

## Collation of OHSAS 18001 Systematic Review Comments, with Secretariat Observations

January 2006

Com ment ator reference	Clause No./ Sub clause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Comment (justification for change)	Proposed change	Observations of the Secretariat
9	General		In order to easily be implemented in an integrated management system Proposed general changes: 1) OHSAS 18001 should be revised 'to be fully aligned to the new edition of ISO 14001: 2004 ; 2) As in ISO 14001 : 2004 in the introduction will encourage organisation to consider implementation of the best available techniques but not as a requirement in the standard.		1) 18001 now aligned to 14001:2004, as far as practicable 2) To be taken into revision of 18002
8	General		<p><b>Despite the fact that the OHSAS 18001 Specification is generally a well accepted &amp; good model for OH&amp;S, this Specification should be fully revised, as to integrates the following points :</b></p> <p><b>1.- It should be moved from a Specification to a voluntary recognized auditable Standard. This “ Standard “ status should help promotes the use of this model in all sectors of the economy and within/across all countries.</b></p> <p><b>2.- The ISO 18002 – 2000 Guidance document should be integrated as an Annex on the New revised 18001 Standard. Expanded sections of relevant Reference publications would be appreciated by organizations.</b></p> <p><b>3.- There is no doubt that the New 18001 Standard should be aligned as much as possible with the ISO 14001 – 2004, ISO 9001:2000 &amp; the ISO 19011-2002 Standards.</b></p> <p><b>4.- Clarifications &amp; Guidance should be provided on the OHSAS 18001 Standard to help organizations established or upgrade their existing EMS/QMS &amp; OH&amp;S, as <u>INTEGRATED MANAGEMENT SYSTEMS.</u></b></p> <p><b>5.- The concept of <u>tolerability of residual risks (OHSAS 18002- 2000 Clause 4.3.1 d) ii)</u> should be expanded &amp; clarifications/guidance –examples provided to help organizations understand &amp; implement this valuable concept.</b></p> <p><b>6.- Additional Clarifications/Guidance –examples should be provided regarding compliance audits to legal &amp; others requirements.</b></p>		1) Not accepted  2) No, this is achieved in 18002, not 18001  3) Agreed  4) To be considered for revision of 18002  5) To be considered for revision of 18002  6) To be considered for revision of 18002  7) Has been widened to include "all persons working for or on behalf of the organization"  8) Stayed with 14001 versions of these

			<p><b>7.- Specific/distinct elements should address the procurement/suppliers – contractors requirements.</b></p> <p><b>8.- Full alignment to the ISO 9001:2000 – Clause 8.5 for 8.5.1 - Continual Improvement, &amp; distinct Clause for Corrective action – 8.5.2 and preventive actions – 8.5.3 is highly recommended.</b></p> <p><b>9.- Where applicable, the good works performed by others interested parties (e.g. ILO) should be integrated on the revised OHSAS 18001 Standard.</b></p> <p><b>10.- Efforts should continue with the ISO authorities to proposed a credible International model (e.g. the revised OHSAS 18001) as the basis for development of an ISO Standard on OH&amp;S.</b></p>	<p>requirements</p> <p>9) Agreed</p> <p>10) Agreed</p>
8	General		<p>They also need to recognize that the level of documentation may be limited or non-existent for small issues the way they did in ISO14001 in the Annex section A5.3</p> <p>ISO 14001:2004 - A.5.3 Nonconformity, corrective action and preventive action</p> <p>Depending on the nature of the nonconformity, by establishing procedures to deal with these requirements, organizations may be able to accomplish them with a minimum of formal planning, or it may be a more complex and long-term activity. Any documentation should be appropriate to the level of action.</p>	To be considered for the revision of 18002
8	General		<p>Otherwise if they follow the changes in the ISO 14001:2004 they will likely have captured all my "pet peeves."</p>	Agreed
4	General	All	<p>The revised specification should be aligned with ISO 14001:2004 to make sure that the documents are compatible.</p>	Agreed
4	General	All, Clause 3	<p>There should be a comparison made with BS 8800: 2004 that ought to be encompassed within the Specification, specifically clause 3 in BS 8800: 2004 should be reviewed for key principles which is not currently included within OHSAS</p>	Agreed

		18001.		
4	General	It would be helpful to the combined user community if the difference in terminology between hazard identification, risk assessment and risk control between OHSAS 18001 and BS 8800 be reviewed and updated according to the revised BS 8800: 2004.		Has been considered
4	General	There should be a comparison table detailing the clause similarities and differences with BS 8800: 2004 (please refer to BS 8800: 2004 A.4, Table A.3)		Will be considered by BSI for the UK edition of OHSAS 18001
2	General	Regarding the systematic review of OHSAS 18001:1999 we would appreciate if this guideline would be as consistent as possible with the new ISO 14001:2004 standard (e.g. regarding the requirements for the management review).		Agreed
5	General	The difference between procedures and documented procedures should be clarified. For instance, in clause 4.3.2 "Legal and other requirements", it reads that "the organization shall establish and maintain a <b>procedure</b> for ...". In clause 4.4.6a) Operational control, it reads: "Establish and maintain <b>documented procedures</b> to cover situations..."		18001 is consistent with 14001 on this issue
12	General	Addition in acknowledgement	Addition Sucofindo International Certification Services as one co-operating organizations:	Will be considered
6	General	To facilitate the establishment of integrated management systems	To be aligned to ISO 14001:2004	Agreed
13	General	OHSAS should be closely aligned to ISO 14001: 2004		Agreed
13	General	Initial and periodic status review (BS 8800: 2004 (no. 3.2 and 3.9.2) should be put in concrete terms		Initial review is not covered by 18001, but is addressed in 18002
11	General	No comment		Noted
10	General	1. The interpretation of "establish and maintain a procedure" , "establish a procedure" and "establish a documented procedure" need to be made consistent. Is the term used in OHSAS 18001 "establish and maintain a procedure" equivalent to "establish a documented procedure"? If that is so, then we need to change the term to follow ISO 9001. If not, then it means that OHSAS 18001 did not require any documented procedure for the OHS MS.		18001 is consistent with 14001 on this issue
10	General	2. OHSAS 18001 should explain in detail about the HIRARC process as comprehensively explained in BS 8800:2004, Annex E. It is better to include this in the Guideline standard OHSAS 18002.		To be considered for the revision of 18002

