

ISO 14001:2015 Transition to ISO 14001:2026

July 29, 2026

How Long Do I Have to Update?

Already
registered?

- 3 yrs to transition – work with registrar on timing

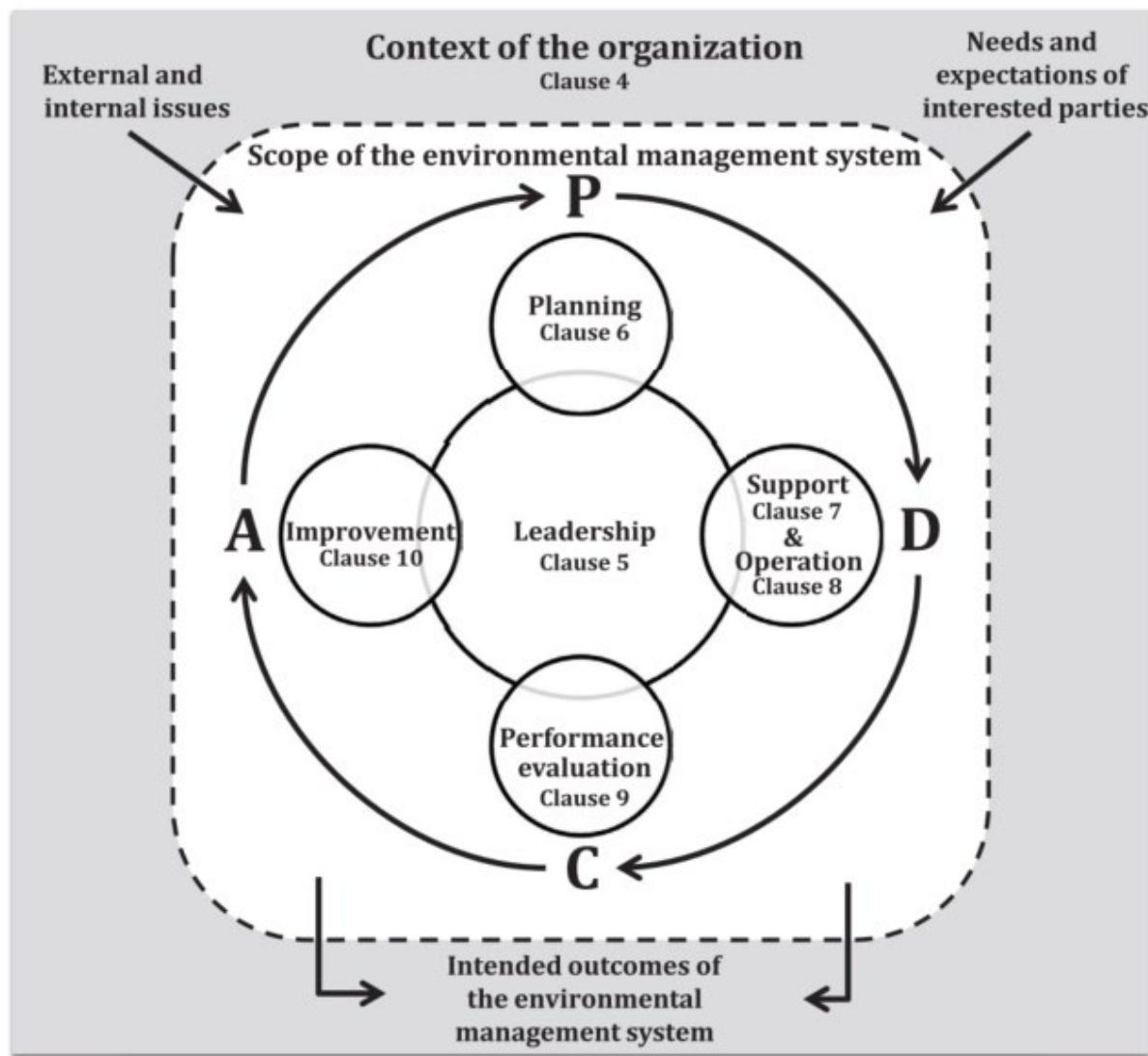
Not yet
registered?

- Applies NOW

What Changed?

