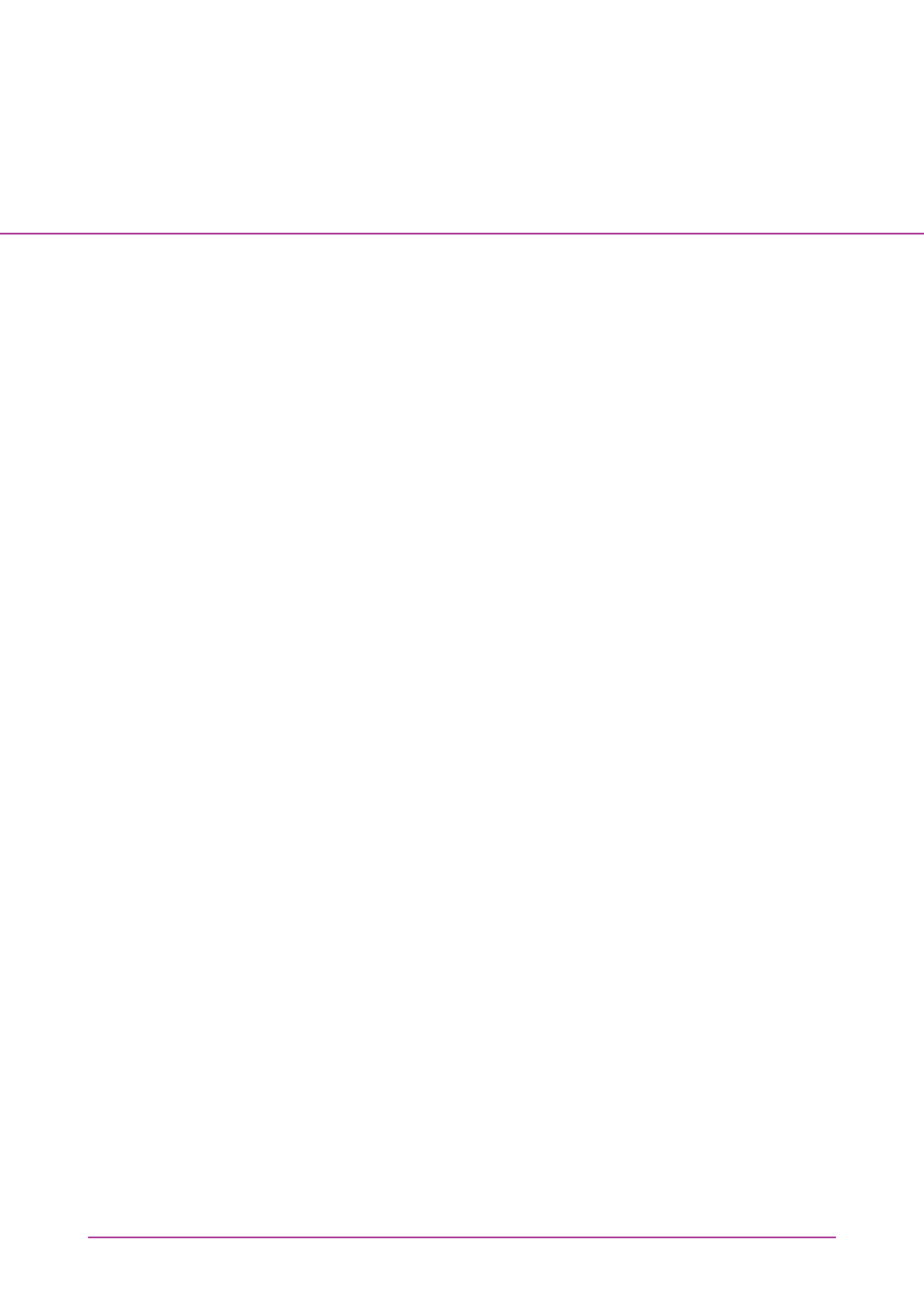# Future Challenges for Environmental Auditing

Prepared for IEMA by Leehane Environmental Consulting Ltd

Special Report | June 2018

Executive Summary

This report presents the findings of the IEMA study of the Future Challenges for Environmental Auditing, undertaken in recognition of the increasingly complex environmental and sustainability arena facing auditors, including many of IEMA's members. The findings of the study will inform IEMA's future strategy in relation to its provision for auditors.

The study included a round table of stakeholders to identify key themes for the study, an on-line survey of IEMA members, a series of four workshops to provide more detailed input from members and consultations with auditing on the initial results. This report includes the findings of the survey, the workshops and the subsequent consultations, discussion of key themes, conclusions and recommendations for IEMA.

The survey results confirmed that auditors and others involved in auditing recognise that there are new developments in the field of environmental auditing that pose challenges for auditors, including integrated audits, and audits of social and ethical issues and the supply chain. There are also increasing expectations for audits to address environmental performance and behaviours, and to be recognised as adding value.

A majority of respondents indicated reservations about the adequacy of guidance for auditors on emerging issues and on auditor competence, the provision of training for auditors and the adequacy of resources for auditing. These, together with other weaknesses in competence and auditing practices, can contribute to audits being perceived as failing to deliver value.

Key findings are that audits need to be better planned, with clear scope and objectives, and with resources to match expectations. Auditor competence needs to be improved to address the new challenges, but also to ensure that auditors have the necessary soft skills and communications skills. Senior management should appreciate the value of audits and actively support the audit process.

This study has confirmed that there is a demand from members of the profession for support to help overcome them. From the detailed discussions at the workshops, it is apparent that many members consider IEMA has a leading role to play, including in relation to:

- developing useful audit tools

- refreshing its approach for auditor continuing professional development (by providing more training, guidance on its website, using Myspace to share learnings and collaborating with other professional bodies to harmonise CPD processes)

- Finding ways to encourage its members to participate more actively in networking events

- Communicating more widely on the benefits of environmental auditing and the value of registered auditor levels.

IEMA should establish a working group to develop a plan for addressing these practitioner needs, to confirm what the Institute can realistically accomplish and ways in which its members can contribute to this process.

The findings of this report should be shared with other professional bodies (for example those representing the quality and health & safety professions) that may be interested in collaborating with IEMA to developing guidance and tools that their members can apply. Also, the report should be shared with the International Organization for Standardization's environmental auditing sub-committee to assist it in its own review of the challenges facing environmental auditing.

Contents

1 Introduction

1.1 Study objectives

This report presents the findings of the IEMA study of the Future Challenges for Environmental Auditing, undertaken in recognition of the increasingly complex environmental and sustainability arena facing auditors, including many of IEMA's members. The findings of the study will inform IEMA's future strategy in relation to its provision for auditors. It will also be offered to the International Organization for Standardisation's environmental auditing sub-committee ISO TC207/SC2, which also is reviewing its strategy

1.2 Approach

The study included:

- A round table discussion (in September 2017) of stakeholders (companies undertaking internal audits, certification bodies, others) to identify key themes

- An on-line survey of IEMA members

- A series of four workshops to provide more detailed input from members

- Invitations to auditing experts (including a number from quality and health & safety backgrounds) for responses on the initial results

- This report, including recommendations for IEMA's future strategy for supporting its members

1.3 Initial themes

The following emerging themes in the field of environmental auditing were identified as potential challenges for auditors:

- Increasing trend towards integrated systems and auditing

- Increasing array of environmental standards with some requirement for auditing

- Increasing expectations of auditors in relation to social issues

- Growth in the requirements of stock exchanges for the submission of sustainability data

- Lack of accessible guidance for internal auditors, especially in SMEs

- Increasing emphasis on lifecycle and the supply chain, including in relation to issues such as conflict minerals, anti-bribery legislation, etc.

- Competence of auditors (including those involved in certification)

1.4 Content of this report

This report includes the following:

- Presentation of the findings of the survey, the workshops and the subsequent consultations

- Discussion of key themes

- Conclusions

- Recommendations for IEMA

In addition, there are appendices with detailed reviews of the data from the survey and the issues raised at the initial round table, the subsequent workshops and the consultations with experts.

1.5 Preparation of this report

This report was prepared by Nigel Leehane[†], FIEMA, on behalf of IEMA. In addition to being an IEMA Principal Environmental Auditor, Nigel chairs the BSI and ISO sub-committees for environmental auditing.

Nigel would like to thank the IEMA members and others who participated in this study. Their contributions to the survey, participation in the workshops and the submission of additional comments were extremely valuable.

2 Presentation of findings

2.1 Overview

The study has confirmed that auditors and others involved in auditing recognise that there are new developments in the field of environmental auditing that pose challenges for auditors. The respondents also indicated that they have more fundamental concerns regarding the state of environmental auditing. Although these issues may share some root causes, they are addressed in the following separate sections.

The survey was in two parts; firstly, a set of questions to test respondents' views as to the emergence of new themes or expectations for environmental auditing. The respondents were asked if the following were becoming more or less important/common, or if there was no change;

- Integrated management systems auditing

- Dealing with an increasing number of environmental standards with some requirement for auditing

- Undertaking audits of social and ethical issues

- Undertaking assurance of sustainability data for submission to stock exchanges or regulators

- Undertaking environmental audits of lifecycle and the supply chain

- Undertaking audits of lifecycle and the supply chain, including issues such as conflict minerals, anti-bribery legislation, modern slavery, etc.

- Using digital or remote tools for environmental auditing

- Expectation that environmental audits provide evidence of environmental performance

- Auditing environmental or sustainability strategy or plans

- Audits examining behaviours, not just documentation

- Auditing senior management

- Undertaking audits internationally

- Environmental issues audited as part of business/ operational performance audits

Secondly, the participants were asked to state how strongly they agreed or disagreed with 11 statements related to auditing practice and its value:

- Audit findings generally are presented in a manner which encourages improvement

- Audits should focus more on leading rather than lagging indicators of performance

- Audit findings are acted on by management

- Management recognise that audits add value to organisations

- More guidance is needed for auditors on emerging topics such as integrated audits, lifecycle and social issues

- There is adequate accessible guidance for internal auditors, especially in SMEs

- External environmental auditors have the necessary competence to produce useful audit findings

- External integrated auditors have the necessary competence to produce useful audit findings on the environment

- Internal auditors are asked to undertake audits without adequate training

- There is adequate and effective guidance on techniques for assessing auditor competence

- Organisations make available sufficient resources for internal environmental auditing

In addition, respondents had the opportunity to submit their own comments, and over two hundred did so.

The following sections explore the survey responses, plus the outputs from the four workshops and the subsequent comments submitted by selected experts. The outputs from these fora extend beyond the scope of the original survey questions and provide a more holistic view of the opinions of the IEMA, and wider, auditing community.

2.2 Emerging themes

Firstly, it is important to emphasise that for almost every topic, significant challenges for auditing were identified, irrespective of the degree of consensus that the topic was emerging or existing. However, the findings of the survey demonstrate that there are topics that are clearly acknowledged as increasingly important or common, and are bringing challenges for auditors. The six topics with the highest rating for becoming more important or common were:

- Integrated management systems auditing*

- Undertaking environmental audits of life cycle and in the supply chain

- Dealing with an increasing number of standards*

- Audits examining behaviours, not just documentation*

- Expectation that environmental audits provide evidence of environmental performance

- Auditing senior management*

Four of these (indicated by an asterisk) also featured in the top six topics chosen for discussion by participants in the workshops. A summary of the survey responses is provided in the figure below.

2 Presentation of findings

Change in importance, how common (%)

Legend:
- More Important/Common
- No Change
- Less Important/Common
- Not Relevant

Categories (top to bottom):
- Integrated management systems auditing
- Dealing with an increasing number of environmental standards with some requirement for auditing
- Undertaking audits of social and ethical issues
- Undertaking assurance of sustainability data for submission to stock exchanges or regulators
- Undertaking environmental audits of lifecycle and the supply chain
- Undertaking audits of lifecycle and the supply chain, including issues such as conflict minerals, anti-bribery..
- Using digital or remote tools for environmental auditing
- Expectation that environmental audits provide evidence of environmental performance
- Auditing environmental or sustainability strategy or plans
- Audits examining behaviours, not just documentation
- Auditing senior management
- Undertaking audits internationally
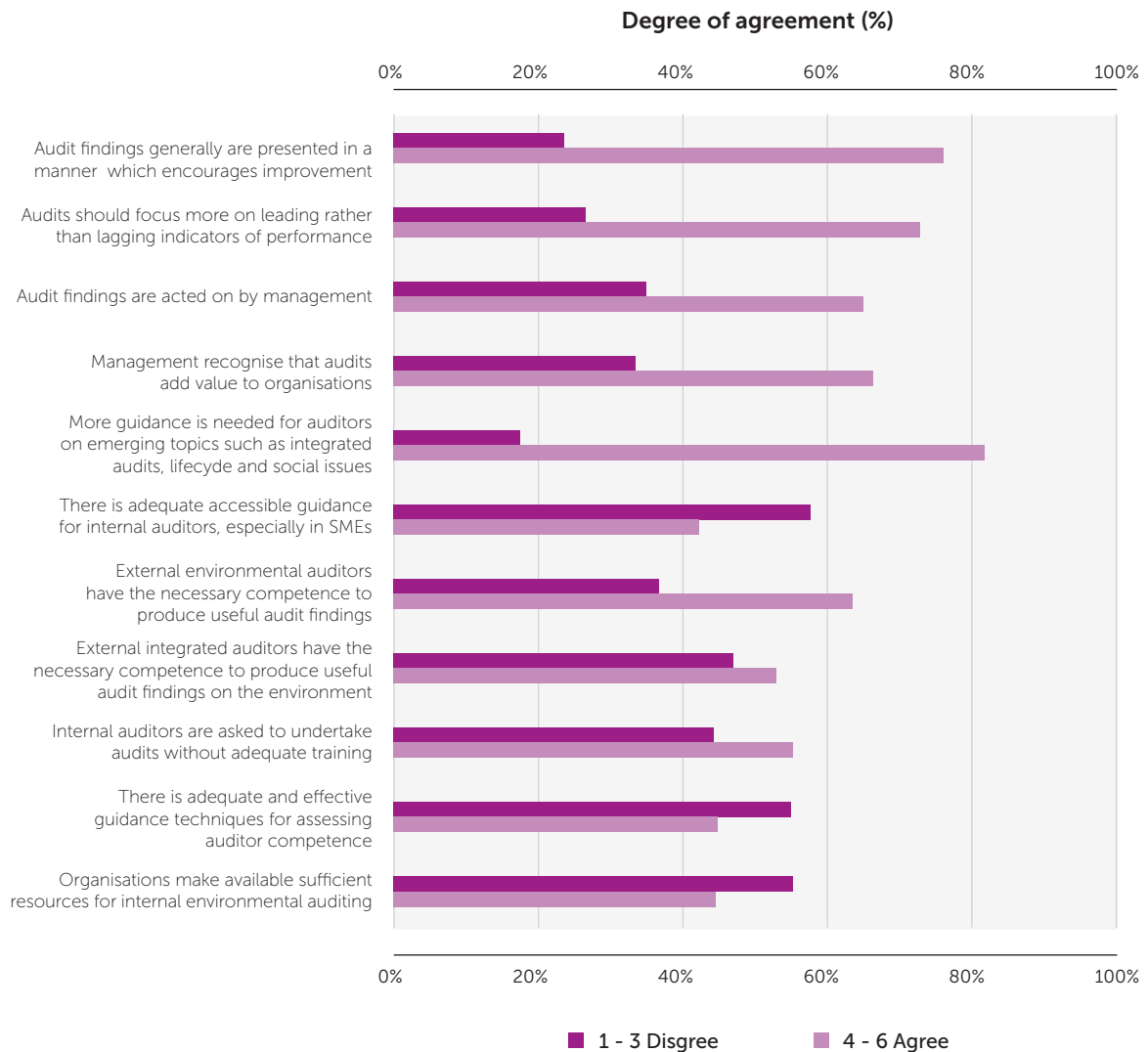- Environmental issues are audited as part of business/ operational performance audits

Challenges and potential solutions for emerging audit topics and situations are explored in section 2.4.

2.3 Opinions on auditing practice and its value

Responses to the survey questions requiring an indication of level of agreement with statements related to auditing practices, resources and perceived value of audits demonstrated varying degrees of consensus. The following figure summarises the responses on the basis that a score of 1-3 indicates disagreement and 4-6 indicates agreement (more detailed analysis is provided in Appendix D).

Degree of agreement (%)

- Audit findings generally are presented in a manner which encourages improvement
- Audits should focus more on leading rather than lagging indicators of performance
- Audit findings are acted on by management
- Management recognise that audits add value to organisations
- More guidance is needed for auditors on emerging topics such as integrated audits, lifecyde and social issues
- There is adequate accessible guidance for internal auditors, especially in SMEs
- External environmental auditors have the necessary competence to produce useful audit findings
- External integrated auditors have the necessary competence to produce useful audit findings on the environment
- Internal auditors are asked to undertake audits without adequate training
- There is adequate and effective guidance techniques for assessing auditor competence
- Organisations make available sufficient resources for internal environmental auditing

■ 1 - 3 Disgree   ■ 4 - 6 Agree

There was a reasonably high proportion agreeing that more guidance is needed on emerging topics, such as integrated audits, lifecycle and social issues. A majority of respondents disagreed with statements that there is adequate guidance for internal auditors (especially in SMEs) and for techniques for assessing auditor competence.

The survey questionnaire asked respondents to state their role in auditing (from a list of options including various roles in undertaking audits and also including managing audit programmes and relying on results of audits). Analysis of the responses by auditor role demonstrated some differences in opinions between those carrying out audits and those managing audit programmes or relying on audit results, with auditors tending to be more positive in relation to the following statements:

- Audit findings generally are presented in a manner which encourages improvement

- Audits should focus more on leading rather than lagging indicators of performance

- Management recognise that audits add value to organisations

- More guidance is needed for auditors on emerging topics such as integrated audits, lifecycle and social issues

- External environmental auditors have the necessary competence to produce useful audit findings

Those planning or managing audit programmes had the lowest level of agreement with the statements that there is adequate and effective guidance on techniques for assessing auditor competence and that sufficient resources are made available for internal environmental auditing.