		Currently OHSAS 18002 just make statement in to refer to BS 8800.		
15	General	OHSAS 18001 should be reviewed (amendment or revision) to ensure the consistency and/or compatibility with ISO 14001:2004		Agreed
15	General	A new clause of "evaluation of compliance" should be added as the revised ISO 14001. If the newly added clause number is 4.5.2, the requirements of the clause should be as follows: 4.5.2 Evaluation of compliance 4.5.2.1 Consistent with its commitment to compliance, the organization shall establish, implement and maintain a procedure(s) for periodically evaluating compliance with applicable legal requirements. The organization shall keep records of the results of the periodic evaluations. 4.5.2.2 The organization shall evaluate compliance with other requirements to which it subscribes. The organization may wish to combine this evaluation with the evaluation of legal compliance referred to in 4.5.2.1 or to establish a separate procedure(s). The organization shall keep records of the results of the periodic evaluations.		Agreed
21	General	In our sector specific committee for occupational health and safety we also discussed the fact that focus in OHSAS 18001 is to identify and manage risks. There is very little said about preventive work. Another thing that people in our sector specific committee for occupational health and safety are concerned about is the risk that organizations certified against OHSAS 18001 will "forget" shall-requirements on management level mentioned in AFS 2001:1.		18001 is consistent with ISO 14001 on this issue.  Need clarification of AFS 2001:1 requirements
16	General	In order to facilitate OHSAS 18001 into ISO 9001:2000 and ISO 14001:2004.	Each OHSAS clause number/requirement is recommended to be persistent with ISO 14001:2004.	Agreed
16	General	In order to have easier statistical control of accident and application of relevant regulations.	Certification scope is recommended to be classified with industry activities (12 activities) rather than product classification such as NACE code. Recommended 12 activities are ; Agri./Forest, General manufacture , Heavy , Chemical, Heavy chemical, Nuclear, Construction, Mining, Fishery, Public administration, Service, Medical	This is an issue for the application of the standard during the demonstration of conformity or certification, not for the standard itself.

				service industry to be classified as high, middle and low risks.	
20	General		OHSAS 18001 should be revised to be as similar as possible to ISO 9001:2000 and ISO 14001:2004, to facilitate for organizations which is or will be certified to both ISO 9001, ISO 14001 and OHSAS 18001.		Agreed
1	Contents	Index	1) Unification of clauses 4.3.3 y 4.3.4 in an only clause. 2) Modification of the title of clause 4.3.1 to improve the treatment of the risks' evaluation. 3) A new clause is added due to the inclusion of a paragraph related to legal requirements.	1) New clause: 4.3.3: Objectives, goals and programmes. 2) New title: 4.3.1: Evaluation and planning for risks' control. 3) New clause: 4.5.2: Evaluation of legal performance.	Agreed
3	Contents		Annex A should change to compactable with ISO9001:2000 & ISO14001:2004	Annex A (informative) Correspondence between OHSAS18001, ISO 14001:2004 and ISO 9001:2000	Agreed
10	Foreward		Publications referred to – BS 8800:1996 has been revised to a new version BS8800:2004	To change “BS8800:1996” to “BS 8800:2004”.	Agreed
3	Foreward		To change for compactable with ISO9001:2000 & ISO14001:2004	Change related statements with ISO description	Agreed
12	Foreward	Paragraph 7	Addition of SMK3 Permenaker PER.05/MEN/1996 as one of documents as reference during the development of this OHSAS specification	Addition in the document of reference with SMK3 Permenaker PER.05/MEN/1996 (Indonesia OH&S Management system regulation) Occupational Safety and Health Management System as one document were referenced during the development of this OHSAS specification.	No, the listing of reference documents is now removed from Foreword. Recommend that reference be included in a national "Supplement" to 18001.
10	Front Page - Wordings in the Box “BSI-OHSAS 18001 is not a British standard .....”		To delete because understood that OHSAS 18001 is not a British Standard because no BS in front of OHSAS 18001.	To delete the wordings and the box.	Agreed
10	Front Page – Title		To be consistent with ISO standards on management system, the word specification should be changed to requirements	To change “Specification” to “Requirements”	Agreed
3	Title		To change for compactable with ISO9001:2000 & ISO14001:2004	OHSAS 18001: xxxx	Agreed

9	2 Reference publications		There are more useful guidelines documents for implementation	AS/NZS 4804:1997 Occupational health and safety management systems- General guidelines on principles, systems and supporting techniques ILO –OSH 2001	May be added to a national supplement.  Added
17	3 Terms and Definitions	3.15 risk assessment	conform toBS8800	“risk assessment”to encompass the entire process of hazard identification, determination of risk, and the selection of appropriate risk reduction or risk control measures.	Agreed
1	3 Terms and definitions		New not existing definitions that clarify terms that appear in the specification shall have to be added.  NOTE: THE PARAGRAPHS REMARKED IN YELLOW ARE DEFINITIONS FROM THE ISO 9000 STANDARD. THE REST OF THEM ARE SPECIFIC DEFINITIONS OF OHS.	<p>Corrective action: action to eliminate the cause of a detected nonconformity, or other undesirable situation.</p> <p>Preventive action: action to eliminate the cause of a potential nonconformity or other undesirable potential situation.</p> <p>Inspection: conformity evaluation by observation and judgement accompanied as appropriate by measurement, testing or gauging.</p> <p>Procedure: specified way to carry out an activity or a process.</p> <p>Auditor: person with the competence to conduct and audit</p> <p>OHS Manual: document specifying the Occupational Health and Safety management system of an organization.</p> <p>Audit programme: set of one or more audits planned for a specific time frame and directed towards a specific purpose.</p> <p>OHS Policy: overall intentions and direction of an organization related to Occupational Health and Safety as formally expressed by top management.</p>	See revised definitions

OHS programme: documented description to reach, in terms of OHS, objectives and goals.

Document: Information and its supporting medium.

NOTE 1: The medium can be paper, magnetic, electronic or optical computer disc, photograph or master sample, or a combination thereof.

Goal: detailed performance requirement applicable to the organization or to its parts that has its origin in the objectives, being necessary its establishment and compliance to reach said objectives.

OHS records: documents stating results achieved or providing evidence of activities performed.

Management review: formal evaluation by the management of the state and adequacy of the Occupational Health and Safety management system in relation with the security policy.

Working condition: it will be understood as "working condition" any of its characteristics that can have a significant influence in the generation of risks for the security and health of the worker. The following are specifically included in this definition:

1. The general characteristics of the premises, installations, equipments, products and other tools existing in the workplace.
2. The nature of the physical, chemical and biological agents present in the work environment and its corresponding intensities, concentrations or presence levels.
3. The procedures for the usage of the aforementioned agents that influence in the generation of the mentioned risks.
4. All those other work characteristics, including those relative to its organization and ordering, that influence

