



**Twelve-step transition process
from ISO 14001:2004 to 2015 revision**



WHITE PAPER

December 03, 2015



1. Purpose

This white paper is intended for companies that have implemented the ISO 14001:2004 revision, and are planning to transition to the 2015 revision. The paper describes the suggested steps in the process.

2. Other useful resources

For more information about the ISO 14001:2015 revision, see these articles:

- [Infographic: ISO 14001:2015 vs. 2004 revision – What has changed?](#)
- [The final draft of ISO 14001:2015 is released!](#)
- [Whitepaper – FDIS ISO 14001:2015 vs. ISO 14001:2004 matrix](#)
- [Risk Management in ISO 14001:2015 – What, why and how?](#)
- [Using internal audits to drive real improvement in ISO 14001:2015](#)
- [The importance of management review in the ISO 14001:2015 process](#)

Or enroll in our free [ISO 14001:2015 Foundations Online Course](#).

3. Timing of the transition

The ISO 14001:2015 standard was published on Tuesday, September 15, 2015. Organizations are granted a three-year transition period from that date to comply with the current version of the standard, at which time the 2004 version and any certification pertaining to it will become obsolete. This effectively means that you can attain certification or receive a surveillance audit on your existing 14001:2004 certification until September 15, 2018, although it is advantageous for any organization to transition well before the due date. It is worth noting that if your organization became certified before September 15, 2015, then your surveillance audit will be based on the 2004 revision, with your recertification audit being based on the 2015 version. However, if you are looking to attain your certification between September 15, 2015, and September 15, 2016, you will be able to be certified against the 2004 version. After that, certification will be against the 2015 revision.

4. Twelve-step transition process

The easiest way to make the upgrade to the 2015 revision is by following these steps:

1) Define the context of the organization

Clause 4 of the 2015 standard is a new requirement and deals directly with defining the “context of the organization.” Organizations are now expected to consider all external and internal issues that may affect the outcomes of the EMS, including any environmental conditions that may affect the organization. This issue should be considered carefully before developing your new EMS and Environmental Policy, and although not specifically prescribed by the 2015 standard, it is highly helpful if the thought process behind this determination is recorded (for example, in your Environmental Policy), as it will be beneficial if you can provide proof of this vital process to the auditor.

Read more here: [Determining the context of the organization in ISO 14001](#).

2) List all interested parties

Section 4.2 of the 2015 revision deals with “understanding the needs and expectations of interested parties.” This outlines how the organization must consider all parties that have relevance to the EMS, identify their respective needs, and then decide which of these will become “compliance obligations.” This replaces section 4.3.2 of the 2004 standard, where all statutory, regulatory, and contractual requirements had to be considered, so if you have already listed these for your EMS, then you have completed part of the task.

Read more here: [How to determine interested parties according to ISO 14001:2015](#).

3) Review the scope of the EMS

The accuracy and effectiveness of your EMS are highly dependent on the organizational boundaries you set. The process of transitioning to the 2015 revision affords organizations an ideal opportunity to redefine the scope and its boundaries more accurately, ensuring the potential for improved performance and continual improvement. For example, have you considered all the effects that your products and services have on the environment? Do your products and services exert influence on your customers, of which you should be considering the environmental effect?

4) Leadership & review of the Environmental Policy

The requirements of the 2015 standard are similar to the 2004 revision, but with one fundamental difference. There is now a greater emphasis on the incorporation of the EMS into the strategic planning and direction of the organization as a whole. It is vital that this aspect should be considered, actioned, and clarified in your Environmental Policy. **This leads to one of the major changes in the 2015 standard, which is the inclusion of a clause on “leadership.”** This is one of the most fundamentally important clauses of the new standard, in that the top management team now must take responsibility for all aspects of the environmental system within the organization. Leadership needs to be defined and demonstrated, all the way from strategic planning through

objective setting, to performance and continual improvement, with all supporting functions in between, including communication. This will require a fundamental change in the way the top team involves themselves in the day-to-day running and performance of the EMS. For this to be successful, careful education and “buy in” from the top team is essential; and, as always, this process must be defined in your EMS documentation.

