ISO 14001:2026

What has changed — and what to check in your environmental management system (EMS)

A leadership briefing prepared from direct comparison of BS EN ISO 14001:2015 and BS EN ISO 14001:2026 | QFactorial | Sept 2026

This briefing does not constitute certification advice.

ISO 14001:2026 was published on 15 April 2026, ahead of ISO 9001:2026 on 16 September 2026. Both revisions are now in their transition periods. The deadlines are ISO 14001 by April 2029 and ISO 9001 by September 2029. If you use both standards, the most efficient approach may be to plan both transitions together, aligning them with your next scheduled certification audit and completing them as a single coordinated programme. The changes to ISO 14001 are in six targeted areas, so a full gap assessment won't be required if you already comply with ISO 14001:2015. The important consideration when planning how to implement the changes is that most of them require you to build up a body of evidence over time. Creating or revising policies and procedures will not suffice.

What's changed

1 Context must name environmental conditions

What is new in 2026 is that Clause 4.1 itself now names pollution levels, availability of natural resources, biodiversity and ecosystem health. The 2015 guidance notes gave similar examples, but guidance notes carry no obligation.

What to check in your EMS

Ensure:

- Your context analysis addresses the environmental conditions that affect you or that you affect: pollution levels, availability of natural resources (including water), biodiversity and ecosystem health.
- You monitor changes in environmental conditions, climate change included, and bring them to management review, so the analysis stays current.

2 Context analysis must consider climate change

A 2024 amendment to ISO 14001:2015 already made climate change a normative consideration in Clauses 4.1 and 4.2. In 2026 it is part of the base text, named among the environmental conditions in Clause 4.1. If you're already certified, this should already be evidenced.

Ensure:

- Your context analysis explicitly records whether (and how) climate change affects your organisation and is affected by it.
- You consider indirect as well as direct impacts, e.g. the impact on your business if your suppliers and customers are impacted by climate change.
- No new action needed if this was fully addressed when the 2024 amendment came out.

3 Life cycle must inform your EMS scope

Life cycle thinking was previously required when identifying environmental aspects. From 2026 it also applies when you set the scope (Clause 4.3): you must consider your authority and ability to control and influence the life cycle of your activities, products and services. Scope cannot be drawn to ignore upstream or downstream environmental impacts.

Ensure:

- Your scope statement reflects your influence over how you source (supplier environmental practices) and how customers use your products.
- Your aspects register covers upstream and downstream life cycle stages as well as on-site activities.

4 Change management is now explicit

ISO 14001:2015 had no clause on planning of changes. Change was covered only through other requirements, such as aspects, internal communication, operational control, audit and management review. Clause 6.3 now requires changes that affect the EMS to be carried out in a planned manner, so that it still achieves its intended outcomes. This will be familiar if you also hold ISO 9001.

Ensure:

- Your change process asks what the environmental implications are, for the EMS and in practical terms, before a change is made.
- Key triggers include new products or service lines, changes of supplier or contractor, regulatory updates and changes in customer environmental requirements.
- You don't get caught out trying to retrospectively document a change after the event.

5 Control or influence now reaches purchases

In 2015 the requirement to control or influence applied to outsourced processes. In 2026 it also reaches externally provided products and services that are relevant to the intended outcomes of the EMS, with the type and extent of control or influence defined within the EMS. The change is the reach: your supply chain as a whole is now in scope.

Ensure:

- You have defined the type and extent of control or influence you apply to externally provided products and services that are relevant to the intended outcomes of your EMS, as well as to outsourced processes.
- Your purchasing process includes environmental criteria for suppliers of processes, products and services, and you can show them being applied when you select, brief and review suppliers.
- Where your influence over a supplier is limited, you can show what you considered and what you decided to do.

6 Internal audits need an objective

Each internal audit in your programme must have its own documented objective in addition to its criteria and scope.

Ensure:

- Each internal audit has a specific, documented objective, in addition to its established criteria and scope.

Not sure how or when to get started with the changes? Talk to us.
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