				in the magnitude of the risks to which the worker is exposed.	
				Especially sensitive worker: worker to whom the risks derived from the work can affect in a special way due to his own personal characteristics or known biological condition, included those who have the physical, psychic or sensory situation of disability recognized.	
4	3 Terms and Definitions		All the revised definitions within ISO 14001: 2004 that are found within OHSAS 18001:1999 should be transferred to the new OHSAS 18001. Alignment with ISO 14001 should take precedent over any alignment with BS8800: 2004		See the revised definitions
4	3 Terms and definitions	New definition	Insert new definition of target to allow for inclusion in 4.4.4	OH&S target  detailed performance requirement, applicable to the organization or parts thereof, that arises from the OH&S objectives and that needs to be set and met in order to achieve those objectives	Not accepted. Reference continues to only made to Objectives.
21	3 Terms and definitions		There ought to be a definition of the word workplace.		Agreed
3	3 Terms and definitions	3.18 3.19	Add the definition of ALARP Add the definition of Risk Control	3.18 _ Risk Control 3.19 _ As low as reasonably practicable" (or ALARP).	Not agreed
14	3 Terms and definitions		All terms and definitions should be aligned with ISO 14001:2004	Same as ISO 14001:2004 and ISO 9000:2000 to facilitate integrations of systems.	See the revised definitions
15	3 Terms and definitions		A definition of "document", "procedure", "record", "OH&S policy", "objectives", "corrective action", "preventive action", "interested party", "internal audit" and "auditor" should be added as same as the revised ISO 14001.		See the revised definitions
4	3.10		The definition needs to refer to those outside of the work place that may be affected.	Amend 'in the workplace' to 'any others who might be affected by work activities'	Agreed in part
1	3.15	Paragraph	Improvement of the definition.	Risks' Evaluation: process by means of which the necessary information is obtained so that the organization is in a position of taking an appropriate decision on the opportunity to adopt preventive actions and, in such case, on the type of actions that shall be adopted.	Agreed in part
15	3.15		conform to BS8800	"risk assessment"to encompass the entire process of hazard identification, determination of risk, and the	Agreed in part

				selection of appropriate risk reduction or risk control measures.	
12	3.18	Addition	Term and definition of Procedure to link with ISO 14001 and 9001	Procedure: Specified way to carry out an activity or a process. Note 1: Procedures can be documented or not Note 2: Adapted from ISO 9000:2000, 3.4.5	See the revised definitions
12	3.19	Addition	Term and definition of record to link with ISO 14001 and 9001	Record: document stating results achieved or providing evidence of activities performed Note: adapted from ISO 9000:2000, 3.7.6	See the revised definitions
1	3.2	Paragraph	Improvement of the definition in order to make the specification compatible with other standards.	OHS management system audit: systematic, documented, periodic, objective and independent evaluation that evaluates the effectiveness and reliability of the OHS management system, as well as if the system is adequate to achieve the organization's policy and the objectives related to this matter.	Now include def for Internal Audit, but not OHS MS Audit
5	3.2		Adjust the term "audit" to the relevant definition of ISO 9000:2000		See the revised definitions
1	3.3	Paragraph	Improvement of the definition in order to make the specification compatible with other standards.	Continual improvement: planned, systematic and periodic process whose purpose is the improvement of the management of an organization related to OHS matters, according to its politics in this field of activity.	See the revised definitions
5	3.3		Adjust the term "continual improvement" to the relevant definition of ISO 9000:2000		See the revised definitions
12	3.3		Addition with recurring process in the beginning of definition of continual improvement for inline with ISO 14001:2004	Continual Improvement: recurring process of enhancing the OH&S management system in order to achieve improvements in overall OH&S performance consistent with the organization's OH&S policy.	See the revised definitions
14	3.3	Continual improvement	Align with ISO 14001:2004	Same definition as ISO 14001:2004 to facilitate integration of systems.	See the revised definitions
13	3.4		3.4 Occupational health and safety management programmes /CIP  The aspects of OH&S management programmes must be included the cont. improvement process; therefore CIP should be added to the headline.		Not agreed. Aligned to 14001
14	3.7	Interested parties	Align with ISO 14001:2004	Same definition as ISO 14001:2004 to facilitate integration of systems.	See the revised definitions
1	3.8	Paragraph	Improvement of the definition in order to make the specification compatible with other standards.	Nonconformity: non-fulfilment of a requirement	See the revised definitions

NOTE: REMARKED IN YELLOW AS IT IS THE DEFINITION STATED IN THE ISO 9000 STANDARD.

12	3.8		Part of overall is changed with part of organizations	Part of organization's management system .....	See the revised definitions
14	3.8	Non conformance	Align with ISO 14001:2004	Same definition as ISO 14001:2004 to facilitate integration of systems.	See the revised definitions
15	3.8		A term of "non-conformance" should be changed to "nonconformity". A definition of "nonconformity" should be non-fulfilment of a requirement.		See the revised definitions
19	4		<p>On Figures 2,3,4,5 and 6 OHSAS 18001 and OHSAS 18002 there are images of each element of plan of effective management system (Figure 1). On these pictures schematically shown 4 in/out arrows, carrying definite sense. And conventional Deming cycle on Figure 1 threading these schematically shown elements of management system, showing only in/out and founding only two arrows to each element on Figures 2,3,4,5 and 6 in OHSAS 18001 and OHSAS 18002.</p> <p>Plan of elements of effective OH&amp;S management system, shown on Figure 1 in BS 8800:2004 and based upon HS(G)65, in our opinion, better co-ordinate with plans on Figures 2,3,4,5 and 6 OHSAS 18001 and OHSAS 18002. This model visually found appearance of side arrows, arising accordingly from presence of feedback and audit, shown on Figure 1 in BS 8800:2004.</p> <p>Therefore, in our opinion, model of effective OH&amp;S management system, shown on Figure 1 in BS 8800:2004, is the most preferable for its allocation in OHSAS 18001 and OHSAS 18002 instead of conventional Deming cycle on Figure 1.</p>	<p>Represent Figure 1 from BS 8800: 2004 on the place of Figure 1 in OHSAS 18001 and OHSAS 18002 , as more preferable, and make corresponding corrections to text of standards.</p>	Not agreed. Aligned to 14001
<p>NOTICE ! OUR PROPOSED CHANGES, HERE AND BELOW, ACCENTUATED WITH A THICK PRINT.</p>					
9	4.1		As in ISO 14001: 2004	The organisation shall define and document the scope of its OH&S system	Agreed
1	4.1	Paragraph	The scope of the system shall be defined in order to make the specification compatible with other standards.	The organization shall define and document the scope of its OHS management system.	Agreed
12	4.1		Addition more detail explanation of OH&S management system	The organization shall establish, document, implement, maintain and continually improve an OH&S management system in accordance with the requirements of this specification and determine how it	Agreed

