SUGGESTED QUESTIONS FOR ISO 14000
REGISTRAR SELECTION INTERVIEWING

The following suggested questions are to be a guide when interviewing potential registrars in preparation for ISO 14001 certification. One must keep in mind that registrars are private sector providers, not government agencies, and you have a choice. Although interpretation of ISO 14001 is somewhat controlled, there is still much room for auditor interpretation. Therefore, within the limits of selecting a credible registrar, one can exercise some freedom in selecting an auditor which most closely matches your system,. Throughout this process keep in mind that an EMS is not implemented to satisfy an auditor, rather it is for internal continual improvement.

For each questions, a note is provided in italics giving background on the significance of the question, and how to assess the answer. Please feel free to call Ed Pinero at OFEE with any questions (202-564-1297, or ed.pinero@ofee.gov).

- **What is your EMS accreditation?**
  To verify and assess the credibility of the certificate.

- **What is the experience of your EMS auditors in the areas of environmental science? Technology and processes? Applicable regulatory requirements? The ISO 14001 standard and management systems?**
  To verify the qualifications of the auditors to do the job at hand, compliance auditors and 9000 auditors are not assured of having the proper qualifications.

- **How do you structure the certification audits (i.e., phases, timing, etc.)?**
  To assess how many trips it will take, this affects travel costs and impact to internal operations and resources.

- **What is your reporting format (i.e., details of documentation)?**
  To obtain some indication of how informative and detailed the deliverable will be, i.e., will it be usable and meet your expectations?

- **How long will the process take and can you meet our timeframe without shuffling auditors during the project?**
  A common problem with some registrars is their inability to provide consistence in the auditing process.

- **What is your expectation on format of our documentation?**
  It is important to know if an auditor has a preset preference to documentation styles; for example, will they accept flow charted procedures?

- **What is your expectation for procedures that are required by ISO but are not required to be documented, i.e., what do you expect to see for verification?**
  As ISO does not always require all procedures to be documented, it is important to know if the registrar will impose that as a requirement. Although we encourage and recommend

procedures be documented for pure ease of verification, it cannot be required, as it is not required by ISO.

- **How do you statistically select representative sampling of records and interviewees for verification?**
  This is simply to get an idea of how objective the audit will be, audits that keep looking until nonconformances are found are biased and incorrect.

- **What is your surveillance audit program (frequency, selecting areas to be assessed, etc.)?**
  This is simply a planning issue. ISO does not prescribe frequency of audits, so it is important to know how often the registrar plans to return.

- **What do you expect to see to verify our aspects determination?**
  A common misconception is that a formal list or "register" of aspects must exist. Again, we recommend such a list be prepared and documented for practical purposes, possibly as a record or even an attachment to the manual, however the requirement for such a list is European standard requirement (BS7750) and not ISO14001.

- **What do you expect in the areas of significance determination?**
  ISO does not prescribe how this is to be done, as long as it captures those aspects that are clearly significant in regard to actual or potential environmental impact. A registrar cannot require any particular format, such as a quantitative scoring system.

- **What are your expectations to verify the Legal and Other Requirements element of ISO 14001?**
  This again is to see what degree of listing they expect. We recommend such a list be kept, as a matrix for example; however, the requirement for a formal "register" was a BS7750 requirement, not ISO 14001.

- **How do you handle regulatory noncompliances encountered during an audit?**
  This is a very sensitive issue, and the correct answer is only what is consistent with your existing corporate policy on handling noncompliance. The importance here is that compliance auditing is not the goal of an ISO 14001 EMS auditor and noncompliances are to be used as any other evidence would be in assessing the system. One must keep in mind however that commitment to compliance is an EMS policy requirement of ISO, and compliance assessment is an expected Monitoring and Measurement requirement of ISO; therefore, an auditor can and will ask for such information to verify these elements.

- **To what degree do you search for regulatory noncompliances in your EMS auditing?**
  See note with previous question.

- **What do you expect to see in terms of the level of internal auditor training and qualifications?**
  A registrar cannot require that internal auditors meet the criteria of ISO 14012 or their own requirements. ISO only requires that personnel conducting EMS tasks have the appropriate training, awareness, and competence consistent with the level of complexity of their function.

- **Do you consider electronic documentation acceptable?**
  The answer should be yes according to ISO 14001, although it has to be effective.

- **How do you address systems integrated with other systems, i.e., health and safety?**
  Integration, be it physically mixing manuals or by cross-referencing procedures, should be acceptable as long as the auditor can find the EMS components. Experienced registrars have no problem with this.

- **How do you distinguish between conformance and performance?**
  A subtle point, in that the EMS Auditor is to ensure that the EMS addresses the requirements of the standard and is effectively implemented so that planned activities are carried out accordingly (conformance). The question of how well it works and whether it should be different or "better" is up to the organization's Management Review and not the third part auditor.

- **How do you distinguish between major and minor nonconformances?**
  Some types of nonconformances are certainly acceptable during an audit where the certification would not be threatened. The key is to decide which are major, i.e., can delay certification, and which are minor, i.e., should be corrected by the next surveillance audit, if at all. Usually, major nonconformances are where an element or requirement of ISO 14001 is not met, or where there is a multitude and pattern of minor nonconformances indicative of a system failure. The threshold between the two is somewhat at the auditor's discretion and interpretation, and these criteria should be discussed in advance.