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FOR

ISO 14001:2004

POCKET GUIDE

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CLAUSE

4.6

MANAGEMENT REVIEW



An earlier discussion spoke of the EMS need for attention like any other system. The discussion even addressed the attention given to portions of the EMS that contained key characteristics related to the activities and operations that have significant environmental impact. In the previous sub-clause, the overall EMS audit was discussed. Corrective action was applied in both of these discussions. The treatment required for the EMS is still incomplete. The ultimate responsibility for the EMS belongs to the top level of management.

Management has a requirement to meet on a predetermined schedule and review the EMS. Collected data allows management to document and retain a record that includes a review of the EMS for:

- **continuing suitability** (Managers could consider the following as they define continuing suitability for their business - does it continue to be appropriate regardless of the dynamics of your business?).
- **adequacy** (Managers could consider the following as they define adequacy for their business - does

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it fulfill the ISO 14001:2004 requirement and your company's needs?).

- **effectiveness** (Managers could consider the following as they define effectiveness for their business - is it sufficiently robust to repeatedly assure the desired outcome?). (4.6)

Through this review, **management must assess the need for change and act on any opportunity to improve the EMS.** (4.6)

Employees contribute to this effort by accurately collecting data as directed by documentation and training. Most of the collected data will find its way to management as some form of input to management review. **The required input includes:**

- **results of internal audits**
- **compliance assessments for legal requirements.**
- **compliance assessments for other subscribed to requirements.**
- **complaints and other communication from interested parties,** especially those with vested interest - like nearby property owners and the community as a whole.
- **measures of environmental performance by your company.**
- **a determination of achievements relative to objectives and targets.**
- **progress toward assigned corrective and preventive actions.**

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- updates to unfinished business.
- changes to legal requirements associated with relevant environmental aspects.
- changes to other requirements associated with relevant environmental aspects.
- submitted recommendations for improvement of the EMS. (4.6)

After all the data has been carefully considered, management must determine if any action needs to be taken for the purpose of adjusting the environmental policy, objectives, targets or any other component of the EMS. These adjustments must be rooted in the commitment to continual improvement of the EMS. (4.6)

Management's Role – The first concern of the auditors is to determine the definition of the management review team. From that point on, the auditors from your registrar will then ask about the documented frequency for management review. Once they have confirmed that the “committed to” frequency is being maintained, the conversation will turn to the details of the review(s). You can be certain that an auditor would carefully determine that all of the input requirements in the bulleted list above have been addressed and/or included. Be prepared to share the data and the results of the review with them including documentation supporting the management decision on continuing suitability, adequacy and effectiveness.

Action items related to continual improvement or evi-

dence of the review for improvement needs should be available in order for the auditor to feel comfortable about your commitment to continual improvement. For completed actions the auditor could ask to see the records of change to policy, objectives or targets. Please do not confuse continual improvement with corrective action. Taking credit for action items to reestablish suitability, adequacy or effectiveness are merely corrective actions.

Retention of management review records will be verified by the auditor.

Each Employee's Role – Many employees are involved in some type of EMS related reporting. If you have a question about the relevance to the EMS of the reporting that you do, first determine if the data you are recording will become an EMS record or if it is otherwise related to any requirements of the ISO 14001:2004 standard. If you are still not sure if the reporting is EMS related, ask your ISO 14001:2004 Management Representative. Oh, that's right; it's a good idea to know who your 14001:2004 Management Representative is.

As you record the results, assure that they represent the actual outcome. Avoid bias of any kind in the reporting. This will interfere with management's ability to maintain a suitable, adequate and effective EMS.