				will fulfil these requirements. The organization shall define and document the scope of its OH&S management system.	
14	4.1	General requirements	The standard states that the requirements for the management system are set out in clause 4. This is misleading since the terms and definitions are part of the standard and although these are not audited, they should be considered. Also, OHSAS 18002 states that the management system should conform with all of the requirements of OHSAS 18001:1999; the proposed change conforms with this statement.	Same as ISO 14001:2004: "...in accordance with this International Standard".	Agreed
12	4.2		Policy shall be defined by top management	.....safety policy defined and authorized by top management ....	Agreed
14	4.2	OH&S Policy	The first paragraph of the clause includes two commitments in addition to the ones listed in "a" through "g". Doubts occurred regarding the fact that there are two commitments to improvement: OH&S performance and continuous improvement of the system. There is confusion if the two mean the same. There is a difference between both but this is not addressed or further explained in OHSAS 18002.	Include the requirement that the policy clearly states overall health and safety objectives and a commitment to improving health and safety performance under "The policy shall"...as two additional bullets to clearly establish the difference with continuous improvement.	See revised text.
9	4.2b)		To be more specific	To add: "and risk reduction" and/or "commitment to improving health and safety performance"	Agreed in part
12	4.2b)			b. include a commitment to continual improvement and prevention of accident and illness related to work.	Agreed in part
12	4.2c)			c. include a commitment to comply with applicable OH&S legal requirements and with other requirements to which the organization subscribes which relate to its OH&S risk.	Disagreed.
12	4.2e)		Communication policy to all persons working on behalf organization	e. be communicated to all employee and all persons working on behalf the organization.....	Agreed
14	4.2e)		The standard states the policy shall be communicated to all employees...contractors, subcontractors and suppliers are not required to be aware of the OH&S policy. Some organizations use contractors extensively as part of their day to day operations and these contractors are exposed to the same risks as employees.	Include contractors in "e" aligned with the requirements of ISO 14001:2004. "is communicated to all persons working for or on behalf of the organization"...	Agreed
12	4.2f)			f. be available to interested parties and public	Disagree the need

					for "Public" availability
12	4.3		Addition clearly statement of establish, implement and maintain	The organization shall establish, implement and maintain a procedures.....	Agreed
14	4.3	Planning for hazard identification, risk assessment and risk control			Noted
9	4.3.1			Changing the title to: Hazard identification ,risk assessment and risk control processes or risk management	Disagreed
8	4.3.1		In 4.3.1 ? the word "facilities" is misleading. Most people think that its meaning is limited to "buildings," but that does not make sense in the context of the sentence. The dictionary defines "facilities" as "anything that facilitates work" so the meaning includes "everything" such as hand tools, forktrucks, scissor lifts etc?., which makes more sense in the context of risk assessment ? why would we only look at the building. So I think they could clarify that wording.		Agreed, see revised text
21	4.3.1		The sentence - "provide for the classification of risks and identification of those that are to be eliminated, or controlled by measures as defined in 4.3.3 and 4.3.4." doesn't make sense to us.		See revised text
1	4.3.1	Paragraph	Improve the treatment of the risks' evaluation	4.3.1 Evaluation and planning for the risks' control  The evaluation of the labour risks is the process designed to estimate the magnitude of those risks that it has been impossible to avoid and shall be extended to each one of the working positions of the organization in which said risks come together. For this, the following will be taken into account:  a) The existing or foreseen working conditions  b) The possibility that the worker that occupies it or is going to occupy it is especially sensitive, due to his personal characteristics or known biological conditions, to some of said conditions.  From said evaluation, it shall be evaluated the working	Useful suggestion, but considered too detailed for 18001, will be considered for 18002

positions that can be affected by:

a) The work equipments, substances or prepared chemists election, the introduction of new technologies or the modification in the conditioning of the working places.

b) The change in the working conditions.

c) The incorporation of a worker whose personal or known biological characteristics make him especially sensitive to the conditions of the position.

From the information obtained on the organization, characteristics and complexity of the work, on the raw materials and the existing working equipments in the organization and on the health conditions of the workers, the dangerous elements will be established and the workers exposed to them identified, valuing now the existing risk according to objective criteria of appraisal. The information received from the workers on the mentioned aspects will be taken into account.

The evaluation procedure used shall provide confidence on its result. In case of doubt the most favourable preventive measures shall be adopted, from the point of view of prevention.

The evaluation will include the carrying out of the measurements, analysis or tests that are considered necessary.

The documentation that shall include the evaluation and that shall be updated will be:

a) The identification of the work position

b) The risk or existing risks

c) The result of the evaluation and the preventive measures.

			d) The reference of the criteria and evaluation procedures and the measurement, analysis or tests methods used.	
			When the result of the evaluation showed situations of risk, the organization will carry out a planning with the purpose to eliminate or control and to reduce said risks, according to an order of priorities in accordance to its magnitude and number of workers exposed to them.	
			The planning of the preventive activity will include the human media and necessary materials, as well as the assignment of the precise economic resources for the achievement of the proposed objectives.	
4	4.3.1	It would be helpful to the combined user community if the difference in terminology between hazard identification, risk assessment and risk control between OHSAS 18001 and BS 8800 be reviewed and updated according to the revised BS 8800: 2004.		Has been considered
3	4.3.1	“the capabilities of risk control measures employed” is not required the company to adopt the most effective measures ;  Numbering system not employed in the clauses	“ the capabilities of risk control measures employed with effectiveness  e.g 4.3.1 a - routine and not-routine activites	Disagreed  Will be done during editing
5	4.3.1	To clear out the requirement “provide for the monitoring of required actions to ensure both the effectiveness and timeliness of their implementation “.  The requirement “describe or list monitoring and risk control provisions, particularly those non tolerable” should be included.		Disagreed
12	4.3.1	Addition clearly statement of establish, implement and maintain	The organization shall establish, implement and maintain a procedures	Agreed
7	4.3.1	It is recommended that the organization takes pro-active measures to safeguard ‘other parties’ who may be effected by its activities. MT considers that the organisation should show due dioligence in its activites to ensure the health and safety of parties external to the organization.  MT recommends that the inclusion of the phrase ‘activities of the organization that may effect other parties’ be made by means of a fourth indent in the first bulleted list of this	The organization shall establish and maintain procedures for the ongoing identification of hazards, the assessment of risks, and the implementation of necessary control measures. These shall include:  — routine and non-routine activities;  — activities of all personnel having access	Agreed see text

			clause.		to the workplace (including subcontractors and visitors); — facilities at the workplace, whether provided by the organization or others. — activities of the organization that may effect other parties	
					The organization .....	
14	4.3.1		The process includes hazards identification, risk assessment and implementation of controls on "facilities at the workplace". Facility is defined by the Webster Dictionary as: something that is built, installed, or established to serve a particular purpose". This definition applies primarily to buildings and permanently installed equipment. The scope to the requirement should include equipment that is brought to the facilities (ie. Cranes, forklifts, construction equipment, etc.).	Add "facilities and equipment at the workplace....".		Agreed
15	4.3.1	3rd paragraph	"The organization's methodology for hazard identification and risk assessment shall be:" should be changed to "The organization's methodology for hazard identification, risk assessment and implementation of necessary control measures shall be:"			Agreed
		2nd bullet of 3rd paragraph	The latter part of 2nd bullet is ambiguous, especially, the words "measures as defined in 4.3.3 and 4.3.4" are difficult to be understood. To be reworded.			Revised
15	4.3.1	3rd Paragraph 5th bar	should make clear the contents which should be carried out.			Not possible, will be dependent on the organization's situation
17	4.3.1	3rd Paragraph 5th bar	should make clear the contents which should be carried out.			Not possible, will be dependent on the organization's situation
19	4.3.1		For successful identification, checking and control of risks, it is appropriate to supplement the methodology of hazard identification by requirement to provide personnel and visitors of organization with personal and collective protective equipment. "Collective protective equipment" is the use, in an effort to provide safety, of signal colours, safety signs, sign marking in hazardous places (correspondent to ISO 3864, ISO 7010), safety prompt-lists on workplaces, spherical safety mirrors,	- provide input into the determination of facility requirements, identification of training needs and/or development of operational controls; - determine the need and adequacy of personal		Too specific for 18001, to be considered for 18002

photoluminescent safety guidance systems for providing safety and saving personnel and visitors in case of emergency situation (correspondent to ISO 16069, ISO 15370), system against unapproved turning on/off (lockout/tagout) etc.

