

UPDATES

TO STANDARDS



from DQS Inc.



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Twenty Things You Should Know About ISO 14001 Revisions

On July 15, we presented a webinar on the status of revisions to the ISO 14001 Environmental Management Systems standard. The webinar, which can be viewed at www.dqsus.com, included the latest updated information on transitioning to the revised document. The Final Draft International Standard (FDIS) version of the standard is now in the approval stage and most involved in the revision process believe that it will easily achieve enough affirmative votes from ISO member bodies to ensure publication as ISO 14001:2015 in September or early October. This also coincides well with the publication of the ISO 9001 standard also under revision.

The core focus of this webinar was an interview with Gary McRae on questions that certification organizations are asking about how and when to transition to the revised standard. Gary gave insightful and clear verbal responses to these questions on the webinar and, as promised, the questions and responses are reproduced here as an aid for those of you who are preparing to transition your certification to the revised standard. We will be with you all along the way and will continue to provide information and helpful guidance as ISO 14001:2015 emerges this fall.

Please continue to let us know your questions and how we can help.

Question 1: Now that the document is at the FDIS stage, how does that impact the timeline for auditing, transition, certification, etc.?

Our timeline with ISO14001:2015 began with the release of the Draft International Standard (DIS) back in July 2014, just a year ago. Since then we have seen some minor editorial and content changes but not a lot of changes to the text or to the structure. The Final Draft International Standard (the FDIS) was just recently released, so we are thankful for that. We can now start looking at requirements and be assured there will be no technical or structure changes from the FDIS version to the issued IS standard.



And as a follow up: for how long will certifications for ISO 14001:2004 be valid?

Basically, if the Standard is finalized and published in September this year, there is an allowed three year transition period from the ISO 14001:2004 version of the standard to the ISO 14001:2015 version.

Question 2: We've heard a lot about key changes to ISO14001:2015. In your opinion as an auditor, what are some of the more significant of these changes?

Some of the more significant changes to the Standard are related to, first of all:

Context of the Organization; Life Cycle Perspective; and probably the

Restructuring of the Standard to meet requirements that are defined in Annex SL we've heard so much about.

Question 3: Could you explain what "Context of the Organization" means in practical terms so that I can better understand and be able to explain the meaning to my organization?

Context of the Organization is very high on our list of key changes and is talked about very early in the new Standard. Section 4.1 of the Standard is titled "Understanding the organization and its context". The intent of this section is to assure that there is a high-level understanding of important issues that can have an effect on an organization's environmental responsibilities. You could think of this as an "initial review" in your process of defining your environmental management system (EMS). Note that the initial issues that you do identify could be either positive or negative and could be internal issues or could be external issues. Internally understanding the context of the organization can help further the business success of the

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Now that the long-awaited FDIS was made available a few days before the deadline of July 15, 2015, the standard revision process seems to be on track for the release of the ISO9001:2015 International Standard by the next deadline of September 15, 2015 as well.

The FDIS is currently being reviewed by the member committees, and yet it is not anticipated there will be any major changes to the standard before its publication as an international standard. There might still be some minor changes, or paragraph renumbering, but with very little chance of changing the core requirements, or the focus of the revised standard.

Copies of FDIS ISO9001:2015 are available for purchase from ISO.org and ASQ.com, among other sources.

The good news here is that the announced changes are not radical. Basically, the overall intent of the standard is intact, and none of the changes that have been made

may be classified as “major” or “drastic”.

There were, however, many minor changes made throughout the standard. Most notably, the Terms and Definitions and Annex B have been deleted from ISO9001:2015 and added to ISO9000:2015. Also, in the Introduction section, a new diagram has been added to better describe the concept of “Process Approach”. The text that describes the diagram has also been slightly revised as well, but the changes are not significant. This is an excellent method in describing the concept of “Process Approach” when planning, monitoring and improving the quality management system.

The DIS mostly had references to “Risk”, but not so much to “Opportunity”. Now, both are mentioned in several places. “Opportunity” is defined as the “upside of risk”- or positive aspects that may be focused on to benefit the organization. This significant clarification on risk-based thinking and the differentiation between “risk” and “opportunity” are noted in the introduction, planning and in Annex A4. Also, in a few places, the term “impact” is

now replaced by “effect” or “potential effect”.

Refer to the chart below for a listing of some of the changes.

Overall, the FDIS is very similar to DIS in intent, but slightly modified to use the correct terminology. There has not been any significant change on the focus of the new standard, and its intent for a quality management system to be planned, checked and improved in order to meet the stakeholder’s requirements, including the requirements of the customers remains unchanged.

