

# **Beware of The Trouble Areas in 14001/18001:**

**Addressing those Grey Areas causing Problems**

**by**

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**WHEN YOU NEED TO BE SURE**



- **To identify a selection of trouble areas that are causing difficulties in implementing the ISO 14001 and / or OHSAS... reflecting**
- **Differences in the intent of the standards**
- **In interpretation of the standards, and**
- **Hot spots in application**
- **Particularly relating to integrated ISO 14001 / OSHAS systems**
- **Experienced by organizations.....and auditors**

**In integrated systems:**

**Trouble / confusion in establishing significance:**

- **EMS Methodology for Significance determination**
- **OHSAS – simple risk assessment**
- **Confusion in the ranking of what is considered significant caused by the methodology**

- **EMS: In identification of significant aspects, risk assessment (PxC) is just one component of several ranking factors**
- **Whereas, in OHSAS significance is based on level of Risk and Need for Control only: including**
  - **Hazard identification**
  - **Evaluation of risk with control measures in place**
  - **Residual risk**
  - **Assessment of tolerability of residual risk**
  - **Identification of additional risk control needs**
  - **Evaluation whether risk control measures are sufficient**

### **Integrated systems**

**OHSAS: designed to control hazards including hazards to human injury or ill health,**

**but also includes**

- Damage / loss to property**
- Equipment**
- Workplace environment / infrastructure**

**9001 designed to control the deterioration of product**

**EMS does not include reference to damage / loss of property, equipment or infrastructure**

## Overlap of Environmental versus OH&S

- **Grey Area: areas of overlap with EMS and OH&S**
- **With ISO 14001 organizations will want to exclude particular area e.g., WHMIS training, or emergency response other than strictly environmental response, or impacts internal to the building.**
- **But, the definition of Environment includes**
  - “ **surroundings in which an organization** operates including air, water, land, natural resources, flora, fauna, **humans** and their interrelation”

- **EMS covers a number of areas similar to OHSAS:**
  - **WHMIS**
  - **Emergency Response**
  - **Chemicals**
  - **Hazardous material management**

**With requirements for equipment, protective ware,  
and training**

- **Discussions revolve around “Where do we draw the line?” in issues of:**
  - **emergency response**
  - **Hazardous material programs (e.g., PCBs, asbestos)**
  - **Environmental impact internal versus external to the building**
  
- **Typically, only those that are strictly OH&S issues are excluded from EMS...e.g., ergonomic issues, accident/injury to body, repetitive strain.....where no overlap with the environmental issues.**



### **Non-conformances:**

- **OHSAS: Risk assessment process must be used in the Corrective Action process (Clause 4.5.4..... proposed corrective and preventative actions shall be reviewed through the risk assessment process prior to implementation).**
- **ISO 14001 ....risk assessment is not required for addressing non-conformances.**



## Trouble Area: Internal Audits

### **Internal Audits:**

What is expected:

#### **a) Grey Area:**

To assess conformance to ....”**Planned Arrangements’**

**Organizations do not clearly understand this requirement**

#### **b) Trouble Area-**

**For OHSAS: audits not based on the results of risk assessment**

**For EMS: audits not based on areas of Environmental Importance**

**ISO 14001: 2004 has moved beyond the OHSAS 18001:1999 regarding training**

- **Potential conflict in an integrated system**
- **EMS now requires training “ for persons working for it or on its behalf aware of.....” i.e., includes contractors etc outside of company personnel.**
- **18001 refers to training of workplace personnel , however, ....**
  - **18001 (4.4.3) Communication requires communication of pertinent OH&S information to and from .....interested parties e.g., contractors, visitors, volunteers**

- **Awareness of potential issues is the first line of defense**
- **Auditors: fore-warned is to be fore-armed as an effective auditor**
- **Organizations: heads-up for planning and implementing a robust system**