5) Align EMS objectives with the company’s strategy

Section 0.3 of the introduction to the 2015 standard specifically prescribes that environmental management should now be incorporated into the organization’s business processes and strategic direction-making processes. For instance, your top team will now need to demonstrate that this is part of the strategic planning of the overall business strategy, so you must ensure that this is documented within the business plan or equivalent document.

6) Assess risks and opportunities

Section 6.1 addresses risks and opportunities, and is completely new in the 2015 standard. The 2015 standard states that all environmental aspects should be considered, but also other influencing factors such as compliance obligations and organizational context. On the basis of this, plans should be formulated for tackling these risks and opportunities, with the desired outcome being that the EMS can meet its planned outcomes and display continual improvement. This represents a key change in the 2015 revision, and ensuring this is addressed in your EMS effectively will not only ensure compliance, but improved performance and the gateway to continual improvement.

Read more here: [The role of risk management in the ISO 14001:2015 standard.](#)

7) Identify and evaluate environmental aspects

There are some key changes between the 2004 and 2015 revisions in how you are expected to evaluate your environmental aspects. A “lifecycle perspective” of your products and services now needs to be considered, and potential abnormal and emergency situations need to be taken into account when planning. Again, consideration and plans to demonstrate these considerations must now be built into your EMS documentation. For example, if your product or service range has recently been extended, can you prove that the environmental aspects of these new services have been fully considered and documented, and actions decided upon to mitigate and remove them?

Read more here: [4 steps in identification and evaluation of environmental aspects.](#)

8) Determine the compliance obligations

In the 2004 revision, there was a requirement for complying with statutory and regulatory requirements, but in the 2015 revision “interested parties” and their “needs and expectations” must also be considered. Both of these combined now become “compliance obligations.” Again, the organization must document and demonstrate that this has been understood and considered, and the selection process defined. For example, considering legal requirements is no longer enough; you now must also consider the needs of all external and internal stakeholders.

9) Control documented information

Documents and records are both now referred to as “documented information.” You will now need to align your existing procedures to the new clause numbers, and this also provides an opportunity to

improve your documentation at the same time. For example, the requirement for preventive action has been removed due to it being absorbed into the risk assessment process, so your preventive action process document and form will no longer be required, and can be deleted. As another example, it is good practice to check and ensure that the risk assessment process does accurately reflect the change mentioned.

Read more here: [A new approach to documented information in ISO 14001:2015](#).

10) Operational control

In the 2015 version, “operational control” becomes “operational planning and control,” and the scope of this clause is expanded. The context of the organization, risks and opportunities, environmental aspects, and compliance obligations all must now be considered when specifying methods of operational control. This should lead to defined methods of operational control, performed by specified and competent individuals, with the goal being that the EMS performs within the predicted parameters. Again, these changes must be planned and documented within the appropriate places in your EMS. For instance, can you show evidence that your responsible person is trained and “competent”?

11) Environmental performance

The 2015 revision also makes a point of the importance of measuring and monitoring to environmental performance. There is also specific mention of the measurement of external, procurement, and outsourced services, so the message is clear: the organization remains responsible for outsourced and external processes and the subsequent conformance or nonconformance to objectives and targets. Again, this process will need to be defined, documented, and followed through in order for your EMS to conform to the 2015 revision.

12) Measuring and reporting

There is a general improvement of reporting requirements in the 2015 standard. We have mentioned environmental performance above, but other functions such as Management Review and internal audit are also mentioned, specifically in terms of being reported “to top management.” This change makes it clear that top management, who are directly responsible for strategic planning and the integration of the EMS into the organization’s strategic direction, must be made aware of and make decisions on the basis of these results. Again, it is advised that the importance and process steps of this are documented as well as implemented in your EMS.

For more information about internal audit according to ISO 14001:2015, visit our [ISO 14001:2015 Internal Auditor Online Course](#).

5. Sample documentation

You can download an [ISO 14001:2015 Premium Documentation Toolkit](#). This will allow you to see a sample of policies and procedures required by the ISO 14001:2015 standard.



EPPS Services Ltd.
for electronic business and business consulting
Zavizanska 12, 10000 Zagreb
Croatia, European Union

Email: support@advisera.com
Phone: +1 (646) 759 9933
Toll-Free (U.S. and Canada): 1-888-553-2256
Toll-Free (United Kingdom): 0800 808 5485
Fax: +385 1 556 0711



EXPLORE THE ACADEMIES

