

ISO 14001-2004 CHECKLIST

Report No:

Assessor:

Date:

Shaded areas indicate significant new requirements of ISO 14001-2004 that must be verified prior to upgrade from ISO 14001-1996

4.1 General Requirements

The organization shall establish, document, implement, maintain and continually improve an environmental management system in accordance with the requirements of the International Standard and determine how it will fulfill these requirements.

The organization shall define and document the scope of its environmental management system.

Audit Guidance

Conformance Status

1. The organization must define and document the scope of the EMS to ensure the boundaries are clearly defined to which the EMS applies. All activities, products and services within the scope must be addressed by the EMS.

Auditor Comments/Evidence



ACCESSIBLE. UNDERSTANDABLE. REGISTRATION.

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4.2 ENVIRONMENTAL POLICY

Top Management shall define the organizations environmental policy and ensure that, within the defined scope of its environmental management system, it

- a) is appropriate to the nature, scale and environmental impacts of its activities, products and services,
- b) includes a commitment to continual improvement and prevention of pollution,
- c) includes a commitment to comply with applicable legal requirements and with other requirements to which the organization subscribes which relate to its environmental aspects,
- d) provides the framework for setting and reviewing environmental objectives and targets,
- e) is documented, implemented and maintained,
- f) is communicated to all persons working for or on behalf of the organization, and
- g) is available to the public.

Audit Guidance	Conformance Status
The environmental policy must now align with the defined scope of its EMS, and commit to: Compliance with Legal and Other requirements which relate to the environmental aspects, and	
2. Is communicated to all persons working on behalf of the organization <i>NOTE: ISO 14001-1996 required communication to all employees. Communication of the policy now applies to all fulltime, temporary, and contract employees, contractors working on site and key suppliers, etc. Communication to contractors and key suppliers can be alternative forms to the policy statement itself, such as rules, directives and procedures, and may therefore only include pertinent sections of the policy.</i>	

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4.3.1 ENVIRONMENTAL ASPECTS

The organization shall establish, **implement** and maintain a procedure(s)

a) to identify the environmental aspects of its activities, products and services **within the defined scope of the environmental management system that it can control and those that it can influence taking into account planned or new developments, or new or modified activities, products and services, and**

b) to determine those aspects that have or can have significant impact(s) on the environment (i.e. significant environmental aspects).

The organization shall document this information and keep it up to date.

The organization shall ensure that the significant environmental aspects **are taken into account** in establishing, implementing and maintaining its environmental management system.

Audit Guidance	Conformance Status
<p>1. Environmental aspects has been broadened to take into account planned or new developments, or new or modified activities, products or services within the EMS scope that it can control.</p> <p><i>NOTE: ISO 14001-1996 edition states – “when identifying the environmental aspects of its activities, products or services that it can control and over which it can be expected to have influence”</i></p> <p><i>NOTE: Controls may consist of changing input material, reducing or eliminating waste products, projects that minimize or prevent adverse pollution, or implementing specific operating criteria to prevent or mitigate potential adverse impacts</i></p> <p><i>NOTE: Organizations do not have to consider each product, component or raw material input individually. They may select categories of activities, products and services to identify their environmental aspects.</i></p>	
<p>2. Significant aspects now shall be taken into account in establishing, implementing and maintaining its environmental management system” –</p> <p><i>NOTE: The 1996 edition stated that significant aspects shall be considered when setting its environmental objective. “Taken into account” implies making allowances for rather consider which implies to think about carefully and seriously.</i></p> <p><i>NOTE: A road map is one approach the organization may use to <u>take into account</u> how the environmental aspects are related to other elements of the EMS (how the key elements link together)? The auditor when auditing aspects should also audit sequentially (the process) of the other key elements that have interactions, i.e. between (aspects, legal requirements); (significant aspects, training needs and operational controls, etc.) The audit plan should reflect this approach.</i></p>	



