



## The 7+1 biggest mistakes people make with ISO 14001

# 1. Not assessing aspects and impacts by having a ‘good old look around’

When people aim to write and complete their aspects and impacts register, they sometimes fail to look around their own premises - that can be fatal before an audit.

One of the first activities a visiting auditor may do is acquaint themselves with your site - and that means a look around, especially if you have large premises that have many types of operation and activities going on.

You’ve also got to check for contamination and discharges around your site, which can only be found by a good look around because some people may keep these quiet or hidden for various reasons.

Looking in quiet dark corners and areas with which you wouldn’t expect to normally pass through is a good way of getting a proper ‘feel’ to your environment.

Some people like to take pictures with their mobiles etc. Beware; get permission to do this as it can get people and companies into serious trouble.

You should be checking your aspects and impacts under certain operating conditions i.e.

## **Potential environmental aspects under normal operating conditions i.e.**

- Normal operations, daily activities that are considered normal and necessary (to you).

## **Potential environmental aspects under abnormal operating conditions i.e.**

- Quick (out of normal routine) start up and shut down
- Part load operations
- Change of product or operation
- Partial failure
- Maintenance

## **Potential environmental aspects under Emergency conditions**

- ☛ Breakdowns
- ☛ Spillages
- ☛ Explosions (this doesn’t apply to all!)
- ☛ Get out there and have a good look!

## 2. Not having targets and objectives properly set out

Objectives (targets) and the programmes that you set yourselves are to ensure that you improve your environment and adhere to your policy of improvement.

The purpose of your programmes and objectives is to identify where you need to improve, monitor and maintain your systems, in order to give you an outcome that is an improvement on the current condition, it should also be measurable and attainable for you.

People often don't set any proper objectives or have them in any sort of recorded format to prove what they are trying to achieve.

### **Aim to:**

Have your objectives set via discussion at committees and management reviews after reviewing the documented evidence that has been presented, and after the identification of aspects has been carried out.

Document your aspects and the objectives in your EMS / operational control manual. They should be consistent throughout the company so that all personnel are aware of the objectives and goals that the company has set.

Aim to prioritise your objectives around the environmental aspects that you view as a higher priority and those with which you feel you can do the most to influence for the better.

### 3. Not completing proper evaluation of legal compliance

This is important if you are to discover what you need to be compliant with. The main point that is missed is that people just write down their evaluations as to what they feel the regulation means to all companies - not to them personally.

What the auditor is expecting is 'your take' on the regulation, what it means to *your* company, not just what the regulation means in general.

You need to specify why the regulation is pertinent as well as having a general understanding of its application.

You must determine the extent to which the requirements and regulations that you must satisfy are being met (or not).

These requirements can be discussed at environmental meetings and environmental management review meetings.

Ensure that all of your activities are controlled and managed within the boundaries of compliance with applicable your legal requirements.

#### **Aim to do this in a number of ways:**

1. Checking compliance with legal and other requirements by monitoring periodically on websites (environment agency, HSE etc)
2. With EMS Management Review meetings and environmental meetings, get other people's advice and experience
3. Determining the environmental aspects of the business, assessing them and putting into place effective preventive or corrective measures based on what the regulations require
4. Get people involved, it's not a one person job!

## 4. Not getting proper Director ‘buy in’

### How do you encourage management commitment?

- Discuss with senior management how important an EMS is to your company
- Have regular meetings to update on progression of audits
- Discuss how the EMS can assist your company with goals and company objectives
- Ask what actions the management would like to see
- Consistent management review meetings

### Management review

First things first: management reviews are carried out when *you* specify. Most organizations write this into their system, in their quality manual for instance.

We believe that one review a year is sometimes not enough but is about the average.

But some organizations we go to do not even carry it out that frequently - and end up with a non-conformance because their procedure says that they do complete one every year! Management review is absolutely necessary.

