



Dancing with an Ugly Duckling,

this thing we call ISO 14001:2015

Help Tools from a Negotiator

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FAQs from the Technical Committee on Environmental Management – Executive Team

Understanding Canadian Technical Interpretations for CAN/CSA ISO 14001 Environmental Management Systems

What are official technical interpretations?

The drafters of national and international standards make every effort to avoid uncertainty and ambiguity in the standards they publish, especially in the case of specification standards whose requirements must be capable of objective audit. Occasionally, however, the meaning of a provision of a published standard is not completely clear from the text of the standard itself and there is need for an authoritative interpretation that users, auditors, registrars, regulators, consumers and other stakeholders can rely upon to provide certainty and predictability.

The purpose of official technical interpretations is to fill this need. Official technical interpretations go by different names in different countries, including “clarifications of intent,” “statements of intent,” or simply “interpretations.” But they all share the same purpose: to provide a written clarification of the meaning a provision of a standard, without changing the intent or requirements of the standard.

In Canada, the Canadian Standards Association (CSA) defines an interpretation as a “written clarification of the meaning of a provision of a CSA Standard, provided by the responsible TC [Technical Committee] in response to a written request for an interpretation” (CSA Directives, Part 2: Development Process, Clause 2.1).

Interpretation is part of the process of maintaining published standards. Aside from interpretation, maintenance also includes amendments, errata and systematic review (CSA Directives, Part 2, Clause 12.1).

Who provides official technical interpretations, in general?

The answer to this question depends on the standard. If a standard is developed at the national level, official technical interpretations of the standard are usually issued by the standards development body that developed it. The situation is more complicated for international standards. For some international standards, for example the ISO 9000 quality management systems standards, the international standards body has its own international process for issuing interpretations.

Many international standards have no interpretation process at the international level. For these standards, national standards bodies may issue interpretations of international standards for their own markets, as needed. In some cases, primary responsibility for interpretation rests with national standards bodies but the international standards body has a process for reviewing national interpretations.



National standards bodies that adopt ISO 14001 as a national standard are free to issue national interpretations of the standard for their own marketplaces, but there is a process for reviewing these national interpretations at the international level. The goal of this international process is to promote global consistency while respecting national standards bodies' autonomy and accommodating variations in national circumstances.

Who provides Canadian official technical interpretations of ISO 14001?

Responsibility for preparing official technical interpretations of ISO 14001 for the Canadian marketplace rests with a Technical Committee of the Canadian Standards Association (CSA). CSA is accredited by SCC to adopt and maintain standards in the ISO 14000 family as national standards.

The CSA Technical Committee responsible for official technical interpretations of ISO 14001 is the Technical Committee on Environmental Management and Related Activities (TC EMRA, also known as S2040). The TC EMRA is a harmonized CSA/SCC committee. It operates as both the CSA's national technical committee on environmental management and the SCC Mirror Committee to ISO/TC 207, the ISO committee responsible for the ISO 14000 standards.

Only the harmonized Canadian Technical Committee (in the case of ISO 14001, the TC EMRA) has the authority to provide official technical interpretations of the adopted standards within its portfolio (CSA Directives Part 2, Clause 12.3.4).

The TC EMRA delegates the preparation of proposed interpretations of ISO 14001 to a subsidiary committee, the SCC Mirror Committee to ISO/Technical Committee 207/Subcommittee 1 (SMC/SC 1). The SMC/SC 1 is the body responsible for developing Canadian input into the international process of developing and revising ISO 14001. It is the main repository of Canadian expertise who have the background on the meaning ISO 14001 standard.

How are Canadian official technical interpretations of ISO 14001 prepared?

The process for official technical interpretations is set out in the CSA Directives, Part 2, Clause 12.3. Canadian official technical interpretations of ISO 14001 are provided in response to a written request for an interpretation of the standard (CSA Directives, Part 2, Clause 12.3.1.1). Anyone may submit an interpretation request to CSA staff (Clause 12.3.3).

Requests for interpretation should define the problem with reference to a specific clause of the standard, explain the circumstances causing the problem, and preferably be phrased as a question permitting a "yes" or "no" answer (Clause 12.3.5.1).

The CSA project manager responsible for the TC EMRA reviews the interpretation request in consultation with the chairs of the TC EMRA and SMC/SC 1. If the request is in order, the project manager refers it to the TC EMRA for consideration and response (Clauses 12.3.5.2, 12.3.5.3). As noted earlier, the TC EMRA delegates the preparation of proposed interpretations to the SMC/SC 1.