protective equipment and collective protective equipment (safety signs, signal marking, hazardous area marking, safety instruction, safety prompt-lists on workplaces , spherical safety mirrors, photoluminescent safety guidance systems to ensure safety and rescue etc.);

- provide for the monitoring of required actions to ensure both the effectiveness and timeliness of their implementation.

9	4.3.2			The organisation shall ensure that these applicable legal requirement and other requirement are taken in account in establishing ,implementing and maintaining its OH&S system	Agreed
3	4.3.2	Justification of compliance of applicable OHS legal and other requirements		The organization shall assess the compliance of the applicable OHS legal and other requirements to it.	Now addressed in 4.5.2.1
5	4.3.2	Adjust according to ISO 14001:2004			Agreed
12	4.3.2	Paragraph 1 Addition clearly statement of establish, implement and maintain...		The organization shall establish, implement and maintain a procedures.	Agreed
		Applying legal and other requirements to OH&S Risk		To determine how these requirements apply to its environmental aspects	
				The organization shall ensure that these applicable legal requirements and other requirements to which the organization subscribes are taken into account in establishing, implementing and maintaining its OH&S Risk.	
9	4.3.3			Unification of paragraphs 4.3.3 + 4.3.4 .its title shall be "Objectives, targets and programmes	Unification agreed. "Targets" not referenced in 18001,

8	4.3.3	The lack of "targets" in 4.3.3 is "dumb" and I have never audited anyone who felt they could do without targets so why not include them in the requirement.		only objectives. Targets are merely a subordinate type of Objective, so are not referenced by 18001
5	4.3.3	The requirement should specify that objectives shall be measurable and shall be measured.		See 4.3.3 and 4.5
12	4.3.3	Objectives, target and programme(s)	The organization shall establish, implement and maintain documented OH&S objectives and targets....	Implement – agreed Targets - disagreed
14	4.3.3	Align with ISO 14001:2004	Combine sub clauses 4.3.3 and 4.3.4. into one clause (4.3.3).	Agreed
1	4.3.3 and 4.3.4	Unification of clauses 4.3.3 y 4.3.4 to follow the criteria stated in ISO 9001 and ISO 14001	<p>4.3.3 Objective, goals and programmes</p> <p>The organization shall establish, implement and maintain documented OHS objectives and goals, in the pertinent levels and functions inside the organization.</p> <p>The objectives and goals shall be, when possible, measurable and shall be coherent with the OHS policy, the OHS risks, the fulfilment with the applicable legal requirements and other requirements that the organization subscribes, and with the continual improvement.</p> <p>When an organization establishes and revises its objectives and goals it shall take into account legal requirements and other requirements that the organization subscribes, and its OHS risks. Besides, it shall consider its technological options and its commercial, operational, and financial requirements, as well as the opinions of the interested parties.</p> <p>The organization shall establish, implement and maintain one or various programmes to reach its objectives and goals. These programs shall include:</p> <p>a) The assignment of responsibilities to achieve the objectives and goals in the pertinent functions and levels of the organization; and</p>	Agreed in part, see revised text

			b) The media and time limit to achieve them.	
12	4.3.3a)	No change, similar with 4.3.4 a		Agree in part, see revised text
12	4.3.3b)	No change, similar with 4.3.4b		Agree in part, see revised text
4	4.3.4	Replace existing text of 4.3.4 and 4.4.4 to make one clause, as detailed.	<p>The organization shall establish, implement and maintain documented OH&amp;S objectives and targets, at relevant functions and levels within the organization.</p> <p>The objectives and targets shall be measurable, where practicable, and consistent with the OH&amp;S policy, including compliance with applicable legal requirements and with other requirements to which the organization subscribes, and to continual improvement.</p> <p>When establishing and reviewing its objectives and targets, an organization shall take into account the legal requirements and other requirements to which the organization subscribes, and its significant OH&amp;S risks.</p> <p>It shall also consider its technological options, its financial, operational and business requirements, and the views of interested parties.</p> <p>The organization shall establish, implement and maintain a programme(s) for achieving its objectives and targets. Programme(s) shall include</p> <p>a) designation of responsibility for achieving objectives and targets at relevant functions and levels of the organization, and</p> <p>b) the means and time-frame by which they are to be achieved.</p>	Agree in part, see revised text
14	4.3.4	Align with ISO 14001:2004	Combine sub clauses 4.3.3 and 4.3.4. into one clause (4.3.3).	Agreed
15	4.3.4	This clause should be unified into the clause 4.3.3 as the revised ISO 14001. In the unified 4.3.3, the similar procedures as ISO		Agreed

			14001:2004 are to be employed in the process of establishing and reviewing objectives by taking into account both the identified risks and the legal requirements and other requirements.		Agreed in part. Do not refer to "identified" risks.
15	4.3.4		delete 4.3.4 and combine to 4.3.3 ,because conform to ISO 14001	The organization shall establish, implement and maintain a programme(s) for achieving its objectives and targets. Programme(s) shall include a) destination of responsibility for achieving objectives and targets at relevant functions and level of the organization ,and the means and time- frame by which they are to be achieved .	Agreed in part, see revised text
17	4.3.4		delete 4.3.4 and combine to 4.3.3 ,because conform to ISO 14001	The organization shall establish, implement and maintain a programme(s) for achieving its objectives and targets. Programme(s) shall include b) destination of responsibility for achieving objectives and targets at relevant functions and level of the organization ,and c) the means and time- frame by which they are to be achieved .	Agreed in part, see revised text
12	4.3.4 to 4.3.3		Clause 4.3.4 joint with 4.3.3 to link with ISO 14001	The organization shall establish, implement and maintain a programme(s) for achieving its objectives and target. Programme(s) shall include:	Agreed in part, see revised text
5	4.4.1		The definition of "roles" should be included.		Disagreed
12	4.4.1	Paragraph 1 and 2	Change to link with ISO 14001 and ISO 9001	Title: Resources, roles, responsibility and authority Management shall ensure the availability of resources essential to establish, implement, maintain and improve the environmental management system. Resources include human resources and specialized skills, organizational infrastructure, technology and financial resources. Roles, responsibilities and authorities shall be defined, documented and communicated in order to facilitate effective OH&S management.	Agreed in part, see revised text
15	4.4.1	2nd Paragraph	delete top management because make consistency have with ISO 14001	Ultimate responsibility for occupational health and safety rests with top management. The organization shall appoint with a specific management representative(s) with particular responsibility for	Disagree. Consider it is essential to keep reference to Board / executive committee