With the expected release of the ISO901:2015 International Standard by mid-September of 2015, all current registrations to the 2008 edition will have to be upgraded during the three year certificate upgrade window, which will run until mid-September of 2018. Any certificate that is not upgraded by that time to comply with the requirements of the 2015 revision will be withdrawn at the three year anniversary of the new standards since the 2008 version will no longer be allowed by

Clause	DIS to FDIS Change
5.1.1	Risk-based Thinking added to section 6.1.1 e) Promoting awareness of the use of the process approach and risk-based thinking.
6.1	In Planning- now it is required that risks shall also address desirable effects (Opportunities). Note 2 added to clarify the intent.
7.1	There are several minor editorial-type changes with no effect on the overall intent of the requirements. In 7.1.3, sub-item (c) has been changed from “transportation” to “transportation resources”.
7.1.4	New Note added- A suitable environment can be a combination of human and physical factors.
7.1.6	Under Organizational Knowledge, the main requirements remain unchanged, but notes now include clear definition and some clarification.
7.3	A clarification has been added that the term “awareness” applies to relevant persons of the organization and not all members.
7.4	For Communication, a new requirement has been added to determine who communicates
8	Section 8 has been revised as well, but the changes are minimal. The changes are mostly to use the correct terminology that is used throughout the Standard.
8.2	There are no major changes in 8.2 – just some minor changes to the wording and the paragraph number for “Changes In Product Requirements”.
8.3	Slightly revised as well. Now, there is a need to maintain documented information for inputs, controls, outputs and changes. Also, there is a better differentiation between the three types of controls – which are review, verification and validation.
8.4	Better definition of externally provided processes, products and services added.
8.5, 8.6, 8.7	The term “products and services” and “product outputs” have been replaced with “outputs” – just a clarification and not a major change.
8.5.1	There is a new requirement to have steps in place for “the implementation of action to prevent human error”..

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ISO and IAF rules.

This timeline is independent of the organization being registered to any other management system standard, such as TS16949, ISO13485, TL 9000 or AS9100, etc. Although some of those standards and specifications will be revised per separate industry notifications, the transition process for those standards will not affect the three year window transition process for ISO9001:2015 and ISO14001:2015. With that said, our registered organizations may want to take into consideration the timing of their upgrade with the industry and the transition timing requirements for the 2015 standard and industry standards. The upgrades may be done at any time during the registration cycle. Having the upgrade done during the recertification

audit could be one of the most cost-effective ways of upgrading to the new standard. If an organization wants to coordinate their upgrade with their industry standard certifications transition, we are prepared to review this with clients on an individual basis taking into consideration cycles and transition rules

We will appreciate if you could keep your Customer Service Professional informed of your transition plans as soon as possible so we can help find the most effective ways to help you through this process. This way, we will be able to schedule your audit at your desired timeframe, and make sure that the right resources are assigned for the correct number of days to avoid any possibility of certification interruptions.

As an added service, we currently have trained lead auditors who are available to conduct site presentations and gap assessments to the new standard requirements, or just an executive overview of the requirements, the transition process, and information on what may be verified during the upgrade audits. Should you be interested in any of these services, please let your Customer Service Professionals know as well.

At DQS, Inc., we look forward to working with you in making the transition possible. If there is anything we could do to help, please let us know.

Joe Mansour

ISO9001:2015 Program Manager and
Lead Auditor

Clause	DIS to FDIS Change (continued)
8.7	The reference to “corrective” has changed to “correction” as one of the options for controlling nonconforming products.
9.1	Under 9.1.1, there is a minor change in the General section and the customer satisfaction section.
9.2	The reference to “Quality Objectives” has been removed, but the intent is still to audit “to the extent needed”, as the requirement still includes “importance of the processes concerned, changes affecting the organization, and the results of previous audits”.
10.1	The requirements for improvement of processes and prevention of nonconformities” has been replaced by “correcting, preventing and reducing undesired results”. Also, “predicted requirements” have been replaced by “future needs and expectations”.
10.2	Under 10.2 for Nonconformity and Corrective Action, there is a new requirement to update Risks and Opportunities that are identified during the planning process.
10.3	Use of outputs was replaced with “results” to be consistent with the other sections of the standard.

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company.

Let us give you some examples of internal and external issues that may be identified during this process:

- Internal Issues could be the activities of the organization, the products (or outputs) of the organization, the strategic direction of the organization and could also include the organization’s capabilities.
- External Issues could be related to regulatory requirements, economic concerns, even geographical concerns (such as if your site location is next to an environmentally sensitive area) – such as near a school, a waterway or protected wetlands.