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<p>3. When evaluating the environmental aspects <u>to determine</u> those that have significant impact (or the potential for significant impact) the organization should have <u>established criteria to evaluate both the adverse impacts and/or those with beneficial impacts to the environment.</u></p> <p><i>NOTE: Note: Impacts, both adverse and beneficial, need to be considered by the organization when determining those aspects that are significant. Beneficial impacts are the organizations management controls that are used to mitigate or prevent adverse impacts from occurring</i></p>	
<p>4. Aspects should have linkage to the legal and other requirements; Significant aspects should have linkages to, objectives, training and operational controls.</p> <p><i>Note: Organizations do not have to consider each product, component or raw material input individually. They may select categories of activities, products and services to identify their environmental aspects.</i></p>	
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4.3.2 Legal and Other Requirements

The organization shall establish, implement and maintain a procedure(s)

a) to identify and have access to applicable legal requirements and other requirements to which the organization subscribes related to its environmental aspects, and

b) to determine how these requirements apply to the environmental aspects.

The organization shall ensure that applicable legal requirements and other requirements to which the organization subscribes are taken into account in establishing, implementing and maintaining its environmental management system.

Auditor Questions	Conformance Status
<p>1. The organization’s procedure(s) on identifying legal and other requirements shall take into account how the environmental aspects apply to the legal requirements.</p> <p><i>Note: A road map (clearly defined linkage) is one approach the organization may use to take into account how the legal and other requirements apply to the environmental aspects and other related elements of the EMS.</i></p>	
<p>2. The organization’s procedures shall also take into account how the environmental aspects apply to the” other requirements” the organization subscribes to, i.e. agreements with customers and corporate, voluntary principle or codes of practice, voluntary labeling or stewardship commitments, requirements of trade associations, etc.</p>	

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4.3.3 Objectives, Targets and Programs

The organization shall establish, implement and maintain documented environmental objectives and targets, at relevant functions and levels within the organization.

The objectives and targets shall be measurable, where practicable, and consistent with the environmental policy, including the commitments to prevention of pollution, to compliance with applicable legal requirements and with other requirements to which the organization subscribes, and to continual improvement.

When establishing and reviewing its objectives and targets, an organization shall take into account the legal requirements and other requirements to which the organization subscribes, and its significant environmental aspects. It shall also consider its technological options, its financial, operation and business requirements, and the views of interested parties.

The organization shall establish, implement and maintain a program(s) for achieving its objectives and targets.

Programs shall include:

- a) designation of responsibility for achieving objectives and targets at relevant functions and levels of the organization, and
- b) the means and time-frames by which they are to be achieved.

Audit Guidance	Conformance Status
<p>1. The organization shall show how the significant aspects are “taken into account” when establishing environmental objectives. This does not necessarily mean all objectives shall be established from the significant aspects and legal and other requirements.</p> <p><i>NOTE: ISO 14001- 1996 required the organization to” consider rather than” take into account”. “Take into account implies making allowances for” – “Consider implies to think about carefully and seriously.”</i></p> <p><i>NOTE: The determination of how significant aspects and legal and other requirements apply to the environmental objectives should be addressed in the aspects procedure and not necessarily again in the objectives and targets procedure.</i></p> <p><i>When establishing objectives, other considerations can also include new technology, financial, operational and business requirements, and the views of interested parties.</i></p> <p><i>NOTE: The programs established to accomplish the objective should include, where practical, consideration in the planning, design, production, marketing and disposal stages.</i></p> <ul style="list-style-type: none"> <i>a) For products this may include design, materials, production processes, use and ultimate disposal.</i> <i>b) For new installations or significant modifications, the plan should address planning, design, construction, startup, operation and/or decommissioning where appropriate.</i> 	
<p>2 Linkages between the significant aspects, objectives, monitoring and measuring and management review should be established</p>	
<p>3. The organization should have established the relevant roles and responsibilities within each program (plan) and the means to accomplish the</p>	



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objective.	
4. The organization should define, within the procedure, how the objective will be monitored and measured.	
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4.4.1 Resources, Roles, Responsibility and Authority

Management shall ensure the availability of resources essential to establish, maintain and improve the environmental management system. Resources include human resources and specialized skills, organizational infrastructure, technology and financial resources.

Roles, responsibilities and authorities shall be defined, documented and communicated in order to facilitate effective environmental management.