The interpretation goes through the same consensus process that applies to other CSA standards development, with two modifications. There is no public notice of the intent to prepare the interpretation, and no public review of the draft interpretation (Clauses 5.5.2, 8.1).

The proposed interpretations of ISO 14001 are forwarded to the TC EMRA for approval. The TC must take care that the proposed interpretation does not conflict with the standard, and may not approve an interpretation that does. The TC EMRA must have a balanced matrix of stakeholder representation. It approves the proposed interpretation by electronic ballot or by recorded vote at a TC meeting. The approval process follows the normal rules for approval of a proposed standard. All comments must be considered and all negative votes must be resolved by the TC EMRA Chair or the TC itself (Clause 12.3.6).

What do Canadian official technical interpretations of ISO 14001 look like?

Normally, interpretations take the form of a “yes” or “no” answer to a specific question. They may also include an explanatory statement (CSA Directives, Part 2, Clause 12.3.1.1).

What parts of ISO 14001 may be subject to a Canadian official technical interpretation?

Any part of the current version of ISO 14001 may be the subject of an interpretation, except for notes and informative annexes. Superseded or withdrawn versions of ISO 14001 may not be the subject of interpretation, except to the extent that they are referenced in government regulations (CSA Directives, Part 2, Clause 12.3.2). An interpretation may address the literal text or the intent of the text of the standard (Clause 12.3.5.4).

What effect do Canadian official technical interpretations of ISO 14001 have?

Official technical interpretations do not have the same force as the standard itself or an amendment to the standard, since they do not purport to modify the standard. That said, they are important in at least two ways. First, users, auditors, registrars and other stakeholders can rely on them as authoritative guidance on the meaning and intent of ISO 14001. For example, in the event of a disagreement between a user and an auditor, either party may point to an official technical interpretation to resolve the disagreement. Second, interpretations are important inputs to the development of new editions of the standard (CSA Directives, Part 2, Clause 6.5.2).

How are Canadian official technical interpretations of ISO 14001 publicized?

Canadian official technical interpretations of CAN/CSA ISO 14001 are available from CSA Group via the CSA Group subscriptions found at [<http://shop.csa.ca/en/canada/p59/iso-140012015/invt/060857>].

The CSA Group Project Manager makes best efforts to arrange for interpretations to be published in other print or online venues (CSA Directives, Part 2, Clause 12.3.7).



Program Area: Environment and Climate Change

Completed Projects

Formal Interpretations

The following interpretation regarding CSA standard **CAN/CSA-ISO 14001:16 Environmental management systems — Requirements with guidance for use** (ISO 14001:2015), has been approved by the Members of the CSA Standards Technical Committee on **Environment / Harmonized with SMC to ISO TC207**

Question: ISO 14001:2015 has a very different structure than the two previous versions. Our documentation is aligned to the clauses that existed in the previous version. Do we have to restructure our documentation to follow the new clause structure?

Answer: No.

Clause A.2 states: "The clause structure and some of the terminology of this International Standard have been changed to improve alignment with other management systems standards. There is, however, no requirement in this International Standard for its clause structure or terminology to be applied to an organization's environmental management system documentation."

Question: Does the term "compliance obligation" in ISO 14001:2015 have the same meaning as the phrase "legal requirements and other requirements to which the organization subscribes" in the previous edition?

Answer: Yes.

Clause A.3 states: "The phrase '*compliance obligations*' replaces the phrase '*legal requirements and other requirements to which the organization subscribes*' used in prior editions of this International Standard. The intent of this new phrase does not differ from that of the previous edition."

Question: Are the references to other standards in the Notes to Entry in Clause 3 (terms and definitions) normative?

Answer: No.

A normative reference is a reference to another document that is indispensable for the application of the standard. If a document is normatively referenced, an organization must conform to it in order to conform with the standard. As Clause 2 states, there are no normative references in ISO 14001:2015.

ISO 14001 is a standalone document that can be applied without reference to any other documents.

While "Notes to Entry" in Clause 3 (Terms and Definitions) are normative, references to other standards in those Notes to Entry are informative only.

For example, Notes 3 and 4 to Entry 3.2.10 (“risk”) refer to definitions of “events”, “consequences” and “likelihood” in ISO Guide 73:2009. Note 4 to Entry 3.4.1 (“audit”) refers to definitions of “audit evidence” and “audit criteria” in ISO 19011:2011.

These references to other standards are provided for information only. There is no need to purchase additional standards. Furthermore, anyone interested in the terms and definitions in other ISO standards can preview elements of these standards on the ISO Online Browsing Platform (OBP) at no charge, including the Foreword, Introduction, Scope, Normative references and Terms and Definitions.