- More emphasis on sustainability
 - Climate change
 - Biodiversity
 - Ecosystem health
- Clarification of lifecycle
- Minor wording updates
 - “Fulfil” to “meet”
 - “Maintain” and “Retain” to “Available”
- Reordering of some subclauses for clarity and consistency
- Added subclause for change management

PDCA Model – Now with Clause Numbers



Changes by Clause

CLAUSE 4 – CONTEXT OF THE ORGANIZATION

4.1 Understanding the organization and its context

2015

- Determine external & internal issues including environmental conditions capable of affecting or being affected by the organization

2026

- Determine external & internal issues including environmental conditions capable of affecting or being affected by the organization

2024 Amendment

- Must determine if climate change is a relevant issue

- **“such as pollution levels, availability of natural resources, climate change, biodiversity, ecosystem health”**

4.2 Understanding the needs and expectations of interested parties

- c) which of these needs and expectations become its compliance obligations **(see 6.1.3) and will be addressed through the environmental management system**
- Added 2 notes
 - **NOTE 1 Relevant interested parties can have needs and expectations related to environmental conditions, such as pollution levels, availability of natural resources, climate change, biodiversity or ecosystem health.**
 - **NOTE 2 The relevant needs and expectations of interested parties, other than legal requirements, become a compliance obligation when the organization decides to comply with them**

REMEMBER – Notes are not requirements - only for clarification and guidance

4.3 Determining the scope of the EMS

Added Lifecycle perspective to the following:

When determining the scope, the organization shall consider:

e) its authority and ability to exercise control and influence, **over the life cycle of its activities, products and services.**

Changed wording from 'maintained' to 'available'

The scope shall be **available** as documented information and shall be available to interested parties.

NO CHANGE to 4.4 – Environmental Management System

Changes by Clause

CLAUSE 5 – LEADERSHIP

5.1 Leadership and commitment

Removed the word management from i) to be more inclusive:

Top management shall demonstrate leadership and commitment with respect to the environmental management system by:

- i) supporting other **management** relevant roles to demonstrate their leadership as it applies to their areas of responsibility.

5.2 Environmental policy

2015

...policy that within the defined scope of its environmental management system:

- d) includes a commitment to **fulfil** its compliance obligations

- The environmental policy shall:
- — be **maintained** as documented information

2026

...policy within the defined scope of its environmental management system that:

- d) includes a commitment to **meet** its compliance obligations

- The environmental policy shall:
- — be **available** as documented information

5.3 Roles, responsibilities and authorities

Title removed the word “Organizational”

“this International Standard” was replaced with “this document” in a)

Changes by Clause

CLAUSE 6 – PLANNING

6.1 Actions to address risks and opportunities

2015

6.1.1 General

6.1.2 Environmental aspects

6.1.3 Compliance obligations

6.1.4 Planning action

2026

6.1.1 General

6.1.2 Environmental aspects

6.1.3 Compliance obligations

6.1.4 Risks and opportunities

6.1.5 Planning action

Info from 6.1.1 was mainly split into shortened 6.1.1 and new 6.1.4 R&O subclause – Reordered for clarity and better flow of operations

6.1.1 General

6.1.1 General, first paragraph

Replaced reference from 6.1.1 to 6.1.4 to **6.1.2 to 6.1.5.**

6.1.1 General, second paragraph

Moved to 6.1.4. Risks and Opportunities, as first paragraph.

6.1.1 General, third paragraph

Moved to 6.1.2 Environmental Aspects, as first paragraph.

6.1.1 General, last paragraph Reworded to:

The process(es) for 6.1.2 to 6.1.5 shall be available as documented information to the extent necessary to have confidence they are carried out as planned.

6.1.2 Environmental aspects

6.1.1 General, third paragraph moved to 6.1.2 Environmental Aspects, as first paragraph.

Potential emergency situations are now defined here.

Added reference to 6.3 to third paragraph –
Switched a) and b) and added ‘normal’ to a). Split emergency situations out from abnormal operations.

“When determining environmental aspects, the organization shall take into account:

- a) **normal** and abnormal conditions;
- b) change, including planned or new developments, and new or modified activities, products and services (see 6.3);
- c) potential emergency situations.

