

ISO 14001:2015 and environmental risk



Will the pending ISO 14001 update result in improved environmental risk management outcomes? By Aaron Westwood.

Earlier this year the second committee draft (CD2) of the revised ISO 14001 standard was formally adopted.

The section on organisational risks and opportunities has been completely reworked. For many organisations, the changes involving environmental aspects and impacts, and organisational risks and opportunities will provide a timely opportunity to overhaul the way they approach environmental risk management. But will they take it?

Just for show?

The revised CD2 includes a modified content and structure, but the requirements for planning actions to address environmental aspects/impacts and organisational risks and opportunities will still appear in the planning phase.

But how many environmental management system (EMS) practitioners actually use their existing Environmental Aspects and Impacts Registers (in their various forms) as a tool to assist in proactive environmental risk management, and how many have it to show an auditor or to meet a requirement of the standard?

Is it really used to inform training requirements or as a basis for setting improvement objectives? Can you really say that it helps your organisation manage the risks of its operations, and respond better to incidents and emergencies?

If you answered no to these questions, you're not alone. Often the reason for this is the complexity of the information itself and the uncertainty surrounding potential consequences. EMS practitioners have traditionally centred their registers to individual activities, products and services, meaning aspects are listed individually, despite them being managed collectively in many cases.

As an example, registers will often identify spillage of chemicals as an aspect in several locations, despite the management of chemicals being fundamentally the same across the site.

ISO 14001: 2015 – Five Key Changes

Element	Key Changes
Environmental Aspects and Impacts	Essentially little change in intent and wording. Requirement to take into account 'abnormal and emergency conditions taken from Annex A and added to body of standard.
Lifecycle Perspective	Environmental aspects and impacts will need to be identified, taking into consideration a life cycle perspective.
Organisational Risks and Opportunities	New section added for determining significant aspects and organisational risks and opportunities. First time the word risk has appeared in ISO 14001.
Criteria for Assessment	New requirement to have documented criteria for determining significant aspects and organisational risks and opportunities, which takes into account various factors.
Value Chain Control	New section on value chain control (alongside operational planning and control), which explains the requirement for control or influence to include outsourced process along the value chain.

A register with hundreds of aspects is not uncommon, but complex registers are hard to maintain and updates can tend towards high-level checks rather than thorough reviews.

The net result of the upcoming changes is that organisations will be asked to extend the boundaries of the EMS.

The changes in CD2 around environmental aspects/impacts and organisational risks and opportunities will challenge organisations to extend their thinking beyond traditional boundaries. Will this simply mean more lines in the register, or an overhaul of the environmental risk management process to better integrate the process into the business?

The key changes

Although the section on organisational risks and opportunities has been completely reworked in CD2, it is much

closer to the final text than the first draft.

While already implied in the 2004 standard with the use of control and influence, many organisations did not look outside their physical boundaries and the focus of the EMS was largely on managing the impacts of an organisation on the environment. The net result of the upcoming changes is that organisations will be asked to extend the boundaries of the EMS and to look at the risk of impact from external sources on them, too. Criteria for determining significant aspects will continue to be related to actual or potential impacts on the environment, however criteria for determining organisational risks and opportunities will be related to potential impacts on the organisation caused by environmentally related issues.

Opportunity for reinvention?

It will be interesting to see how EMS practitioners and certification auditors interpret the new requirements, especially organisational risks and opportunities, and the need to exert control over significant aspects throughout the value

chain. Organisations hamstrung by a complicated and detailed environmental aspects/risk assessment process will be at a crossroads: maintain the status quo and add on to the existing process, or take the opportunity to reinvent environmental risk assessment and management by integrating it into business processes more effectively.

To do this though, the assessment process and its outputs need to be user-friendly. Moving away from the traditional Aspects and Impacts Register toward a more process-based approach may make this feasible. Process mapping, for example, can promote an understanding of the value chain and provide a visual perspective of environmental aspects/risks across the organisation. Assessment criteria can also be designed to select out the significant aspects/risks for further examination and avoid risk assessing every aspect and potential consequence.

Better integrating with safety processes may also have benefits. Often the listing of environmental aspects/risks is maintained and reviewed by the EMS coordinator, and sits to the side as a reference when needed. Safety risk

processes tend to be driven (or at least completed) at operator and supervisor level, with risk documentation readily available and reviewed by those who are responsible for managing the risk. If environmental risk is identified in the same way, and in the same documentation, then there is no need for a separate register. Outputs like these will provide more usable inputs into other processes such as change management, procurement and supplier evaluations, design and development, training and emergency preparedness.

Next steps

Readers of CD2 will note that Annex A does not yet include guidance on determining significant environmental aspects and organisational risks and opportunities. Keep your eye out for the Draft International Standard (DIS) due out July/August this year where the guidance will appear. This will be the first chance organisations outside the initial review and consultation process will get to see the revised standard.

Maybe it describes a structured process for what you are doing already, or maybe there's some work to be done, but most



Westwood: interested to see how new requirements are interpreted.

EMS practitioners agree that we need more clarity on these key areas to move forward with confidence. Proactive ISO 14001 users will then start assessing gaps, planning changes and training internal auditors to begin the change process.

The final revised standard should be available in May/June 2015.

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