The responses were also analysed to determine if there were any significant differences between the views of those who undertake accredited certification audits and those who do not. Those carrying out accredited certification audits agreed slightly more positively with the following:

- Audit findings generally are presented in a manner which encourages improvement

- Audit findings are acted on by management

- Management recognise that audits add value to organisations

- More guidance is needed for auditors on emerging topics such as integrated audits, lifecycle and social issues.

2.4 Recognised challenges for environmental auditing

The following sections of this report address specific themes from the survey, the workshops or the feedback from experts. In general, the experts confirmed that they recognised the issues highlighted in the survey and workshops as being important to the future of environmental auditing. Some of these sections are directly related to individual questions from the survey, but others address broader themes raised in the various fora.

2.4.1 Integrated auditing

Integrated auditing was the issue recognised by the highest number of survey respondents as becoming more important or common, and was the topic most widely explored in the workshops.

Challenges

- Integrated auditing poses new challenges for many auditors, with both internal and external auditors lacking the necessary discipline competences and understanding of integrated management systems as well the context of an organisation, and its strategic direction

- There is a tendency for large organisations to have health, safety and environment teams, with a greater degree of expertise in health and safety, and potentially a lack of adequate competence in environmental issues (this may be exacerbated as organisations reduce the size of HSE teams, potentially losing environmental expertise). Consequently, internal integrated audits may only include a small environmental component, with more focus on health and safety or quality (or sector-specific issues such as food safety)

- External certification auditors may also allocate more time to health & safety as a result of having H&S but not environmental qualifications

- Few auditors have genuine multi-discipline expertise

- There is a risk that environmentalists will be left behind if they can't work on H&S

Potential solutions

- Audit planning needs to be improved, with greater clarity regarding the scope and expected outcomes

- The necessary auditor competences need to be better defined (but there is concern regarding the adequacy of guidance in determining auditor competence)

- There is a need for integrated auditor qualifications

- Audit teams should have a balance between specialist auditors and multi-disciplinary auditors

- IEMA to provide more auditor CPD and training, specific to IMS auditing (internal and external auditors) – need to ensure environmental issues receive adequate priority

- IEMA to provide clarity on skills auditors need (including non-environmental professionals) – collaboration between professional bodies and certification bodies

2.4.2 Increasing number of standards with requirements for auditing

This also was acknowledged as a challenge by a substantial number of participants in the study, potentially as a contributing factor to audit fatigue and pressure on audit resources.

Challenges

- The increasing number of standards may result in an increased burden on auditors and certification bodies in relation to knowledge management and training

- Maintaining knowledge of a growing range of standards is a part of the professional development process, and its cost may be outweighed by the potential for differentiation on the basis of professionalism and capability (for external auditors)

- In addition, it is the changes or developments in legislation (i.e. audit criteria) that can be difficult to keep up with. Lack of knowledge of legislation was seen as a widespread problem.

- There will be a need for competent and qualified verifiers for some of the emerging ISO standards such as those for environmental cost-benefit analyses and natural capital.

- Some organisations subscribe to international environmental or sustainability protocols that are not understood by UK auditors

- Senior management do not appreciate the implications for auditor competency

Potential solutions

- More guidance is needed, on both the new standards with requirements for auditing and on new audit criteria (i.e. legislation).

- More training is needed (see Competence section)

- Stop publishing standards

2.4.3 New requirements of ISO 14001:2015

Despite the passage of time since the publication of the 2015 standards, there are concerns that auditors have not increased their competence adequately to address new requirements.

Challenges

- Some auditors are unfamiliar with Annex SL requirements (in ISO 14001:2015 and other management systems standards), for example strategy and business drivers

- Management systems standards based on Annex SL are more subjective than the previous versions, which will require a greater use of professional judgement (a competence issue)

- Standards such as ISO 14001:2015 can be difficult to comprehend for users for whom English is not a first language. Auditors would benefit from simple guidance explaining the requirements.

- Complaints regarding the ability of certification auditors to understand the requirements of ISO 14001:2015 are common in Asia, perhaps reflecting the lack of robustness in the accreditation process.

Potential solutions

- See the section on Competence (2.4.9)

2.4.4 Auditing senior management

This was recognised as a challenge especially for internal auditors, and particularly those in cultures where challenging authority is not common practice.

Challenges

- Many internal auditors lack the confidence to audit senior management. This is even more of a barrier in some cultures where it is not customary to challenge the authority of senior colleagues, and internal auditors may leave this to external certification auditors

- Auditors may not be able to communicate effectively with senior management (lack of knowledge of business strategy, business management, senior management's motivations/drivers, etc.)

Potential solutions

- Improve the confidence of auditors

- IEMA briefing/training – how to audit senior managers, how to communicate with them (management terminology, convey value)

- Senior management to openly support the audit process

2.4.5 Ensuring management values the results of audits and takes action on the findings

Participants in the study recognised the need to ensure that senior management appreciates the value of auditing and actively supports it.[1]

Challenges

- Audits need to focus on performance, not just conformance to standards (there were many comments on this, including external auditors still focusing on documentation, not practice), and on leading indicators, root causes, good practice and opportunities, not just risk.

- The results must be communicated more effectively, for example by focusing on potential consequences and benefits, and also on common themes, especially in integrated audits, rather than presenting a long list of non-conformances. This would help to combat the negative perception of audits.

- Management are concerned by audit costs in relation to the audit outcome/benefits

- The ability of external auditors to add value is often questioned

- How can auditors escalate findings to ensure action is taken?

- Would the results of unannounced audits be accepted more readily by management?

Potential solutions

- Senior management need to support auditors by emphasising the importance of audits in identifying opportunities for performance improvement. They should be involved in audits to ensure they reflect business needs

- Auditing findings should include achievements/ positive findings/good practice

- Auditors should become more productive and be able to identify efficiency and effectiveness issues while auditing and thus be seen by the senior management as adding value to the organisation.

- Need to prepare management to receive bad news from audits (this can be a positive outcome)

- IEMA to help with mentoring and integrity of external auditors

- Need guidance on organisational performance and auditing

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1. In IEMA's recent code of practice survey one of the most common examples provided of unprofessional practice was with auditing and senior management putting pressure on auditors not to report things or to reduce the significance of observations, another indicator of senior management not always appreciating the value of auditing and wanting it to be a tick box exercise.

2.4.6 Behaviours and culture

This is recognised as an emerging area for environmental auditors, with parallels being drawn with the well-established emphasis on behavioural safety.

Challenges

- Environmental auditors don't focus enough on behaviours and organisational culture (for example like behavioural H&S)

- Internal auditors may be over-familiar with the auditee, so not able to assess behaviour impartially

- Should audits focus on one-off behaviour or bigger picture – root cause?

- Behaviours are different globally (e.g. recycling)

- Are environmental practitioners more comfortable with technology than people (need soft skills)?

- Would unannounced audits help in identifying genuine behaviours?

Potential solutions

- Guidance on what behavioural non-compliance looks like, asking the right question, finding root cause of behavioural issues, how to report findings regarding behaviours, etc.

- Auditors also need guidance on how to deal with of auditee behaviours during audits – distraction, obstruction, collaboration, etc.

- Provide auditors with sufficient training

- IEMA to develop an audit skills workshop

- Research into the link between behaviours and environmental performance

2.4.7 Life cycle and the supply chain, and social and ethical issues

There are increasing expectations on environmental auditors to undertake supply chain audits, involving environmental life cycle issues and (according to survey respondents), to a lesser extent, social and ethical issues, including conflict minerals, anti-bribery legislation, modern slavery, etc. Also, although just over 50% of respondents stated that undertaking audits of social and ethical issues was becoming more important or common, it was not evident that such a high proportion of auditors attending the workshops (a far smaller sample) had experience of auditing these topics. None-the-less, this is clearly an area posing challenges.

Challenges

- How far should organisations go in the supply chain – so how far should auditors push them?

- What is good practice (ISO 20400 Sustainable procurement – guidance?)

- How should auditors advise auditees regarding balancing risks in the supply chain against costs of assessment and engagement?

- Skills wise, few environmental auditors will be equipped for social compliance matters let alone human rights issues unless they are specialists in this area

- It is difficult for auditors operating internationally to get a good appreciation of environmental and social legislation at UK and EU level in other jurisdictions.

- How to deal with the digital economy

Potential solutions

- Simple guides in audit techniques, for life cycle/supply chain

- Auditing in the field of due diligence ESG - Environmental, Social and Governance - is increasingly in demand from companies; IEMA could develop some guidance for this and for members wishing to explore upskilling themselves - with 'health warnings' around key areas where they may be professionally exposed if they stray too much into specialist areas like human rights

- IEMA could partner with a specialist organisation to provide guidance on environmental and social legislation in international jurisdictions.

2.4.8 Soft skills

The importance of soft skills and communications were themes raised by survey respondents as well as in the workshops and by experts.

Challenges

- Auditors need to be able to communicate with staff at all levels. This is especially important for auditing social issues

- Many auditors lack soft skills - clear communication, putting auditee at ease, listening, silence, open questions

- Important for auditors to know when to move on

- Poor communication generally and poor presentation of findings, both oral and written (often a deficiency in internal auditors)

- Inadequate documentation of evidence

- In general organisations do not consider soft skills when selecting auditors

Potential solutions

- Auditors with intuition and experience

- Better auditor selection, induction, support and guidance

- IEMA to provide training, case studies, Q&A articles, simple guides in audit techniques, including softer auditing skills

2.4.9 Competence

It was recognised that auditors need to be able to demonstrate their competence to the audit client, to give credibility to their results.

Challenges

- Auditors need an increasing range of skills and knowledge to deal with a wider range of topics

- Expectation that auditing skills can be applied to all areas, without specialist knowledge

- In addition to discipline knowledge, many auditors lack sector and technical knowledge and experience (a common deficiency in external certification auditors)

- Many auditors follow outmoded practices or rely on outdated information, including in requirements of legislation

- Many of the new requirements of standards need the application of judgement and ability to understand behaviours

- Some auditors (including external certification auditors) also struggle to interpret new requirements of ISO 14001:2015 (especially context)

- There is little training available other than for EMS auditing (needed for due diligence, compliance, report/data assurance)

- External certification auditors do not sufficiently challenge the competence of internal auditors

- Varying background/training from different organisations (external auditors)

- Cost of auditor training is a burden, especially for SMEs

- How can junior auditors develop in a small team – who can mentor them?

- There has been a degree of reluctance from management systems auditors to undertake training to prepare them to audit against the most recent revisions to ISO 9001 and 14001

Potential solutions

- Greater understanding needed of competences required for different audit scopes and criteria (guidance?)

- There is a need for more guidance (and a route map) for improving auditor competence

- Common competence standards should be adopted by accredited bodies, with periodic competence assessments

- Auditors would benefit from periodic refresher training

- Collaboration between IEMA, IRCA, IOSH, CQI etc. in requirements for auditors/auditing, guidance, CPD reporting requirements, etc.

- A quality system for auditors

2.4.10 Resources

The need to balance audit scope and objectives with available resources is an important factor. In the survey, over 55% of respondents disagreed with the statement that organisations make available sufficient resources for internal auditing.

Challenges

- Senior management not allocating sufficient resource

- Preparation (lack of time)

- Lack of time to fully address audit scope

- Audit scope changed at short notice (staff unavailable, etc)

- Having to audit their own work (if not enough people in the organisation have environmental skills

- Some new areas of auditing, such as life cycle/supply chain, take more time

- There is a view that environmental professionals spend too much time auditing rather than working to improve performance

- Resources needed for multi-lingual auditors to address workforces with multiple primary languages

Potential solutions

- Consider benefits of a risk-based deep audit v a guidance-led simple approach ("proportionate approach")

- ISO 14001:2015 supports a risk-based approach, so should encourage resources to be used effectively

- Ensure that management appreciate the value of effective auditing

2.4.11 Digital and remote technology

The increasing use of electronic systems and data management processes are a challenge for many auditors.

Challenges

- Although new technology offers many advantages (use of tablets in auditing, data management systems, AI, etc.) many auditors do not have the skills to use or audit them

- Electronic management systems can be difficult to access

- Evolving technology, business practice, and organisations being encouraged to use different and more varied sources of evidence means that management systems auditors are increasingly required to be able to identify and interrogate electronic data

- Some data management systems, such as Achilles, Avetta and Joscar are used for environmental information, but are audited by quality auditors who do not understand the environmental implications

Potential solutions

- More resources, and indeed the appetite, are needed to support the requisite professional development of auditors to allow them to adapt to be able to identify and interrogate electronic data

2.4.12 Consistency

Lack of consistency in auditing practices and findings was raised in most of the workshops. In particular, this related to external auditors.

Challenges

- Differing interpretations of standards

- Lack of competence of auditors, including soft skills

- Lack of sector knowledge/experience

- External auditors fear losing clients so may downplay negative findings

Potential solutions

- More guidance

- A process for verifying findings

- Workshops and refresher training

- Need guidance for selecting audit activities, tools (such as checklists/aides memoir), resources, for different audit scopes and objectives (level of confidence, reproducibility)

- many of the solutions identified above for competence issues would have an impact on the consistency of auditing practices and results

2.4.13 Auditing internationally

Although this is a situation encountered by a relatively small proportion of environmental auditors, it poses a range of challenges for those involved.

Challenges

- Cultural differences /language

- Implications of different jurisdictions on environmental management practices (and so avoid a "one-size-fits-all" approach)

- Geography/cost

- Confidence and competence

Potential solutions

- Training, understanding of culture, preparation, technology (e.g. Skype)

- IEMA to provide training, good practice and "rough guides" to countries/cultures

2.4.14 External (certification auditing)

There was substantial concern regarding the perceived value of external certification audits, for a variety of reasons.

Challenges

- Audit reports based on templates, often difficult to find findings

- Reports are copied, so often have errors (i.e. previous details left in)

- Auditors spend too much time writing reports on site

- Lack of sector knowledge

- How to challenge certifiers – no-one knows about role of the BSI mirror committee in interpretation

- Given that there are some questions regarding the perceived value of third party certification, will some organisations look for alternative methods or approaches for providing assurance to their stakeholders?

Potential solutions

- Collaboration between professional bodies such as IEMA and certification companies.

3 Discussion

3.1 Emerging challenges for auditing

The study has confirmed that professionals involved in environmental auditing recognise that they are facing new challenges from a range of emerging expectations. A number of these relate to new areas of auditing, including integrated management systems, life cycle/supply chain, social and ethical issues, etc., together with a growing array of standards requiring audits. The study has also produced evidence to suggest that expectations are also evolving in relation to auditing methods and approaches, and to the value of the output from audits. These three themes impose a range of challenges for auditing.

3.2 New areas of auditing

In reality, these are not all new areas, but they are recognised as growing in importance or becoming more common, and they present some common challenges:

Competence

The study raised concerns regarding the competence of individual auditors in relation to the new areas of auditing, for example auditing integrated systems, and non-environmental disciplines such as health & safety and social/ethical/human rights. It is clear that specialist knowledge and skills are needed in these areas if environmental auditors are to become multi-disciplined. However, in some cases environmental auditors are under pressure to apply themselves in areas where they do not have the requisite competence. In part this may be due to lack of resources to train auditors or to bring in specialists in the relevant discipline.

Also, it was acknowledged that many auditors are not yet sufficiently familiar with the new requirements of ISO's high level structure for management system standards (Annex SL) and would benefit from training.

A lack of knowledge of company-specific issues was highlighted, including in relation to sector knowledge and experience, and specific legislation. There were many criticisms levelled at external certification auditors not having the requisite detailed understanding of relevant issues.

Generic competence issues are discussed below in section 3.4.

Resources

In addition to the cost of training, resource limitations extend to the maintenance of multi-disciplinary teams. Concerns were raised over cost-cutting potentially weakening internal audit teams, potentially with the loss of specific discipline expertise and imbalance in the skill sets available for auditing, resulting in the over-emphasis on those disciplines in which the organisation has competent auditors.

Inadequate provision of auditor time can result in the failure to fulfil audit objectives, and this needs to be recognised by those responsible for managing audit programmes, so that expectations and resources needed are balanced. The risk-based approach to auditing, increasingly adopted by standards requiring auditing, should be used to prioritise audit effort and resources. This was raised in particular in relation to integrated audits and supply chain audits (where electronic data management systems may require additional time to audit effectively).

Provision of mobile electronic equipment may be needed for some audits.

Planning and managing audit programmes

Those responsible for managing audit programmes need to have a better understanding of competence requirements for specific audits and ensure that those competences are available. Where there is an issue with the independence of auditors (for example small audit teams not being able to accommodate independence of auditors) those planning and managing audit programmes need to be mindful of this and schedule audits accordingly or potentially engage stakeholders or external consultants to add independence (taking account of cost and need to demonstrate independence).

They have an important role in ensuring consistency or standardisation of audit practices and results, by monitoring auditor performance. This applies to internal teams that they manage and also to external certification bodies and auditors that they engage.

They should also be realistic in setting audit scopes and objectives, for example how far to extend auditing into the supply chain. They (or senior management) should also provide more support for auditors, by communicating the value and importance of audits.

Guidance and training

There is a need for more guidance and training. In relation to the emerging areas of auditing, the following needs were identified:

- An IMS auditing qualification

- Guidance for environmental auditors on ESG and social/ethical/human rights auditing, including clear guidance on the limitations for non-specialists in these areas.

- Potentially guidance in environmental and social legislation in jurisdictions outside the EU.

In addition, it was recognised that many auditors would benefit from training in fundamental competence areas such as soft skills and auditing techniques and practices. In the workshops, there was a clear preference for this to be available as short (half or one day) workshops rather than protracted training courses. Face-to-face, interactive training was the preferred medium for addressing auditor skills, with webinars providing a mechanism for disseminating technical updates.

Interdisciplinary collaboration

It was recognised that within organisations, there is an increasing need for collaboration between specialists in different disciplines such as environment, health & safety, quality and energy.

Many respondents also highlighted the potential benefits of collaboration between professional bodies including IEMA, CQI, IRCA and IOSH, to harmonise CPD requirements and collaborate on the development of guidance and training.

These new areas of auditing are one of the drivers for changes to audit methods and approaches.

