



ISO 14001:2015

ISO/TC 207/SC 1 reviewed interpretations

Version – September 2017

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) has a [process for managing interpretations](#) of ISO 14001:2015, this was revised 4 September 2017. 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 on ISO 14001:2015.

The SC1 process includes:

- it is the responsibility of each National Member Body (NMB) to respond to any interpretation enquiries it receives;
- NMB interpretations are submitted to SC1 on an annual basis and reviewed at the SC1 plenary;
- after the review, the interpretation is made available to the public via [ISO Livelink](#) 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'.



Reviewed Interpretations

This document sets out the interpretations submitted by SC1 National Standard Body (NSB) members and reviewed at SC1 plenary 2016 and 2017

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	Year reviewed by SC 1 plenary
General	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?	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.”	SCC - Standards Council of Canada	2017
3	Are the references to other standards in the Notes to Entry in Clause 3 (Terms and definitions) normative?	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	SCC - Standards Council of Canada	2017



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		<p>definitions of “audit evidence” and “audit criteria” in ISO 19011:2011.</p> <p>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.</p> <p>Access is enabled by visiting the ISO site at https://www.iso.org/obp/ui.</p>		
3.1.5	Are there any situations in which “top management” refers to persons outside the scope of the environmental management system?	<p>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 <i>environmental</i> 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</p>	SCC - Standards Council of Canada	2017



Clause in ISO 14001	Question	Response	NSB	Year reviewed by SC 1 plenary
		organization has established or to extend the scope of the internal audit beyond the scope of the EMS.		
3.2.9	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?	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.”	SCC - Standards Council of Canada	2017
3.2.10	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?	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.	SCC - Standards Council of Canada	2017



Clause in ISO 14001	Question	Response	NSB	Year reviewed by SC 1 plenary
3.3.4	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 <i>environmental</i> management system”?	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.	SCC - Standards Council of Canada	2017
4.1 4.2	Is an organization required to establish a process in order to meet the requirements in 4.1 and 4.2 that it determine its context, relevant interested parties and their needs and expectations? Is an organization required to develop and maintain documented lists of its external and internal issues, its relevant interested parties and their needs and expectations?	Clauses 4.1 and 4.2 do not state a requirement for a process nor does it state a requirement for maintaining or retaining documented information. The intent behind using the word “determine” is that the organization generates information (knowledge) regarding its “understanding of the needs and expectations of interested parties” and of its “external and internal issues.” A secondary intent in changing from the use of the word “identify” in the 2004 edition of ISO 14001 to “determine” in the 2015 edition is to conform to Annex SL management system terminology. The term “determine” implies that the organization make some specific effort to generate information that results in knowledge. While a process is not required for these determinations, whether or not to have a process is a consideration for the organization to make when developing its EMS (See Clause 4.4). The decision to document the knowledge gained or the means of acquiring it is made by the organization by	ANSI - American National Standards Institute	2017



Clause in ISO 14001	Question	Response	NSB	Year reviewed by SC 1 plenary
		<p>considering Clause 7.5.1, which gives the organization flexibility as to which processes it needs to document and records it needs to keep in order to make the EMS effective. If the organization decides documentation is the best way to give guidance to users and to achieve consistency, then documentation should be considered.</p> <p>Whether documented or not, an understanding of the relevant needs and expectations of interested parties as well as of external and internal issues would be evident in the implemented EMS; for example, in the determination of risks and opportunities that need to be addressed.</p>		
6.1	Does the organization have to identify at least one risk or opportunity that needs to be addressed, i.e. at least one potential adverse effect (threat) or beneficial effect (opportunity) that needs to be addressed?	<p>Although there is no explicit requirement in Clause 6.1. of ISO 14001:2015 that an organization will identify one or more risks or opportunities that need to be addressed, there is an underlying assumption that the organization will do so.</p> <p>Risks and opportunities are defined as potential adverse effects (threats) or beneficial effects (opportunities), which may result from environmental aspects, compliance obligations, or from other issues and requirements identified as part of the context of the organization. The intent is for the organization to determine which risks or opportunities it considers to be important to address within its EMS, in order to achieve the intended outcomes of its EMS and support continual improvement.</p>	ANSI - American National Standards Institute	2017
6.1.2	Does ISO 14001:2015 require Life Cycle Assessments (LCAs) to be completed as part	ISO 14044:2006 Clause 3.2.1, defines a life cycle assessment as “a compilation and evaluation of the inputs, outputs and	ANSI - American National	2016