The organization's top management shall appoint a specific management representative(s) who, irrespective of other responsibilities, shall have defined roles, responsibilities and authority for

- a) ensuring that an environmental management system is established, implemented and maintained in accordance with the requirements of this International Standard,
- b) reporting to top management on the performance of the environmental management system for review, including recommendations for improvement.

Audit Guidance	Conformance Status
<p>1. The organization shall show how the key environmental management roles and responsibilities are well defined, documented and communicated to all persons working for or on "behalf of the organization".</p> <p><i>NOTE: The successful implementation of an EMS calls for a commitment from all persons working for the organization or on its behalf. Environmental roles and responsibilities, should not be seen as confined to the EMS function, but can also cover other areas of an organization, such as operational management or staff functions other than environmental. (see annex A.4.1)</i></p>	

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4.4.2 Competence, Training and Awareness	
<p>The organization shall ensure that any person(s) performing tasks for it or on its behalf that have the potential to cause a significant environmental impact(s) identified by the organization is (are) competent on the basis of appropriate education, training or experience, and shall retain associated records.</p> <p>The organization shall identify training needs associated with its environmental aspects and its environmental management system. It shall provide training or take action to meet these needs, and shall retain associated records.</p> <p>The organization shall establish, implement and maintain a procedure(s) to make persons working for it on its behalf aware of</p> <p>a) the importance of conformity with the environmental policy and procedures and with the requirements of the environmental management system,</p> <p>b) the significant environmental aspects and related actual or potential impacts associated with their work, and the environmental benefits of improved personal performance,</p> <p>c) their roles and responsibilities in achieving conformity with the requirements of the environmental management system, and</p> <p>d) the potential consequences of departure from specified procedures.</p>	
Audit Guidance	Conformance Status
<i>NOTE: To assess training needs the organization needs to have established relevant linkages between the significant aspects and that of the operational controls. This element cannot be effectively assessed by the organization, or audited, without assessing the subsequent requirements in the other elements.</i>	
1. The organization is required to: Identify the training needs of its employees or persons performing tasks on “their behalf” associated with the environmental aspects of their work activities.	
2. The training needs assessment shall identify those employees or those person(s) performing tasks on “its behalf” a) the significant aspects and the actual or potential impacts associated with their work activities, b) The environmental benefits of approved personal performance, and c) the potential consequences of not following specified procedures	
3. Competency shall be determined for those employees, or those employees working on its behalf, whose work activities are associated with the potential for significant impact.	
4. Training records need to be documented and maintained, including those performing tasks on the organization’s behalf, shall be documented maintained.	
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4.4.3 Communication

With regard to its environmental aspects and environmental management system, the organization shall establish, implement and maintain procedure(s) for

- a) internal communication among the various levels and functions of the organization,
- b) receiving, documenting and responding to relevant communication from external interested parties.

The organization shall decide whether to communicate externally about its significant environmental aspects and shall document its decision. If the decision is to communicate, the organization shall establish and implement a method(s) for this external communication.

Audit Guidance	Conformance Status
<p><i>NOTE: Methods of internal communication may include formal training, work group meetings, newsletters, intranet, bulletin boards and posters.</i></p> <p><i>NOTE: External communication may include phone or email dialogue with interested parties, consideration of their relevant concerns, communication with regulators, and with public authorities regarding emergency planning and other relevant issues.</i></p>	

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4.4.4 Documentation

The environmental management system documentation shall include

- a) the environmental policy, objectives and targets,
- b) description of the scope of the environmental management system,
- c) description of the main elements of the environmental management system and their interaction, and reference to related documents,
- d) documents, including records, required by this International Standard, and
- e) documents, including records, determined by the organization to be necessary to ensure the effective planning, operation and control of processes that relate to its significant environmental aspects.

Audit Guidance

1. The organization shall provide a level of detail of the documentation sufficient to describe the EMS and how the individual elements work together, and provide direction on where to obtain more information on the specific parts of the EMS.

NOTE: EMS documentation may be integrated with documentation of other systems implemented by the organization. EMS documentation does not need to be in the form of a manual. Documentation created for purposes other than the EMS may be used as part of the system, but need to be referenced in the system.

