



Global
Standards™

ISO 14001

**Environmental Management Systems
Gap Analysis**

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ISO 14001 Gap Analysis

If you're currently implementing an Environmental Management System (EMS) and aiming for ISO 14001 certification, this Gap Analysis will help you understand how compliant you are and where you need to do more work.

If you haven't done so already, you should familiarize yourself with the brief, plain English [Guide to the Requirements of ISO 14001](#) available for free from the Global Standards website. It gives a simple summary of all the major clauses.

The ISO 14001 standard, like many ISO standards, includes repetition, reinforcement of clauses within other clauses and jumping from one clause to another. So, whilst this document is sequenced in the order of the clauses, some sections bring in elements from other clauses and some sub-clauses are skipped when they've been included elsewhere. The aim here is to help you audit in an organized way that largely reflects the standard but which is logical and understandable. It helps you look at the system as a whole - which is the way an Auditor will carry out the formal audit.

This document is not a complete checklist of everything that's covered in the ISO 14001 standard (which you need a copy of and which you need to be familiar with). Being able to tick 'Yes' to all

the sections in here is no guarantee that you will achieve ISO 14001 certification. However, it's a very good starting point if you're new to ISO 14001 and it can help form the basis of your internal audits. The document starts with Clause 4 since the first three clauses do not contain auditable requirements.

Text in blue italics indicates tips from the Global Standards Experts.

Please note that this document is for your own internal use only and has no official standing.

Clause 4 - Context of the Organisation

This clause requires that you determine the relevant external and internal conditions that may affect your organisation's existence and strategy. The 'context' relates to the business environment in which you operate.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
4.1	Identified the external and internal issues that affect the organisation and the EMS. <i>Possibly written down e.g. as a SWOT analysis. If not, must be able to explain your awareness to the Auditor. Don't forget to include 'legal requirements'.</i>						
4.2	Clear understanding of needs and expectations of interested parties (any persons or groups affected by your environmental performance) e.g. customers, neighbours of your site, investors, and government/environmental regulatory bodies. <i>Compliance obligations are a major part of this. Seek advice from a specialist consultant if you don't know what legislation applies to you.</i>						
4.3	Scope of the EMS clearly determined. <i>The scope of your EMS must be written down. It must describe the parts of your operation and the physical sites (boundaries) that your EMS applies to. This will be displayed on your certificate.</i>						
4.4	The EMS is built and maintained in its entirety. You need to demonstrate an understanding of how you maintain and continually improve your system. <i>Although the Standard isn't very enlightening, the Auditor will look to see if: Required resources are identified; Responsibilities are assigned; Risks and opportunities identified and addressed; Appropriate processes and their interaction are effectively monitored.</i> <i>The level of documentation only needs to be proportionate - take advice on this.</i>						

Clause 5 - Leadership and Commitment

Top management cannot delegate overall responsibility for the EMS. They have to take ultimate responsibility and show real leadership, taking a proactive, hands-on role.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
5.1	Top management able to provide evidence that they take accountability for the EMS. <i>Able to answer questions, perhaps show minutes of meetings, have awareness of any improvement actions required.</i>						
	Policy and objectives compatible with overall strategy of the organisation.						
	Resources (staff, time, budget etc.) are made available where necessary to support the functioning of the QMS.						
	Evidence that top management actively promote the EMS amongst staff. <i>Auditors might ask random staff for their comments.</i>						
	Ensuring that the EMS achieves intended results. <i>Evidence from Internal Audits, Management Reviews etc. will help support this.</i>						
5.2	Environmental policy should be relevant to your organisation and what you're trying to achieve. Should be documented and available to everyone. <i>Search online for examples of other organisations' policies. Often only a page or so, outlining high level aims. It should include preventing pollution among other requirements. Your policy should be visible to staff on noticeboard/intranet, for example, and people should be familiar with it. This should be relatively easy since you know your organisation well.</i>						

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Top management cannot delegate overall responsibility for the EMS. They have to take ultimate responsibility and show real leadership, taking a proactive, hands-on role.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
5.3	Responsibilities and levels of authority for individuals relating to the EMS must be understood. Must also include who is responsible for reporting on performance of the EMS. <i>A good way to check this is by random questioning of staff.</i>						

Clause 6 - Planning

Risk-based thinking is one of the cornerstones of ISO 14001. This is all about ensuring that the expected results are achieved, and no unwanted incidents occur.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
6.1	<p>With reference to 4.1 and 4.2, be sure that the EMS will achieve intended outcomes; address the risks and opportunities related to environmental 'aspects'; prevent undesired effects; and achieve continual improvement.</p> <p><i>See the Alcumus Guide to the Requirements of ISO 14001 for an explanation of 'aspects' and 'impacts'. The lifecycle of activities associated with an aspect's impacts should be explored - look online for examples.</i></p>						
	<p>Identify the environmental aspects of your activities, products and services considering a lifecycle perspective. Determine how they impact the environment and write them down.</p> <p><i>See the Guide to the Requirements of ISO 14001 for an example of an Aspects & Impacts Register.</i></p>						
	<p>Identify abnormal and potential emergency situations and how to respond.</p> <p><i>When determining aspects and impacts it is important to consider potential changes and incidents which may not happen every day.</i></p>						
	<p>Identify your most significant environmental aspects and communicate them appropriately.</p> <p><i>Document the criteria used to determine your significant environmental aspects so that the process is clear and repeatable.</i></p>						