Access is enabled by visiting the ISO site at <https://www.iso.org/obp/ui>.

Question: My organization’s EMS does not fulfill ISO 14001:2015’s requirements for outsourced processes because my organization has no outsourced processes. Does this preclude my organization from claiming conformity to ISO 14001:2015?

Answer: No.

Clause 1 of ISO 14001:2015 states that an organization may not claim conformity to the Standard unless all the requirements of the Standard are incorporated into the EMS and fulfilled without exclusion, but some of the Standard’s requirements are applicable only if certain preconditions are met. If those preconditions are not met, the requirements do not apply and the organization can claim conformity to the Standard even though it does not fulfill those inapplicable requirements.

In the case of outsourced processes, an organization must establish a process (per Clause 8.1) to determine if it has any outsourced processes. If it has no outsourced processes, the further requirements of the Standard that apply to outsourced processes are not applicable. If, however, it does have one or more outsourced process, all the requirements that apply to outsourced processes apply to each of those processes and must be fulfilled for the organization to claim conformity to the standard.

Question: There appears to be ambiguity in ISO 14001:2015 regarding whether the term “risk” has only a negative connotation or includes both negative and positive connotations. The definition of “risk” (3.2.10) states that risk can be positive or negative, but the definition of “risks and opportunities”(3.2.11) implies that risk is only negative, while opportunities are positive. May an organization decide for itself whether to use the term “risk” in its Environmental Management System as a solely negative concept or as both a negative and positive concept?

Answer: Yes.

ISO 14001:2015 requires an organization to identify and address both the potential adverse and the potential beneficial effects of uncertainty, but the organization may decide for itself what terminology it will use to capture these concepts. Each organization may decide for itself whether to use the term “risk” to capture potential adverse effects of uncertainty and the term “opportunities” to capture potential positive effects of uncertainty, or to use the term “risk” to encompass both potential negative and positive effects of uncertainty. As Annex A.2 states, there is no requirement to apply the terminology used in the standard to the organization’s EMS documentation, or to replace the terms used by the organization with the terms used in the standard. In deciding what terms to use, organizations should be aware that although the

definitions of “risk” (3.2.10) and “risks and opportunities” (3.2.11) take different approaches to the concept of risk, only the term “risks and opportunities” is used in the clauses of the standard that contain requirements

Question: Are there any situations in which “top management” refers to persons outside the scope of the environmental management system?

Answer: No.

Top management is defined in relation to the scope of the EMS. If the EMS covers the entire organization, top management is the person or people who direct and control the entire organization. If the EMS covers only part of an organization, top management is the person or people who direct and control that part of the organization. Note 2 to Entry in the definition of top management (3.1.5) is intended to clarify this point, but the phrase “the scope of the management system” in that Note to Entry might lead to some confusion. This phrase means the scope of the *environmental* management system. It should not be misunderstood as a reference to an organization’s generic management system, quality management system or some other discipline-specific management system. It is not intended to broaden the scope of the EMS beyond what the organization has established or to extend the scope of the internal audit beyond the scope of the EMS.

Question: Does the requirement for internal audit (9.2) include a compliance or financial audit?

Answer: No.

The internal audit provides information about whether the EMS conforms to the requirements of the Standard and the organization’s own requirements for its EMS (9.2.1). The organization determines which requirements beyond those of the Standard itself are EMS requirements, and will thus be included in the scope of the internal audit. The internal audit is not a financial audit, a compliance audit, or an audit of conformity with interested parties’ needs and expectations. The Standard’s new definition of nonconformity (3.4.3) clarifies this by stating in Note 1 to Entry that nonconformity does not mean non-fulfilment of any and all requirements, it only means non-fulfilment of the requirements of the Standard and additional EMS requirements the organization establishes for itself. There is no change from the previous edition of the Standard in this respect.

Question:

In Note 1 to Entry 3.3.4 “outsource,” does the phrase “outside the scope of the management system” mean “outside the scope of the *environmental* management system”?

Answer:

Yes.

The intent of the definition of “outsource” in ISO 14001:2015 is to cover situations where a process or function that is within the scope of the environmental management system is performed by an organization that is outside the organizational boundaries of the environmental management system as determined by the organization. The definition is not intended to capture processes or functions that are outside the scope of the environmental management system as established by the organization.