Follow-up Discussion: The relationship of context of the organization, complexity and

environmental aspects:

Context of an organization refers to the set of circumstances that encompass an organization. These circumstances could be both internal and external issues that affect the organization’s ability to achieve the intended outcomes of its environmental management system. For example, external circumstances could relate to adjacent properties with environmental sensitivity such as wetlands, schools, or even protected species of plants and animals. Internally, the complexity of operations that an organization performs can be seen as part of its context. An organization’s level of operational complexity is also a consideration and this complexity could be minimal, where office functions are the main activity, or could hold much higher risks, as in the case of a complex chemical manufacturing

site. The level of environmental risks, associated with the complexity of operations, is evaluated by the management system in its processes for the identification of aspects and determination of environmental impacts. The overall understanding of both internal and external circumstances then provides a high-level picture and understanding of the important issues that an organization manages.

Question 4: What about “Life Cycle Perspective”? What are the expectations that a Certification Body, such as DQS Inc., would expect to see related to this requirement?

We see that in the Planning section of the Standard, section 6.1.2 “Environmental Aspects”, that you are to have a life cycle perspective when determining the environ-

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mental aspects of your organization. Note that it is NOT a requirement to perform a formal Life Cycle Assessment. It may seem a bit confusing, but Annex A of the Standard provides some clarification.

The Annex says: “In the identification of environmental aspects the organization should apply a life cycle perspective. 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. Typical stages of a product life cycle include raw material acquisition, design, production, transportation/delivery, product use, end-of-life treatment and final disposal. The life cycle stages that are applicable will vary depending on the activity, product or service.”

Essentially, a consideration of the life cycle stages that can be controlled or influenced by the organization is sufficient. Auditors would look for some objective evidence of this consideration. I expect that the consideration would most likely be documented in some way.

Question 5: The new Standard talks about “Risks and Opportunities”. Could you elaborate on these terms?

The term “risks and opportunities” is used in a number of places in the new Standard. A “risk” essentially refers to a “threat” to your current condition. The Standard refers to a risk as being the “effect of uncertainty”. This definition is okay, but I would say we still need some additional explanation for many of us to use the Standard effectively. Essentially, I think of risk as the likelihood of something occurring. Be aware, however, that a risk could be either positive or negative.

The word “opportunities” doesn’t give us as much trouble and is probably easier for most of us to understand. An opportunity is essentially a potential beneficial effect. The Standard refers to opportunities in a number of places as beneficial environmental impacts, and the Standard also uses the word opportunities when talking about continual improvement.

Question 6: The restructuring of the Standard to Annex SL is a key change along with new terminology for “docu-



mented information”. As a certified organization will I be expected to change all my management system documentation to align it with the new Standard requirements and structure?

Annex SL is a new management system structure that many of us have not seen before. The ISO 14001 Standard, along with ISO 9001, are the first Standards being modeled around the new Annex SL High-Level Structure so we really have no previous experience or even any “lessons learned” at this time. That being said, we want to carefully look at both the requirements and structure of the new Standard and evaluate if there is value in significantly changing our internal documentation. There may be. The global effort that went into formulating the new structure for management systems was immense and required a consensus of world-wide management system experts - not an easy task.

With the new high-level structure, we may see value in adjusting our internal management system documentation to align it with the new Standard. However, note that this is NOT a requirement that we do so, and even if we do decide to align our internal documentation with the Standard, it would not be necessarily to have to be done all at once and would not be required before our management system could be registered to the new Standard.

Question 7: The terms “Consider” and “Take into Account” are used in several clauses in the new Standard. What is the difference?

Annex A of the new Standard gives us some insight into the difference. Annex A says that the word “consider” means

that it is necessary to think about the topic being discussed, but the organization can actually decide not to do it. Let me give you an example: Section 8.1 (Operational Planning) says that the organization is to consider the need to provide information about potential significant environmental impacts during the delivery of products or services. We have to show evidence of this consideration, but the final decision could be to not provide this information, and that decision may be okay, depending on the circumstances.

The phrase “take into account” is a bit different than “consider”. We first see the “take into account” phrase in section 6.1.2 Environmental Aspects where it is stated:

“When determining environmental aspects, the organization shall take into account,” and then there is a number of listed items. Again, Annex A of the Standard, provides some clarification. Section A.3 says that “take into account” means that it is necessary to think about the topic, but interestingly, it cannot be excluded. For example, in section 7.4.1 of the Standard it says that “When establishing its communication processes, the organization shall take into account its compliance obligations”. Obviously, for this requirement we are not going to exclude compliance obligations.