				ensuring that the OH&S management system is properly implemented and performing to requirement in all location and spheres of operation within the organization.	member.
		5th Paragraph	What demonstrate the commitment the continual improvement of OH & S performance should be made clear.		This is not possible in 18001, but may be addressed in 18002
17	4.4.1	2nd Paragraph	delete top management because make consistency have with ISO 14001	Ultimate responsibility for occupational health and safety rests with top management. The organization shall appoint with a specific management representative(s) with particular responsibility for ensuring that the OH & S management system is properly implemented and performing to requirement in all location and spheres of operation within the organization.	Disagree. Consider it is essential to keep reference to Board / executive committee member.
17	4.4.1	5th Paragraph	What demonstrate the commitment the continual improvement of OH & S performance should be made clear.		This is not possible in 18001, but may be addressed in 18002
9	4.4.2			To add: " records of training and competence shall be kept" , and " including competence according to legal requirement"	Agreed in part
8	4.4.2		4.4.2 does not ask for training needs to be identified (you have to go to 4.3.1 to get the idea that a training needs analysis is required). That makes it hard for the novice to find the requirement so why not add it to 4.4.2.		Agreed
4	4.4.2		The competency issue should be emphasised within the draft.	Drafters to emphasise	Agreed
5	4.4.2		Update according to ISO 9001:2000		Agreed in part
12	4.4.2	Paragraph 2	Change to link with ISO 14001 and ISO 9001	Title: competence, training and awareness The organization shall identify training needs associated with its OH&S risk and its OH&S management system. It shall provide training or take	Agreed

			other action to meet these needs and shall retain associated records. Training needs shall take into account differing levels of:		
			- responsibility, ability and literacy; and		
			- risk		
15	4.4.2		conform to ISO 14001	The organization shall retain associated records. Agreed	
17	4.4.2		conform to ISO 14001	The organization shall retain associated records. Agreed	
19	4.4.2		We suggest, guided by the long-term experience of Russia, to include the condition about the need to provide separate room for team teaching of personnel in occupational health and safety (such room in Russia is named “ Health and Safety studying room”), using appropriate means: visual aids, training aids, study aids, trainer-simulator for teaching in outpatient- care and cardiopulmonary resuscitation at workplace.  (In the present time in Russia our company worked out final reduction of National standard for “Health and Safety studying room”). We suggest the following addition for this clause:	- responsibility, ability and literacy; and  - risk.  To ensure knowledge and competency of personnel about occupational health and safety conditions on workplaces, ways of safety working, risks and ways of reducing them, and also for performance of instructions with personnel and visitors, organization establish separate room for team teaching of personnel in occupational health and safety. Training of personnel is made in this separate Health and Safety studying room by the representative of senior management of organization, responsible for OH&S, or by outside specialists on safety in area of appropriate organization activities.	To be taken forward for consideration during the revision of 18002
4	4.4.3		The emphasis should on the consultation and worker involvement should remain within the text.	Agreed	
15	4.4.3	2nd Paragraph	It extends too much that the contents of consultation arrangements are informed to the interested parties.	Agreed	

17	4.4.3	2nd Paragraph	It extends too much that the contents of consultation arrangements are informed to the interested parties.		Agreed
12	4.4.4			The OH&S management system documentation shall include:	Agreed
14	4.4.4		Align with ISO 14001:2004. Doubt arises as to the need to establish and maintain an OH&S manual (or similar document). This is not the intention of 4.4.4 and this should be clearly stated.	Same as ISO 14001:2004.	Agreed
12	4.4.4a)			The OH&S policy, objectives and targets	Agreed in part, "targets" not accepted
12	4.4.4b)			Description of the scope of the OH&S management system	Agreed
12	4.4.4c)		New sub clause	Description of the main elements of OH&S management system and their interaction, and reference to related documents,	Agreed
12	4.4.4d)		New sub clause	Documents, including records, required by this specification, and	Agreed
12	4.4.4e)		New sub clause	Documents, including records, determined by the organization to be necessary to ensure the effective planning, operation and control of process that relate to its significant OH&S risk.	Agreed in part, see revised text. Do not reference "significant" OH&S risks
1	4.4.5	Paragraph	<ol style="list-style-type: none"> <li>1) The term "data" is deleted to follow the same criteria as in ISO 9001 and ISO 14001</li> <li>2) The term "documented" is added for a better control of the documents</li> </ol>	<ol style="list-style-type: none"> <li>1) Delete the term "data"</li> <li>2) Include the term "documented" before the term "procedures"</li> </ol>	<ol style="list-style-type: none"> <li>1) Agreed</li> <li>2) Not accepted, for consistency with 14001</li> </ol>
12	4.4.5			The organization shall established, implement and maintain...	Agreed
10	4.4.5	Title	To be consistent with ISO 9001 and ISO 14001- change the title to Control of documents	To change the title from "Document Control" to "Control of Documents".	Agreed
10	4.4.5	2nd para	To be consistent with ISO 9001 which require a documented procedure to be established.	To change the sentence from "The organisation shall establish, implement and maintain a procedure(s) to" to "A documented procedure shall be established to define the controls needed to"	Not accepted, for consistency with 14001
14	4.4.5		Align with ISO 14001:2004.	Same as ISO 14001:2004.	Agreed in part, see revised text

9	4.4.5f)		Ensure that documents of external origin needed for the OH&S system are identified and controlled	Agreed in part, see revised text
1	4.4.6	The existing content is deleted to improve the concept of operational control	<p>The organization shall establish and maintain updated documented procedures to verify the fulfilment of the activities established in matter of OHS. Special attention shall be paid to the following elements:</p> <p>a) The working documents that define the way of developing the activity by the workers of the organization or by other who act on their behalf.</p> <p>Said procedures shall be issued to cover situations where their absence could give rise to deviations regarding the OHS policy and objectives</p> <p>b) The systematic inspection of the working conditions.</p> <p>c) The evaluation of the workers behaviour to identify insecure working practices that can require correction.</p> <p>d) The control of all the personnel that has access to the working place (suppliers and visitors).</p> <p>e) The health evaluation.</p>	Disagreed
4	4.4.6	Retain the current text		Agreed
5	4.4.6	This should be complemented with the determination of controls required at the source, in the environment and in individuals.		See 4.3.2
19	4.4.6. e).	Add new clause e) in the following redaction:	<p>e) development and maintenance of procedures for provision personnel (and visitors) of organization with personal protection equipment and collective protective equipment, determine their adequacy for ensuring minimal impact of hazards and harmful elements and establishing continual control of their abilities to carry out</p>	Disagreed