FAQ on ISO 14001: 2015

Version – August 2016

This document is designed to provide additional insight to users of ISO 14001:2015 and is based on the recommendations agreed by working group experts of ISO/TC 207/SC 1/WG 5 (WG5) during the ISO 14001 revision process. It is divided into sections related to:

- General Concepts
- Terms and Definitions
- Clause Specific Concepts

The terms "HLS" and "Annex SL" refer to the high level structure, identical core text, common terms and core definitions for use in management system standards (MSS) set out in Annex SL to the ISO Directives Part 1 2015 (6th edition).

GENERAL CONCEPTS

1. Why has some of the text in Annex SL, ISO's requirements for management system standards, been modified?

In order to add environmental management system (EMS)-specific requirements into the core text and still comply with the rules governing the use of Annex SL, it was agreed to use an integrated approach in a flexible way to incorporate EMS-specific requirements, depending on the subject, and in line with ISO/TC 207/SC 1/WG 5 operating principles. Sometimes the EMS requirements were added in a separate sentence or bullet; sometimes they were inserted within the generic Annex SL sentence or bullet.

WG5 operating principles related to text included:

- simplicity, clarity and translatability
- be concise and avoid redundancy
- flexibility and ease of use of the standard
- verifiability
- compatibility with the other elements of the standard.

In some cases, some Annex SL words were replaced for consistency. For example, on the use of "plan, establish, implement, maintain, control, continually improve..." it was agreed that consistent use of the phrase in ISO 14001:2015 was important, but it has been adjusted in selected clauses to address the specific intent of the clause correctly. For example, in 6.1.1, WG5 used the wording "establish, implement and maintain (the) process(es)", which is different from 8.1 where the wording used by WG5 is "establish, implement, control and maintain".

2. What happened to all of the required procedures in ISO 14001:2004?

ISO 14001:2015 avoids the use of the term "procedure" because it has been incorrectly applied by many as meaning "documented procedure".

In addition to the specific clauses that require a "process", Clause 4.4 requires an organization to establish processes needed for its environmental management system. Clause A.4.4 clarifies that it's up



to the organization to determine the extent processes are needed in order to have confidence that they are controlled, carried out as planned and achieve the desired results.

Clause A.8.1 on operational planning and control, clarifies that there are different ways of ensuring that processes are effective and achieve the desired results (see bullets a) to f)). Establishing a “procedure” (i.e. a specified way to perform a process) is just one of those ways (see bullet c), and establishing a “documented procedure” is another way (see bullet f).

Clause 7.5.1 references the documented information required in specific clauses of the standard, and also any other documented information the organization deems necessary for the effectiveness of its environmental management system.

Taking into account the provisions of these clauses, WG5 reevaluated the need for required “procedures” in the 2015 version, and agreed to specify requirements for “processes” in select clauses, and, in some cases, requirements to document these processes. This allows organizations the flexibility to determine if a process has to be carried out in a specified way (i.e., “procedure”), if other operational control methods are more appropriate, and if additional documented information may be needed.

3. *Why is there no clause on Management of Change?*

ISO/TC 207/SC 1/WG 5 agreed that no stand-alone clause or sub-clause in the requirements would be added to address "management of change". "Management of change" is addressed in suitable sub-clauses and, explanatory text on managing change is provided in the Annex, A.1.

4. *Why does ISO 14001 sometimes use "effect" and sometimes "impact"?*

ISO/TC 207/SC 1/WG 5 agreed that the word "effects" used in the definition of "risks and opportunities" and elsewhere in the standard covers both "effects" on the organization and on the environment. The phrase "environmental impact" is used when referring specifically to "effects" on the environment.

5. *What is the intent of the phrase "enhance environmental performance"?*

The underlying intent of this phrase is to reduce the organization's adverse environmental impacts (i.e. reduce resource use, emissions, effluents, wastes, etc.) or to enhance the organization's beneficial impacts (e.g.: reuse and recycling of by-products, land conservation, etc.). This concept is referred to as "operational performance" in ISO 14031. ISO/TC 207/SC 1/WG 5 wanted to retain alignment with Annex SL and ISO 14031 concepts with respect to improvement of the environmental management system, consistent with the ISO 14001 revision mandate, but in selected clauses wanted to emphasize the focus on improving operational performance. It was agreed to use the phrase "to enhance environmental performance" in those clauses where WG5 agreed to add emphasis.

