Climate **Performance**

ISO 14001:2026 - WHAT'S CHANGING AND WHAT YOU NEED TO DO

A guide to understanding and implementing the updates to ISO 14001



LRQA

Your Risk Management Advantage

INTRODUCTION

The published ISO 9001:2026 standard marks an important step forward in how organisations are expected to manage environmental risks, impacts and responsibilities. While the structure of the standard remains consistent with the Harmonised Structure (Annex SL), the standard introduces changes that reflect new global priorities such as climate resilience, biodiversity protection and the role of environmental performance in organisational sustainability.

This guide outlines all the changes, grouped by clause, and provides practical guidance to help you evaluate and prepare your environmental management system (EMS) for the transition.

WHY IT MATTERS

The updated ISO 14001 reflects growing global expectations around climate change, nature, and ecosystem impacts. Understanding the changes now will help you stay ahead of stakeholder and compliance demands.

CLAUSE-BY-CLAUSE BREAKDOWN OF KEY CHANGES

CLAUSE 1 TO CLAUSE 3

UPDATED WORDING, NO NEW REQUIREMENTS

While Clauses 1 to 3 remain non-certifiable, there are editorial changes throughout to improve clarity and consistency with other ISO standards.

- “This International Standard” is replaced with “This document” throughout
- Clarifications have been made in definitions (Clause 3) to reflect updated terminology and structure
- The term “risk” as a standalone concept has been removed and replaced with the combined term “risks and opportunities”

Tip

Review your EMS documentation and terminology. Align your language with the new standard to ensure clarity and audit readiness.



CLAUSE 4

CONTEXT OF THE ORGANISATION

Clause 4 has been updated to ensure that environmental conditions are explicitly considered in the EMS.

Investments in energy-intensive industries such as manufacturing, logistics and real estate contribute significantly to global carbon emissions. Demonstrating progress in reducing carbon footprints gives competitive differentiation and long-term growth.

KEY CHANGES



- Environmental conditions such as pollution levels, climate change, biodiversity and ecosystem health must now be considered as external issues (4.1)
- Stakeholder needs and expectations (4.2) may now include expectations related to environmental conditions
- Organisations must assess their authority and ability to influence, considering a life cycle perspective (4.3)
- The phrase “maintain documented information” is replaced with “available as documented information”

WHAT YOU NEED TO DO



- ✓ **Update your context analysis to include specific environmental conditions**
- ✓ **Revisit your stakeholder analysis and evaluate new environmental expectations**
- ✓ **Ensure your EMS scope takes a life cycle perspective into account**
- ✓ **Review how you make key EMS documents available to interested parties**

CLAUSE 5

LEADERSHIP

Clause 5 now reinforces the role of top management in embedding sustainability into the EMS.

Leadership spotlight

The revised standard expects leaders to actively shape environmental culture, not just oversee compliance.

KEY CHANGES

- Top management must support all relevant roles, not just “management” roles (5.1)
- The commitment is now to “meet compliance obligations” rather than “fulfil”
- New emphasis on environmental performance, biodiversity and the conservation of natural resources
- Documentation must be “available” rather than simply “maintained”

WHAT YOU NEED TO DO

- ✓ **Ensure top management understands the broader scope of leadership in the EMS**
- ✓ **Update your environmental policy to reflect revised terminology and broader commitments**
- ✓ **Make policy documentation clearly accessible internally and externally**

CLAUSE 6

PLANNING

Clause 6 sees some of the most structural changes, particularly in the planning of risks and actions.

New clause alert

Clause 6.3 requires formal planning and control of EMS-related changes.
This is a new and auditable requirement.

KEY CHANGES

- Clause 6.1.1 has been simplified, with its content now split into 6.1.4 and 6.1.5
- Clause 6.1.2 requires you to identify potential emergency situations as a separate requirement from abnormal conditions
- Clause 6.1.4 (new) focuses specifically on identifying risks and opportunities
- Clause 6.1.5 (new title for former 6.1.4) covers planning actions to address risks, aspects and compliance
- A new Clause 6.3 has been added for managing changes to the EMS

WHAT YOU NEED TO DO

- ✓ **Separate your planning processes into identification (6.1.4) and action (6.1.5)**
- ✓ **Update your aspect analysis to include potential emergency situations**
- ✓ **Introduce a structured change management approach as required by Clause 6.3**
- ✓ **Review your planning documentation to reflect new clause references**

CLAUSE 7

SUPPORT

Changes to Clause 7 focus on standardising terminology and improving clarity on documentation.