			prescribed protective and information functions.	
12	4.4.6a)		Establishing, implementing and maintaining.....	Agreed
5	4.4.6c)	Clarify		Agreed
5	4.4.6d)	Clarify		Agreed
19	4.4.6d)	Add requirements for collective protective equipment, including signal colours, safety signs, sign marking (correspondent to ISO 3864, ISO 7010), photoluminescent safety guidance systems to provide safety and saving personnel and visitors in case of emergency situation including the cases of different hazards and terrorism (correspondent to ISO 16069, ISO 15370), system against unapproved turning on/off (lockout/tagout). Precise regulations of methods and management of work in organization and give them in the following redaction:	d) establishing and maintaining procedures for the design of workplace, process, installations, machinery, allocation of safety signs and signal marking on equipment and workplaces, ways of safe working and organization of safe working , including their adaptation to human capabilities, in order to eliminate or reduce OH&S risks at their source.	Agreed in part
16	4.4.6e) - Addition	According to our organization accident survey in gas and petrochemical industries, higher than 80% of accidents are caused by improper control and lack of awareness after modification of personnel/process/facility/equipment etc.  Majority of industries including OSHA also require MOC within the organization.  Korea High-pressure gas regulation also requires to have MOC.	c) Management of Change(MOC)  The organization shall establish and maintain procedure for controlling for the following: - Evaluation of how the modifications, including temporary change of OH&S management system implementation, impact current operation, process, and activities.  - Evaluation of necessity of OH&S management system adoption and/or revision.  - Where any modifications required, its risk assessment shall be performed and its results	Agreed in part, included in 4.3.1

shall be reflected to the modification.

9	4.4.7		Incidents and emergency situation has to address to cases of high residual risk	Done in part
8	4.4.7	As already mentioned the use of the word "incident" in 4.4.7 is incorrect and should be replaced with "accident" (in two locations in the text) since there would be no emergency response involved with an "incident" (near miss).		diagree
3	4.4.7	The periodical test of emergency procedures where practicable is not required the company to review the test result / recommendations via 4.31 procss.	These procedures shall require that all proposed corrective and preventive actions shall be reviewed through the risk assessment process.	Cross reference to 4.5.3 now added
12	4.4.7		The organization shall establish, implement and maintain...	Agreed
19	4.4.7	Add requirement to supplement staff and visitors in organization by photoluminescent safety guidance systems for information and evacuation in conditions of emergence, including conditions of threat and terrorism, as in ISO 16069 and ISO 15370, and give it in the following redaction:	The organization shall establish and maintain plans and procedures to identify the potential for, and responses to, incidents and emergency situations, for ensuring effective evacuation of personnel and visitors, including photoluminescent safety guidance systems, and for preventing and mitigating the likely illness and injury that may be associated with them.	To detailed for 18001.
9	4.5.1		The evaluation of compliance can be in a new paragraph as in the revised 14001 or a sub paragraph in 4.5.1 .	Agreed
4	4.5.1	The text should be amended to reflect the changes in ISO 14001 and significantly, take on the methodology used within BS 8800: 2004 which is different from the current version of OHSAS 18001, this specifically should include replacing the terms proactive and reactive monitoring with the terms leading and lagging indicators	The drafting group should address the issue and explain the reasoning for the usage of the terms as detailed in BS 8800	Agreed
5	4.5.1	Monitoring to workers´ health should be explicitly included.		Left for further consideration
12	4.5.1		The organization shall establish, implement and maintain...	Agreed

14	4.5.1	Last paragraph	Methods for the monitoring of quantitative OH&S parameters are of utmost importance to obtain valid and reliable measurements, not only calibrated equipment. No requirements to this respect are addressed in the standard.	"If monitoring equipment is required for performance measurement and monitoring, the organization shall establish and maintain procedures for the calibration and maintenance for such equipment. Methods used for measurement and monitoring shall be established. Records of calibration...."	Already required in 1 <sup>st</sup> paragraph of 4.5.1
15	4.5.1	3rd bullet	When the new clause of evaluation of compliance is added, "proactive measures of performance that monitor compliance with the OH&S management programme, operational criteria and applicable legislation and regulatory requirements" should be changed to "proactive measures of performance that monitor compliance with the OH&S management programme and operational criteria"		Now replaced by text on leading and lagging performance indicators
15	4.5.1		conform to ISO 14001 4.5.2 Evaluation of compliance	Consistent with its commitment to compliance, the organization shall establish, implement and maintain a procedure(s) for periodically evaluating compliance with applicable legal requirements.	Agreed
17	4.5.1		conform to ISO 14001 4.5.2 Evaluation of compliance	Consistent with its commitment to compliance, the organization shall establish, implement and maintain a procedure(s) for periodically evaluating compliance with applicable legal requirements.	Agreed
9	4.5.2			To add: " the risk assessment shall be revised according to the accident investigation findings' .	Agreed in part
8	4.5.2		In 4.5.2 they refer to "the risk assessment process" as if there is only one allowed and as if it must be the same process as used in 4.3.1. It should say "an appropriate risk assessment process" because small issues must use less complex processes than large complex issues. (they in fact recognize this in the next paragraph when they say the corrective action must be appropriate to the magnitude of the problem ? therefore the risk assessment must also be appropriate to the magnitude).		Agreed
4	4.5.2		Insert a new clause on the 'Evaluation of legal compliance', equivalent to that in ISO 14001: 2004		Agreed
12	4.5.2		New clause to link with ISO 14001	Evaluation of compliance	Agreed
10	4.5.2	1st para	To require a documented procedure to be established.	To change from "The organisation shall establish and maintain procedures...." To "The	proposed revision does not refer to

				organisation shall establish a documented procedure....”	“documented procedure”, but is consistent with 14001
14	4.5.2	2 <sup>nd</sup> paragraph	Align with ISO 14001. The requirement that proposed corrective and preventive actions are reviewed through the risk assessment process prior to implementation is confusing. Doubts occurred after the initial risk assessment regarding the changes to actual controls and whether these shall be reviewed through the risk assessment process. This creates a double risk assessment (with current controls and new controls).	Change to 4.5.3 2 <sup>nd</sup> paragraph: “ Corrective or preventive actions resulting from the investigations of accidents, incidents or non conformances shall be reviewed through the risk assessment process prior to implementation.”	Agreed in part
15	4.5.2		The requirements for re view through the risk assessment process are to be limited to accidents or serious incidents to the utmost. Their application for general nonconformity is not necessary.		Disagreed
19	4.5.2		Add the requirement for assessment of providing personal and collective protective equipment, the absence of which (equipment) potentially increased the consequence of incident. Formulate it in new clause e). in the following redaction:	e) determination of adequacy of personal and collective protective equipment, absence or lack of which might cause complication of consequences, incidents, accidents or inadequacy;	Disagreed
14	4.5.2 (new)		Add another sub clause (4.5.2) “Evaluation of compliance” aligned with ISO 14001:2004.	New 4.5.2: same as ISO 14001:2004	Agreed
1	4.5.2 New clause	Paragraph	A new clause related to legal fulfilments is added in between paragraphs 4.5.1 and 4.5.2 as new 4.5.2	4.5.2 Evaluation of the legal fulfilments  In accordance with its commitment of fulfilment, the organization shall establish, implement and maintain one or various procedures to periodically evaluate the fulfilment of the applicable legal requirements and other requirements that it subscribes.	Agreed
12	4.5.2.1			The organization shall maintain the records of the periodic evaluations.  Consistent with its commitment to compliance, the organization shall establish, implement and maintain a procedure(s) for periodically evaluating compliance	Agreed

