

## ISO 14001 ENVIRONMENTAL MANAGEMENT SYSTEM DOCUMENTATION (4.4.4)

In order to be in conformance with this provision of ISO 14001 an organization must be able to answer the overall question: **"What level of documentation is needed?"**. In order to answer that question three specific tasks must be addressed under the Environmental Management System Documentation section of the standard. First, the organization must describe the foundation elements of the environmental management system in either paper or electronic format. Second, the preceding description must demonstrate the interaction between the foundation elements of the environmental management system. Third, the description must reference the related documentation.

The use of the word "document" in ISO 14001 provides a direct reference to what are the foundation elements of the environmental management system. Where is the word "document" used in the standard?

<u>USE OF THE WORD "DOCUMENT"</u>		
1.	<b>Environmental Management System Requirements:</b> Environmental Policy (4.2)	"documented"
2.	<b>Planning :</b> Objectives and Targets (4.3.3)	"documented"
3.	<b>Implementation and Operation:</b> Structure and Responsibility (4.4.1) Environmental Management System Documentation (4.4.4) Document Control (4.4.5) Operational Control (4.4.6)	"documented" "documentation" "document" "documented"
4.	<b>Checking and Corrective Action:</b> Monitoring and Measurement (4.5.1)	"documented"
5.	<b>Management Review</b> (4.6)	"documented"

Where in the standard is there an "implied" requirement for documentation?

<u>"IMPLIED" DOCUMENTATION</u>		
1.	<b>Planning :</b> Environmental Aspects (4.3.1) Legal and Other Require...(4.3.2) Environmental Management Programme(s) (4.3.4)	"establish...procedures" "establish...procedures" "establish...programme(s)"
2.	<b>Implementation and Operation:</b> Training, Awareness and Competence (4.4.2) Communication (4.4.3) Emergency Preparedness And response (4.4.7)	"establish...procedures" "establish...procedures" "establish...procedures"

"IMPLIED" DOCUMENTATION (cont.)

3. <b>Checking and Corrective Action:</b>	
Nonconformance and Corrective And Preventative Action (4.5.2)	"establish...procedures"
Records (4.5.3)	"establish...procedures"
Environmental Management System Audit (4.5.4)	"establish...programme(s)"

What approach will conform to the intent of the Environmental Management System Documentation section of ISO 14001? A reasonable approach would be to develop an environmental management system manual. The content of the manual might be as follows:

- A. Planning
  - 1. Environmental Policy Statement
  - 2. Planning Details
    - a. Listing of Significant Environmental Aspects
    - b. Listing of Environmental Objectives and Targets
    - c. Workplans and timelines for each Environmental Objective and Targets
  
- B. Environmental Management Program Overview
  - 1. Operational Workplans for Each Environmental Objective/Targets
    - a. Structure and Responsibility Charts
    - b. Training, Awareness and Competence Procedures and Evidence
    - c. Communication Procedures and Evidence
    - d. Environmental Management System Manual Procedures and Evidence
    - e. Document Control Procedures and Evidence
    - f. Operational Control Procedures and Evidence
    - g. Emergency Preparedness and Response Procedures and Evidence
  - 2. Checking and Corrective Action
    - a. Monitoring and Measurement Procedures and Evidence
    - b. Nonconformance and Corrective and Preventative Action Procedures and Evidence
    - c. Environmental Management Records Procedures and Evidence
    - d. Environmental Management System Audit Procedures and Evidence
  
- C. Management Review
  - Records of continual review of the environmental management system by top management.

The potential benefit to this approach is that it generally follows the overall structure of the standard. First, part A establishes the vision and goals of the organization

(Environmental Policy and the Environmental Objectives and Targets). Second, part B establishes the operational and checking mechanisms required by the standard (including the necessary procedures and evidence). Finally, top management is able to review the evidence developed in part B against the vision and goals established in part A in order to evaluate conformance with ISO 14001.

ISO 14001 does not require that an environmental management system manual be utilized by an organization. However, the manual approach does provide a frame for internal communication and both internal and external audit. It is recommended that the EMS manual be kept as simple and streamlined as possible to meet the intent of this section of the standard.

#### Questions That Need To Be Answered:

The following questions will need to be answered in order to determine whether the Environmental Management System Documentation Section meets the intent of ISO 14001:

1. Has the organization documented information that describes the foundation elements of the environmental management system and how they interact?
2. Does the documented information reference all the necessary supporting information?