6. *What is expected in clauses 4.1, 4.2 and 6.1?*

The expectation begins with a conceptual understanding followed by a more detailed determination. For example, the expectation in 4.1 and 4.2 is for a conceptual understanding of the issues and interested party requirements that are relevant to the organization. Regarding 6.1, the intent is that a detailed determination of significant environmental aspects (6.1.2) and compliance obligations (6.1.3) is carried out. Consistent with "risk-based thinking", the intent of 6.1.1 is to generate a conceptual analysis of the "risks and opportunities" associated with other issues and requirements. There is no requirement or expectation for a detailed risk assessment.



7. What is the intent of the new phrase "person(s) doing work under its control"?

As set out in the Annex, A.3, the phrase "person(s) doing work under its control" includes persons working for the organization and those working on its behalf for which the organization has responsibility (e.g. contractors). It replaces the phrase "persons working for it or on its behalf" and "persons working for or on behalf of the organization" used in the prior edition of ISO 14001. The intent of this new phrase does not differ from that of the previous edition.

8. What does "intended outcomes of the EMS" mean?

In Clause 1, Scope, the concept of "intended outcomes" is introduced. Further explanation is provided in Annex, A.3. The phrase "intended outcome" expresses what the organization is expected to achieve by implementing its environmental management system. The three minimal "intended outcomes" include enhancement of environmental performance, fulfilment of compliance obligations and achievement of environmental objectives. Organizations can set additional intended outcomes for their environmental management system. For example, consistent with their commitment to protection of the environment, an organization may establish an intended outcome to work towards sustainable development.

TERMS & DEFINITIONS

9. How are the terms and definitions ordered in clause 3?

As set out in ISO/IEC Directives, Part 2, terms and definitions are listed according to the hierarchy of the concepts (reflecting the sequencing of their introduction in the standard). In the case of ISO 14001:2015, terms are grouped by major clause title (i.e. Context of the Organization, Leadership, Planning, etc.). ISO/TC 207/SC 1/WG 5 agreed to order terms within the groupings such that (i) discipline-specified terms are presented consecutively after its generic form, and to the extent possible (ii) present terms in the order in which they appear in the text. WG5 inserted an "Alphabetical index of terms", which may be modified to reflect alphabetical listings in another language.

10. Why is the term "compliance obligations" used in the English version of ISO 14001 but "legal requirements and other requirements" used in some translations?

To address a translation issue for some languages, ISO/TC 207/SC 1/WG 5 agreed to add to the definition of "compliance obligation" the **admitted term** "legal requirements and other requirements". When preparing other language versions of ISO 14001:2015, National Member Bodies responsible for translation may choose to use the term that best conveys the meaning of the definition.

11. Is there a difference between the use of the term "compliance obligations" in ISO 14001 for environmental management and ISO 19600 for compliance management?

Yes. ISO/TC 207/SC 1/WG 5 modified the definition of this term by adding "Note 1 to entry (normative)" to clarify that "compliance obligations" in ISO 14001 are limited to just those requirements related to the environmental management system.



12. Does ISO 14001 treat the applications of an organization's various compliance obligations (e.g. mandatory requirements, voluntary requirements, etc.) the same?

Yes. ISO/TC 207/SC 1/WG 5 agreed that EMS clauses and associated provisions applied equally to:

- mandatory requirements such as regulations and legally binding requirements,
- obligations that you have no choice but to comply with, even though they aren't technically legally binding, such as directives set by a parent company to a subsidiary, or a corporate directive to various divisions,
- and voluntary requirements such as commitments the organization chooses to make.

WG5 did not want to distinguish these by either (1) establishing separate provisions (i.e., shall statements) for each or (2) providing redundant provisions for each.

13. What is an outsourced process?

An outsourced process differs from procured products and services. Specific conditions for an outsourced process were introduced in Annex A, A.8.1. It is "a process or function performed by an external organization that fulfils all of the following:

- it is within the scope of the environmental management system;
- it is integral to the organization's functioning;
- it is needed for the environmental management system to achieve its intended outcome;
- liability for conforming to requirements is retained by the organization, and
- the organization and the external provider have a relationship where the process is perceived by interested parties as being carried out by the organization."

CLAUSE SPECIFIC CONCEPTS

14. What is meant by "issues" in clause 4.1?

"Issues" include important topics for the organization, problems for debate and discussion or changing circumstances that can affect, either positively or negatively, the intended outcomes of the environmental management system.

- Environmental conditions, e.g. air, water, land, natural resources, are NOT the only issues relevant to an EMS.
- Issues can arise from non-environmental external and internal subjects, e.g. financial, technology, governance (see examples given in the Annex, A.4.1).
- Risks/opportunities are NOT issues; risks/opportunities arise from issues.