				with applicable legal requirements. The organization shall keep records of the results of the periodic evaluations.	
12	4.5.2.2			The organization shall evaluate compliance with other requirements to which it subscribes. The organization may wish to combine this evaluation with the evaluation of legal compliance referred to in 4.5.2.1 or to establish a separate procedure(s). The organization shall keep records of the results of the periodic evaluations.	Agreed
1	4.5.3	Paragraph	The term “documented” is added, necessary for a better control of the records.	Include the term “documented” before the term “procedures”	proposed revision does not refer to "documented procedure", but is consistent with 14001
4	4.5.3		Amend text for accuracy and consistency with ISO 14001: 2004	‘nonconformance’ should be replaced with ‘non conformities’	Agreed
12	4.5.3		Substitute clause from 4.5.2 No substantial change, only addition in statement establish, implement and maintain...	Title: Accidents, incidents, non-conformances and corrective and preventive action The organization shall establish, implement and maintain....	Agreed
10	4.5.3	Title	To be consistent with ISO 9001 and ISO 14001 – change the title to Control of records.	To change the title from “Records and Records Management” to “Control of Records”.	Agreed
10	4.5.3	Whole clause	To be consistent with ISO 9001 – to follow the requirements of Clause 2.4 of ISO 9001 standard.	To change the whole clause to “Records shall be established and maintained to provide evidence of conformity to requirements and of the effective operation of the OHS management system. Records shall remain legible, readily identifiable and retrievable. A documented procedure shall be established to define the controls needed for the identification, storage, protection, retrieval, retention time and disposition of records”.	Have remained consistent with 14001
14	4.5.3		Align with ISO 14001:2004. Change to 4.5.4	Same as ISO 14001:2004.	Agreed
4	4.5.4		Should ensure compatibility with ISO 19011.		In part
5	4.5.4		The expression “wherever possible” should be deleted. Personnel conducting the audits shall be independent.		No longer relevant
12	4.5.4		Substitute clause from 4.5.3	Title: Records and records management The organization shall establish, implement and maintain...	Consistent with 14001

14	4.5.4		Align with ISO 14001:2004. Change to 4.5.5	Same as ISO 14001:2004.	Agreed
15	4.5.4		The overall procedures in 4.5.4 are to be in conformance with ISO 14001:2004 so that an earlier implementation of combined audits can be possible for IMS.		Agreed
12	4.5.5		Substitute clause from 4.5.4, title change with Internal audit	Title: Internal Audit The organization shall establish, implement and maintain....	Agreed
12	4.5.5a)		No change similar with old version 4.5.4a		Agreed in part, see revised text
9	4.6			Records of the management reviews shall be retained. Should be considered detailing the inputs to management reviews.	Agreed
4	4.6		The revision should take into account the BS 8800: 2004 text and ISO 14001: 2004 text when referring to management review.		Agreed
5	4.6		Management review input and output should be specified, as it is in ISO 9001:2000		Aligned to 14001
12	4.6	Paragraph 2	Delete paragraph 2 in OHSAS 18001:1999 and addition with agenda of management review in paragraph 2 to similar with ISO 9001, ISO 14001 and SMK3	Input to management reviews shall include A) result of internal audit and evaluations of compliance with legal requirements and with other requirements to which the organization subscribes. B) OH&S performance of the organization. C) The extent to which objectives and targets have been met. D) Status of corrective and preventive action. E) Follow up actions from previous management review F) Changing circumstances, including developments in legal and other requirements related to its OH&S risk, and G) Recommendations for improvement.  The outputs from management reviews shall include any decisions and actions related to possible changes to OH&S policy, objectives, targets and other elements of the OH&S management system, consistent with the commitment to continual improvement.	Agreed in part, see revised text
13	4.6		4.6 Management review		To be

			The management review should also include the technical aspects of no. 3.4 concerning safety management programmes /cont. improvement process / status review. Normally the first management review must be carried out before the certification audit and will be continued every year; as for OHSAS 18001 this is applied to Initial and Status review. These subjects ought to be closely aligned to the status review of BS 8800 3.2 and 3.9.2 – initial and periodic status review.		considered for 18002
14	4.6		Align with ISO 14001:2004.	Same as ISO 14001:2004.	Agreed
15	4.6		Same as our comment for 4.5.4 audit.		Agreed
3	Annex A		To match with the ISO 9001 and ISO 14001 standards	Review the clause table	Agreed
12	Annex A		Annex A (informative) Correspondence between OHSAS 18001, ISO 14001:2004 and ISO 9001:2000	Correspondence could be more easy, because clause OHSAS 18001 similar with ISO 14001:2004.	Agreed
15	B.3.4		“The ILO-OSH Guidelines recommend in 3.3.1 (h)” should be changed to the ILO-OSH Guidelines recommend in 3.3.2 (h)		Agreed
3	Table A.1		To match with the ISO 9001 and ISO 14001 standards	Review the clause table	Agreed
12	Table A.1			Correspondence could be more easy, because clause OHSAS 18001 similar with ISO 14001:2004.	Agreed
14	Table A.1		Change to correspondence between ISO 14001:2004 and ISO 9001:2000	Change table to new clauses	Agreed
15	Table A.1		When the new clause of evaluation of compliance is added or the clause 4.3.4 is unified into the clause 4.3.3, this table should be changed.		Agreed
18	Table A.1		To delete (table A1 is without utility)	To delete	Disagree
15	Table A.2		When the new clause of evaluation of compliance is added or the clause 4.3.4 is unified into the clause 4.3.3, this table should be changed.		Agreed
18	Table A.2	Table A2 of amendment	The correspondence must be made with the new version of the standard ISO 14001-2004 and delete correspondence with ISO 14001-1996	To insert the new modifications of the paragraphs titles of the standard ISO 14001-2004 and to delete those of the standard ISO 14001-1996	Agreed
15	Table B.1		When the new clause of evaluation of compliance is added or the clause 4.3.4 is unified into the clause 4.3.3, this table should be changed.		Agreed

- (1) ISO 9001:2000 Quality Management System, requirements Agreed
- (2) ISO 14001:2004, Environmental management system-Specification with guidance for use
- (3) ISO 19011:2002 Guidelines for quality and/or environmental management systems auditing