## 5. Not assessing all costs of certification visits

### Certification

Obviously, choosing a certification body is important. Who are these bodies? Some of the major ones to look out for are:

- WCS
- BSI
- NQA
- LRQA
- ISOQAR

**Before you choose a body to certify your organization, it is wise to consider the following:**

**Is the certification body accredited by a National body or International body themselves?** UKAS and ANAB are two of the more widely known accreditation bodies. UKAS is the single National Accreditation body for the UK and ANAB for the USA. They are also the sole national representatives to the ISO for their respective countries.

These two international bodies accredit certification bodies to ISO 17021; to ensure that good and proper certification of organizations (like your own) is upheld. They are usually connected to Government although not always. UKAS and ANAB both are. We will only use and recommend to you, UKAS and / or ANAB accredited organizations for certification.

**Does the certification body have the scope to certificate you in our industry?** An appropriately accredited certification body cannot just certificate you, it has to have the experience (the auditor from a suitable and relevant field / sector similar to yours) and the administration and assessment of risk in your sector, to back it up, to be able to prove auditing competency in a particular sector. Most sectors are covered by all certification bodies.

**Are they competitive?** Quite simply, how does the quote measure up to your expectations?

**Do they charge expenses?** Some do and some do not. Better to check before your auditor gets flown in, has a few nights in a 4 star hotel and you get the bill. We've seen this happen so many times; find out where the auditor is coming from **BEFORE YOUR AUDIT!!!**

**Do your customers recognize them?** In the case of certification, some of your overseas customers may request a particular body who are accredited by someone who they recognize as competent.

**Are their auditors available or do you have to book months in advance to get an audit date?** Certification bodies have their personnel issues, just like any of us. If you think you need to speak to them in April, phone them in February, most are very busy and auditor competency is a big issue, so get in touch earlier than you think, or you may be waiting longer than you anticipated for an audit.

**What are their ongoing terms after certification?** Most certification bodies' terms are 3 years which is acceptable, be careful though, some terms and conditions are not customer friendly and they may make it hard for you to leave that body and transfer? Find a body that will charge you once per year for your audits with their administration charges built in.

## 6. Not writing your system on what you do at present

We have seen this issue cost one particular business over £27,500 in lost time and resources. This one particular company spent 22 months generating procedures, policies and instructions that they barely needed.

Let us be clear, when you are setting out your procedures and work instructions, you write about what you do, nothing else - nothing less.

The key here is to set out your procedures in a way that you find agreeable, agreeable to you and agreeable to your customers if they require procedures being written in a certain manner.

If you write about what you'd like to do in the future, you'll possibly forget you have written it and it will be audited!

## 7. Not setting out procedures properly

This is your company, these are your procedures, and these procedures are written on what you do and with the exception of what you need to write in the future, you write in the present tense.

- Purpose - what is the procedure for?
- Scope - where is the procedure to be applied?
- Responsible - who is responsible for the procedure?
- Procedure - the writing or diagrammatical procedure of what you do.
- And finally, reference documents - what makes your procedure work in the form of records / documents / software etc?

Everybody has their own ways of writing procedures but if you set them out according to the previous five points, you will be 99% accurate.

The ISO 14001 standard does not tell you at present how to set out your procedures so you will find the information above highly valuable.

It is also really useful to have a document register, this document register is used to record and control your environmental documentation i.e. procedures, policies, instructions etc.

# 7+1. Not understanding what the biggest benefits are

Your system can be effectively used for:

- **Saving money** - most people overlook what an EMS can do, if you focus on waste, energy and processes properly, the cost savings can be substantial depending on the business size
- **Saving the local (and sometimes national) environment** - that's what an EMS is for, doing YOUR bit!
- **Because it makes your customers look good** - BIG corporations like their supply chain to have proven systems and standards in place. Because they know that standards and companies who follow them are being responsible and with responsibility tends to come respectability.

They also know that an efficient supplier EMS drives down the risk of them being prosecuted themselves.

The ISO 14001 Standard can be interpreted in many ways; and there are always more than a few avenues to your destination of achieving it.