It’s interesting to note that the current version of ISO14001:2004 does not make any distinction between these terms “consider” and “take into account.”

Question 8: I understand that “Preventive Action” is no longer in the Standard. What is going on with this?

That is correct. We no longer see the term preventive action in the new Standard, which is quite a shock to some of us. We have been so used to addressing preventive action as a separate requirement or as an integral part of our corrective action process. This change in perspective, we are told, is because one of the key purposes of an environmental management system itself is to act as a preventive tool. This is a more holistic perspective that does make sense, but it’s not how we have traditionally been addressing preventive action in our management systems. Also there has

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been considerable confusion between preventive action and full corrective action

Again, if we look in Annex A, we get some explanation where it states “One of the key purposes of an environmental management system is to act as a preventive tool. The concept of preventive action is now captured in 4.1 (Understanding the organization and its context) and 6.1 (Actions to address risks and opportunities).

Question 9: The revised Standard uses the terms “Appropriate” and “Applicable”. Can you talk about what the difference in these terms means?

That is correct; there is a difference between these two terms, and they are used often in the new Standard. The word “appropriate” appears 17 times. The word “applicable” appears seven times.

Once again, Annex A of the Standard provides some clarification where it tells us: “Appropriate” means suitable for and implies some degree of freedom. Whereas, “applicable” means relevant or possible to apply and implies that if it can be done, it needs to be done.

“In the Standard, “Appropriate” means suitable for and implies some degree of freedom. Whereas, “applicable” means relevant or possible to apply and implies that if it can be done, it needs to be done.”

For “appropriate” examples: Section 9.1.1 states that “The organization shall retain appropriate documented information as evidence of the monitoring, measurement, analysis and evaluation results.” The term “appropriate” here could mean determining if any documentation is needed and to what level of detail – there’s the degree of freedom that we have.

For “applicable”: Again Section 9.1.1 states “The organization shall determine (b) the methods for monitoring, measurement, analysis and evaluation, as applicable, to ensure valid results;” in other words, the methods should be determined, if possible, for each and every situation.

Question 10: There are a number of references to “intended outcomes” in the revision. Can you help clarify what this means?

This phrase “intended outcomes” is used

over 20 times in the Standard and Annexes. An example of its early use in the Standard is in Section 1 “Scope” where it is stated: “the intended outcomes of an environmental management system include:

1. Enhancement of environmental performance;
2. Fulfillment of compliance obligations; and
3. Achievement of environmental objectives.”

What this basically means is stating what the organization intends to achieve by implementing its environmental management system and what is expected to be achieved through its planning processes, such as the environmental objectives and targets and the expectation to achieve these.

Question 11: We have been living with and are very familiar with our 2004 version of the Standard. Do you have any advice for those of us who want to get up to speed with the new Standard?

I would recommend not jumping directly into the main requirements and body of

the new Standard, which are in Sections 4-10. I would recommend pulling back and start with reading the Introduction section carefully. You’ll find some new concepts, or modified ideas that we have not seen before, such as the new framework for the Plan, Do, Check, Act model.

After that I would take a look at Clause 1, Scope. Then take a look at definitions carefully to assure that when you read through the Standard you have a clear understanding of the meanings. As we’ve been discussing during this Q&A session, there are a number of definitions and terms from the previous version of the Standard that now have clarified meanings, or for some of us, new meaning.

Along with this, as you read through the Standard, be sure to look at the clarifications in Annex A of the Standard. With all of this in mind I think you may get the

greatest value and understanding of the Standard and of its intended requirements.

In addition to the above, each member body of ISO can have a Clarification of Intent (CI) document to accompany an ISO standard. For example, in the US, a copy of the CI for ISO 14001 is available through the TAG Administrator, ASQ, delegated by the U.S. national body, ANSI. You can go to www.asq.org and search for Clarification of Intent, ISO 14001. Users of the standard are encouraged to contact their own national body to obtain a copy of the relevant CI. Keep in mind that certification auditors use the CI as a key tool. The ISO website also has information on intent.

Question 12: How is DQS Inc. approaching the transition process?

First of all, we know we need to be qualified ourselves so that we can provide our customers transition services that are helpful to their situations and success. Internally, we have been reviewing our management system processes and procedures to see where we may need to make adjustments, such as in our scheduling and planning processes. Along with these changes, we’re adjusting processes as necessary and conducting in-house training of all our departments so they’re completely familiar with the new Standard and how the changes affect their functional processes.

