TRINIDAD AND TOBAGO BUREAU OF STANDARDS
CERTIFICATION DIVISION

TRANSITION TO ISO 14001:2015

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1   INTRODUCTION

ISO 14001 has been revised; the document was published on 2015-Sep-15.

This document provides guidance for the transition from ISO 14001:2004 to ISO 14001:2015 and has been prepared by the Trinidad and Tobago Bureau of Standards (TTBS) to provide advice to our certified clients on transition arrangements.

The revision introduces significant changes to the standard. The standard is now based on Annex SL of the ISO Directives, a high-level structure (HLS) which standardizes sub-clause titles, core text, common terms and core definitions to enhance compatibility and alignment with other ISO management system standards.

What are the emerging changes?

Strategic Environmental Management – There is an increased prominence of environmental management within the organization's strategic planning processes. A new requirement to understand the organization's context has been incorporated to identify and leverage opportunities for the benefit of both the organization and the environment. Particular focus is on issues or changing circumstances related to the needs and expectations of interested parties (including regulatory requirements) and local, regional or global environmental conditions that can affect, or be affected by, the organization. Once identified as a priority, actions to mitigate adverse risk or exploit beneficial opportunities are integrated in the operational planning of the environmental management system.

Leadership – To ensure the success of the system, a new clause has been added that assigns specific responsibilities for those in leadership roles to promote environmental management within the organization.

Protecting the environment – The expectation on organizations has been expanded to commit to proactive initiatives to protect the environment from harm and degradation, consistent with the context of the organization. The revised text does not define 'protect the environment' but it notes that it can include prevention of pollution, sustainable resource use, climate change mitigation and adaptation, protection of biodiversity and ecosystems, etc.

Environmental performance – There is a shift in emphasis with regard to continual improvement, from improving the management system to improving environmental performance. Consistent with the organization's policy commitments the organization would, as applicable, reduce emissions, effluents and waste to levels set by the organization.

Lifecycle thinking – In addition to the current requirement to manage environmental aspects associated with procured goods and service, organizations will need to extend their control and influence to the environmental impacts associated with product use and end-of-life treatment or disposal. This does not imply a requirement to do a life cycle assessment.

Communication – The development of a communications strategy with equal emphasis on external and internal communications has been added. This includes a requirement on communicating consistent and reliable information, and establishing mechanisms for persons working under the organization's control to make suggestions on improving the environmental management system. The decision to communicate externally is retained by the organization but the decision needs to take into account information reporting required by regulatory agencies and the expectations of other interested parties.

Documentation – Reflecting the evolution of computer and cloud based systems for running management systems, the revision incorporates the term 'documented information', instead of 'documents' and 'records'. To align with ISO 9001, the organization will retain the flexibility to determine when 'procedures' are needed to ensure effective process control.

2 TRANSITION

The International Accreditation Forum (IAF) and the ISO Committee on Conformity Assessment (CASCO) have agreed to a three year transition period from the publication date of ISO 14001:2015.

IAF Resolution 2014-11 was passed by the IAF General Assembly in Vancouver on 17 October 2014 endorsing a 3 year transition period to ISO 14001:2015.

2.1 Certifications to ISO 14001:2004

TTBS will allow new certifications to ISO 14001:2004 until 2017-Sep-15.

ISO 14001:2004 certifications will not be valid after 2018-Sep-14. As a result all certificates to ISO 14001:2004 will expire on the same date to correspond to the end of the three year transition period.

2.2 Transition Audits (moving from ISO 14001:2004 to ISO 14001:2015)

TTBS can begin conducting transition audits from 2016-Feb-01. These will be scheduled based on client readiness.

In addition to the normally scheduled ISO 14001:2004 surveillance and recertification audits, the transition to ISO 14001:2015 will require a separate one-off Transition Audit. All transition audits must be completed by 2018-May-15.

During this one-off audit, only the additional requirements listed in ISO 14001: 2015 would be assessed. This provides an advantage, in that if the organization were to be found noncompliant with ISO 14001: 2015 it could still maintain its certification to ISO 14001: 2004 up until the end of the transition period on 2018-Sep-14. This approach may minimize the risk to the certified organization in case they are unsuccessful in transitioning.

Now that ISO 14001: 2015 has been published, TTBS will be working to create a correlation matrix to identify the additional requirements that will need to be assessed in the Transition Audit. This will help us to determine the duration needed for the Transition Audits. You will be contacted in this regard in the near future.

2.3 Guidance for certified organizations

For any organisation the degree of change necessary will be dependent upon the maturity and effectiveness of the current management system, organisational structure and practices. An impact analysis/gap assessment is strongly recommended in order to identify realistic resource and time implications.

