



ISO 14001:2004 Revisions Changes and Possible Organizational Impacts

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Recent approval of ISO 14001:2004 revisions by ISO member countries clarifies the standard and more closely aligns it with ISO 9001:2000. This document provides an overview about the most important changes to ISO 14001, as well as how those changes may impact your organization. Because each organization and its environmental management system (EMS) are different, affects will vary among organizations.

Use this document only as a guide when making changes to your environmental management system. Because all changes are not discussed here, it is not meant to be a stand-alone reference. Use it in conjunction with the complete standard.

Direct technical questions about this document to your QMI auditor, or to John Fraser, QMI Development Manager, Environment, at jfraser@qmi.com or (800) 465-3717.

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ISO 14001:2004 Requirement	Clarification of Change	Impact
1. Scope	New wording aligns better with 4.3.1, but does not change existing scope requirements, since the process of identifying aspects still must be thorough.	No impact.
4.1 General Requirements The organization shall define and document the scope of its environmental management system.	A new requirement is to document the EMS scope.	No impact. Organizations should have already documented their scope in terms of their activities, products, services and physical location.
4.2 Environmental Policy ... This includes a commitment to comply with applicable legal requirements, as well as with other requirements to which the organization subscribes relating to its environmental aspects. ... is communicated to all persons working for, or on behalf of, the organization ...	The commitment to comply with relevant environmental legislation and regulations has expanded to all applicable legal requirements related to the environmental aspects. The scope of individuals who must be aware of the policy has been expanded.	No impact. QMI originally interpreted that OH&S laws, for example, could be applicable in order for this clause to be consistent with 4.3.2. Organizations must be prepared to devote more resources to ensuring communication of the policy to contractors, agents, temporary staff, home office staff, etc.
4.3.1 Environmental Aspects ... taking into account planned, or new developments, as well as new or modified activities, products and services ...	Identification of aspects must now be more proactive.	Organizations need to implement a process that identifies potential new aspects prior to implementation of change.

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<p>4.3.1 Environmental Aspects ... to determine those aspects that have, or can have, significant impact(s) on the environment (i.e. significant environmental aspects).</p> <p>The organization shall ensure that significant environmental aspects are taken into account in establishing, implementing and maintaining its environmental management system.</p>	<p>Organizations must identify aspects that they can control and aspects they can influence. It avoids a potential interpretation that aspects the organization could influence, but not control, were out of the scope.</p> <p>Special attention must be directed toward any significant environmental aspects when establishing, implementing and maintaining the EMS.</p>	<p>No impact. This was QMI's existing interpretation.</p> <p>Consideration of significant environmental aspects may have to be built into management of change processes.</p>
<p>4.3.2 Legal and Other Requirements ... to determine how these requirements apply to its environmental aspects.</p> <p>The organization shall ensure that these applicable legal requirements and other requirements to which the organization subscribes are taken into account in establishing, implementing and maintaining its environmental management system.</p>	<p>The relationship between aspects and legal and other requirements must be determined.</p> <p>Special attention must be directed toward any legal or other requirements when establishing, implementing and maintaining the EMS.</p>	<p>Organizations may have to:</p> <ul style="list-style-type: none"> • Link 4.3.1 and 4.3.2 registries; • Explain legal and other requirements in terms of its operations; and/or • Include details of legal and other requirements into procedures. <p>Consideration of legal and other requirements may have to be built into management of change processes.</p>
<p>4.3.3 Objectives, Targets and Program(s) When establishing and reviewing its objectives and targets, an organization shall take into account the legal requirements and other requirements to which the organization subscribes, as well as its significant environmental aspects.</p>	<p>Objectives and targets must now take into account significant environmental aspects and legal and other requirements, not just consider them.</p>	<p>Objectives and targets must now address at least one significant environmental aspect and at least one legal and other requirement, unless there is a detailed review demonstrating that continual improvement can be better achieved through addressing other areas.</p>
<p>4.4.2 Competence, Training and Awareness ... any person(s) performing tasks for it, or on its behalf, that has (have) the potential to cause a significant environmental impact(s) identified by the organization is (are) competent ...</p> <p>The organization shall identify training needs associated with its environmental aspects and its environmental management system.</p> <p>The organization shall establish, implement and maintain a procedure(s) to make persons working for it, or on its behalf, aware of ...</p>	<p>The scope of individuals who must be competent has been expanded.</p> <p>The scope of required training has been expanded to beyond that required to support significant aspects (and legal requirements) to that needed for all aspects and the EMS.</p> <p>The scope of individuals who must meet awareness requirements has been expanded.</p>	<p>Organizations must be prepared to ensure and/or verify the competency of newly affected contractors, agents, temporary staff, home office staff, etc.</p> <p>Some organizations may have to review all aspects and identify additional training needs.</p> <p>Organizations must be prepared to provide awareness to newly affected contractors, agents, temporary staff, home office staff, etc.</p>