. Examples of EMS (based upon organization complexity)

- Policy, objectives & targets
- Information on aspects and process to determine significant aspects
- procedures
- process information
- organizational charts (including EMS functions)
- site emergency plans
- audit reports
- records

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<p>4.4.5 Control of Documents</p> <p>Documents required by the environmental managements system and by this International Standard shall be controlled. Records are a special type of document and shall be controlled in accordance with the requirements given in 4.5.4 The organization shall establish, implement and maintain a procedure(s) to</p> <ul style="list-style-type: none"> a) approve documents for adequacy prior to use, b) review and update as necessary and re-approve documents, c) ensure that changes and the current revision status of documents are identified, d) ensure that relevant versions of applicable documents are available at points of use, e) ensure that documents remain legible and readily identifiable, f) ensure that documents of external origin determined by the organization to be necessary for the planning and operation of the environmental management system are identified and their distribution controlled, and g) prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose. 	
Audit Guidance	Conformance Status
<p><i>NOTE: The intent of 4.4.5 is to ensure that organizations create and maintain documents in a manner sufficient to implement the EMS. However, the primary focus of organizations should be on effective implementation of the EMS and on environmental performance, not on a complex document control system.</i></p>	
<p>Auditor Comments/Evidence</p>	



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4.4.6 Operational Controls

The organization shall identify and plan those operations that are associated with the identified significant environmental aspects consistent with its environmental policy, objectives and targets, in order to ensure that they are carried out under specified conditions, by

- a) establishing, implementing and maintaining a documented procedure(s) to control situations where their absence could lead to deviation from the environmental policy, objectives and targets, and
- b) stipulating the operating criteria in the procedures(s), and
- c) establishing, implementing and maintaining procedures related to the identified significant environmental aspects of goods and services used by the organization and communicating applicable procedures and requirements to suppliers, including contractors.

Audit Guidance	Conformance Status
<p>1. The organization shall have documented, specific operating criteria (work instructions) developed, implemented and maintained for those employees or those working in behalf of the organization. Procedures (work instructions) shall address abnormal or emergency operations as related to the significant aspects.</p> <p><i>Note: In order to ensure what documented procedures (i.e. work instructions) are necessary, the organization shall have the required subsequent links, i.e. significant aspects, training, etc. The significant aspects will determine what training and competency are required and what documented procedures or work instructions are required.</i></p>	
<p>2. Contractors working on site shall be made aware of the organization's procedure(s) that relate to the significant aspects.</p>	
<p>3. The organization will need to have supplier and contractor qualifications (working on site) that are performing work activity(s) related to the identified significant aspects. These qualification records will need to be maintained by the organization.</p>	
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4.4.7 Emergency Preparedness and Response The organization shall establish, implement and maintain a procedure(s) to identify potential emergency situations and potential accidents that can have an impact(s) on the environment and how it will respond to them. The organization shall respond to actual emergency situations and accidents and prevent or mitigate associated adverse environmental impacts. The organization shall periodically review and, where necessary, revise its emergency preparedness and response procedures, in particular, after the occurrence of accidents or emergency situations. The organization shall also periodically test such procedures where practicable.	
Audit Guidance	Conformance Status
1. The organization is required to ensure emergency response personnel are trained on the procedures and competent to respond to emergency events or accidents.	
2. The organization should ensure that appropriate public agencies and/or first responders have been made aware of the organization’s emergency response plans and the location of chemicals or other environmental hazards that may be encountered.	
3. The organization is required to have a schedule and to conduct emergency drills on a periodic basis (i.e. spills, fire, chemical releases, et4. In the event of a reportable spills or emergency events, procedures are required to be reviewed, modified if necessary and document what corrective actions taken.).	
4. Emergency numbers should be posted in relevant locations and kept up to date.	
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Audit Guidance	Conformance Status
<p>4.5.1 Monitoring and Measurement</p> <p>The organization shall establish, implement and maintain a procedure(s) to monitor and measure on a regular basis, the key characteristics of its operations that can have a significant environmental impact. The procedure(s) shall include the documenting of information to monitor performance, applicable operational controls, and conformity with the organization’s environmental objectives and targets.</p> <p>The organization ensure that calibrated or verified monitoring and measurement equipment is used and maintained and shall retain associated records.</p>	
<p>1. The organization is required to identify the key characteristics of its operations that can have a significant impact. Monitoring and measuring data collected should be relevant to the identified key characteristics and a frequency established for review including the status of the objectives and targets.</p> <p>In determining the key characteristic the determination may encompass review of other management programs within the organization’s business plan such as the quality program, as these quality measurables may have the potential for environmental impact (i.e. nonconforming product,) affecting:</p> <ul style="list-style-type: none"> - increase in waste streams, - distribution and end use of product, - excess consumption of raw materials, <p>The organization should consider all the processes of the organization that may have the potential for significant impact including:</p> <ul style="list-style-type: none"> - design and development, - manufacturing processes, - packaging and transportation, - environmental performance, - practices by contractors and suppliers, - waste management, - extraction and distribution of raw materials and natural resources, - customer requirements, quality objectives and business requirements. <p><i>NOTE: Key characteristics should have clear links to the significant aspects, objectives and targets, operational controls, to corrective and preventive actions and to management reviews.</i></p>	
<p>2. When evaluating measuring equipment the organization should ensure that all processes using measuring equipment are calibrated and records maintained as related to the identified aspects/significant aspects.</p>	
Auditor Comments/Evidence	