6.1.2 Environmental aspects – cont'd

Reworded last paragraph from “shall maintain documented information” to:

The following shall be **available** as documented information: ...

Added note with guidance on lifecycle perspective

6.1.3 Compliance obligations

Reworded last paragraph from “shall maintain documented information” to:

The compliance obligations shall be **available** as documented information.

6.1.4 Risks and opportunities

Moved original 6.1.4 Planning action to 6.1.5

6.1.1 General, second paragraph moved to 6.1.4 Risks and Opportunities, as first paragraph.

Added highlighted terms

When planning for the environmental management system, the organization shall consider:

- a) the external and internal issues referred to in 4.1;
- b) the needs and expectations of interested parties referred to in 4.2;
- c) the scope of its environmental management system referred to in 4.3;

6.1.5 Planning action

Moved from 6.1.4 to new 6.1.5

Additional clarity added by referencing 6.1.2, 6.1.3, 6.1.4 in the first paragraph.

6.2 Environmental objectives and planning to achieve them

Reworded last paragraph in 6.2.1 from “shall maintain documented information” to:

f) **available** as documented information

6.3 Planning of changes

NEW Subclause!!!!

“When the organization determines the need for changes that affect or can affect the environmental management system, the changes shall be carried out in a planned manner. The changes shall be managed to ensure that the organization can achieve the intended outcomes of its environmental management system.”

6.3 Planning of changes (cont'd)

NOTE 1 The need for change to the environmental management system can arise from internal or external sources. See **A.6.3** for examples.”

“Changes affecting the environmental management system can arise from internal or external sources. The organization plans the implementation and control of temporary and permanent changes that can impact environmental performance, including:

- a) new or changes to existing products, services, processes, operations, equipment or facilities;
- b) changes to compliance obligations;
- c) changes in knowledge or information about environmental aspects, environmental impacts or risks and opportunities;
- d) developments in knowledge and technology;
- e) changes to technical specifications of materials or process inputs;
- f) changes in business assets due to mergers, acquisitions, joint ventures or divestitures;
- g) changes in staff or external providers, including contractors;
- h) business disruption due to, for example, supply chain issues, labour disputes, natural disasters, regime change, political unrest or war.”

6.3 Planning of changes (cont'd)

NOTE 2 Managing change is addressed in various requirements in this document. See **A.6.3** for examples.

“Requirements for managing change are included in various clauses in this document, such as:

- environmental aspects (see 6.1.2);
- internal communication (see 7.4.2);
- control of documented information (see 7.5.3);
- operational control (see 8.1);
- internal audit programme (see 9.2.2);
- nonconformity and corrective action (see 10.2). “

Changes by Clause

CLAUSE 7 – SUPPORT

7.1 Resources

No change

7.2 Competence

Changed 'fulfil its compliance obligations' to '**meet** its compliance obligations' in a)

Reworded last paragraph from "The organization shall retain appropriate documented information as evidence of competence." to

“Appropriate documented information shall be available as evidence of competence.”

7.3 Awareness

Changed 'fulfilling the organization's compliance obligations' to '**meeting** the organization's compliance obligations' in d)

7.4 Communication

7.4.1 General

In the last sentence, replaced:

- "The organization shall retain documented information as evidence of its communications, as appropriate."

with:

- "Appropriate documented information shall be **available** as evidence of the organization's communications."

7.5 Documented Information

7.5.1 General

Second list item in Note replaced “fulfilment” to “meeting”.
— the need to demonstrate meeting its compliance obligations;

7.5.2, subclause title “Creating and updating” changed to
“Creating and updating documented information”

Changes by Clause

CLAUSE 8 – OPERATION

8.1 Operational planning and control

Third paragraph replaced:

The organization shall ensure that outsourced processes are controlled or influenced.

with:

The organization shall ensure that externally provided processes, products or services that are relevant to the intended outcomes of the environmental management system are controlled or influenced.

Last paragraph replaced:

maintain documented information with **available** as documented information

8.2 Emergency preparedness and response

Replaced “identified” with “determined” and updated reference to 6.1.2 in first paragraph.

“The organization shall establish, implement and maintain the process(es) needed to prepare for and respond to potential emergency situations **determined** in **6.1.2**.”