3.3 Evolving audit methods and approaches

The survey asked a number of questions in relation to audit methods and approaches, and others were raised by study participants, including:

Auditing behaviours

Slightly more than 58% of survey respondents consider that auditing behaviours is becoming more important or common. However, it was acknowledged that this is an area in which there is little guidance and environmental auditors receive little training (unlike the emphasis on auditing behaviours in health & safety management). It was suggested that is not just an issue for environmental auditing, but more broadly for environmental management, in that insufficient prominence is given to behaviours and organisational culture (one respondent suggested that environmental practitioners may be more comfortable with technology than people).

The competence of auditors to address behavioural issues was questioned, including their ability to explore underlying root causes rather than noting one-off behaviours. There were requests for more guidance and IEMA-approved training and audit skills workshops, including to address the following:

• What constitutes behavioural non-conformance

• What questions to ask in audit situations

• Finding the root cause of behavioural issues.

Using digital or remote tools for environmental auditing

Almost 46% of survey respondents consider that this is becoming more important or common. Detailed responses suggested that this embraces two areas: the need to audit digital data systems and using digital and remote tools to aid auditors. The latter could include electronic tablets for recording findings, video conferencing for interviews or remote cameras for observations, for example. It was suggested that many environmental auditors are not familiar or comfortable with either of these areas of application of digital technology.

So, there is clearly a need for those responsible for managing audit programmes to recognise that environmental auditors may need training in these new technologies, in order to be able to apply them effectively in different audit situations, including in the interrogation of data management systems.

Given the degree of recognition that digital and remote tools are becoming more important or common, which presumably indicates that they are seen as adding value, then their uptake should be encouraged.

Soft skills and communication skills

These issues are not new, having been recognised for many years as important auditing skills. However, if anything their importance and relevance is increasing, for example with regard to the need for soft skills in some of the new areas of auditing (auditing behaviours, social/ethical/human rights, etc.) and to the greater need to communicate effectively with senior management.

None-the-less, study participants presented numerous examples of auditors lacking these abilities, for example in relation to interviewing techniques and communicating audit findings accurately, whether orally or in written format. This applied to both internal and external auditors.

It was suggested that these skills may be overlooked in auditor selection, indicating that there is a need to emphasise the importance of these skills in auditor competence guidelines.

Audits should focus more on leading

rather than lagging indicators

Lagging indicators are metrics of past performance, for example the number of incidents or reduction achieved in emissions. They are useful measures of past trends, but do not necessarily indicate continuing trends or future performance. Leading indicators are metrics that provide an indication of potential future performance, for example the amount of training undertaken or the number of improvement actions in progress. A good illustration is emergency prevention; a lagging indicator showing a low number of past incidents is not necessarily a reliable indicator of a continuing trend of a low incident frequency in the future. Leading indicators showing regular maintenance and inspection, and high levels of training may provide greater reassurance.

Over 73% of survey respondents agreed that there should be a focus on leading indicators.

3.4 Audit outputs and their value

It was encouraging to see that the majority of survey respondents consider that the expectation that environmental audits provide evidence of environmental performance is becoming more common (almost 58% considered this was more important/common, with under 3% stating it was less so). This echoes the intent of ISO 14001:2015, where the emphasis on improvement has changed from improving the environmental management system to achieving genuine improvement in environmental performance.

It follows that environmental management systems auditing needs to provide evidence to allow organisations to understand if they are achieving improvements in environmental performance, and over 76% of survey respondents agreed that audit findings generally are presented in a manner which encourages improvement. However, slightly lower numbers agreed with the following:
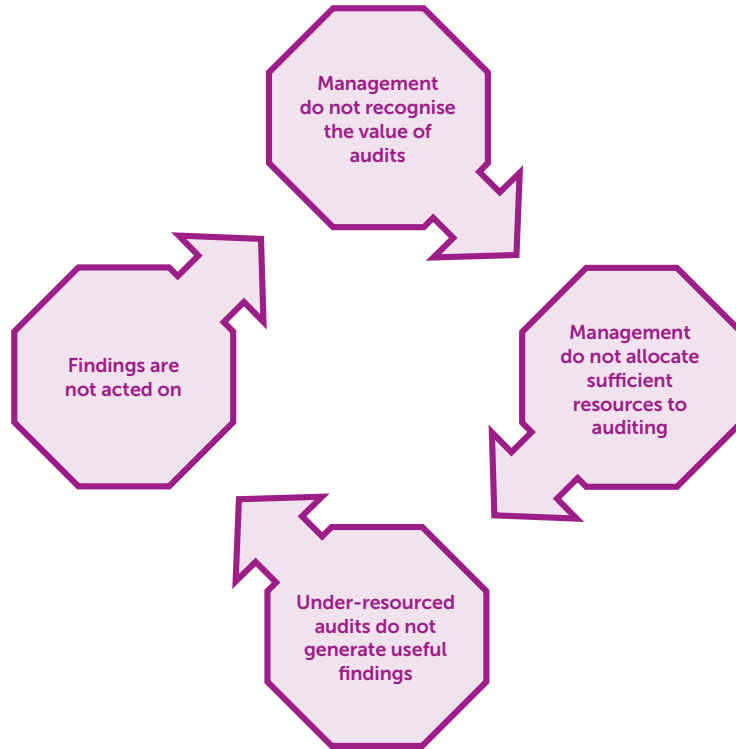
- Audit findings are acted on by management (65% agreement)

- Management recognise that audits add value to organisations (66% agreement)

Comments submitted by survey respondents and discussions at the workshop illustrated that there is genuine concern among practitioners that the findings of audits are not valued and acted on sufficiently. This was attributed to many factors, including:
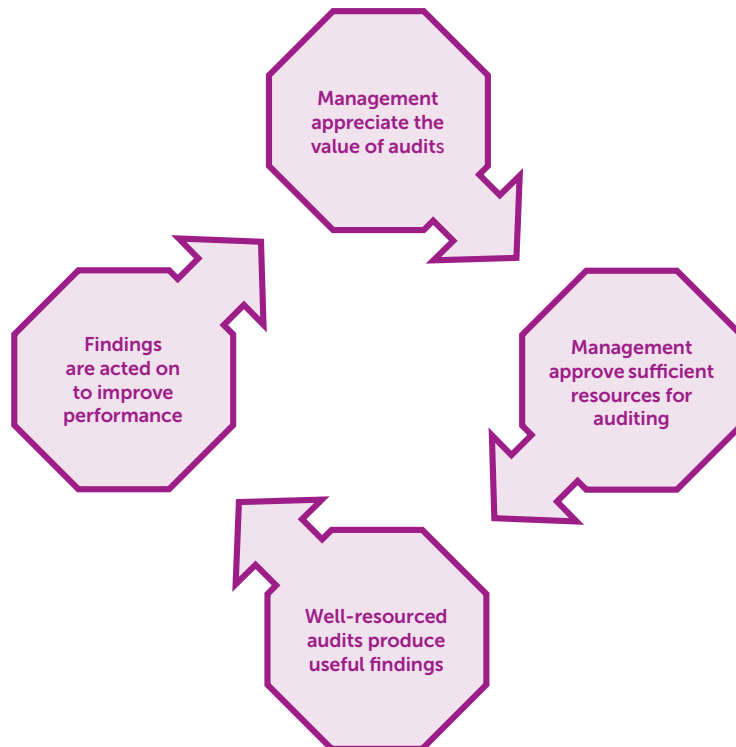
- Auditors focussing on negative issues and not reporting sufficiently on good practice and practical opportunities for improvement

- Auditors having insufficient experience of disciplines and sectors to enable them to produce useful findings

- Auditors (especially external certification auditors) focussing too much on documentation and not actual practices and behaviours)

- Poorly presented findings (including due to basic deficiencies in oral and written communications skills, the inability to communicate findings to senior management in business language, and external certification audit reports being unhelpful formats)

- Senior management being concerned by the costs of auditing in relation to value provided

- Inadequate resources available to meet audit objectives

This highlights a fundamental self-perpetuating problem, that senior management will not allocate sufficient resources to auditing if they do not value its output.

Negative audit value cycle

Management do not recognise the value of audits

Management do not allocate sufficient resources to auditing

Under-resourced audits do not generate useful findings

Findings are not acted on

Positive audit value cycle

Management appreciate the value of audits

Management approve sufficient resources for auditing

Well-resourced audits produce useful findings

Findings are acted on to improve performance

Auditors need to find ways to break the vicious, negative audit value circle, by convincing senior management that audits add value, by ensuring that they produce useful audit findings and then communicating them effectively. Techniques and approaches that could be applied include:

- Modifying expectations of audit outcomes – ensuring the audit objectives and scope are realistic for the resources available, encouraging management to appreciate the value of negative findings (better to know that there is a problem so that it can be addressed)

- Avoiding audit situations where auditors/ audit teams lack the necessary competence to produce useful findings

- Arguing for adequate resources to do justice to an audit

- Generating robust, evidence-based findings that provide the basis for improvement (even if it is not possible within the constraints of the audit to confirm the root cause). To do this, auditors will need to be competent, possess the necessary soft skills, be able to audit behaviours, etc. as outlined above.

- Ensuring that audit findings are directed to those who have the authority to implement action

- Communicating the findings in a way that conveys effectively to the audience the issues, causes, consequences and value (of both positive and negative findings)

- Planning and carrying out audits efficiently to optimise the resources available and minimise impacts on the business of the audit process

- Encouraging senior management to support audits by communicating their value and the need for staff to co-operate fully.

4 Conclusions

This study has taken into consideration the views of over 600 individuals, many of whom have extensive experience of environmental auditing. Although there are some differences in priorities and views between respondents (including some slight differences between the various auditing roles, for example between auditors and those planning or managing audit programmes and those relying on the results of auditors), there is clear evidence that there are concerns regarding future challenges for environmental auditing. These extend not only to emerging audit types and changing audit practices and expectations, but also to concerns regarding basic issues including competence, resourcing and planning audits (although it is recognised that there are many examples of excellent audit practice). In the workshops, discussions typically concluded that auditing is a key environmental management tool, and more needs to be done to promote and support it.

There are commonly-held concerns that some of the emerging audit types, including integrated audits, and audits involving the supply chain and social and ethical issues are particularly challenging, requiring a range of competences that many environmental auditors may not have. This needs to be emphasised to those responsible for planning and managing audits as well as senior management and others relying on audit findings and potentially also with the responsibility for making resources available for auditing.

Related to this is the need for ensuring that the value of audits is appreciated, especially by senior management, so that they recognise the need to take action on findings, resource audit programmes and secure co-operation from staff.

Those responsible for planning and managing audit programmes must be aware of the demands on auditors, not only from auditing new things, but also the from unrealistic audit scopes and objectives. Expectations and resources, including participation of relevant specialists, need to be balanced to ensure acceptable audit outcomes.

Environmental auditors need to recognise their limitations in terms of discipline and sector competences and ensure that they do not over-extend themselves. They need to ensure that they continue to develop or refresh their technical knowledge and also their auditing skills and practices. They also need to focus on conducting audits efficiently, most importantly, communicate the findings effectively.

Concerns were raised regarding the effectiveness of some external certification auditors and the perceived value they add, due to factors including lack of discipline, sector or other necessary specialist knowledge, poor auditing practices, such as focussing on documentation and spending a disproportionate amount of time on report preparation, and ineffective communications. Participants were concerned that this compromises the reputation of auditing and potentially also of environmental management systems.

The challenges facing environmental auditors are not unique. Auditors in related disciplines, such as quality and health & safety management, are also presented with emerging demands and expectations, and have similar needs. This clearly presents an opportunity for collaboration between representative bodies to provide unified or harmonised support.

In order to rise to these challenges, many auditors require access to training, mentoring and guidance, not only to meet emerging challenges but also to continue to develop and maintain good auditing practices.

5 Recommendations

This study has confirmed that there are many emerging and existing challenges for environmental auditing, and that there is a demand from members of the profession for support to help overcome them.

Professional bodies and other organisations involved in the development of standards or provision of guidance or training related to auditing should consider their adequacy and fitness for purpose and, if necessary revise or expand them to meet current and future needs. ISO TC7 SC2, the International Organization for Standardization's environmental auditing subcommittee, should consider the findings of this report when undertaking its own review of its provision for environmental auditors.

Senior management of organisations and the individuals responsible for audit programmes should ensure that they develop audit programmes with achievable objectives and scope, focussed on the needs of the organisation. They should understand the competence and resourcing needs of their audit programmes.

Senior management should appreciate the value added by environmental auditing and encourage all staff to collaborate in the audit process. They should also be prepared to receive negative feedback from audits, and to act on it. Auditors should not be blamed for delivering bad news, but should be encouraged to report truthfully and without fear of recrimination.

All those involved in planning, undertaking and reporting audits should prioritise audit activities based on risks and opportunities. This will ensure that audits deliver maximum value by providing information that encourages organisations to implement action to tackle potential risks in a timely manner and also to take advantage of opportunities for positive outcomes for the EMS, environmental sustainability performance and business performance.

Auditors must act professionally in all situations, in conformance with applicable standards, protocols and codes of conduct. In particular, auditors should exercise caution in taking on new challenges, ensuring that they have the necessary competence before tackling new audit topics. They should also ensure that they keep their auditing skills and knowledge up-to-date, including with regard to the new requirements of ISO 14001:2015, legislation and soft skills.

Auditors should also be aware of the constraints on the effectiveness of audits of inadequate resources, and should communicate to senior management, audit clients or those responsible for audit programmes any concerns they have regarding their ability to fulfil audit objectives and scopes.

Auditors should strive to communicate clearly, not only with auditees, but in reporting their findings. These should be unambiguous, concise and be relevant to the audit objectives. Findings should be conveyed in a manner that emphasises their importance and the business benefits of acting on them.

Auditors or organisations with concerns regarding the interpretation of the requirements of ISO 14001:2015 should be aware that the UK's "mirror committee" for environmental management systems (BSI SES/1/1) is authorised by ISO to provide interpretation of requirements on request.

Accreditation bodies and certification bodies should consider the concerns raised regarding external certification auditor competence and effectiveness and review their auditor selection and training processes accordingly.

From the detailed discussions at the workshops and the feedback from the webinar, it is apparent that many members consider IEMA has a leading role to play, and recommendations for IEMA from the members include:

- Developing useful audit tools, such as checklists, audit protocols and guidance (including case studies demonstrating best practice)

- Refreshing its approach for auditor continuing professional development, by

  - providing more training, workshops and webinars (there was a strong preference for workshops of one day duration or less)

  - making available more guidance on its website

  - using web-tools to share learnings

  - collaborating with other professional bodies to harmonise CPD processes

- Continuing professional development support is needed for a wide range of audit types and topics, including:

  - integrated auditing

  - emerging topics such as social/ethical issues and supply chain audits[2]

  - technical areas such as biodiversity and managing plastics

  - the new requirements of ISO 14001:2015

  - applying soft skills

  - improving communication skills, particularly in presenting audit findings

- A priority is a masterclass in auditing techniques and practices, for experienced auditors looking to refresh their skills

- Finding ways to encourage its members to participate more actively in networking events, which could include refreshers in environmental auditing

- Communicating more widely on the benefits of environmental auditing and the value of registered auditor levels, to its corporate members and by referencing the value of auditing in training and other materials (for example in the Leading with Sustainability course)

- Ensure the standards set by IEMA's auditor register are future fit and sufficient to ensure auditors with the competence needed to overcome the challenges identified during this research are recognised. This could include mandatory competence requirements, for example periodic refresher training, together with validation of experience, as the basis for demonstrating competence to practice as an auditor

- IEMA should advocate that accreditation and certification bodies apply appropriate standards of competence for external certification auditors.

IEMA should take account of the recommendations of this report in when reviewing and modifying the environmental auditor register grades and code of practice.

IEMA should establish a working group to develop a plan for addressing these practitioner needs, to confirm what the Institute can realistically accomplish and ways in which its members can contribute to this process. The round table of experts held to develop the themes for the study could be reconvened to confirm the terms of reference for the working group.

The findings of this report should be shared with other professional bodies (for example those representing the quality and health & safety professions) that may be interested in collaborating with IEMA to developing guidance and tools that their members can apply. Also, the report should be shared with the International Organization for Standardization's environmental auditing sub-committee to assist it in its own review of the challenges facing environmental auditing.

Appendix A - Round table

A1 Approach

IEMA invited a group of stakeholders to an initial round table (18 September 2018), to consider the proposed approach to the study and confirm the key themes for the subsequent member survey. Participants included representatives from:

- Organisations undertaking extensive internal audit programmes

- Consultancies

- Certification and verification

- Regulators

- Academia

A2 Output

The round table was conducted as an open discussion, allowing participants to contribute their own views of the challenges for environmental auditing (the meeting agenda included a list of potential discussion topics, but this was not followed item by item). In general, there was consensus that there are increasing challenges for environmental auditors.

The following points were raised during the discussion:

- Integrated auditing – internal teams may have a health & safety focus, so lack the resources and competence to undertake effective audits of environmental issues

- There is continuing dissatisfaction with the value of external certification audits; they are perceived as not adding value

- Technology/digital information provides opportunities for adding value in supply chain auditing, but there are associated risks

- ISO standards' requirements for auditor competence are at too high a level to facilitate meaningful testing of competence

- Social auditing criteria can pose challenges to auditors, requiring them to prove a negative, for example not employing child labour

- There needs to be greater focus on risk-based auditing, to ensure priorities are addressed, but audits also need to be wide-ranging to ensure all risks are captured

- New requirements of ISO 14001:2015 are not being audited effectively

- Internal audit programmes should complement external audits (follow-up, avoid duplication, etc)

- Audits must add value, and auditors must be able to communicate findings to senior management

- Competence in generic auditing skills should not be confused with discipline and sector knowledge and experience

- There is still a tendency in some quarters to focus on getting or retaining the badge, rather than addressing performance

- There is still a lack of clarity as to how far auditors should go in providing suggestions for improvement (consultancy) rather than straightforward conformance. Lack of guidance can be perceived as poor value

- Leading indicators of performance should be audited, but this may be harder to do

These are explored in more detail in section 2 of the main report.

Appendix B - Survey results

B1 Approach

IEMA launched its member survey of the future challenges for environmental auditing in January 2018. All IEMA members were emailed an invitation to participate in the online survey and were given several weeks to respond. A total of 641 individuals participated.