15. What is meant by the "organization's purpose"?

In 4.1 paragraph 1, the organization's "purpose" refers to why the organization exists, its "*raison d'être*". It covers the activities that are core to the organization's existence, and are often reflected in an organization's vision and mission.

16. What is expected as the output of clauses 4.1 and 4.2?

The output of these clauses is knowledge. This is a conceptual understanding of how internal and external issues, including environmental conditions, and relevant interested party requirements may affect an organization's ability to achieve the intended outcomes of its EMS. This knowledge is used as an input to the design and improvement of the EMS.



Evidence of this knowledge appears in other sections of an organization's EMS, for example. It was agreed that 4.1 and 4.2 did not need documented information to meet the requirements. As each EMS is unique, an organization may decide, under 7.5.1, if additional documented information is needed for the effectiveness of its EMS.

17. What is the intent of clause 4.2?

Clause 4.2 is a strategic, exploratory step for an organization to gather information about interested parties in order to understand their relevant needs and expectations.

It was agreed in ISO/TC 207/SC 1/WG 5 that the organization determines its compliance obligations at a "conceptual level" in 4.2 based on knowledge of the relevant requirements of relevant interested parties. A detailed analysis of these requirements is conducted in 6.1.3.

When referring to interested parties in 4.2, the term "requirements" was replaced with "needs and expectations". This was done to preserve the distinction between an interested party requirement that is a mandatory requirement (such as a law or permit condition) and one that the organization chooses to uphold (such as a contractual agreement). The decision to commit to interested party needs and expectations and then take them into account when designing its EMS remains in the hands of the organization.

18. What is the intent of considering clauses 4.1 and 4.2 when determining the scope of an EMS?

An organization retains the authority to determine the scope of its EMS. It has the autonomy to prioritize which of the issues identified in 4.1 and 4.2 it will address in its EMS. Clause 4.3 does not imply that the organization must work on all issues.

Further, it was agreed by ISO/TC 207/SC 1/WG 5 that the intent is to consider compliance obligations (the relevant interested party requirements that the organization has to or chooses to comply with), not necessarily all interested party requirements. Therefore, the phrase used the term "consider", not "take into account".

19. What is the intent of clause 4.3, determining the scope of an EMS?

"Scope" of the EMS includes the organization's functions, physical boundaries, and its activities, products and services to which ISO 14001 requirements will apply. It is common practice to consider the items described in the bullet points when establishing scope statements.

The long standing consensus position to allow organizations to phase-in EMS implementation was confirmed and preserved by ISO/TC 207/SC 1/WG 5 in the 2015 version of ISO 14001. To address the concern that some might "cherry-pick" activities, products and services to purposefully exclude those with significant environmental aspects, a requirement to make the scope available to interested parties was added to ensure transparency, and avoid misunderstanding.

Once the scope and boundaries of the EMS have been defined, no exclusion of activities, products or services within the defined scope is permitted. While an organization retains the freedom and flexibility to determine the boundaries of its scope, its conformance to ISO 14001:2015 should be based on a robust, credible and reliable EMS.



Consistent with the intent of the following requirement in ISO 14001:2004, 4.1, "the organization shall ...determine how it will fulfil these requirements", ISO 14001:2015 preserves the concept that the organization retains the autonomy to decide **how** it will fulfil its EMS requirements. See Annex, A.4.3 and A.4.4 for further clarification.

20. What is the intent of the policy commitment to protect the environment?

ISO/TC 207/SC 1/WG 5 agreed

- that the intent was to have a policy commitment to protect the environment (the inclusive meaning as captured in the defined term 3.2.1) which **includes** the concept of "prevention of pollution" but could also include other concepts (i.e. sustainable resource use, climate change mitigation, etc.).
- to retain the emphasis on "prevention of pollution".
- that it is intended to cover something broader than "prevention of pollution" that implies positive, proactive efforts.

21. What is the intent of the requirement to determine "risks and opportunities"?

ISO/TC 207/SC 1/WG 5 agreed that:

- "risks and opportunities" are more than environmental risks (i.e. related to air, water, land, natural resources etc.), and can result from other non-environmental issues that pose risk.
- "risks and opportunities" are NOT always relevant to the EMS; only if they can affect the organization's purpose and the intended outcomes of the EMS.
- the intent is to determine and address the risks and opportunities associated with organizational context (i.e. "issues" from 4.1 and 4.2 that have the potential for (i) adverse effects (risks) or (ii) beneficial effects (opportunities)to the intended outcomes of the environmental management system, and to use this knowledge as one of the inputs to the prioritization of risks (threats) and opportunities.
- there is no requirement for a prescriptive risk management process in the standard.