KEY CHANGES

- “Fulfil compliance obligations” becomes “Meet compliance obligations” in 7.2 and 7.3
- All references to retaining or maintaining documented information are now stated as “available as documented information”
- Communication processes must enable individuals to contribute to continual improvement (7.4)

WHAT YOU NEED TO DO

- ✓ **Review how competence evidence is documented and ensure it is accessible**
- ✓ **Ensure all EMS communications, both internal and external, are traceable and transparent**
- ✓ **Adjust process descriptions to align with revised terminology**

CLAUSE 8

OPERATION

Clause 8 introduces clearer expectations for controlling external processes and formalises emergency preparedness requirements.

The new language highlights that contractors and suppliers are now clearly within scope of operational control.

KEY CHANGES

- “Outsourced processes” now referred to as “externally provided processes, products and services”
- Greater emphasis on life cycle and external influence in operational control (8.1)
- Emergency planning (8.2) now directly linked to determinations made in 6.1.2
- Documentation phrasing changed to “available as documented information”

WHAT YOU NEED TO DO

- ✓ **Identify all externally provided processes and assess control mechanisms**
- ✓ **Revisit emergency response plans to ensure they reflect updated planning clauses**
- ✓ **Ensure operational documentation is accessible and consistently maintained**

CLAUSE 9

PERFORMANCE EVALUATION

The revised standard adds clarity to how performance is evaluated and how compliance is assessed.

KEY CHANGES



- Evaluation of environmental performance and EMS effectiveness is now explicitly required (9.1.1)
- Internal audits must define objectives as well as scope and criteria (9.2.2)
- The management review clause has been split into three sub-clauses (9.3.1 to 9.3.3)
- All documentation references now require information to be “available”

WHAT YOU NEED TO DO



- ✓ **Update your internal audit protocols to include defined objectives**
- ✓ **Ensure performance evaluation includes EMS effectiveness, not just data points**
- ✓ **Revise your management review process to follow the new substructure**

CLAUSE 10

IMPROVEMENT

Clause 10 has been streamlined to remove duplication and integrate improvement more clearly across the standard.

KEY CHANGES



- Corrective actions consider system wide imapct and potential recurrence
- Continual improvement (10.1, formerly 10.3) is explicitly linked to the outputs of performance evaluation, compliance evaluation, audits and management review
- Clause renumbering — continual improvement moves from 10.3 to 10.1

WHAT YOU NEED TO DO



- ✓ **Review your corrective action procedure so it addresses root cause and recurrence elsewhere, not just the immediate fix**
- ✓ **Ensure continual improvement draws on your audit, review and evaluation outputs**
- ✓ **Realign clause references in your procedures to the new numbering**

CONCLUSION

ISO 14001:2026 strengthens the relationship between environmental performance, organisational change and sustainability leadership. While many changes are editorial, several introduce new or clearer requirements that must be addressed to maintain compliance and ensure your EMS remains fit for purpose.



START NOW

Begin aligning your EMS with the new requirements. **The sooner you act, the more confidently you can manage the transition.**

NEXT STEPS WITH LRQA

To support your transition:

- Sign up to LRQA's **Transition Club** for regular updates on ISO 14001, 9001 and 45001 and access early insights, tools and practical guidance to support your EMS updates
- Explore our dedicated **ISO 14001:2026 transition training** to help your team understand and implement the changes
- **Speak to our team of experts**

ABOUT LRQA

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Through our connected risk management solutions, we help you navigate an evolving global landscape to keep you one step ahead.

From certification and cybersecurity, to safety, sustainability and supply chain resilience, we work with you to identify risks across your business. We then create smart, scalable solutions, tailored to help you prepare, prevent and protect against risk.

Through relentless client focus, backed by decades of sector-specific expertise, data-driven insight and on-the-ground specialists across assurance, certification, inspection, advisory and training, we support over 61,000 organisations in more than 150 countries.

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