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4.5.2 Evaluation of Compliance	
<p>4.5.2.1 Consistent with its commitment to compliance, the organization shall establish, implement and maintain a procedure(s) for periodically, evaluating compliance with applicable legal requirements. The organization shall keep records of the results of the periodic evaluations.</p>	
<p>4.5.2.2 The organization shall evaluate compliance with other requirements to which it subscribes. The organization may wish to combine this evaluation with the legal compliance referred to in 4.5.2.1 or to establish a separate procedure(s).</p>	
<p>The organization shall keep records of the results of the periodic evaluations.</p>	
Audit Guidance	Conformance Status
<p>1. Review of records should ensure the organization has an established procedure and schedule to assess compliance with environmental regulations (federal, state, local)</p> <p><i>NOTE: In the case of noncompliance with a regulatory or permit requirement has the pertinent regulatory agency been notified where self reporting is required? Has a corrective action plan been implemented to remedy the noncompliance condition? This may or may not be entered into the corrective/preventive action system based upon Attorney Client privilege but must be addressed with a corrective action plan.</i></p>	
<p>2. Review of records should ensure the organization has an established procedure and schedule to assess compliance with Other Requirements to which the organizations subscribes. (i.e. customer requirements, industry codes of practice, voluntary labeling or stewardship commitments, requirements of trade associations, etc.)</p> <p><i>NOTE: An organization's may use attorney client privilege in evaluating regulatory compliance and may be hesitant in combining regulatory compliance with the Other Requirements to which it subscribes.</i></p> <p><i>In the case of noncompliance with Other Requirements has the customer or relevant agency been notified (if required) and has a corrective action been implemented and entered into the corrective/preventive action system</i></p>	
<p>2. The compliance reports shall be documented, records maintained and the results presented at management review.</p>	
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4.5.3 Nonconformity, Corrective and Preventive Action

The organization shall establish, implement and maintain a procedure(s) for dealing with actual and potential nonconformity(ies) and for taking corrective action and preventive action. The procedure(s) shall define requirements for

- a) identifying and correcting nonconformity(ies) and taking action(s) to mitigate their environmental impacts,
- b) investigating nonconformity(ies) determining their cause(s) and taking actions in order to avoid their recurrence,
- c) evaluating the need for action(s) to prevent nonconformity(ies) and implementing appropriate actions designed to avoid their occurrence,
- d) recording the results of corrective action(s) taken, and
- e) reviewing the effectiveness of corrective action(s) and preventive action(s) taken.

Actions taken shall be appropriate to the magnitude of the problems and the environmental impacts encountered. The organization shall ensure that necessary changes are made to environmental management documentation.