Clause 6 - Planning

Risk-based thinking is one of the cornerstones of ISO 14001. This is all about ensuring that the expected results are achieved, and no unwanted incidents occur.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
6.1	Identify your compliance obligations relating to your environmental aspects. You could also record these on your Aspects & Impacts Register. <i>Check online sources for your compliance obligations, some of which are referenced in the Alcumus Guide to the Requirements of ISO 14001.</i>						
	Take 'planning action' for significant environmental aspects to address them and ensure compliance.						
6.2	Have in place environmental objectives relating to relevant functions / processes that support the EMS. Must be measurable, monitored and communicated. Take into account your significant environmental aspects and compliance obligations. <i>For further advice on how to do this and how to document it see the Guide to the Requirements of ISO 14001.</i>						
	Actions on how to achieve your objectives must be planned and resourced (see also 4.4). Results should also be evaluated (see also 9.1).						

Clause 7 - Support

The organisation is required to establish and maintain the necessary infrastructure to ensure the Environmental Management System is implemented, maintained and continually improved.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
7.1	Determine and provide the resources (people, budget, infrastructure, tools, IT etc.) to support the ongoing running of the EMS. <i>You should be able to explain to the Auditor how you did this.</i>						
7.2	Individuals are competent and records are kept as evidence. <i>Relates to skills and experience of individuals. Consider training plans, certificates etc.</i>						
7.3	Individuals are sufficiently aware of: environmental policy; aspects and impacts; their own contribution to the effectiveness of the EMS; implications of not conforming. <i>They should be able to answer questions put by the Auditor.</i>						
7.4	The organisation must determine what to communicate with regard to the EMS (internal and external) e.g. what, to whom, how, when. Communications should be both internal and external. <i>A traditional 'communications plan' is ideal - look online for examples. Keep it documented as evidence for the Auditor. This exercise is also good for public profile!</i>						

Clause 7 - Support

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Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
7.5	Documented information required for effective running of the EMS has been considered and created. <i>Don't forget to include relevant documentation from external sources.</i>						
	Documents must be identifiable with title, date, author and/or reference number.						
	Systems of control for reviewing and updating documented information are in place. Must also be adequately protected, accessible and retained. <i>Storing documents electronically is fine, but ensure they are available to staff as needed and adequately protected by passwords or other means. Make sure people don't inadvertently use out of date documents. Only authorised personnel should be able to modify documents.</i>						

Clause 8 - Operation

This is the 'Do' part of the Plan-Do-Check-Act (PDCA) cycle and is the day-to-day part of what your organisation does. This clause is at the very heart of the of the Environmental Management System.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
8.1	Maintain processes to run the EMS and implement actions identified in 6.1 and 6.2. <i>Need to have control of processes and be able to demonstrate this. Controls can be automated and/or simple procedures.</i>						
	Process for controlling planned changes and to mitigate adverse effects.						
	Outsourced activities also need to be controlled. <i>Should be done with reference to the 'life cycle perspective', that is, everything from raw material/design through to final disposal.</i>						
	Environmental requirements are addressed when designing products/services. <i>Should be done with reference to the 'life cycle perspective', that is, everything from raw material/design through to final disposal.</i>						
	Environmental requirements are considered when purchasing products, services. <i>Treated the same as outsourcing activities.</i>						
8.2	Procedures for emergency responses to deal with risks that could result in a significant impact on the environment. You also need to test, review and revise these procedures periodically and ensure everyone is trained to deal with emergency situations. <i>Are emergency plans tested and are training records available?</i>						

Clause 9 - Performance Evaluation

The organisation is required to determine what needs to be monitored, how to monitor and when to do it.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
9.1	Determined what needs to be monitored and measured, relating to your environmental performance, and when.						
	Established methods for monitoring, measuring, analysing, evaluating and when this should be done.						
	Established the criteria against which to measure performance. <i>Must include legal compliance requirements and probably your own targets too.</i>						
	Equipment used to monitor is maintained appropriately and calibrated.						
	The above is used to evaluate conformity and effectiveness of processes and identify need for improvements in the QMS.						
9.2	Established a planned, programmed approach to internal audits.						
	Results of internal audits are reported to management, appropriate corrective action taken. <i>You may wish to attend an Internal Auditor training course to learn how to do this.</i>						
9.3	There is an appropriate agenda for the management review meetings to cover all requirements as stated in 9.3.2 of the standard.						
	There is documented evidence of the outputs of the reviews, identifying opportunities for improvement, any required changes to the EMS and how to resource any changes required.						

Clause 10 - Performance Evaluation

Underpinning the concept of an EMS are the principles of corrective action and continual improvement. The organisation must identify opportunities for improvement and act on them.

Clause	Plain English Description	Yes	No	Gap Identified/Corrective Action Required	Owner	Target Date	Date Completed
10.1	Have a system for, and be able to provide examples of, identifying and implementing opportunities for improvement.						
10.2	Have a process for reacting to nonconformities, correcting them and dealing with consequences.						
	Review and analyse nonconformities, determining the cause and take corrective action. <i>The objective is to eliminate causes of nonconformity where possible, to ensure mistakes and errors are not repeated. A log of how nonconformities are managed is a good way of tracking corrective actions.</i>						
10.3	Overall, an approach to continually improve the suitability and effectiveness of the EMS. <i>Much of this will be covered in clause 9.</i>						

About Global Standards

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