The survey questionnaire was developed following the round table and took account of the issues raised at that event. It comprised:

- A number of introductory questions to ascertain the nature of the participants' involvement in auditing

- A series of questions to determine participants' views as to whether or not certain audit issues or situations are becoming more important or common

- A series of questions to determine how strongly the participants agree or disagree with certain views related to auditing practice and its value
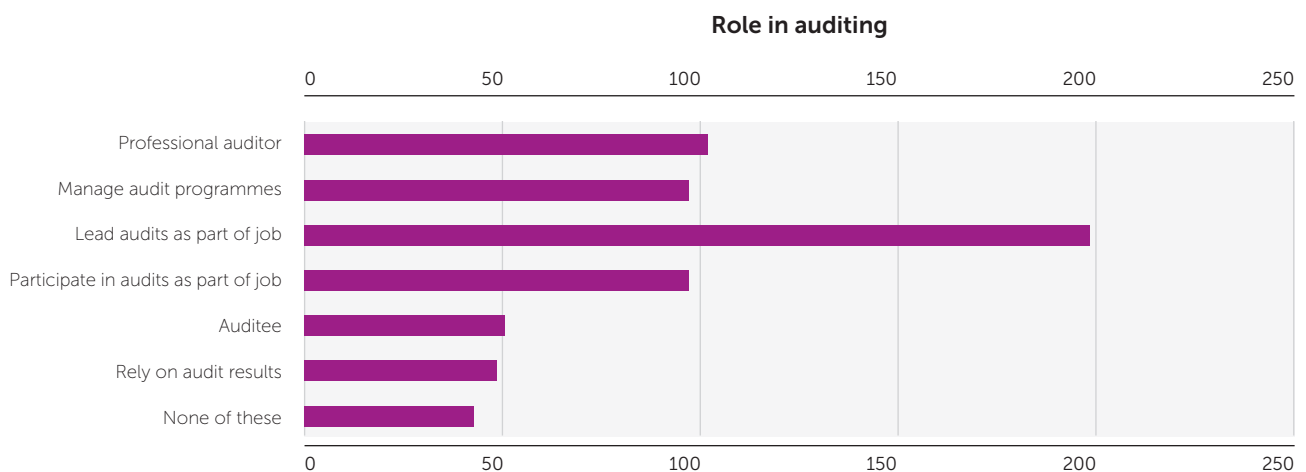
The questionnaire is provided in Appendix C.

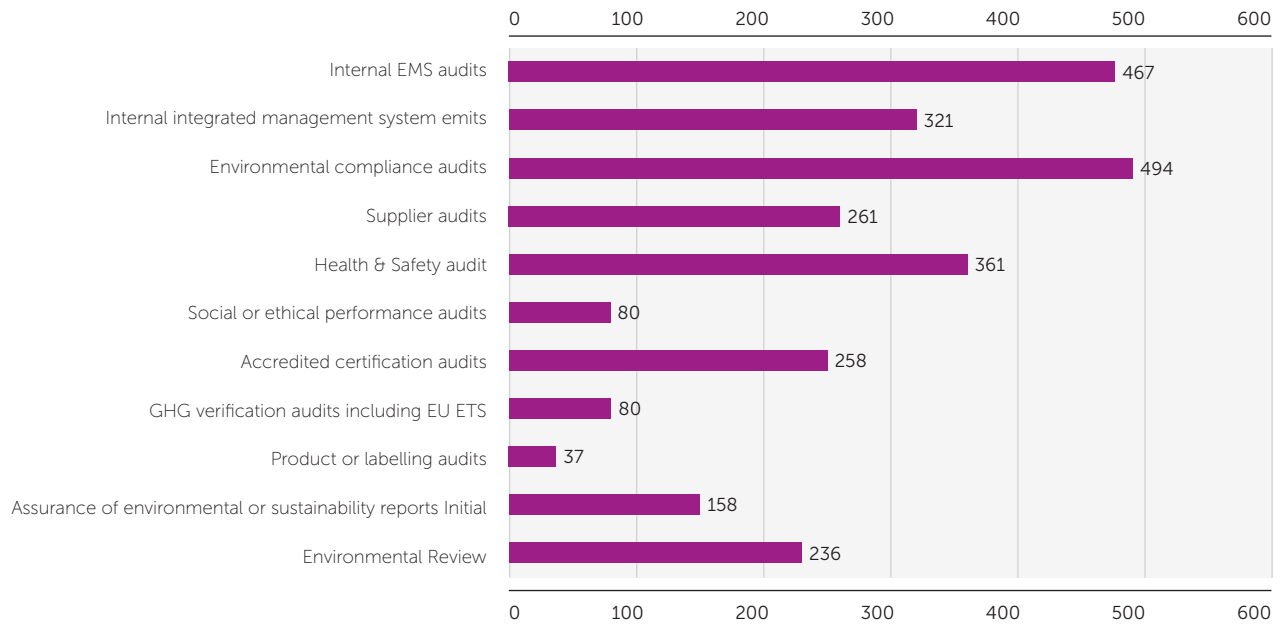## B2 Analysis of the responses – participants' experience

Participants were asked which of these categories best described their role in auditing:

- I am a professional auditor

- I plan or manage audit programmes

- I lead audits as part of my role

- I participate in audit teams as part of my role

- I am regularly audited

- I rely on the results of audits

- None of the above

Participants were asked to select from a list all types of audits that they undertake.
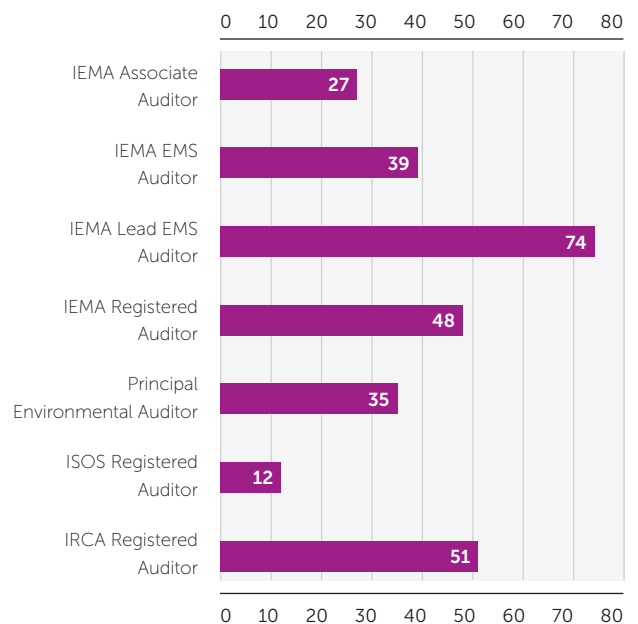
Role in auditing

Role	Value
Professional auditor	~105
Manage audit programmes	~100
Lead audits as part of job	~200
Participate in audits as part of job	~100
Auditee	~53
Rely on audit results	~50
None of these	~45

Types of audits undertaken

Type	Value
Internal EMS audits	467
Internal integrated management system emits	321
Environmental compliance audits	494
Supplier audits	261
Health & Safety audit	361
Social or ethical performance audits	80
Accredited certification audits	258
GHG verification audits including EU ETS	80
Product or labelling audits	37
Assurance of environmental or sustainability reports Initial	158
Environmental Review	236

They also had an option to enter any other kind of audits they undertake that were not included in the list. Responses included

• Mergers and Acquisition due diligence
• Quality
• Energy Saving Opportunity Scheme (ESOS)
• Risk
• Waste
• Regulator
• BREEAM

Participants were also asked to select the most appropriate form of auditor registration. Well over 200 were registered by IEMA, with a further 50 or so being registered by IRCA. A small number of others entered details of registration under other schemes, including SEDEX and various energy, quality and health and safety schemes. Over 50% of respondents were not registered auditors.

Auditor Registration

Type	Value
IEMA Associate Auditor	27
IEMA EMS Auditor	39
IEMA Lead EMS Auditor	74
IEMA Registered Auditor	48
Principal Environmental Auditor	35
ISOS Registered Auditor	12
IRCA Registered Auditor	51

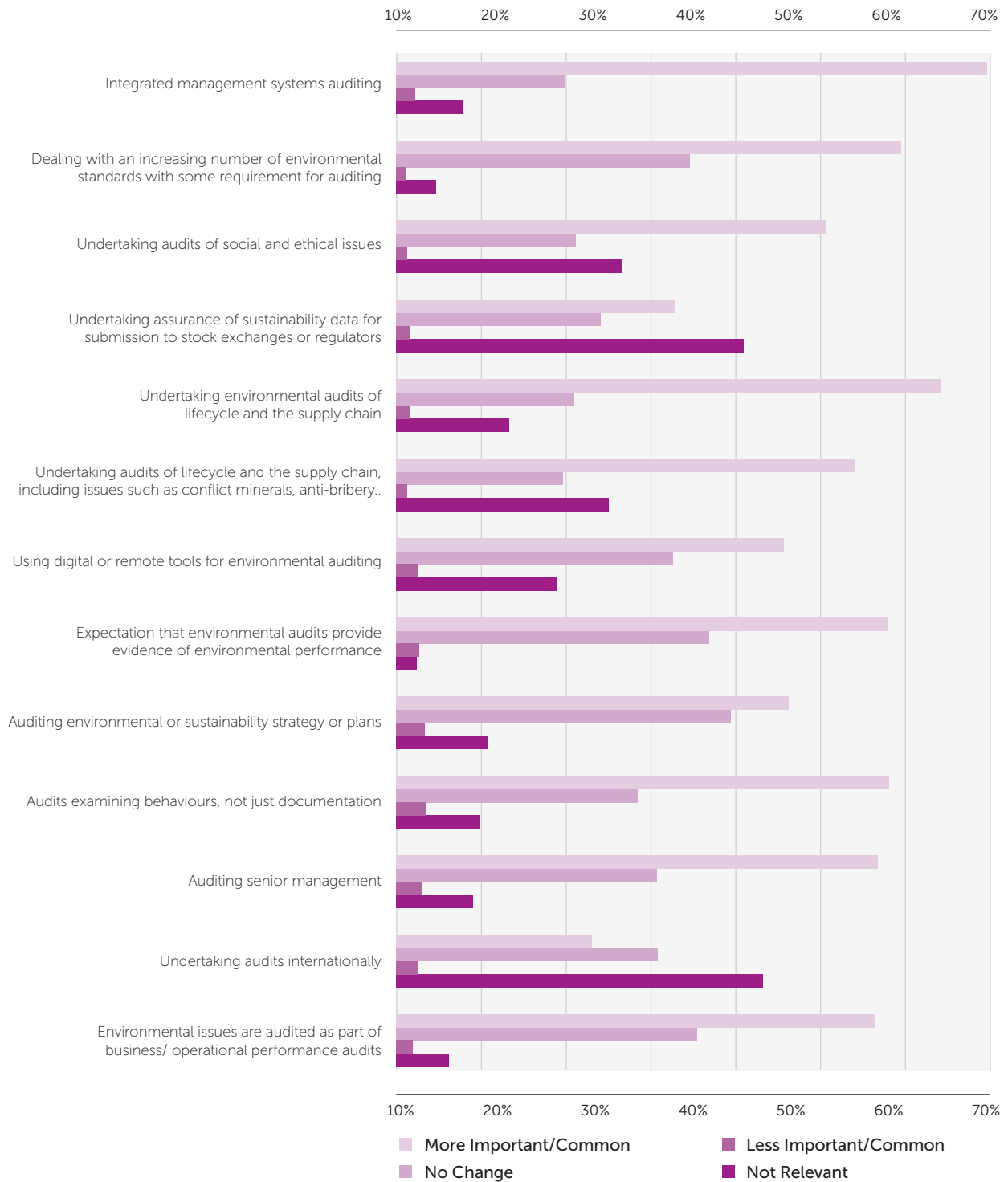### B3 Analysis of the responses – emerging issues

For a range of environmental auditing issues or situations, participants were asked to select from the following:

- Becoming more important/common

- No change

- Becoming less important/common

- Not relevant to their roles

Those six topics ranked most highly as becoming more important or common were:

- Integrated management systems auditing

- Undertaking environmental audits of life cycle and in the supply chain

- Dealing with an increasing number of standards

- Audits examining behaviours, not just documentation

- Expectation that environmental audits provide evidence of environmental performance

- Auditing senior management

Change in importance, how common (%)

Integrated management systems auditing

Dealing with an increasing number of environmental standards with some requirement for auditing

Undertaking audits of social and ethical issues

Undertaking assurance of sustainability data for submission to stock exchanges or regulators

Undertaking environmental audits of lifecycle and the supply chain

Undertaking audits of lifecycle and the supply chain, including issues such as conflict minerals, anti-bribery..

Using digital or remote tools for environmental auditing

Expectation that environmental audits provide evidence of environmental performance

Auditing environmental or sustainability strategy or plans

Audits examining behaviours, not just documentation

Auditing senior management

Undertaking audits internationally

Environmental issues are audited as part of business/ operational performance audits

■ More Important/Common ■ Less Important/Common
■ No Change ■ Not Relevant

None of the topics was selected as becoming less important or common by more than 4% of respondents.

Further detailed analysis of the responses is provided in Appendix C, with percentage scores for these questions being shown by auditor role. In a number of cases this produced very different outcomes between roles, as shown in the following table.

Issue	Auditor categories ranking it as more important, common
Integrated management systems auditing	Professional auditors, people planning or managing audits programmes and people leading audits
Undertaking audits of social and ethical issues	Professional auditors and people relying on the results of audits
Using digital or remote tools for environmental auditing	People relying on the results of audits
Expectation that environmental audits provide evidence of environmental performance	People relying on the results of audits
Audits examining behaviours, not just documentation	Professional auditors
Auditing senior management	Professional auditors, people planning or managing audits programmes and people leading audits

People planning or managing audits programmes and relying on the results of audits were significantly less likely to rate environmental audits of lifecycle and the supply chain as becoming more important or common.

Also, a comparison was made between the views of those undertaking accredited certification audits and those who do not, with some significant differences being identified, as shown below.

Are the following becoming more important/common?	Carry out accredited certification audits (%)	Do not carry out accredited certification audits (%)
Integrated management systems auditing	77.5	64.2
Dealing with an increasing number of environmental standards with some requirement for auditing	56.2	61.6
Undertaking audits of social and ethical issues	52.7	49.4
Undertaking environmental audits of lifecycle and the supply chain	67.8	61.6
Expectation that environmental audits provide evidence of environmental performance	58.1	57.7
Audits examining behaviours, not just documentation	63.2	54.6
Auditing senior management	66.7	50.1

In general, those undertaking accredited certification audits tended to identify more strongly with emerging issues.

B4 Analysis of the responses – auditors' opinions

The participants were asked to state how strongly the agreed or disagreed with 11 statements related to auditing practice and its value, where 6 = strongly agree and 1 = strongly disagree. The percentage of responses in the categories "Disagree" (score = 1-2), "Ambivalent" (score = 3-4) and "Agree" (score =5-6) for each of the statements are presented below.

Do you agree or disagree with the following (6 = strongly agree and 1 = strongly disagree)	1-2 Disagree	3-4 Ambivalent	5-6 Agree
Audit findings generally are presented in a manner which encourages improvement	11.5%	36.1%	52.4%
Audits should focus more on leading rather than lagging indicators of performance	13.1%	37.7%	49.1%
Audit findings are acted on by management	14.4%	49.9%	35.7%
Management recognise that audits add value to organisations	15.2%	45.2%	39.6%
More guidance is needed for auditors on emerging topics such as integrated audits, lifecycle and social issues	10.8%	26.2%	63.0%
There is adequate accessible guidance for internal auditors, especially in SMEs	26.4%	59.6%	14.0%
External environmental auditors have the necessary competence to produce useful audit findings	16.2%	51.4%	32.3%
External integrated auditors have the necessary competence to produce useful audit findings on the environment	18.1%	57.6%	24.4%
Internal auditors are asked to undertake audits without adequate training	23.7%	40.9%	35.4%
There is adequate and effective guidance on techniques for assessing auditor competence	21.8%	64.9%	13.2%
Organisations make available sufficient resources for internal environmental auditing	28.8%	55.4%	15.8%

The responses are presented in the graph below on the basis of agreement or disagreement only, where a score of 1-3 indicates disagreement and a score of 4-6 indicates agreement.

