will evolve into a more strategic one requiring knowledge that encompasses organisational culture and forward planning.

The 3<sup>rd</sup> party auditors will be expected to meet with the top management team and then satisfy themselves, through interviews and the audit process, that evidence demonstrates that the requirement has been implemented across the system.

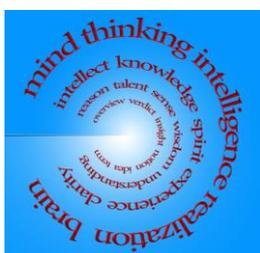
It will also be necessary for the internal audit system and its internal auditors to determine, in the same manner, compliance for this requirement. The 3<sup>rd</sup> party auditors will then be verifying that this has been achieved.

Auditors must be able to understand:

- What the organisation does;
- Be able to engage with strategy and context, not just detail or operational issues;
- What influencing factors are imposed on the organisation and how they manage these;
- What impacts these have on the organisation.

Auditors, both external and internal, will have to ask senior management how organisational knowledge is retained and whether they can illustrate how this is managed and maintained; then follow their answers up in different parts of the organisation.

In order to do this effectively, auditors will need the following leadership skills to establish and comprehend this information and interview top management:



- Confidence
- Ability to develop rapport
- Effective questioning and listening skills
- Ability to interpret and apply the requirement
- Strategic awareness as well as detail focused

### The Value of ISO 14001

It is clear that to fully appreciate the standard's requirements, it needs to be read carefully, reflectively and probably many times over!

A survey conducted by ISO in 2013/14 suggested that users of ISO 14001:2004 realised significant value from the standard for environmental management as well as business management. Most notable in terms of:

Meeting legal requirements,  
Improving environmental performance,  
Management commitment, and  
Employee engagement.

It will be interesting to see whether perceived or measured value is more far reaching with ISO

14001:2015. Also, whether the consensus is that, with time, the new standard delivers on supporting organisations to manage the challenges of the future concepts highlighted in ISO's 2013 survey, namely:

- Prevention of pollution
- Eco-efficiency (i.e. strategies for efficient use of resources)
- Life cycle thinking (for products and services alike)

*"The strongest drivers for adopting ISO 14001 include commitment to environmental protection/conservation and reduction of risk of adverse environmental impact."*

*ISO 14001 Continual Improvement Survey 2013*

In its Introduction, ISO 14001: 2015 emphasises that sustainable development is achieved by balancing the three pillars of sustainability - social, environmental and economic – commenting upon social expectations and that the aim of the EMS is to contribute to sustainable development. Some organisations are already reporting that the EMS is no longer a separate system but is incorporated into their broader sustainability programmes.

There has clearly been a great deal of debate and hard won discussion to achieve what is a ground-breaking standard that finally, after twenty years, puts an environmental management system where it belongs: firmly set at an organisation's strategic level. And given the 'context' within which we all now find ourselves with the consensus for the need to limit the global warming temperature rise to +2° C, ISO 14001:2015's framework is a substantial tool for organisational contribution.

BywaterExcel offers training courses to assist organisations in the transition to ISO 14001:2015 as well as for Auditors needing to develop their skills and knowledge to assess an organisation's EMS effectively:

- ✓ [ISO 14001:2015 Lead Environmental Auditor Course – IEMA Certified](#)
- ✓ [ISO 14001:2015 Internal Environmental Auditor Course – IEMA Certified](#)
- ✓ [ISO 14001:2015 Overview and Transition Course](#)
- ✓ [Implementing ISO 14001](#)

For further details of these training courses, please call our Training team on 0333 123 9001 or email us at [training@bywaterexcel.co.uk](mailto:training@bywaterexcel.co.uk).

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