SUBJECT: Significant Environmental Aspects and Impacts

APPLIES TO:
　　　Quality Management Systems (QMS)
　X　Environmental Management Systems (EMS)

PREFACE

Is an organization required to have identified significant aspects to be registered to ISO 14001? This advisory is intended to answer that question.

ISO 14001 requires an organization to establish and maintain (a) procedure(s) to identify the environmental aspects of its activities, products, and services to determine those which have or can have (a) significant impact(s) on the environment (4.3.1), that is, its significant environmental aspects. The standard also requires these significant environmental aspects be considered by the organization when establishing processes to address objectives and targets (4.3.3); training, awareness, and competency (4.4.2); communication (4.4.3); documentation (4.4.4); operational control (4.4.6); and monitoring and measurement (4.5.1). Although there is no explicit requirement, there is an underlying assumption that the organization will identify one or more significant environmental aspects. This assumption is consistent with a Clarification of Intent published by the U.S. TAG to ISO/TC207, reference 04-03.A1, which can be accessed at http://standardsgroup.asq.org/groups/e/Clarification_Intent_3_22_04.doc.

IAF Guidance on the Application of ISO/IEC Guide 66, which establishes the requirements for EMS certification bodies (CBs), also refers to significant environmental aspects and impacts. A CB is expected to evaluate the organization's process for identifying aspects and determining their significance (G.5.3.17-b and G5.3.21) to ensure it is sound and adhered to. The CB obtains information/objective evidence on those the organization determines are significant environmental aspects (G.5.3.17-d), and verifies they are managed within the system (G.5.3.21-b) and that appropriate links exist between significant environmental aspects and the policy, objectives and targets, responsibilities, programs, procedures, performance data, internal audit, and review (G.5.3.18-c).

Based on the above, an organization is expected to identify its environmental aspects and impacts, and through an evaluation process it defines for itself, determine those that are significant. Neither ISO 14001 nor IAF Guidance defines "significance" or identifies any external or absolute external standard that does so. What is significant for one organization may not be significant for another, and what an organization considers a significant aspect may change over time. There is no absolute measure of significance; rather, significance is internal to the relative importance of aspects as defined by the organization. An organization may use different terminology, such as "important aspects" or "higher value aspects." Regardless, the intent is that an organization prioritize its aspects and focus it attention and resources on the higher value or important ones, that is, the "significant environmental aspects," and then establish an EMS to manage those aspects. Prioritization is intended to be internal to the organization for the purpose of managing its continuing improvement, and therefore inherent to continuation of the EMS.

An organization that identified no significant environmental aspects and impacts might then deem itself not obligated to consider these when setting objectives and targets; establishing competency for and training its personnel; considering processes for external communication; identifying and implementing operational controls; or monitoring and measuring the key characteristics of its operations. Without significant environmental aspects and these related system elements, the organization would not have implemented an EMS in conformance with ISO 14001 and IAF Guidance.

ADVISORY

An organization must identify the environmental aspects and impacts that have a higher value, significance, or importance, and use these resultant aspects and impacts to appropriately address the requirements of the standard for objectives and targets, personnel training and awareness, communication, operational controls, and monitoring and measurement (as evidenced in procedures or processes). Unless the organization has done this, it cannot be certified/registered for conformance to ISO 14001 because its system for determination of significance is not effective.