Degree of agreement (%)
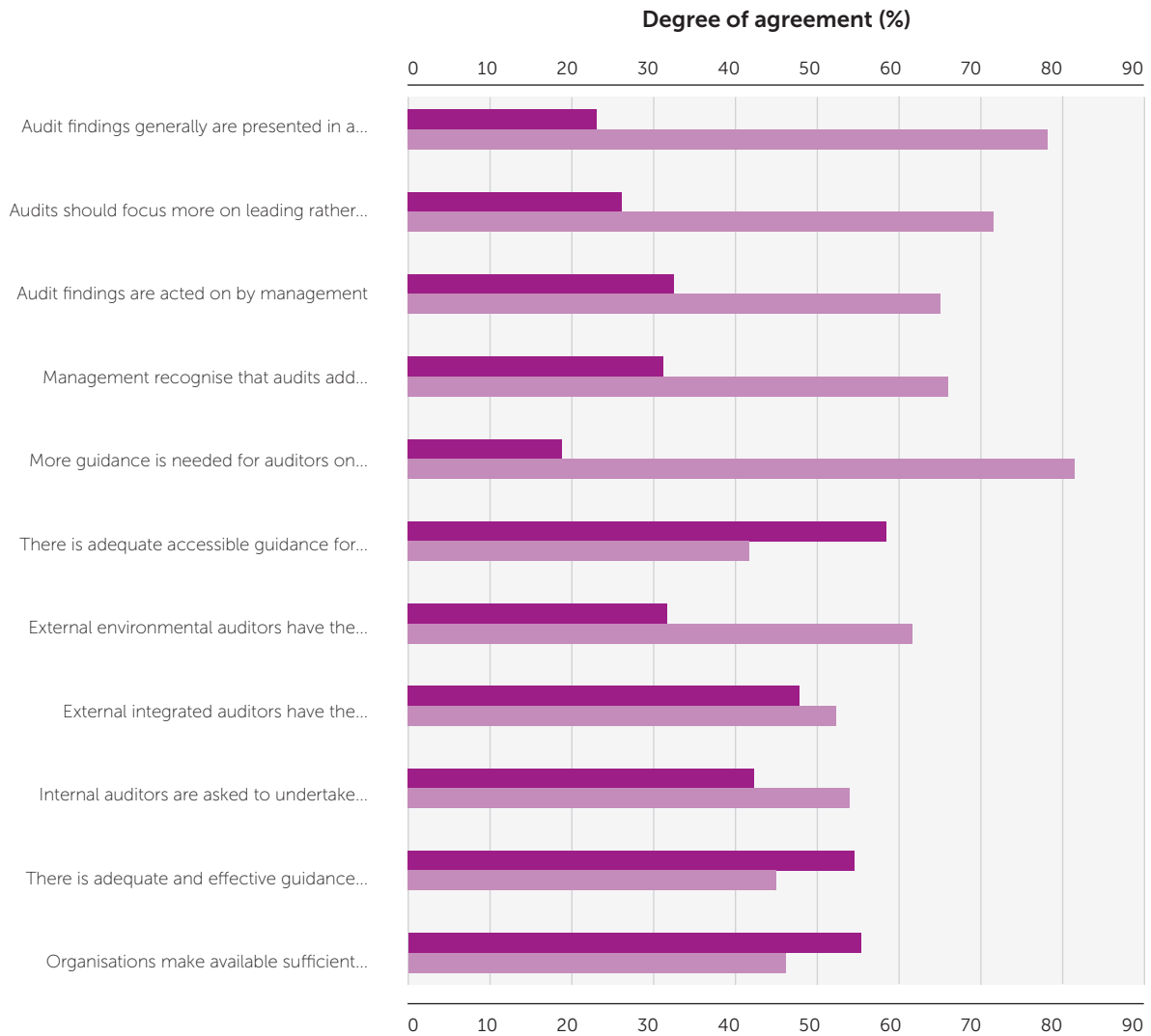
There was reasonably high proportion agreeing that more guidance is needed on emerging topics, such as integrated audits, lifecycle and social issues. Two of the lowest ratings of agreement were awarded to statements regarding the adequacy of guidance for internal auditors (especially in SMEs) and for guidance on techniques for assessing auditor competence.

Further detailed analysis of the responses is provided in Appendix D, with average scores for these questions being shown by auditor role. In a number of cases this produced significantly different levels of agreement between roles, especially between those carrying out audits and those managing audit programmes or relying on audit results, with auditors tending to be more positive.

Do you agree or disagree with the following (6 = strongly agree and 1 = strongly disagree)	Auditor score[3]	Users score[4]
Audit findings generally are presented in a manner which encourages improvement	4.39-4.45	4.00-4.14
Audits should focus more on leading rather than lagging indicators of performance	4.08-4.45	3.94-4.06
Management recognise that audits add value to organisations	3.98-4.22	3.74-3.77
More guidance is needed for auditors on emerging topics such as integrated audits, lifecycle and social issues	4.57-4.68	4.47-4.54
External environmental auditors have the necessary competence to produce useful audit findings	3.85-4.04	3.70-3.72

In many cases those who participate in audits were more likely to disagree, whereas those leading audits or professional auditors agreed more strongly.

Those planning or managing audit programmes had the lowest level of agreement with the statement that there is adequate and effective guidance on techniques for assessing auditor competence (3.14 against an average of 3.37). They also agreed the least strongly that sufficient resources are made available for internal environmental auditing.

The responses were also analysed to determine if there were any significant differences between the views of those who undertake accredited certification audits and those who do not, as summarised below. There were significantly different levels of agreements with the following statements, indicating that accredited certification auditors are more positive in regarding the value of audits. They also more strongly recognise the need for auditor guidance in emerging audit topics.

Do you agree or disagree with the following (6 = strongly agree and 1 = strongly disagree)	Carry out accredited certification audits	Do not carry out accredited certification audits
Audit findings generally are presented in a manner which encourages improvement	4.35	4.28
Audit findings are acted on by management	4.06	3.88
Management recognise that audits add value to organisations	4.11	3.95
More guidance is needed for auditors on emerging topics such as integrated audits, lifecycle and social issues	4.70	4.54

3. Professional auditors, and those who lead or participate in audits as part of their role
4. Those who plan or manage audit programmes or rely on the results of audits

B5 Specific issues raised by respondents

Almost half of the 641 respondents provided additional comments. In some cases, these reaffirmed the answers already selected, and many provided additional information or reasons for their answers.

Integrated auditing – this poses new challenges for many auditors, with both internal and external auditors lacking the necessary competence. In IMS audits, far more time is allocated to health and safety (potentially due to external certification auditors having H&S but not environmental qualifications). There is a need for integrated auditor qualifications.

Increasing number of standards with requirements for auditing – respondents suggested that this is a challenge for auditors, but in addition it is the changes or developments in legislation (i.e. audit criteria) that can be difficult to keep up with. **Lack of knowledge of legislation** was seen as a widespread problem. There will be a need for competent and qualified verifiers for some of the emerging ISO standards such as those for environmental cost-benefit analyses and natural capital. Some organisations subscribe to international environmental or sustainability protocols that are not understood by UK auditors.

New requirements of ISO 14001:2015 – auditors need a greater understanding of strategy and business drivers.

Auditing senior management – many auditors lack the confidence to audit senior management (even more of a barrier in some cultures where it is not customary to challenge senior colleagues), and also may not be able to communicate effectively with them (lack of knowledge of **business strategy,** business management, etc. This also includes the implications of **Brexit**.).

Adding value – audits need to focus on performance, not just conformance to standards (there were many comments on this, including external auditors still focusing on documentation, not practice), leading indicators, root causes, good practice and opportunities, not just risk. The results must be communicated more effectively (for example by focusing on common themes, especially in integrated audits, rather than presenting a long list of non-conformances.). This would help to combat audit the negative perception of audits. Senior management also need to support auditors by emphasising the importance of audits in identifying opportunities for performance improvement.

Lack of resources – this was raised by many respondents, in relation to senior management not allocating sufficient resource, prioritisation given to production management rather than environmental management, etc. A solution was to ensure that management appreciate the value of effective auditing. However, conversely there is a view that environmental professionals spend too much time auditing rather than working to improve performance. Some new areas of auditing, such as life cycle/ supply chain, take more time. Also, due to the increasing prevalence of multiple languages in the workforce, organisations should consider the need to provide resources for multi-lingual auditors.

Soft skills and communication – auditors need to be able to communicate with staff at all levels. This is especially important for auditing social issues. In general organisations do not consider soft skills when selecting auditors. In addition to verbal communication, auditors also need to be able to communicate effectively in writing (often a deficiency in internal auditors).

Digital and remote technology – although new technology offers many advantages (use of tablets in auditing, data management systems, AI, etc.) many auditors do not have the skills to use or audit them. Also, electronic management systems can be difficult to access. Some data management system, such as Achilles, Avetta and Joscar are used for environmental information, but are audited by quality auditors who do not understand the environmental implications.

Guidance and auditor tools – in addition to audit guidance, standard audit question sets/checklists (which could be customised for sectors) would be helpful (IEMA could collaborate with other professional bodies or global entities such as GRI/WRI to develop these). Also, more guidance is needed for auditing in relation to biodiversity and landscape, social issues, ESG, carbon footprinting, data management, human rights compliance, fairness inclusion & respect (FIR), social value, wellbeing, mental health, community engagement, circular economy, life cycle and ethical procurement, managing plastics, and the new requirements of ISO 14001:2015, such as auditing senior management. Case studies demonstrating the benefits of effective audits and guidance in presenting audit findings would be helpful. Reduction in government and regulator funding means there is now less guidance from these sources. Simple guidance is needed for SMEs.

Competence – in addition to discipline knowledge, many auditors lack sector and technical knowledge and experience (a common deficiency in external certification auditors), and many auditors follow outmoded practices or rely on outdated information. Also, many of the new requirements of standards need the application of **judgement** (especially where robust audit evidence may not be available, for example in relation to life cycle issues) and ability to understand **behaviours**. Some auditors (including external certification auditors) also struggle to interpret new requirements of ISO 14001:2015 (especially context) and other new standards, resulting in inconsistency. There is a need for more guidance (and a route map) for improving auditor competence, and common competence standards should be adopted by accredited bodies, with periodic competence assessments. There is little training available other than for EMS auditing (needed for due diligence, compliance, report/data assurance). Junior auditors would benefit from more mentoring and shadowing of experienced auditors. Cost of auditor training is a burden, especially for SMEs. Auditors would benefit from periodic refresher training. External certification auditors do not sufficiently challenge the competence of internal auditors.

Having a transparent/accessible auditor database would allow the selection of competent auditors.

Consistency – many of the competence issues identified above have an impact on the consistency of auditing practices and results.

Understanding of local cultures and practices – this was raised by a number of respondents who work outside the UK, in relation to the need for auditors to be aware of cultural differences and the implications of different jurisdictions on environmental management practices, and so avoid a "one-size-fits-all" approach.

Appendix C - Survey questionnaire

Which of the following sentences best describes your current role or significant experience of involvement in environmental auditing?

- I am a professional auditor

- I plan or manage audit programmes

- I lead audits as part of my role

- I participate in audit teams as part of my role

- I am regularly audited

- I rely on the results of audits

- None of the above

What types of audits are you, or have you been, involved in? Please select all that apply.

- Internal EMS audits

- Internal integrated management system audits

- Environmental compliance audits

- Supplier audits

- Health & Safety audits

- Social or ethical performance audits

- Accredited certification audits

- GHG verification audits, including EU ETS

- Product or labelling audits

- Assurance of environmental or sustainability reports

- Initial Environmental Review

- Other - please specify

Do you hold any of these Auditor registrations, or a member of an equivalent auditor registration scheme? Please select all that apply.

- IEMA Associate Auditor

- IEMA EMS Auditor

- IEMA Lead EMS Auditor

- IEMA Registered Auditor

- Principal Environmental Auditor

- ESOS Registered Auditor

- IRCA Registered Auditor

- None of these

- Other - please specify

What is your view on how, and if, these areas of auditing are becoming more or less important/common?

- Integrated management systems auditing

- Dealing with an increasing number of environmental standards with some requirement for auditing

- Undertaking audits of social and ethical issues

- Undertaking assurance of sustainability data for submission to stock exchanges or regulators

- Undertaking environmental audits of lifecycle and the supply chain

- Undertaking audits of lifecycle and the supply chain, including issues such as conflict minerals, anti-bribery legislation, modern slavery, etc.

- Using digital or remote tools for environmental auditing

- Expectation that environmental audits provide evidence of environmental performance

- Auditing environmental or sustainability strategy or plans

- Audits examining behaviours, not just documentation

- Auditing senior management

- Undertaking audits internationally

- Environmental issues are audited as part of business/ operational performance audits

Please indicate how strongly you agree with the following statements regarding the value of environmental and associated auditing. 1=strongly disagree, 6=strongly agree.

- Audit findings generally are presented in a manner which encourages improvement

- Audits should focus more on leading rather than lagging indicators of performance

- Audit findings are acted on by management

- Management recognise that audits add value to organisations

---

Please indicate how strongly you agree with the following statements regarding competence and resources in environmental and associated auditing. 1=strongly disagree, 6=strongly agree.

- More guidance is needed for auditors on emerging topics such as integrated audits, lifecycle and social issues

- There is adequate accessible guidance for internal auditors, especially in SMEs

- External environmental auditors have the necessary competence to produce useful audit findings

- External integrated auditors have the necessary competence to produce useful audit findings on the environment

- Internal auditors are asked to undertake audits without adequate training

- There is adequate and effective guidance techniques for assessing auditor competence

- Organisations make available sufficient resources for internal environmental auditing

Please provide details of any other issues that you feel are of growing importance or challenges for environmental auditors, including the need for tools or support for auditors.

Appendix D
Survey data and analysis

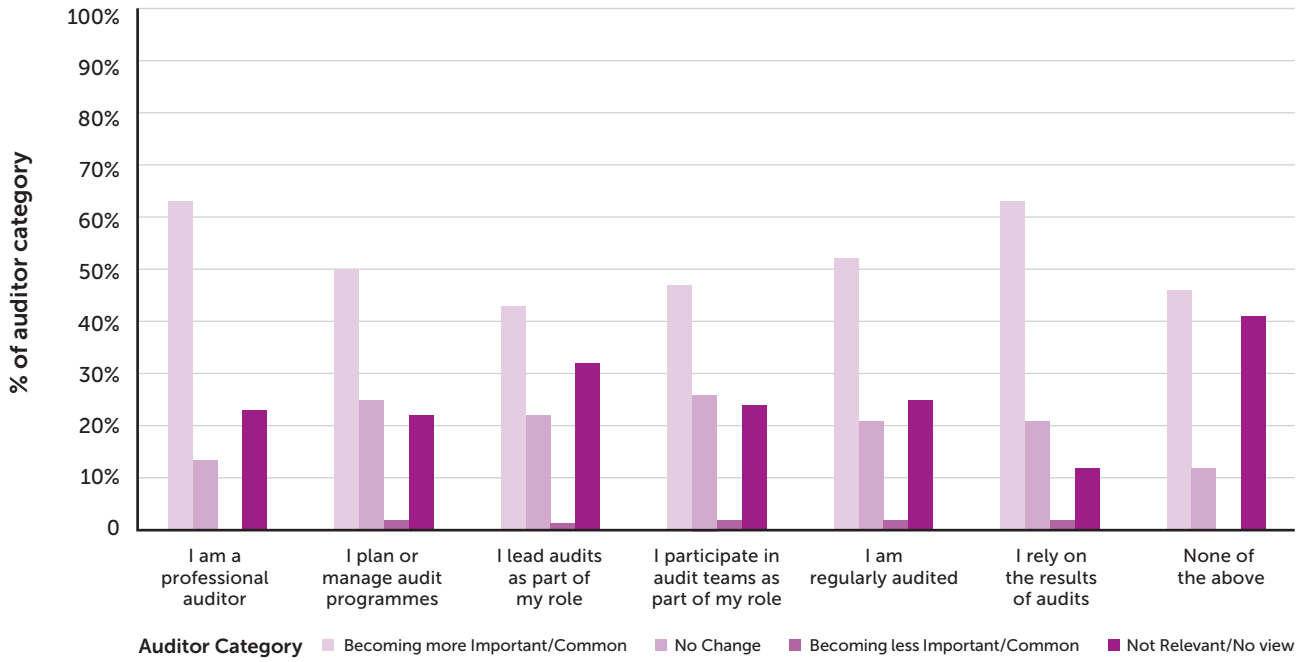**D1 Responses by auditing roles -** The following graphs show the responses by different roles in auditing.