Audit Guidance	Conformance Status
1. Depending on the nature of the nonconformity, by establishing procedures to deal with the standard requirements, The organization may be able to accomplish them with a minimum of formal planning, or with a detailed action plan for more complex and long term activity. Documentation needs to be appropriate for the level of action	
2. The organization must also include Root Cause in their corrective action.	
3. The organization is required to discuss corrective and preventive actions at scheduled management reviews.	

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4.5.4 Control of Records

The organization shall establish and maintain records as necessary to demonstrate conformity to the requirements of the environmental management system and of this Internal Standard, and the results achieved.

The organization shall establish, implement and maintain a procedure(s) for the identification, storage, protection, retrieval, retention and disposal of records.

Records shall be and remain legible, identifiable and traceable.

Audit Guidance	Conformance Status
1. Review of records should assure that records as necessary to demonstrate conformity to the requirements of the environmental management system are available, readily retrievable and identifiable.	
2. Examples of records to support the EMS should include: <ul style="list-style-type: none"> - complaint records - training records - process monitoring records - inspection, maintenance and calibration records - relevant contractor and supplier records - incident reports - records of tests of emergency preparedness - records of audit results (including legal and other requirements) - management review results - external communication decisions - records of relevant legal and other requirements to which the organization subscribes - records of environmental aspects, significant aspects and impacts - records of objectives and targets and associated plans 	
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4.5.5 Internal Audit

The organization shall ensure that internal audits of the environmental management system are conducted at planned intervals to

- a) determine whether the environmental management system
 - 1) conforms to planned arrangements for environmental management including the requirements of this International Standard, and
 - 2) has been properly implemented and maintained, and
- b) provide information on the results of audits to management.

Audit program(s) shall be planned, established, implemented and maintained by the organization, taking into consideration the environmental importance of the operation(s) concerned and the results of previous audits.

Audit procedure(s) shall be established, implemented and maintained that address

- the responsibilities and requirements for planning and conducting audits, reporting results and retaining associated records,
- the determination of audit criteria, scope, frequency and methods.

Selection of auditors and conduct of audits shall ensure objectivity and impartiality of the audit process.

Audit Guidance	Conformance Status
<p>Note: Internal audits of an environmental management system can be performed by personnel from within the organization or by external persons selected by the organization, working on their behalf. In either case, the persons conducting the audit should be competent to perform the audit and in a position to do so impartially and objectively.</p>	

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<p>4.6 Management Review</p> <p>Top management shall review the organization’s environmental management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. Reviews shall include assessing opportunities for improvement and the need for changes to the environmental management system, including the environmental policy and environmental objectives and targets. Records of the management reviews shall be retained.</p> <p>Input to management reviews shall include</p> <ul style="list-style-type: none"> a) results of internal audits and evaluations of compliance with legal requirements and other requirements to which the organization subscribes, b) communication(s) from external interested parties, including complaints, c) the environmental performance of the organization, d) the extent to which objectives and targets have been met, e) status of corrective and preventive actions, f) follow-up actions from previous management reviews, g) changing circumstances, including developments in legal and other requirements related to its environmental aspects, and h) recommendations for improvement. <p>The outputs from management reviews shall include any decisions and actions related to possible changes to environmental policy, objectives, targets and other elements of the environmental management system, consistent with the commitment to continual improvement.</p>	
Audit Guidance	Conformance Status
<p>Note: The management review should cover the scope of the environmental management system, although not all elements of the EMS need to be reviewed at one time and the review process can take place over the planned period of time.</p>	
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This checklist may be used as an aid to establish linkage via employee interviews

Name _____ **Area** _____

What is the environmental policy? Have you been trained on the environmental policy?	
What does the environmental policy mean to you?	
How does the environmental policy relate to your job?	
How could you affect the environment if you had an accident or did not follow procedures?	
Are you familiar with any environmental programs?	
Does your job contribute to any environmental objectives or targets?	
What would you do if you had a spill or other emergency?	
How was the environmental policy developed?	
What are your evacuation procedures?	
Do you have environmental operating criteria for the processes you are involved with?	
Have there been any emergency events or regulatory problems?	
Do you perform any environmental monitoring and what equipment do you use?	
Who do you contact with an environmental suggestion or concern?	