Clause in ISO 14001	Question	Response	NSB	Year reviewed by SC 1 plenary
	of the enhanced life cycle perspective requirements?	<p>the potential environmental impacts of a product system throughout its life cycle”.</p> <p>ISO 14001:2015 requires taking a life cycle perspective. In Annex A6.1.2, a life cycle perspective 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>	Standards Institute	
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?	<p>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.</p>	ANSI - American National Standards Institute	2016
6.1.4	In Clause 6.1.4 A(3), which “risks and opportunities” is an organization required to plan actions to address?	<p>An organization is not required to plan actions to address every risk and opportunity, only those it has determined need to be addressed. This determination is an output of Clause 6.1.1. An organization retains the authority and</p>	ANSI -American National Standards Institute	2017



Clause in ISO 14001	Question	Response	NSB	Year reviewed by SC 1 plenary
		<p>accountability to decide how it fulfills the requirements of ISO 14001, including determining which risks and opportunities need to be addressed.</p>		
8.1	<p>What is an outsourced process? Is every process or service obtained from an external provider an outsourced process?</p>	<p>ISO 14001:2015 defines “outsource” as “make an arrangement where an external organization performs part of an organization’s function or process” (see Clause 3.3.4). A process or service obtained from an external provider is not necessarily an outsourced process. Outsourced processes can be viewed as a subset of these externally provided processes or services.</p> <p>Criteria that an organization can use to distinguish outsourced processes from other processes and services are described in Annex A.8.1, which states that an outsourced process is one that fulfils all of the following:</p> <ul style="list-style-type: none"> – 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; – the organization and the external provider have a relationship where the process is perceived by interested parties as being carried out by the organization. 	<p>ANSI - American National Standards Institute</p>	<p>2017</p>



Clause in ISO 14001	Question	Response	NSB	Year reviewed by SC 1 plenary
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 apply to outsourced processes?	<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 controlled or influenced. – 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>	ANSI -American National Standards Institute	2016
8.1	Does the phrase, “consistent with a life cycle perspective’ in Clause 8.1, Operational Planning and Control mean that an organization needs to consider a life cycle perspective a second time, with regard to operational planning and control?	There is no requirement in Clause 8.1 that the organization undergo an activity to reconsider a life cycle perspective. There is also no requirement for a formal life cycle assessment (see COI 16-01.A1). The four bullets in Clause 8.1 paragraph 4, a) to d) specify requirements that are typically associated with specific life cycle stages.	ANSI -American National Standards Institute	2017
8.1	The operational control clause of ISO 14001:2004 (Clause 4.4.6) referred to identifying and planning those operations associated with significant environmental aspects. The operational planning and control clause of ISO 14001:2015 (Clause 8.1) refers to processes needed to meet environmental management system requirements. Does the revised standard	As was the case in ISO 14001:2004 Clause 4.4.6, Clause 8.1 in the revised standard remains focused on planning and controlling the operations of an organization. The organization decides the controls needed for operational processes associated with its significant environmental aspects, compliance obligations, risks and opportunities that need to be addressed, and environmental objectives. These operational processes are controlled by establishing	ANSI -American National Standards Institute	2017



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	still refer to control of the organization's operational processes?	operating criteria and implementing methods to meet the criteria.		
9.2	Does the requirement for internal audit (9.2) include a compliance or financial audit?	<p>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.</p> <p>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.</p>	SCC - Standards Council of Canada	2017