Last paragraph replaced maintain documented information with **available** as documented information

Changes by Clause

CLAUSE 9 – PERFORMANCE EVALUATION

9.1 Monitoring, measurement, analysis, and evaluation

9.1.1 General

First sentence changed from:

“The organization shall monitor, measure, analyze and evaluate its environmental performance.”

to:

“The organization shall evaluate its environmental performance and the effectiveness of the environmental management system.”

And

9.1.1 paragraph 4 was deleted to avoid redundancy because of the above change

9.1 Monitoring, measurement, analysis, and evaluation cont'd

9.1.1 General

Second paragraph, added “analyzed”

“The organization shall determine:

a) what needs to be monitored, measured and **analysed**;

Last paragraph, changed retain appropriate documented information to “Appropriate documented information shall be **available** as evidence of the monitoring, measurement, analysis and evaluation results.”

9.1 Monitoring, measurement, analysis, and evaluation cont'd

9.1.2 Evaluation of compliance

First paragraph replaced “fulfilment of” with “meeting”:

“The organization shall establish, implement and maintain the process(es) needed to evaluate if it is **meeting** its compliance obligations.”

Last paragraph, changed retain documented information to “Appropriate documented information shall be **available** as evidence of the compliance evaluation results.”

9.2 Internal audit

9.2.2 Internal audit programme

third paragraph, bullet a) added “audit **objective(s)**”

a) define the audit objective(s), audit criteria and scope for each audit;

Last paragraph, replaced “The organization shall retain documented information as evidence of implementation of the audit programme and the audit results”

With”

“The following documented information shall be available:

- the audit programme;**
- evidence of the implementation of the audit programme(s);**
- evidence of the audit results”**

9.3 Management review

Three subtitles added:

- 9.3.1 General, same as 2015 first paragraph
- 9.3.2 Management review inputs,
 - First paragraph: The management review shall include consideration of replaced with “**The management review inputs shall include:**”
 - Second paragraph, bullet b) 2) Added “**that are relevant to the environmental management system**”

9.3 Management review cont'd

Three subtitles added (cont'd):

- 9.3.3 Management review results,
 - Replaced 'outputs' with '**results**' in first paragraph
 - Second paragraph, bullet d) 3) replaced "fulfilment" with "**meeting**":

Replaced 'retain' with '**available**' documented information in last paragraph.

Changes by Clause

CLAUSE 10 – IMPROVEMENT

10.1 Continual Improvement

10.1 'General' is now "Continual Improvement"

10.3 content was moved to 10.1 and subsection was deleted.

"The organization shall continually improve the suitability, adequacy and effectiveness of the environmental management system to enhance environmental performance by determining opportunities for improvement (see Clause 9 and 10.2) and implementing necessary actions to achieve the intended outcomes of its environmental management system."

10.2 Nonconformity and corrective action

- Third paragraph replaced 'The organization shall retain documented information as evidence of...' with
'Documented information shall be **available** as evidence o

Annex A

Annex A in ISO 14001:2026 includes clearer, more practical guidance on:

- Climate, biodiversity & ecosystem health
- Life cycle
- Change management
- Terminology alignment

Next Steps

- Obtain a copy of ISO 14001:2026
- Complete a gap analysis against the 2026 standard.
- Develop a transition plan including internal awareness and communication.
- Update your EMS with a few key items:
 - Review context to determine applicability of natural resource availability, climate change, biodiversity, and ecosystem health.
 - Revise your EMS Scope to reflect a lifecycle approach.
 - Separate emergency situations from abnormal operations in aspects/impacts analysis.
 - Ensure management of changes is addressed
 - Revise operational control processes to extend to suppliers and partners.

Next Steps cont'd

- Update your EMS with a few key items:
 - Update internal auditing processes to define objectives in addition to scope and criteria.
 - Document internal audit plan (more than just schedule)
 - Update management reviews to restructure into three sub-clauses: inputs, process, and results.
 - Strengthen root cause analysis and improvement tracking to link between performance evaluation findings and continual improvement.
- Address changes in Management Review.
- Complete an internal audit to the 2026 standard.
- Work with registrar to transition certificate to 2026.

Questions?

Feel free to reach out anytime with questions:

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