Organizations using ISO 14001:2004 are recommended to take the following actions:
  i.   Identify organizational gaps which need to be addressed to meet new requirements.
  ii. Develop an implementation plan.
  iii. Provide appropriate training and awareness for all parties that have an impact on the effectiveness of the organization.
  iv. Update the existing quality management system (QMS) to meet the revised requirements and provide verification of effectiveness.

2.4 Frequently Asked Questions

1   Why has the ISO 14001 standard been revised?

ISO standards are reviewed every five years and revised if needed. This helps ensure they remain useful tools for the marketplace. Following a substantial user survey the committee decided that a review was appropriate and created the following objectives to maintain its relevance in today's market place and in the future:
- Integrate with other management systems
- Provide an integrated approach to organizational management
- Reflect the increasingly complex environments in which organizations operate
- Enhance an organization's ability to address their environmental impacts

2   Is a Pre-Assessment Audit, conducted by TTBS, required before the Transition Audit?

No. Pre-Assessment Audits can be conducted if desired but are not mandatory. TTBS can begin conducting Pre-Assessment audits from 2016-Feb-01.

Organizations are reminded that audits are based on a sampling process and that while they are a useful tool in appraising the level of readiness for transition, a successful Pre-Assessment does not guarantee a successful Transition. Organizations are also reminded that TTBS cannot engage in consultancy services for our certified clients.

3   My audits are normally due in August, and the transition period ends in September. Why can't my company have its transition audit in August?

If any nonconformities are discovered during the audit, they must be addressed with corrective action, and TTBS must review and approve the audit package by the transition deadline.

An audit in August does not provide enough time for this to happen. Thus, your organization could transition in 2017 or chose to have an audit early in 2018 to allow adequate time for completion of the post-audit process.

Thus, all transition audits must be completed by 2018-05-15.

4 My organization is not yet certified. We have been working towards ISO 14001:2004, Can we still seek certification and transition at a later date?

We will allow certifications to the 2004 version of the standard until 2017-09-15. Keep in mind that ISO 14001:2004 certifications will not be valid after 2018-09-14 and that all certificates to ISO 14001:2004 will expire on that date. An organization will need to transition to the new version of the standard in order to maintain continued certification.

5 What if we have a Recertification audit in early 2016, should we just plan on performing that audit to ISO 14001:2015?

This will be a strategic decision that each company makes on its own. If you have had a chance to examine your quality system against the revised requirements and feel that you are ready, you can certainly request that a transition audit be performed, however this is not mandatory.

6 Is transitioning earlier better?

There is no difference if you transition in 2016, 2017 or 2018. An ISO 14001:2004 certificate is still valid until the end of the transition period. An ISO 14001:2015 certificate should not be perceived as better than an ISO 14001:2004 certificate until the obsolescence date of that standard.

Organizations are however advised that our capacity to schedule audits is based on limited resources. We would therefore advise our clients to schedule their Transition Audits as soon as you feel that you are ready instead of waiting until the end of the Transition Period.

7 What happens if my organization doesn't transition on time?

You will no longer be certified as of the end of the transition period. In order to become certified to ISO 14001:2015, you will need to start over with an Initial Certification Audit (Stage 1 and Stage 2).

If your organization has undertaken the audit but post audit activities (including assessments of corrective action and evaluation of the audit package for a decision on certification) are not completed prior to the end of the transition period, then an

ISO 14001:2015 certificate will be issued as soon as the post audit activities are completed. This means that there will be a lapse in your certification status.

8   What is Annex SL?

Annex SL is a portion of the "ISO/IEC Directives Part 1 – Consolidated ISO Supplement – Procedures Specific to ISO" document. This standard regulates and controls the process of developing, updating, and issuing ISO published standard. The full text of Directives Part 1, including the Annex SL text can be found here:
 http://www.iso.org/sites/directives/directives.html#toc_marker-76.

Annex SL can be thought of as a ten section blueprint to be used for all ISO standards. It promotes (among other things) common terms and core definitions for many of the terms used in the ISO family of standards. It is through the mandatory structure of Annex SL that organizations will be better enabled to achieve multiple certifications such as ISO 9001, ISO 14001, and OHSAS 18001, because each of these standards will have the same 10 sections and the same core terms and definitions.

9   Do we have to change our existing procedures?

The level of change needed will depend on the maturity of the current management system and its associated documents. Existing procedures should be reviewed against the new requirements, it is anticipated that changes would be manageable.

10 Will our staff have to complete transition training?

Generally Yes - you will be expected to provide some form of awareness and transition training to your staff, especially internal auditors. TTBS would also expect that training be provided where applicable based on an assessment of the new standard's impact on the various processes and personnel.