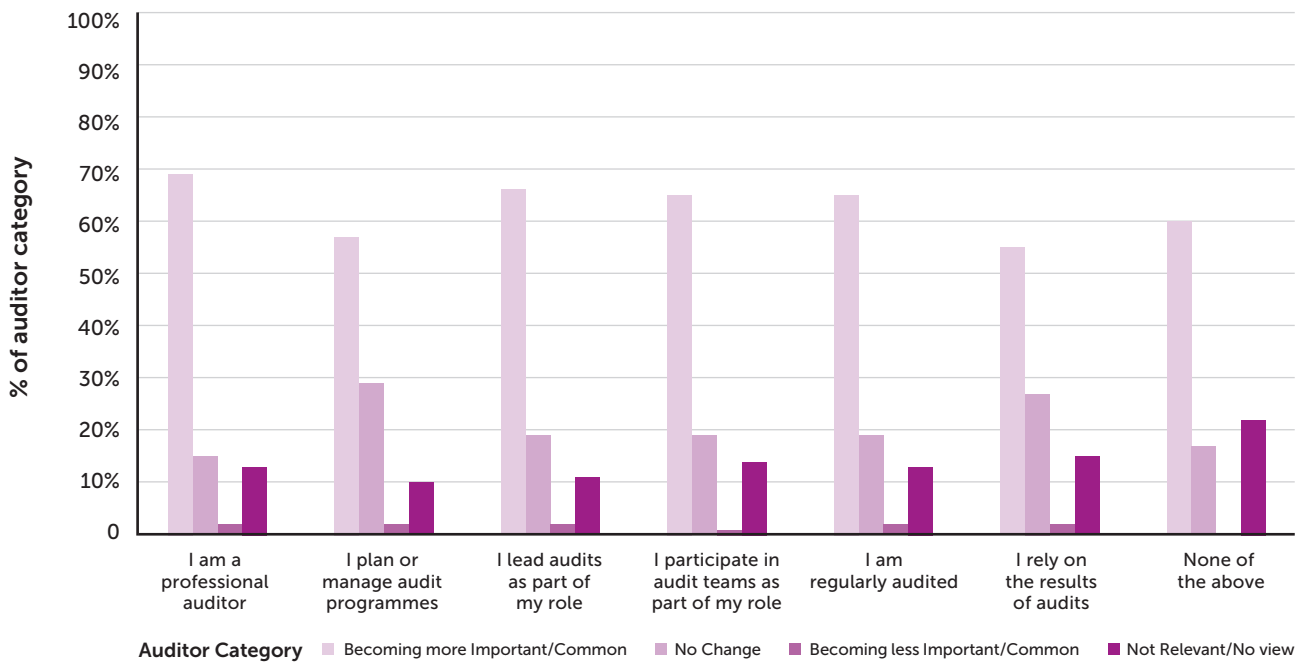### Integrated Management Systems Auditing
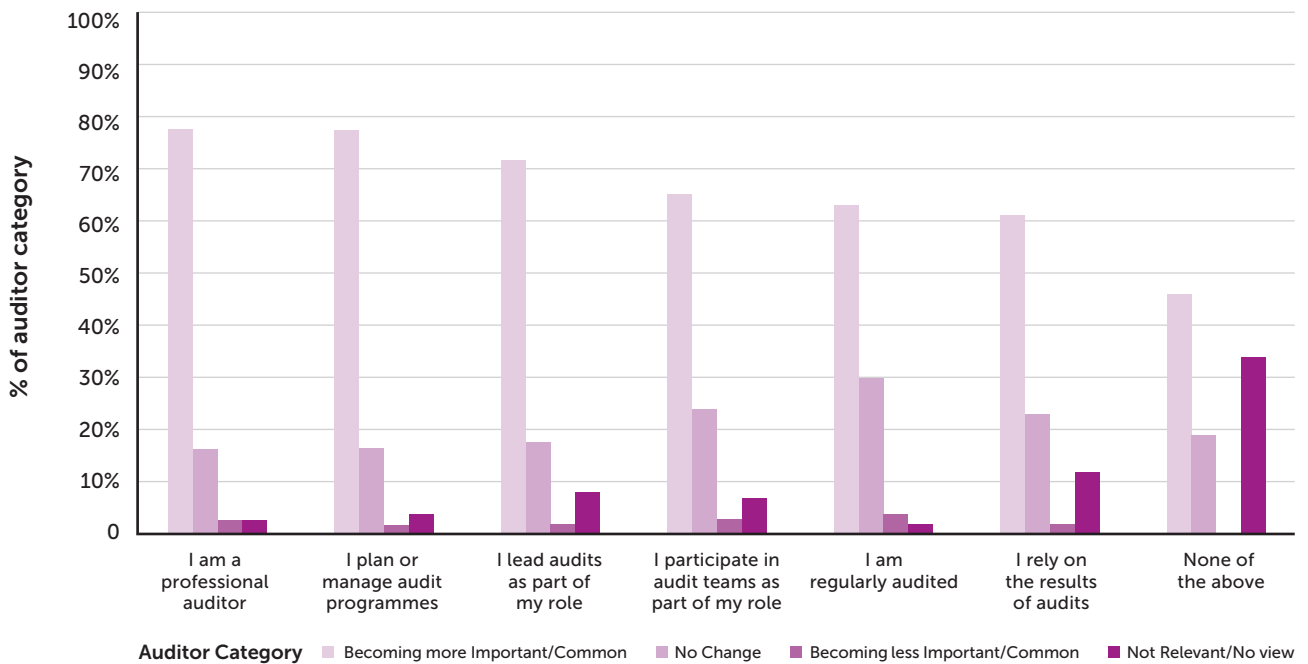
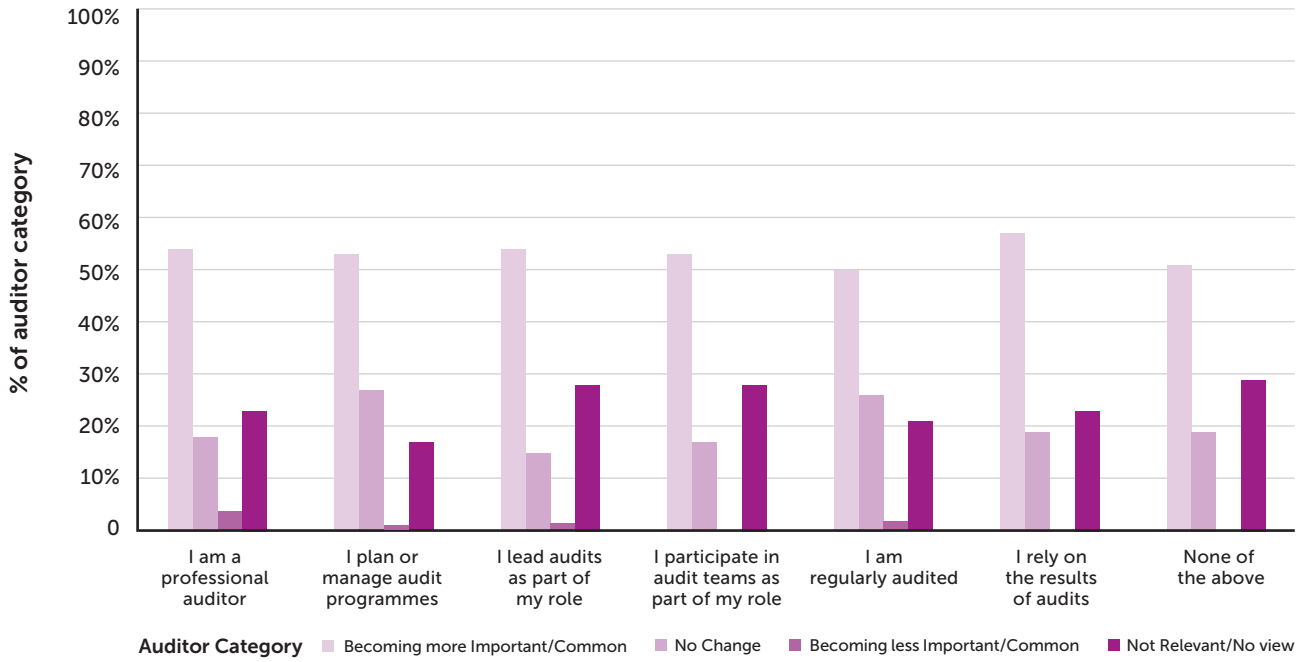### Increasing number of standards required auditing
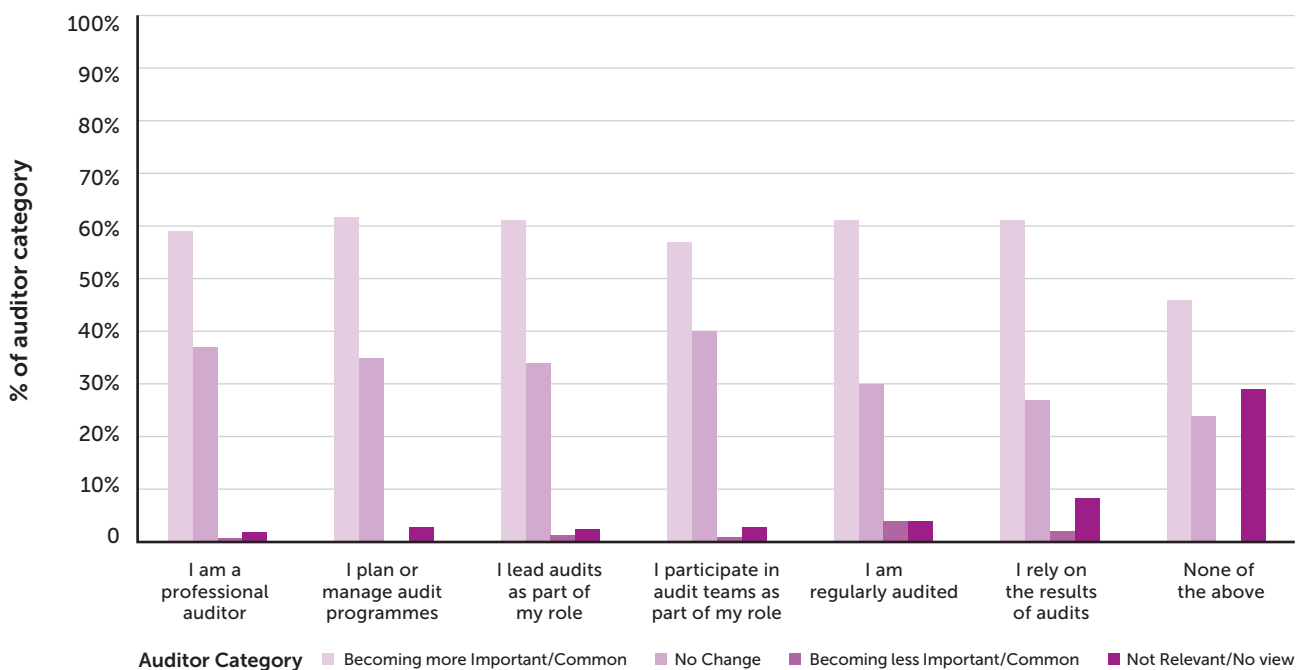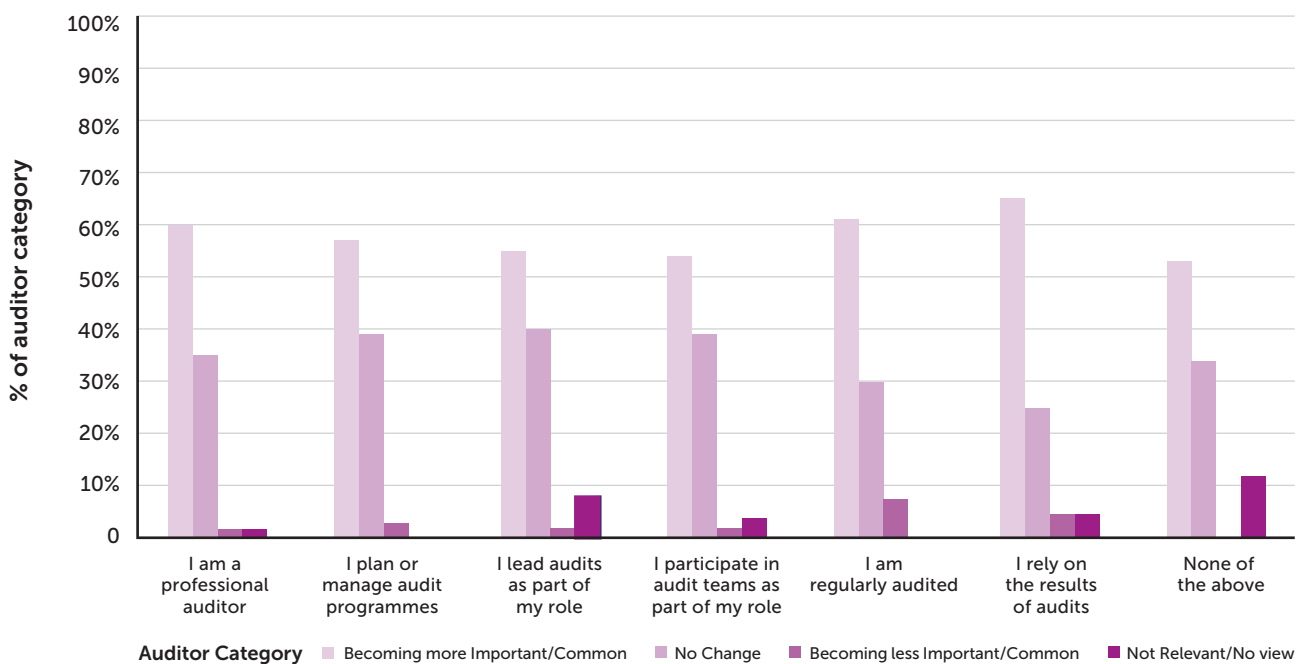
Auditors of social and ethical issues

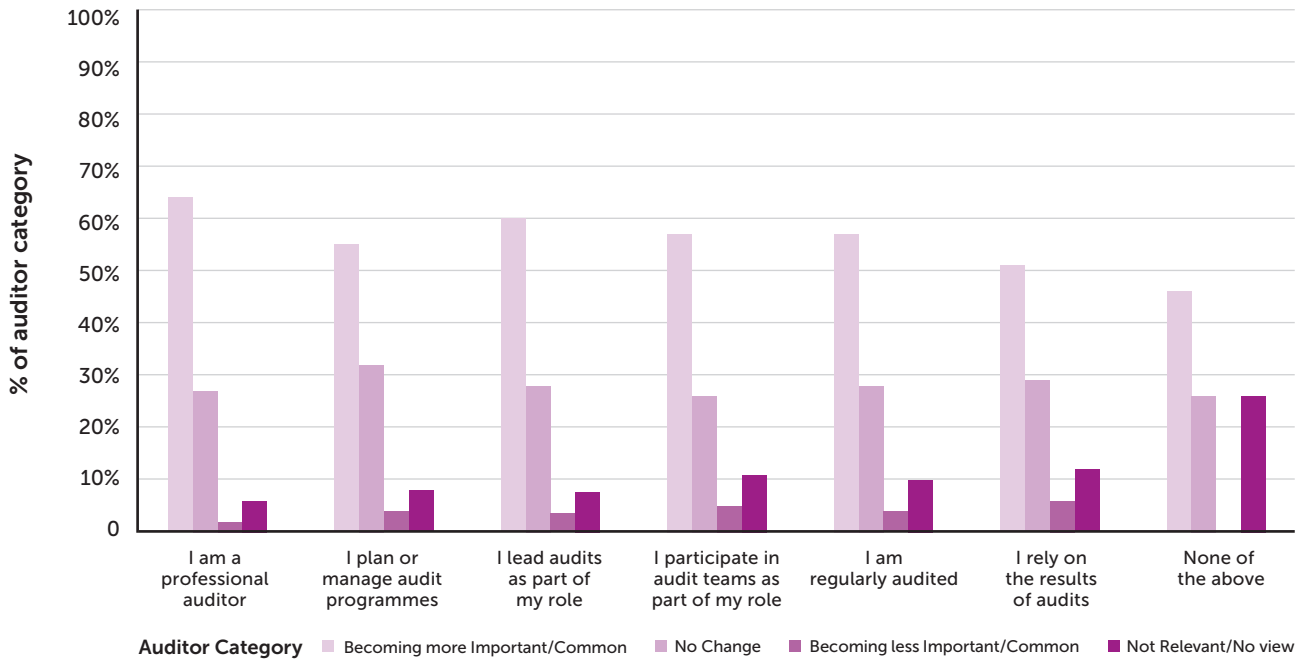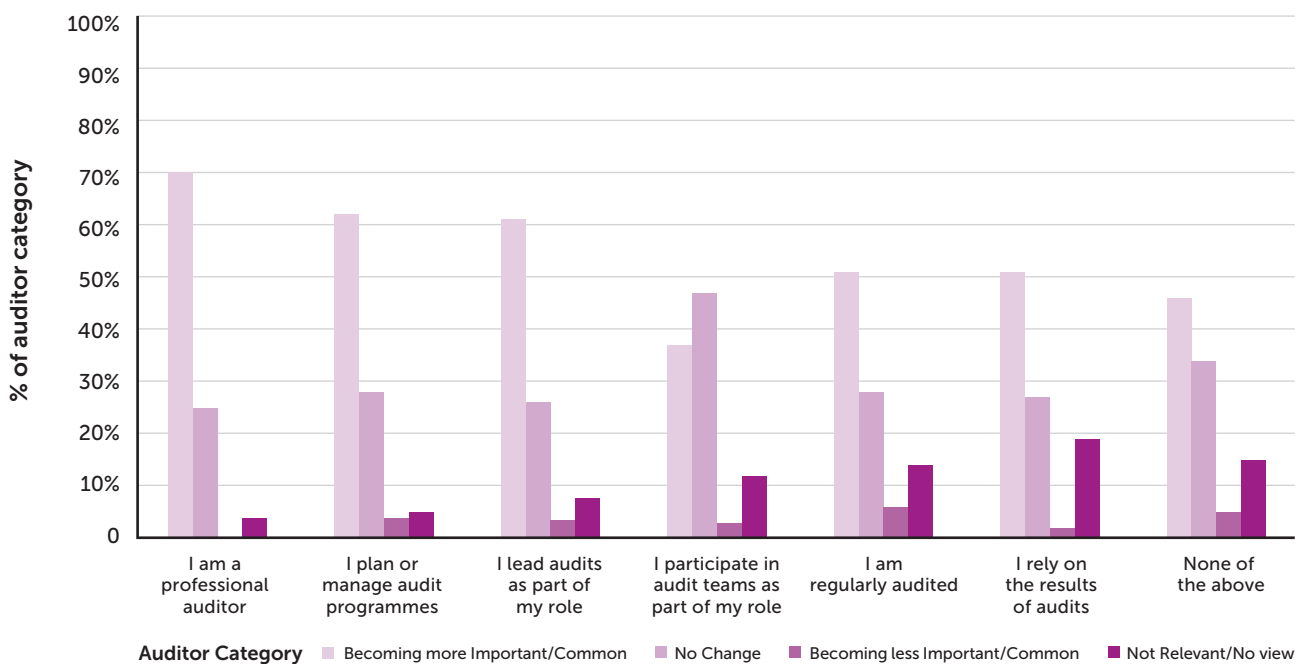## Undertaking environmental audits of life cycle and supply chain

Undertaking audits of life cycle and supply chain, including conflict minerals, anti-bribery legislation, modern slavery etc.