For our auditors, we have already provided extensive online training and examination and had comprehensive face-to-face training in August to further the competency of auditors. The August training also included case studies and scenarios to help us be better prepared for on-site assessments.

For customers we are providing Webinars and informational meetings to help with their understanding of the Standard and the transition processes. We’re also publishing online bulletins and articles, such as our Update to Standards bulletin and our IMPACT articles.

Question 13: If I am currently certified to ISO14001:2004, what is the process to upgrade my management system to the ISO14001:2015 Standard?

Once the International Standard is pub-

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lished (in September we still expect) organizations may officially be registered to or certified to the revised Standard. In the meantime, before the International Standard is officially published, organizations may begin moving toward conformance to the new requirements by enhancing their existing management system (such as adjusting their documented procedures) or providing training to employees, their internal auditors, to the management team, etc. When the Standard is finally published, an organization may begin the two stage assessment process for registration.

Question 14: What is the difference between a Stage 1 and Stage 2 audit?

The Stage 1 audit is essentially a high-level review of key requirements of the ISO14001:2015 Standard. The Stage 1 is generally a 1-day assessment for small-medium size organizations and is conducted onsite to assure the organization is knowledgeable of the Standard's requirements and has implemented or planned key requirements prior to the Stage 2 Assessment being conducted. The Stage 1 is really a good gage to assure an organization that they are ready for the certification audit. Based on the successful outcome of the Stage 1, the lead auditor will recommend conduct of the Stage 2 comprehensive audit where all requirements of the new Standard are then assessed.

Question 15: Can DQS Inc. help me prepare for using the new standard by doing a gap assessment on my company's current management system?

Of course! A GAP assessment can be a wonderful tool to measure where your organization is in relationship to the new Standard. It can identify where requirements cannot be substantiated and can measure how far from meeting a specific requirement the management system is. DQS Inc. can currently provide a GAP assessment to the FDIS Standard. Once the official international standard is published, we will also be providing GAP assessments to that.

Question 16: Do I need to wait to upgrade my existing ISO14001 registration until I am due for my normal triennial recertification?

No, you can be upgraded as soon as the new Standard has been officially published in September. However, you do not have to be immediately compliant or have to immediately upgrade to the new Standard. The three year transition period allows organizations to upgrade anytime during this 3-year window of time. At the end of the transition period the ISO14001:2004 Standard will be retired. Organizations that do not upgrade prior to the retirement of ISO14001:2004 will no longer be registered to the ISO14001 Standard.

Question 17: How many audit days are required for upgrading to the new ISO14001:2015 Standard?

Audit days for upgrading are based on the number of audit days needed for your regular recertification assessment. Please keep in mind these could change based on the changes an organization makes to conform to the new standard. So based on the number of employees you have and the environmental and system complexity of the organization, the recertification audit day calculations will reflect how many audit days are required for your upgrade.

Question 18: In the final analysis, what are some of the benefits of being certified to the revised standard? Isn't the transition going to be a lot of extra work?

It will take us all some effort and time to understand the new version of the ISO14001 Standard - as well as how it will affect our existing management system. Remember that there is a three year period to transition to the new Standard, but also understand that you don't want to wait very late in the three year transition period. By waiting late in the three year period, you may be putting your management system at risk of not having had a successful transition audit conducted and a certificate issued by that time. Remember that the old ISO14001:2004 Standard will be retired at the end of the three year transition period - it will no longer exist.

As far as benefits go, once the initial efforts of transitioning have occurred, there could be notable benefits of having the revised standard in place. For example, if you are also certified to the ISO9001 Standard, ISO14001 will be well aligned with the

same management system requirements. Another benefit is that the new Standard will necessitate taking a fresh look at environmental performance and evaluating where improvements can be made. Finally, having your leadership team include environmental considerations in the strategic direction of the organization may provide additional resources for greater environmental Stewardship.

Question 19: Can I use the FDIS as the basis for preparing for certification, and if so, where do I get it?

Yes. Although it is still referred to as DRAFT, in the FDIS revision stage only editorial changes can be made to the document so what you see in the FDIS is what the final published standard will contain. The FDIS is available through the TAG administrator, ASQ, at www.asq.org.

Question 20: Finally, how should I prepare my organization for transitioning to the new Standard?

Each organization is going to be different, but some key considerations in preparing for transitioning could be first learning as much as you can about the new Standard, evaluating what training may be needed for staff members to get them up to speed (including the Leadership team) and determining where gaps lie in the management system so you can prioritize and get these addressed.

Last but not least: Call DQS Inc. for information on what we can do to assist you. We'll be glad to help!

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