Additional guidance on risks and opportunities is provided in the Annex, A.6.1.

22. What are some examples of criteria for determining that an environmental aspect is significant?

Environmental criteria (for example, toxicity, duration and likelihood of exposure, etc.) are the primary and minimum criteria for assessing environmental aspects. Other criteria may also be used (example: an aspect may not be significant when considering only environmental criterion but when other organizational issues are considered (such as threat of a noncompliance, or an opportunity to satisfy the needs and expectations of a relevant interested party), the aspect may take on a higher priority or greater importance for determining significance. However, other criteria are not to be used to downgrade an aspect that is significant based on its environmental impact.

23. Is the determination of risks and opportunities, environmental aspects and compliance obligations separate processes, or can they be consolidated?

The organization decides if they want to do separate analyses for sub-clauses 6.1.1 to 6.1.4 or combine some (or all) of the analyses. ISO/TC 207/SC 1/WG 5 agreed not to imply that significant environmental aspects (the output of 6.1.2) or compliance obligations (the output of 6.1.3) need to undergo a second "filtering" step to determine the "risks and opportunities" that need to be addressed in 6.1.4. Since the



organization can determine risks and opportunities" related to issues, significant environmental aspects, and compliance obligations either separately or in combination, it is required that the organization plans a process and maintains documented information on the process (including the criteria used to determine significant environmental aspects) to the extent necessary to have confidence that the process has been carried out as planned. ISO 14001:2015 does, however, require the output of the process (or processes) to be documented.

24. What is the relationship between clauses 4.1, 4.2, 6.1 and 8.1?

Clauses 4.1 and 4.2 provide knowledge which the organization uses in 6.1 to determine risks and opportunities that need to be addressed, significant environmental aspects, including application of a life cycle perspective, and compliance obligations in 6.1. These are inputs to 6.1.4 and 8.1 which is focused on the implementation of operational controls needed to address the planned actions identified in 6.1.4.

25. Why were the business considerations moved out of the clause on environmental objectives?

ISO/TC 207/SC 1/WG 5 agreed that an organization had various options when planning actions to take in 6.1.4. The considerations for environmental objectives (i.e. technological options, etc.) apply to all these options, and therefore were moved to 6.1.4.

26. Now that an organization plans actions to address risks and opportunities, compliance obligations and significant aspects, are environmental objectives required?

ISO/TC 207/SC 1/WG 5 agreed that an organization had various options when planning actions to take in 6.1.4, but an environmental objective had to be established as a minimum.

WG5 agreed that taking into account significant environmental aspects, compliance obligations and considering risks and opportunities when setting the environmental objectives did not imply repeating the determination of which significant environmental aspects, compliance obligations and risks and opportunities need to be addressed (these were determined in 6.1).

27. Why aren't the topics that are required to be communicated listed in clause 7.4?

Following the Annex SL model for placing requirements for documented information, requirements for communicating a particular topic are placed in the clause corresponding to where that topic is discussed, and not summarized in 7.4.

28. Does clause 8.1 impose requirements on external providers?

ISO standards can only impose requirements on the organization adopting the standard. 8.1 focuses on the internal processes that can be used to influence external providers, not on controlling the external providers' processes. The term "external providers" was used to encompass the suppliers of either procured products and services or outsourced processes, and to align with ISO 9001.

29. Why does ISO 14001 include a new requirement for design?

ISO/TC 207/SC 1/WG 5 agreed that operational planning and control should address design activities because important decisions are made that can potentially affect the environmental impacts at each stage of the product and service life cycle.



30. Does ISO 14001 require the organization to communicate its environmental impacts to everyone in its value chain?

No. An organization has the flexibility to provide information on potential significant environmental impacts during the delivery, use, and end-of-life stage; hence the phrase "consider the need" was retained.

31. Did ISO 14001:2015 remove the 2004 requirement to identify potential emergency situations?

No. It was agreed that the requirement to identify potential emergency situations was better aligned with the Plan phase of the PDCA model, rather than the control phase, so it is now covered in 6.1.1.

32. Does clause 9.3 d) 4) apply only to internal EMS audits or is the intent to include information on both internal and external EMS-related audits?

The intent when using the term "audit" in 9.2.2 refers to internal audits conducted by the organization or on its behalf only (consistent with the title of sub-clause), whereas in 9.3 it refers to both internal and external EMS-related audits (i.e., 1st, 2nd and 3rd party).

33. What is the intent of the phrase "continual improvement of the environmental management system to enhance environmental performance"?