Auditor Category
- Becoming more Important/Common
- No Change
- Becoming less Important/Common
- Not Relevant/No view

Expectation that environmental audits provide evidence of environmental performance

Auditor Category
- Becoming more Important/Common
- No Change
- Becoming less Important/Common
- Not Relevant/No view

Audits examine behaviours, not just documentation

Auditing senior management

D2 Degree of agreement -

The participants were asked to indicate their agreement with a number of statements using a scale of 1 = strongly disagree to 6 = strongly agree. For each statement, the following pairs of graphs show the responses on the basis of:

- "Disagree" (score = 1-2), "Ambivalent" (score = 3-4) and "Agree" (score =5-6)
- "Disagree" (score = 1-3) and "Agree" (score =4-6)

Audit finding are generally presented in a manner which encourages...
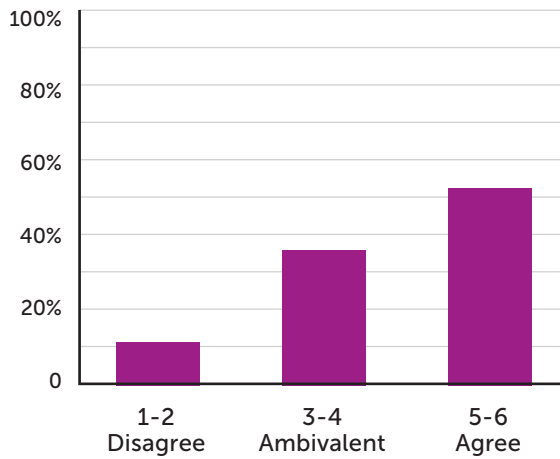
Audit finding are generally presented in a manner which encourages...
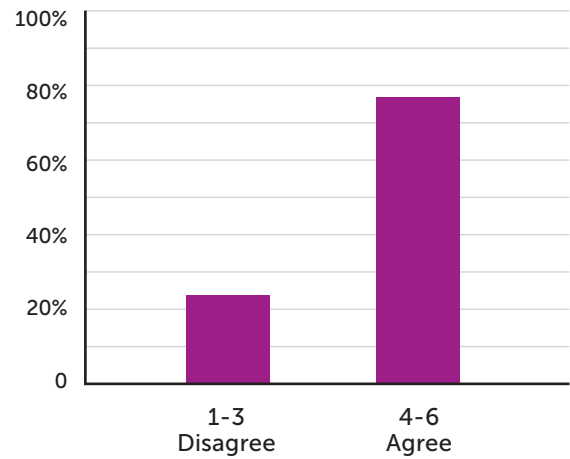
Audits should focus more on leading rather than lagging indicators of performance
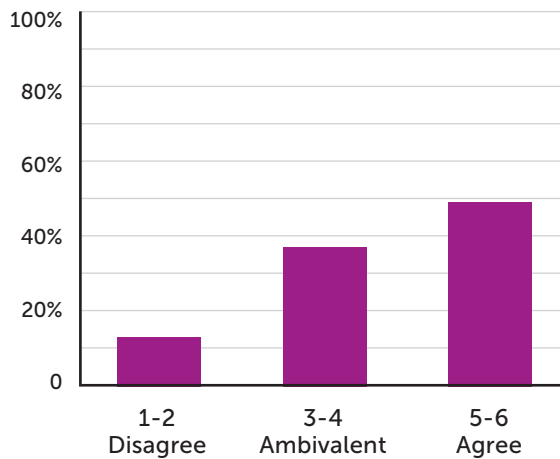
Audits should focus more on leading rather than lagging indicators of performance
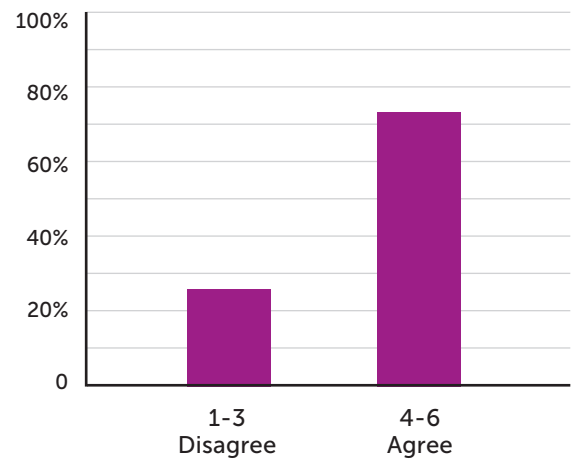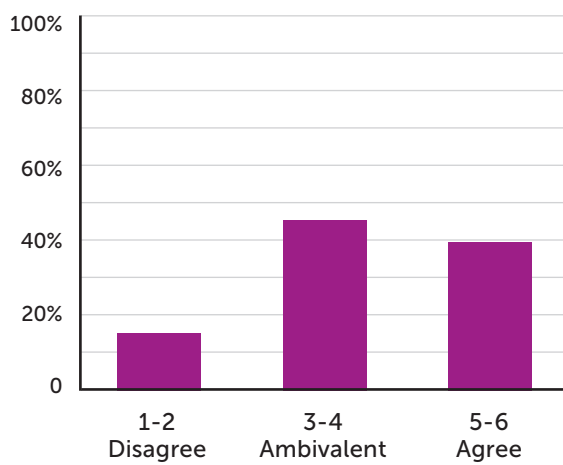
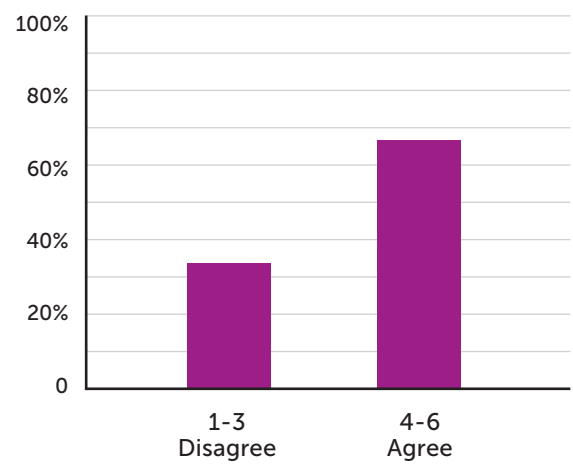## Audits finding are acted on by management
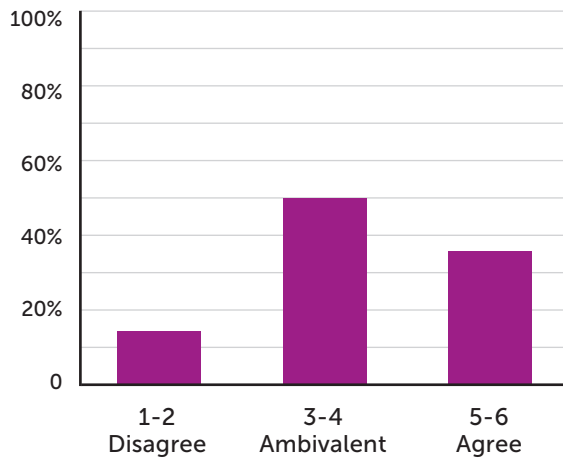
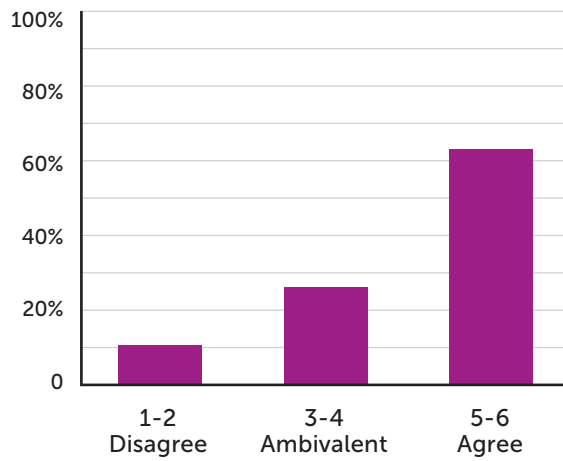

Audits finding are acted on by management
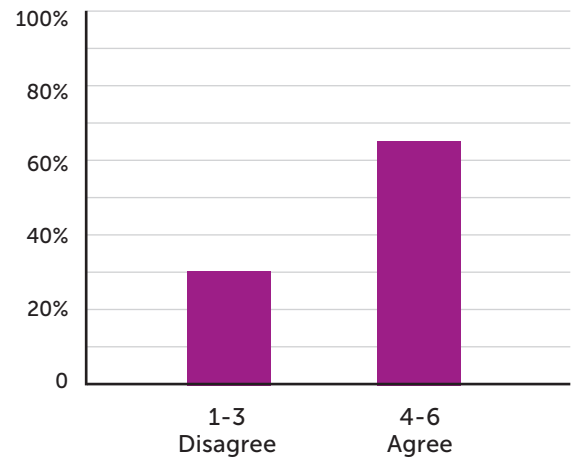
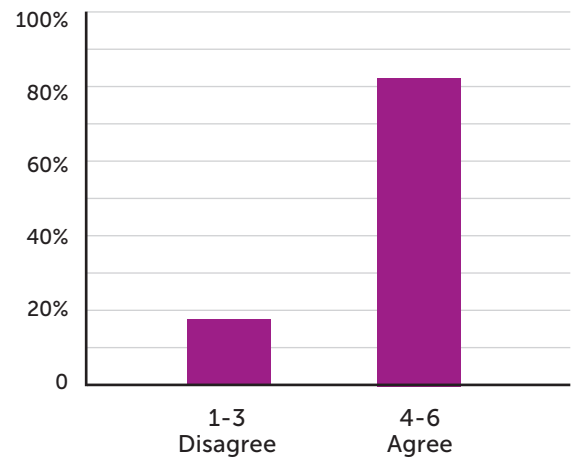## Management recognise that audits add value to organisations

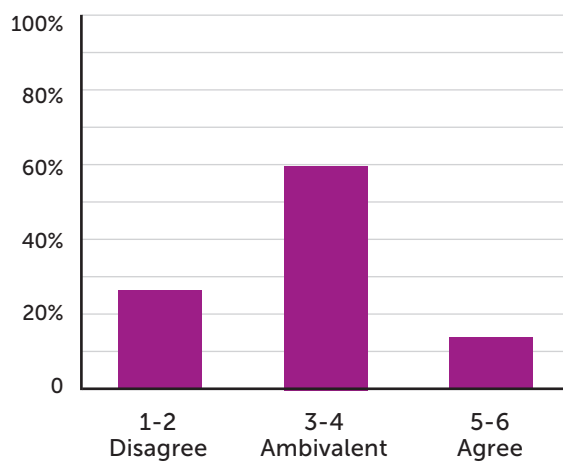## Management recognise that audits add value to organisations

More guidance is needed for auditors on emerging topics such as integrated audits, life-cycle and...
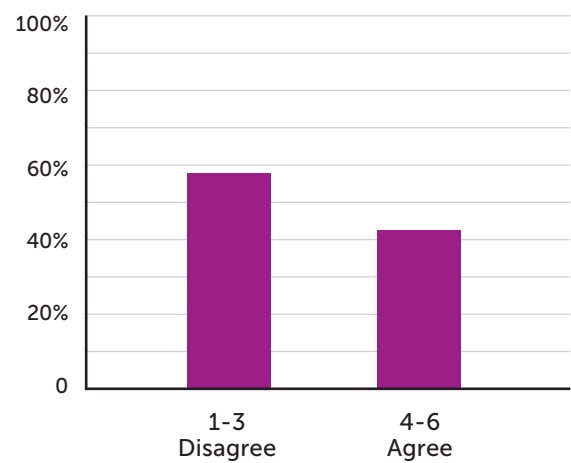

More guidance is needed for auditors on emerging topics such as integrated audits, life-cycle and...
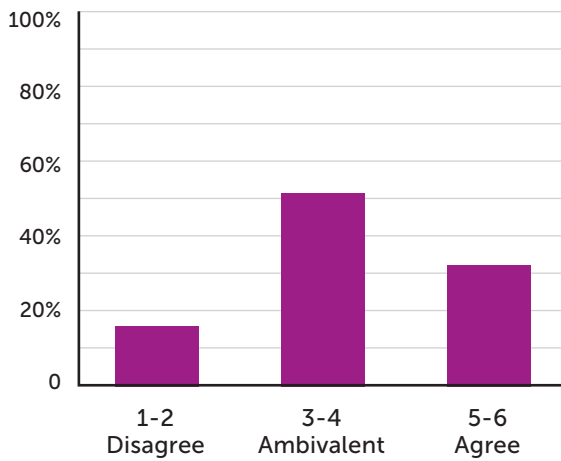

There is adequate accessible guidance for internal auditors, especially in SME's

There is adequate accessible guidance for internal auditors, especially in SME's
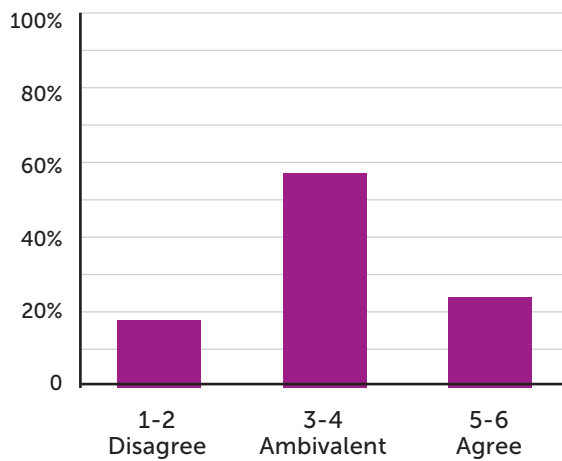
External environmental auditors have the necessary competence to produce useful audit...

External environmental auditors have the necessary competence to produce useful audit...
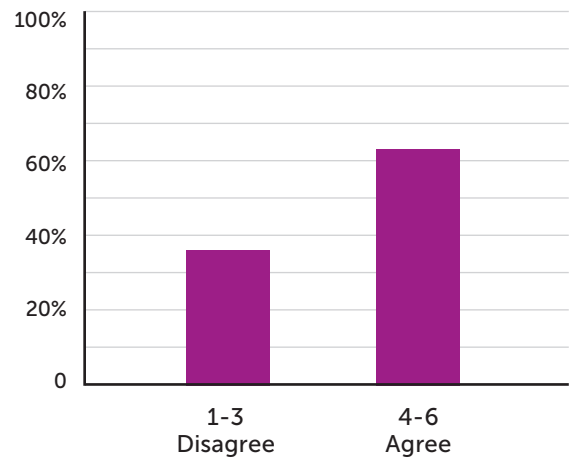
External integrated auditors have the necessary competence to produce useful audit...

External integrated auditors have the necessary competence to produce useful audit...

Internal auditors are asked to undertake audits without adequate training
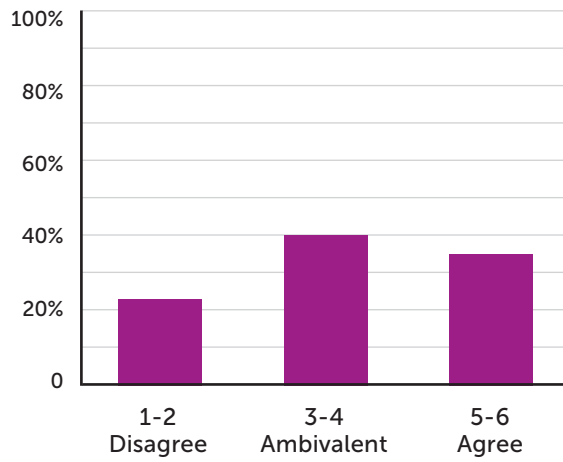
	1-2 Disagree	3-4 Ambivalent	5-6 Agree
	23%	40%	35%

Internal auditors are asked to undertake audits without adequate training

	1-3 Disagree	4-6 Agree
	44%	55%

There is adequate and effective guidance techniques for assessing auditor compliance

	1-2 Disagree	3-4 Ambivalent	5-6 Agree
	21%	65%	13%

There is adequate and effective guidance techniques for assessing auditor compliance

	1-3 Disagree	4-6 Agree
	55%	44%
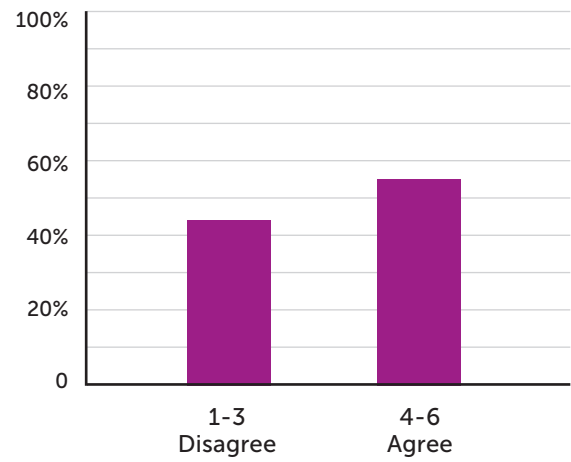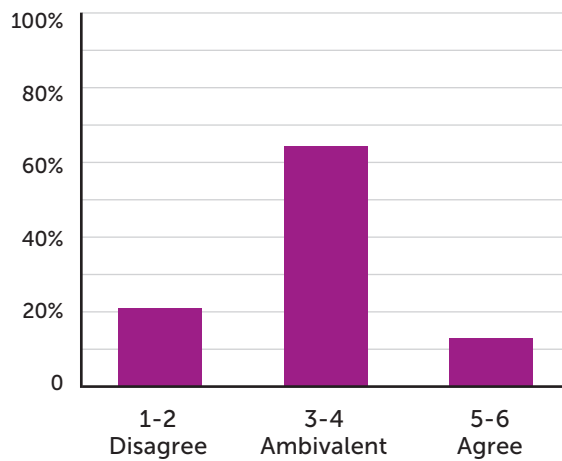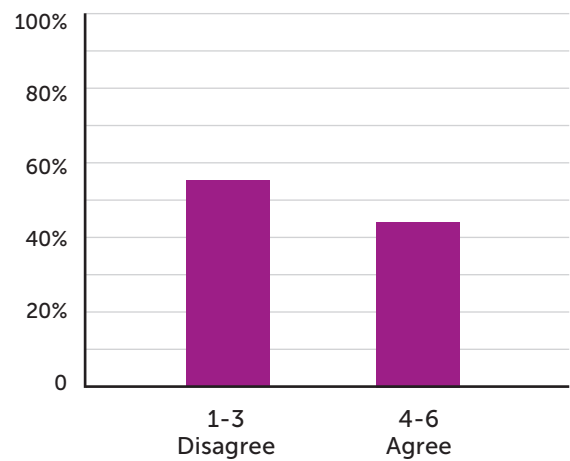
Organisations make available sufficient resources for internal environmental auditing

Organisations make available sufficient resources for internal environmental auditing
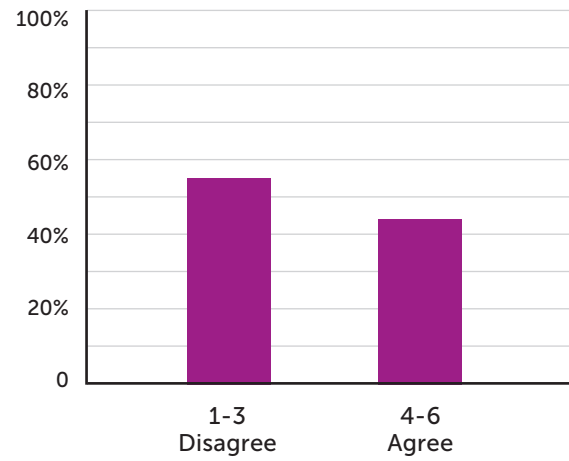
Appendix E - Workshops – approach and output

E1 Objectives and Approach

IEMA invited its members to participate in a series of workshops, held in February 2018 in Edinburgh, Manchester, Birmingham and London, to review the survey results and further explore the future challenges for environmental auditors. The principal objective of the workshops was to gain a greater understanding of practitioners' concerns, in particular:

- The emerging issues posing the greatest challenge to auditors

- The underlying causes of those challenges

- What made them challenging for auditors

- What auditors need to help them overcome the challenges (guidance, tools, etc.)

