

The gap analysis checklist is one of the first tools available from the auditor's toolbox. The self-assessment questions will help you to identify gaps between your existing Environmental Management System and the requirements of ISO 14001:2015.

Gap Analysis & Transition Guide

ISO 14001:2015 & ISO 14001:2004

Introduction

This document provides a matrix that correlates the new requirements of ISO 14001:2015 to the old requirements of ISO 14001:2004 and should be used to determine where the new and amended clauses are located. Many of the requirements from ISO 14001:2004 are present with ISO 14001:2015. Try to understand each business process in the context of each of the requirements by comparing different activities and processes with what the standard requires. At the end of this activity you will have a list of activities and processes that comply and ones that do not comply. The latter list now becomes the target of your implementation plan.

Gap Analysis Checklist

ISO 14001:2015		ISO 14001:2004	Evidence/Action Required		
			Guidance	Action Owner	Due Date
4.1	Understanding the Organization and its Context	1.1	This new requirement requires an organisation to demonstrate that it understands all internal and external influences that may affect its strategic direction and market position and what effect any changes may have on its future.		
4.2	Understanding the Needs and Expectations of Interested Parties	1.1	This is a new requirement which requires the organisation to determine the boundaries and applicability of the EMS. It also makes reference to 4.1.		
4.3	Determining the Scope of the EMS	4.1	This requirement is comparable to ISO 14001:2001 Clause 4 - EMS and Clause 4.1 – General Requirements. Organizations should review their process-based management system to ensure that it captures elements from 4.1 and 4.2.		
4.4	Environmental Management System	4.1	Process approach – now a stated requirement but the content is largely the same as previous Clause 4.1 apart from a requirement to determine the risks to conformity if processes are ineffective.		
5.1	Leadership and Commitment	N/A	Top management is now required to demonstrate leadership and commitment in regard to the EMS. They should ensure that the quality policy and objectives are compatible with the business's strategic direction that the policy is understood and followed, and the EMS is integrated into the organization's business processes.		

ISO 14001:2015		ISO 14001:2004	Evidence/Action Required		
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5.2	Environmental Policy	4.2	Includes an additional requirement to make the policy available to interested parties and being available as documented information.		
5.3	Organizational Roles, Responsibilities and Authorities	4.4.1	Amended, no longer requires the specific position of an Environmental Management Representative. Organizations ensure should that Top management has taken on or delegated the responsibility for management of the EMS, and that they have established a means to monitor if processes are delivering their intended outputs.		
6.1	Actions to Address Risks & Opportunities	N/A	This is a new requirement that requires a process to be implemented to determine and evaluate applicable risks. The organization will be expected to have an understanding of this requirement and be prepared to explain how they are managed within their EMS. There are three principle sources of risk and opportunity: environmental aspects, compliance obligations and other issues and requirements. You are required to assess these sources for risks and opportunities that need to be addressed to ensure the success of your EMS and benefit the organisation as a whole.		
6.1.1	General	N/A			
6.1.2	Environmental Aspects	4.3.1	Identify the environmental impact for each environmental aspect, list the environmental impact for each environmental aspect. As you complete this step, remember the cause-and-effect relationship discussed earlier. Please note that environmental impacts can be positive or negative. Examples of negative impacts include increased air pollution, potential contamination of the ground, or depletion of natural resources. Positive impacts can include conservation of natural resources, improved wetlands area, decreased soil erosion, and conservation of natural habitat.		
6.1.3	Compliance Obligations	4.3.2	Your organization must determine those obligations that it has to comply with and those it chooses to comply with, e.g. mandatory requirements and voluntary requirements. Once your organization		