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ISO 14001:2015 Environmental Management Systems - The 2004-to-2015 Gap Analysis Checklist

This gap analysis checklist is prepared for use in evaluating your Environmental Management System (EMS) against the requirements of ISO 14001:2015 as you transition from ISO 14001:2004 to ISO 14001:2015. Each requirement is expressed as a question that the user (auditor / assessor) can ask to evaluate your EMS capabilities. You will need to have copies of the ISO 14001:2015 and ISO 14001:2004 standards to use along with this checklist so that you can refer to the requirements if necessary.

While the two versions of the standard do not line up when comparing the requirements:

- New requirements and / or new terminology are highlighted **in yellow**.
- The intent of the main clauses of the new standard is shown in **bold blue font**.
- The right hand column in **green shade** is intended to provide reference / comparison / similarities to the ISO 14001:2004 requirements, and to identify and locate where in the new clauses, the former requirements are relevant.
- Comments highlighted in **bold red font** indicate removed / missing requirements.

After you have prepared an audit schedule, and assigned responsibility to your auditors for different areas or processes to audit, copy each section of the checklist for the auditors working with that section. As you work through the checklist take notes on what is in place, and what needs to be developed. In the space for 'currently in place', list or reference the procedures or other documents, or evidence that you have reviewed and that will provide information for the new EMS. Take notes on the status of the documents, that is, will they need to be revised for the new system, or can they be used as is? Also note where processes are in place, but documentation is needed. Focus on what is in place, and what needs to be developed.

While you do want to know if documented information is in place and if procedures and processes are being complied with, compliance is not your main focus for this audit. Remember that the final outcome of this audit should be a list of things that your company needs to do to comply with ISO 14001:2015.

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ENVIRONMENTAL MANAGEMENT SYSTEMS REQUIREMENTS	Currently in Place	Compliant YES / NO?	If NO - % Complete	Items Needed	ISO 14001:2004 Requirements
4 CONTEXT OF THE ORGANIZATION			4 Environmental management system requirements		
<p>This clause introduces two sub-clauses relating to the context of the organization, (1) understanding the organization and its context and (2) understanding the needs and expectations of interested parties. Together they require that you determine the issues and requirements that can impact on the planning of the EMS. In addition the scope of the EMS needs to be determined and the Environmental Management System established, implemented, maintained and continually improved.</p>					----
4.1 Understanding the organization and its context			4.1 General requirements		
Has your company determined the external and internal issues that affect your ability to achieve the intended outcomes of the Environmental Management System (EMS)?					4.1 Establish, document, implement, maintain and continually improve the EMS.
Have you included such issues as environmental conditions being affected by or capable of affecting your company?					
4.2 Understanding the needs and expectations of interested parties			----		
<p>Has your company determined:</p> <ul style="list-style-type: none"> The interested parties that are relevant to the EMS? The requirements (relevant needs and expectations) of these interested parties? 					

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<ul style="list-style-type: none"> • The requirements that become compliance obligations? 					
4.3 Determining the scope of the environmental management system			----		
To establish the scope of the EMS, has your company determined the boundaries and applicability of the EMS?					4.1 Define and document the scope of the EMS
<p>When determining the scope of the EMS, have you considered:</p> <ul style="list-style-type: none"> • The external and internal issues (per 4.1)? • The compliance obligations relevant interested parties (per 4.2)? • Your organizational units, functions and physical boundaries? • The activities, products and services of your company? • Your authority and ability to exercise control and influence? 					
<p>Within the defined scope of the EMS, have you included all your activities, products and services in the EMS?</p> <p>Is the scope of the EMS available and maintained as documented information?</p>					
4.4 Environmental management system			----		

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Has your company obtained the current version of the ISO 14001:2015 international standard?					
As required by the standard, have you established, documented implemented, maintained and continually improved the EMS?					4.1 Establish, document, implement and maintain an EMS and continually improve its effectiveness
Have you determined the processes needed for the EMS and their interactions throughout the company?					4.1 Establish an EMS -- and determine how the requirements of the ISO standard will be met.
When establishing and maintaining the EMS, have you considered the knowledge gained from: <ul style="list-style-type: none"> Your understanding of the organization and its context (per 4.1)? Your understanding of the needs and expectations of interested parties (per 4.2)? 					
5 LEADERSHIP				----	
This clause requires that your top management demonstrates leadership and commitment with respect to the EMS. This section also asks top management to establish, implement and maintain an environmental policy that is appropriate to your company and to ensure that the responsibilities and authorities for relevant roles are assigned and communicated.					----
5.1 Leadership and commitment				----	