- What IEMA can do to help its members meet the challenges

The workshops comprised:

- An introductory presentation, addressing IEMA's objectives for the study and providing feedback from the online survey

- An exercise to prioritise the challenges

- An exercise to consider the underlying factors and potential solutions to selected challenging issues

E2 Prioritising the issues

The participants were asked to work in small groups to agree the six most important issues facing auditors, from the following fifteen taken from the survey. They could also add their own topics.

Integrated management systems auditing	Increasing number of standards	Auditing social and ethical issues
Assurance of sustainability data for submission to stock exchanges or regulators	Environmental audits of lifecycle and the supply chain	Audits of lifecycle/supply chain, including conflict minerals, anti-bribery legislation, modern slavery
Using digital or remote tools for environmental auditing	Ensuring that audits provide evidence of environmental performance	Auditing environmental or sustainability strategy or plans
Audits examining behaviours, not just documentation	Auditing senior management	Auditing environmental issues as part of business/ operational performance audits
Undertaking audits internationally	Ensuring management value audits	Ensuring findings are acted on

Additional issues identified by participants were:

- Consistency of audit practice

- Non-UKAS accredited certifiers

- Keeping up with changes in legislation

- Auditor competence

- Understanding the purpose of auditing

- Soft skills

- New requirements of the 2015 standards

A number of these are not emerging issues but reflect long-standing concerns regarding standards in auditing. Some of these attracted substantial discussion, and clearly remain topics of major concern to practicing auditors. The following bar chart shows the number of times each of the challenges was selected as a top six priority. The most frequently selected were:

- Integrated management systems auditing (7 times)

- Auditing senior management (7 times)

- Increasing number of environmental standards with some requirement for auditing (6 times)

- Audits examining behaviours, not just documentation (6 times)

- Ensuring management values the results of audits (6 times)

- Audits of lifecycle and the supply chain, including issues such as conflict minerals, anti-bribery legislation, modern slavery, etc. (6 times)

A further six issues were selected as a priority two or three times and the remainder were selected once each.

Key Issues Identified in Workshops

Issue	Value
Integrated management systems auditing	7
Increasing number of standards	6
Auditing social and ethical issues	1
Assurance of sustainability data for submission to stock exchanges or regulators	2
Environmental audits of lifecycle and the supply chain	2
Audits of lifecycle/supply chain, including conflict	5
Using digital or remote tools for environmental auditing	2
Ensuring that audits provide evidence of environmental performance	1
Auditing environmental or sustainability strategy or plans	3
Audits examining behaviours, not just documentation	6
Auditing senior management	7
Undertaking audits internationally	2
Auditing environmental issues as part of business/ operational performance audits	1
Ensuring management value audits	6
Ensuring findings are acted on	4
Other - Consistency of audit practice	2
Other - Non- UKAS certifiers	1
Other - Keeping up with changes in legislation	1
Other - Auditor competence	4
Other - Understanding the purpose of auditing	1
Other - Soft skills	1
Other - New requirements of the 2015 standards	1

E3 Exploring key issues

E3.1 Selecting the topics for discussion

The original intention was that each group of participants would, in addition to selecting six priority issues, identify the single most important topic. This would have helped to select the topics for more detailed discussion. However, in practice some groups found it hard to select one single topic, or in some cases identified two topics that they considered to be inter-related. As a result, a more consensus-based approach was taken to selecting topics for more detailed group discussion (numbers in brackets show the number of groups that discussed the topic).

- Integrated management systems auditing (4)

- Dealing with an increasing number of environmental standards with some requirement for auditing (2)

- Undertaking audits of lifecycle and the supply chain, including issues such as conflict minerals, anti-bribery legislation, modern slavery, etc.

- Audits examining behaviours, not just documentation (2)

- Auditing senior management

- Undertaking audits internationally

- Ensuring management values the results of audits/takes action (3)

- Consistency of audit practice (2)

- Auditor competence

- Keeping up with changes in legislation

- Soft skills

- External certification auditing

E3.2 Outcomes from the discussions

The objectives of the group discussions were to:

- Determine what makes the issue challenging for auditors

- Identify potential solutions, including

  - Support needed by auditors

  - What can IEMA do to help?

The following is a summary of key points arising from the discussions at the four workshops.

Consistency of audit findings

Issue

- Differing interpretations of standards

- Lack of competence of auditors, including soft skills

- Lack of sector knowledge/experience

- External auditors fear losing clients so may downplay negative findings

Solution

- More guidance

- A process for verifying findings

- Workshops and refresher training

- Need guidance for selecting audit activities, tools (such as checklists/aides memoir), resources, for different audit scopes and objectives (level of confidence, reproducibility)

Integrated management systems

Issue

- HS & E departments merging to cut cost so losing auditors with discipline skills

- How many auditors are genuinely multi-disciplinary?

- There is a risk that environmentalists will be left behind if they can't work on H&S

- Auditor experience determining prioritisation

- How to balance specialist auditors v multi-disciplinary

- Lack of discipline-specific knowledge/ competence (internal and external auditors)

- Disproportionate amount of time allocated to disciplines depending on an auditor's specialism/pet subjects

Solution

- Define scope of the audit and the business

- Provide more clarity regarding expected outcome from the audit

- Define the auditor competence needed

- Need either teams or multi-disciplinary individuals (who are rare)

- IEMA to provide more auditor CPD and training, specific to IMS auditing (internal and external auditors) – need to ensure environmental issues receive adequate priority

- IEMA to provide clarity on skills auditors need (including non-environmental professionals) – collaboration between professional bodies and certification bodies

Number of standards

Issue

- Wide range of standards – internal, external, market, regulatory

- Maintaining knowledge is a challenge

- Costly for individuals and companies to gain competence by training

- Lack of understanding by top management of auditor competency

- Too much flexibility in interpreting guidance

- Auditors unfamiliar with Annex SL requirements

Solution

- Quick referencing guide

- Training – in people and audit management skills (IEMA guidance for this)

- Webinars

- Stop bringing out standards!

Management taking action on findings

Issue

- Findings should be understandable – potential consequences, benefits

- How can auditors escalate findings to ensure action is taken?

- Would the results of unannounced audits be accepted more readily by management?

Solution

- Visibility and accountability to management – who to close out

- IEMA to help with mentoring and integrity of external auditors

- Need to prepare management to receive bad news

Soft skills and communications

Issue

- Many auditors lack soft skills - clear communication, putting auditee at ease, listening, silence, open questions

- Important to know when to move on

- Poor presentation of findings (oral and written)

- Inadequate documentation of evidence

Solution

- Auditor intuition and experience

- Key – auditor selection, induction, support and guidance

- IEMA to provide training, case studies, Q&A articles, simple guides in audit techniques, inc. softer auditing skills

Auditing internationally

Issue

- Culture/language

- Geography/cost

- Confidence and competence

Solution

- Training, understanding of culture, preparation, technology (e.g. Skype)

- IEMA to provide training, good practice and "rough guides" to countries/cultures

Audits examining behaviours, not just documentation

Issue

- Internal auditor – familiarity, not independent (auditee can over-share knowledge)

- Is it one-off behaviour or bigger picture – root cause?

- Announced or unannounced audits?

- Tone, asking the right question

- What does behaviour non-compliance look like?

- How to report findings regarding behaviours?

- Behaviours are different globally (e.g. recycling)

- Auditors don't focus enough on behaviours (for example like behavioural H&S)

- Auditors need to be aware of auditee behaviours during audits – distraction, obstruction, collaboration, etc.

- Are environmental practitioners more comfortable with technology than people (need soft skills)?

Solution

- Provide sufficient training

- Audit skills workshop

Audits examining behaviours, not just documentation

Issue

- Internal auditor – familiarity, not independent (auditee can over-share knowledge)

- Is it one-off behaviour or bigger picture – root cause?

- Announced or unannounced audits?

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- Auditors don't focus enough on behaviours (for example like behavioural H&S)

- Auditors need to be aware of auditee behaviours during audits – distraction, obstruction, collaboration, etc.

- Are environmental practitioners more comfortable with technology than people (need soft skills)?

Solution

- Provide sufficient training

- Audit skills workshop

Audits examining behaviours, not just documentation

Issue

- Management are concerned by audit costs v audit outcome/benefits

- Quality of external auditors (to have impact)

- Auditors demotivated if management do not value/support them

Solution

- Auditing findings should include achievements/ positive findings/good practice

- Senior management should be involved in audits to ensure they reflect business needs

- Provide guidance on organisational performance and auditing

- Need to change mindsets

Auditing senior management

Issue

- Need to understand management's motivations/drivers

- Auditors must see the big picture, communicate effectively

- Understanding strategic direction of business – relate to risk, future plans/objectives

Solution

- Improve the confidence of auditors

- IEMA briefing/training – how to audit senior managers, how to communicate with them (management terminology, convey value)

Auditing senior management

Issue

- How far should organisations go in the supply chain – so how far should auditors push them?

- What is good practice (ISO 20400 Sustainable procurement – guidance)?

- How should auditors advise auditees regarding balancing risks in the supply chain against costs of assessment and engagement?

- Ethical sourcing not well understood

- How to deal with the digital economy

- Difficult area for auditors

- Retailers are competing, so don't share information

Solution

- Simple guides in audit techniques, inc. life cycle/supply chain

External (certification auditing)

Issue

- Audit reports based on templates, often difficult to find findings

- Reports are copied, so often have errors (i.e. previous details left in)

- Auditors spend too much time writing reports on site

- Lack of sector knowledge

- How to challenge certifiers – no-one knows about role of the BSI mirror committee SES/1/1 in interpretation of ISO 14001

Solution

- Collaboration between professional bodies such as IEMA and certification companies

Competence

Issue

- Greater understanding needed of competences required for different audit scopes and criteria

- Keeping on top of changes in legislation

- Auditors need an increasing range of skills and knowledge to deal with a wider range of topics

- Lack of knowledge of the new requirements of the 2015 standards

- How can auditors develop in a small team – who can mentor them?

- Expectation that auditing skills can be applied to all areas, without specialist knowledge

- How to deliver robust and repeatable findings?

- How can auditors develop competence to defend their approach and results?

- Varying background/training from different organisations (external auditors)

- Level of experience of external auditors

Solution

- Some companies will have a team of auditors, including specialists

- QS for auditors?

- Guidance on auditor competence

- Define a clear scope (so appropriate auditor can be selected)

- Collaboration between IEMA, IRCA, IOSH, CQI etc. in requirements for auditors/auditing, guidance, CPD reporting requirements, etc.

Resources

Issue

- Preparation (lack of time)

- Lack of time to fully address audit scope

- Audit scope changed at short notice
  (staff unavailable, etc)

- Having to audit their own work (if not enough people
  in the organisation have environmental skills

Solution

- Consider benefits of a risk-based deep
  audit v a guidance-led simple approach
  ("proportionate approach")

- ISO 14001:2015 supports a risk-based approach, so
  should encourage resources to be used effectively

Other points raised (not necessarily related to auditing)
included:

- EMS processes often are separate from business
  processes/mainstream work, so are not prioritised

- Environmental issues are seen as the
  responsibility of the environmental team

- Duplication of processes – potential
  for consolidation/harmonisation

- It is easy to lose sight of purpose/
  key benefits of the audit

Recommendations for IEMA included:

- Develop more audit protocols

- Communicate the value of IEMA's
  auditor registration scheme

- Develop a guide on "what is a good auditor"

- Focus more on CPD, guides, training, webinars

- The website has little guidance compared to IOSH

- Could use online platforms to share learnings

- Networking events not well attended – why not?

- Only a small fraction of the 15,000 members play
  an active part – need better communications?

- How does IEMA use data on members
  to target what they need?

Appendix F - Experts' views

F1 Approach

A summary of the survey results and an overview of issues raised in the workshops was sent for comment to a number of experts in the fields of environment, quality and health & safety, including:

• Members of the International Organization for Standardiszation's environmental auditing sub-committee (TC207/SC2)

• Experts involved in the development of ISO 45001 (health & safety management systems standard

• Specialists in quality management

• Experts in environmental auditing

F2 Feedback from the experts

In general, the experts confirmed that they recognised the issues highlighted in the survey and workshops as being important to the future of environmental auditing. Additional or supporting comments included:

• Standards such as ISO 14001:2015 can be difficult to comprehend for users for whom English is not a first language. Auditors would benefit from simple guidance explaining the requirements.

• The Asian culture of not questioning authority can be an obstacle during internal audits. Consequently, not many are keen to audit their own Senior Management. They'd rather leave that to the certification auditors to do.

• Complaints regarding the ability of certification auditors to understand the requirements of ISO 14001:2015 are common in Asia, perhaps reflecting the lack of robustness in the accreditation process.

• When auditing integrated management systems, auditors need a good understanding of integration as well the context of an organisation, and its strategic direction, in addition to discipline-specific competence.

• The increasing number of standards may result in an increased burden on auditors and certification bodies in relation to knowledge management and training. This is a part of the professional development process. Its cost may be outweighed by the potential for differentiation on the basis of professionalism and capability (for external auditors)

• Management systems standards based on Annex SL are more subjective than the previous versions, which will require a greater use of professional judgement (a competence issue).

- Auditors (certainly OH&S) will have to look at auditing an organisation's culture (in relation to safety), something most auditors are ill-equipped to do.

- There may be benefits in developing joint guidelines on auditing for environmental and health & safety auditors, with collaboration from their respective professional bodies

- Auditors should become more productive and be able to identify efficiency and effectiveness issues while auditing and thus be seen by the C Suite as adding value to the organisation.

- Skills wise, few environmental auditors will be equipped for social compliance matters let alone human rights issues unless they are specialists in this area

- Auditing in the field of due diligence ESG - Environmental, Social and Governance - is increasingly in demand from companies and it might be good if IEMA could develop some guidance around these growing areas of audits and considerations for members should they wish to explore upskilling themselves in these areas - with 'health warnings' around key areas where they may be professionally exposed if they stray too much into specialist areas like human rights

- It is difficult for auditors operating internationally to get a good appreciation of environmental and social legislation at UK and EU level in other jurisdictions. This is a massive gap that IEMA could attempt to fill with the right partner.

- Issues pertaining to the competence of management systems auditors, continuing professional development and refresher training are pertinent to the quality discipline, which has experienced a degree of reluctance from auditors to undertake training to prepare them to audit against the most recent revisions to ISO 9001 and 14001.

- Given that there are some questions regarding the perceived value of third party certification, will some auditors look for alternative methods or approaches for providing assurance to their stakeholders?

- Evolving technology, business practice, and organisations being encouraged to use different and more varied sources of evidence means that management systems auditors are increasingly required to be able to identify and interrogate electronic data. Auditors must adapt to exploit this, and at present the resources, and indeed the appetite to support the requisite professional development is insufficient.

Appendix G – Webinar Feedback

The results of the study were presented to IEMA members in a webinar on 18th April 2018, with over 340 individuals participating. During the webinar, the views of the participants were sought on several topics, using a polling function.

The following three questions were asked, with the participants being able to select one answer per question (see tables below):

• What are your perspectives on the increasing challenges for environmental auditing?

• Do you broadly agree with these priorities from the workshops?

• Do you agree that IEMA should support auditors by: (a range of options)?

There were four possible answers to the first question on increasing challenges, with 10% of respondents answering that new audit topics and expectations are either not a challenge or auditors have the capability of meeting the challenges. However, 90% considered that auditors needed more support in order to meet the challenges, or without support, quality and value of audit findings is at risk.

When asked if they agreed with the priority issues identified in the workshops, only 2% stated that the key issues were not important or challenging. A total of 98% confirmed that they agreed with the priorities from the workshops, potentially with some additions or changes.

The final poll related to the type of support that members would like IEMA to provide. The options included downloadable audit tools, guidance on specific audit types and topics, more focused training, all of the first three and finally all of the first three, plus collaboration with other professional bodies. The final option received over 70% of the responses, showing there is clear support from IEMA members for greater collaboration with other professional bodies in providing support for auditing.

What are your perspectives on the increasing challenges for environmental auditing?		%
New topics and expectations are not a significant challenge	5	1.9%
Auditors have the capability of meeting the new challenges	22	8.1%
Auditors need more support to help meet the new challenges	136	50.2%
Without support, quality & value of audit findings is at risk	108	39.9%
Total responses	**271**	

What are your perspectives on the increasing challenges for environmental auditing?		%
Yes, these generally are the key priorities	148	58.7%
No, highlighted issues aren't important or challenging	5	2.0%
Happy with the priorities, with additions/changes	99	39.3%
Total responses	**252**	

Do you agree that IEMA should support auditors by:		%
Providing downloadable audit tools	11	4.1%
Providing guidance on specific audit types and topics	10	3.7%
Providing more focussed training	3	1.1%
All of 1-3	40	15.5%
All of 1-3 + collaborating with other professional bodies	194	71.6%
Total responses	**258**	

Appendix H - Study limitations

The participants in this study are from either a professional auditing background or other sustainability or environmental management role. With over 600 respondents, the sample size can be taken as representative of those IEMA members who have a genuine interest in environmental auditing. However, their experiences are not necessarily the same as other individuals in organisations, who have little or no environmental management or auditing experience, and yet are expected to undertake, commission or participate in environmental audits.

Secondly, the survey questionnaire did not include a question on the respondents' global location, so it has not been possible to identify any trends related to global region.

Thirdly, one of the questions in the survey asked respondents to select auditing issues or situations that were becoming more important or common (or no change, less important/common). The question did not ask specifically if this imposed challenges, although this perhaps can be inferred.

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Transforming the world
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We are the worldwide alliance of environment and sustainability
professionals. We believe there's a practical way to a bright future
for everyone, and that our profession has a critical role to play.

Ours is an independent network of more than 15,000
people in over 100 countries, working together to make
our businesses and organisations future-proof.

Belonging gives us each the knowledge, connections, recognition,
support and opportunities we need to lead collective change,
with IEMA's global sustainability standards as our benchmark.

By mobilising our expertise we will continue to challenge
norms, influence governments, drive new kinds of enterprise,
inspire communities and show how to achieve measurable
change on a global scale. This is how we will realise our
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