

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 Checklist

ISO 14001:2015 Self-assessment

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## Guidance

### About this Checklist

This gap analysis checklist highlights the new requirements contained in ISO 14001:2015, and is not intended to cover all of the requirements from ISO 14001:2015 comprehensively. The unique knowledge obtained about the status your existing Environmental Management System (EMS) will be a key driver of the subsequent implementation approach. Armed with this knowledge, it allows you to establish accurate budgets, timelines and expectations which are proportional to the state of your current management system when directly compared to the requirements of the standards.

Your organization may already have in place an ISO 14001:2004 compliant EMS or you might be running an uncertified system. If this is the case, you will want to determine how closely your system conforms to the requirements ISO 14001:2015. The results of a gap analysis exercise will help to determine the differences, or gaps, between your existing management system and the new requirements. Not only will this analysis template help you to identify the gaps, it will also allow you to recommend how those gaps should be filled.

The gap analysis output provides a valuable baseline for the implementation process as a whole and for measuring progress. 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.

### Summary of Key Changes

#### Context of the Organization

Your organization is now required to identify and assess all internal and external issues that could impact upon your EMS's ability to deliver its intended results. You will need to develop a methodology to understand the needs and expectations of all interested parties. Examples of internal issues could include your organisation's culture and capabilities, whilst external issues could include the effects of climate change, flooding and the availability of natural resources to name but a few. Your organisation should identify the stakeholders of its EMS and any requirements they have as this will influence the type and complexity of management system needed.

#### Leadership

Top management are now required to be actively involved in the operation of the EMS. The removal of the role of 'management representative' reinforces a need to see the EMS embedded into routine business operations, rather than operating as an independent system in its own right with its own dedicated management structure. Top management will need to take accountability for the effectiveness of the EMS and provide support and resources as necessary.

### Risks and Opportunities

Risk associated with threats and opportunities is a new concept introduced in the 'planning' section of the standard. It requires your organisation to identify the effect of uncertainty ("risk") associated with its threats and opportunities and take action to address them.

Threats and opportunities can include the negative or positive impacts associated with environmental aspects or compliance obligations (previously known as legal or other requirements).

### Strategic Environmental Management

Top management needs to ensure that the environmental policy and environmental objectives are consistent with the overall business strategy, and that management review outputs include any implications for the strategic direction of the organisation.

This will be new territory for ISO 14001 audits and in conjunction with the above, more audit time is expected to be devoted to discussions with the organisation's leaders.

### Life-cycle Perspective

The identification of aspects and impacts should now be done whilst considering a life cycle perspective, i.e. from raw material acquisition, or generation from natural resources to end-of-life treatment. A life-cycle perspective does not require a detailed life cycle assessment; a simple consideration of the life cycle stages which can be controlled or influenced would be sufficient.

Environmental requirements need to be established and considered throughout the procurement and design activities of your organisation's products and services; such design processes should consider development, delivery, and use, and end-of-life treatment.

### Performance Evaluation

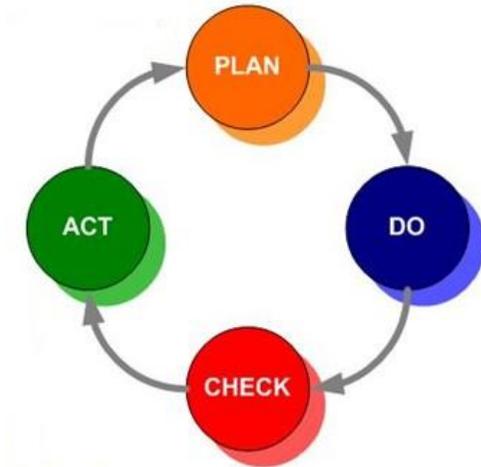
There is a new emphasis on the need for evaluation in addition to the current requirements for measurement and analysis. Evaluation is the interpretation of results and analysis. This is not new to managers but is made explicit in the standard for the first time. Processes may be well defined and effective, but do they yield optimum results?

## How to Make the Changes

Purchase copies of ISO 14001:2015 and ISO 14004:2016. Read them both and make yourself familiar with their language and concepts. Although it is written in a dense, formal language, the clause titles in ISO 14001:2015 are fairly self-explanatory. We suggest that you use the familiar Plan-Do-Check-Act (PDCA)

methodology to manage your organization’s transition from the old to the new requirements. The following guidance provides nine simple steps to make the transition, using the PDCA approach:

1. **Plan:** Undertake a gap analysis to understand how the requirements affect your EMS and then prepare the transition plan based on the results.
2. **Do:** Implement the transition plan by ensuring that the new requirements are embedded in to your EMS and your processes.
3. **Check:** Evaluate the effectiveness of the newly implemented aspects by performing a full system (element) audit, review the findings and implement any corrective actions.
4. **Act:** Take action to address transition any problems and improve the EMS before beginning process auditing.