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<p>4.4.5 Control of Documents Documents required by the environmental management system and by this International Standard shall be controlled.</p> <p>The organization shall establish, implement and maintain a procedure(s) to ...</p>	<p>Document control now applies to all documents in the EMS, not just those required by the standard.</p> <p>Periodic reviews are no longer required. Changes to documents must be identified. New controls are required for documents of external origin.</p>	<p>Some organizations may find some additional documents that need to be controlled.</p> <p>Some changes to the manner in which documents are controlled may be required.</p>
<p>4.5.1 Monitoring and Measurement The organization shall ensure that calibrated or verified monitoring and measurement equipment is used and maintained ...</p>	<p>Monitoring and measurement equipment can be calibrated or verified.</p>	<p>The time and costs associated with calibration may be reduced in situations that warrant equipment verification.</p>
<p>4.5.2 Evaluation of Compliance</p> <p>4.5.2.2 The organization shall evaluate compliance with other requirements to which it subscribes ...</p> <p>The organization shall keep records of the results of the periodic evaluations.</p>	<p>Compliance with other requirements must be evaluated periodically.</p>	<p>Organizations will need to conduct evaluations of their compliance with any other requirements. This may be done by expanding the scope of a Legal Compliance Audit (and ensuring the auditor competency) or, implementing a new form of evaluation.</p>
<p>4.5.3 Nonconformity, Corrective Action and Preventive Action The organization shall establish, implement and maintain a procedure(s) for dealing with actual and potential nonconformity (ies) ...</p>	<p>A more comprehensive approach to corrective and preventive action is required, covering identification, mitigation, root cause, implementation and effectiveness.</p>	<p>Most organizations will have already implemented this full approach for corrective and preventive actions under the 1996 standard.</p>
<p>4.5.4 Control of Records ...to demonstrate conformity to the requirements of its environmental management system and of this international standard ...</p>	<p>Records management now applies to all EMS records, not just those required by the standard.</p>	<p>Some organizations may find additional records need to be controlled.</p>
<p>4.5.5 Internal Audit Selection of auditors and conduct of audits shall ensure objectivity and impartiality of the audit process.</p> <p>3.1 Auditor Is defined as the person (s) with the competence to conduct an audit.</p> <p>3.14 Internal Audit Systematic, independent and documented process ...</p>	<p>Internal auditors must be independent, impartial, objective and competent.</p>	<p>Auditors can no longer audit their own work. Organizations may need to obtain and qualify new auditors or change existing auditor assignments.</p> <p>Organizations may also need to revisit how they have defined auditor competency.</p>
<p>4.6 Management Review Reviews shall include:</p> <ul style="list-style-type: none"> • Input to management reviews shall include ... • The outputs from management reviews shall include ... 	<p>The scope of information to be considered at management review has expanded, as well as the outputs from the review.</p>	<p>Organizations may need to prepare more information for the review and be prepared to spend more time reviewing the information and making decisions. The agenda and minutes may be more comprehensive.</p>