ISO/TC 207/SC 1/WG 5 agreed that the ultimate goal of system improvement is that it results in environmental performance improvement. WG5 also agreed that EMS improvement can include environmental performance improvement. It was noted that in some cases the intent of a requirement focused on EMS improvement, while in others the intent was to emphasize environmental performance improvement. -

WG5 therefore used the following:

- Where the term "continual improvement" is used on its own, the intent is to focus on both EMS improvement and environmental performance improvement, with *no particular emphasis* on either.
- Where the phrase "continual improvement of the environmental management system" is used on its own, the intent is to focus on just environmental management system improvement.
- Where the phrase "enhance environmental performance" is used on its own, the intent is to focus on just environmental performance improvement
- Where the phrase "continual improvement of the environmental management system to enhance its environmental performance" is used, the intent is to focus on both EMS improvement and environmental performance improvement, with *added emphasis* on performance improvement.



ISO 14001:2015

ISO TC 207 SC1 reviewed interpretations 2016

Version – December 2016

Introduction

To help clarify the intent of ISO 14001:2015, the ISO process allows for interpretations to be provided by each National Member Body (NMB).

The sub-committee (SC1) follows a process for managing interpretations of ISO 14001:2015. It is important to note that Interpretations do not change the requirements in ISO 14001:2015 but are intended to give users a better understanding of ISO 14001:2015.

The SC1 process includes:

- it is the responsibility of each NMB to respond to any interpretation enquiries it receives;
- NMB interpretations are submitted to the SC1 Secretary and reviewed annually at the SC1 plenary;
- after the review the interpretation is made available to the public via the e-Committee and the SC1 website;
- questions about the interpretation should be referred to the NMB where the interpretation originated.

Please note that some NMB use the term 'clarification of intent' instead of the term 'interpretation.'

See next page for the reviewed interpretations from 2016.



Reviewed Interpretations 2016

This document sets out the interpretations submitted by SC1 National Member Body (NMB) members and reviewed at the 2016 SC1 plenary.

Note the questions and their responses below are provided in response to questions related to ISO 14001:2015. One should not infer that these responses are valid with regard to the 2004 version of ISO 14001.

Clause in ISO 14001	Question	Response	NSB
6.1.2	Does ISO 14001:2015 require Life Cycle Assessments (LCAs) to be completed as part of the enhanced life cycle perspective requirements?	<p>ISO 14044:2006 Clause 3.2.1, defines a <i>life cycle assessment</i> as “a compilation and evaluation of the inputs, outputs and the potential environmental impacts of a product system throughout its life cycle”.</p> <p>ISO 14001:2015 requires taking a <i>life cycle perspective</i>. In Annex A6.1.2, a <i>life cycle perspective</i> is explained as follows: “This does not require a detailed life cycle assessment; thinking carefully about the life cycle stages that can be controlled or influenced by the organization is sufficient”. The life cycle stages of a product (or service) include acquisition of raw materials, design, production, transportation/delivery, use, end-of life treatment and final disposal (3.3.3). In Clause 6.1.2, ISO 14001:2015 requires the organization to consider these life cycle stages when determining the environmental aspects that it can control or can influence.</p>	ANSI - American National Standards Institute
8.1	If an organization does not have any outsourced processes, to what extent does clause 8.1 apply? Do the requirements in the paragraph starting “consistent with a life cycle perspective” only	<p>If an organization has no outsourced processes, the only requirements of Clause 8.1 that are not applicable to its EMS are:</p> <ul style="list-style-type: none">– The org shall ensure that outsourced processes are	ANSI - American National Standards Institute



Clause in ISO 14001	Question	Response	NSB
	apply to outsourced processes?	<p>controlled or influenced.</p> <ul style="list-style-type: none">– The type and extent of control or influence to be applied to the processes shall be defined within the environmental management system. <p>All of the other requirements in 8.1 are independent of whether a process is outsourced or not, including the requirements in the paragraph starting with ‘Consistent with a life cycle perspective...’</p>	
6.1.2	Does ISO 14001:2015 require the organization to apply a life cycle perspective when determining which of its environmental aspects are significant, i.e., in its criteria for determining significance?	In Clause 6.1.2 of ISO 14001:2015, an organization needs to consider a life cycle perspective when identifying the environmental aspects that it can control or influence. There is no single method for determining significant environmental aspects. As stated in A.6.1.2, environmental criteria are the primary and minimum criteria for assessing environmental aspects to determine significance. The organization has the autonomy to apply additional criteria, including criteria related to life cycle perspective.	ANSI - American National Standards Institute