### Minimum ISO 14001:2015 Documentation

Clause Ref.	Documentation Requirement
4.3	The scope of the EMS is maintained as documented information and available to interested parties.
5.2	The environmental policy is maintained as documented information
6.1.1	Maintain documented information relating to; (a) risks and opportunities that need to be addressed, and (b) processes needed in Section 6 to the extent necessary to have confidence they are carried out as planned.
6.1.2	Maintain documented information relating to; (a) environmental aspects and associated environmental impacts, (b) criteria used to determine significant environmental aspects, and (3) significant environmental aspects.
6.1.3	Maintain documented information concerning compliance obligations.
6.2.1	Maintain documented information on the environmental objectives.
7.2	Retain appropriate documented information as evidence of competence.

Clause Ref.	Documentation Requirement
7.4.1	Retain documented information as evidence of communication, as appropriate.
7.5.1	The EMS must include: (a) documented information required by 14001:2015, and (b) documented information determined by the organization as being necessary for the effectiveness of the EMS.
8.1	Maintain documented information to the extent necessary to have confidence that processes have been carried out as planned.
8.2	Maintain documented information to the extent necessary to have confidence that processes are carried out as planned.
9.1.1	Retain appropriate documented information as evidence of the monitoring, measurement, analysis and evaluation results.
9.1.2	Retain documented information as evidence of the compliance evaluation result(s)
9.2.2	Retain documented information as evidence of the implementation of the audit programme and the audit results.
9.3	Retain documented information as evidence of the results of management reviews.
10.2	Retain documented information as evidence of: (a) the nature of the non-conformities and any subsequent action taken, and (b) the results of any corrective action.

## Self-assessment Checklist

### Context of the Organisation

Ref	Gap Analysis Question	Finding		Implementation Plan (if No)				
		Yes	No	ISO Clause	Process Owner	Action Needed	Date Planned	Date Actual
1	Has your organization determined external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended outcome(s) of its EMS? E.g. in minutes of meetings, strategic analysis, SWOT analysis etc.							
2	Is information on changes in the context systematically presented at the Management Review?							
3	Have issues been considered as inputs to determine scope and for determination of risks and opportunities? Issues include environmental conditions capable of affecting or being affected by your organization.							
4	Has your organization determined: 1. Interested parties relevant to the EMS; 2. Relevant needs and expectations (i.e. requirements) of these interested parties; 3. Those needs and expectations that become compliance obligations.							
5	Have both internal and external parties been considered?							

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Ref	Gap Analysis Question	Finding		Implementation Plan (if No)				
		Yes	No	ISO Clause	Process Owner	Action Needed	Date Planned	Date Actual
6	Is information on changes in the context systematically presented at the Management Review?							
7	Have they been considered as inputs for scope definition and for determination of risks and opportunities?							
8	Is the scope of the EMS documented and available to interested parties?							
9	Are all activities, products and services within the scope included (i.e. no exclusions)?							
10	Does your organization use the knowledge gained from 4.1 and 4.2 to establish and maintain its EMS?							

### Leadership

Ref	Gap Analysis Question	Finding		Implementation Plan (if No)				
		Yes	No	ISO Clause	Process Owner	Action Needed	Date Planned	Date Actual
11	How does Top management demonstrate leadership and commitment with respect to the environmental management system?							
12	Do they take an active and leading role and understand their duties in relation to the EMS and are participating in promoting and supporting effective environmental management?							
13	Is the environmental policy compatible with strategic direction and the context of your organization?							
14	Does it include (a) commitment(s) to the protection of the environment, including prevention of pollution and other specific commitments relevant to the context of your organization?							
15	Have Top management ensured that all responsibilities and authorities for relevant roles are assigned and communicated within your organization?							
16	Have Top management assigned the roles, responsibilities and authorities for ensuring conformance of the EMS?							

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Ref	Gap Analysis Question	Finding		Implementation Plan (if No)				
		Yes	No	ISO Clause	Process Owner	Action Needed	Date Planned	Date Actual
17	Have Top management assigned the roles, responsibilities and authorities for reporting on the performance of the EMS and its processes?							