



Transportation Safety
Healthcare Waste Management
Dangerous Goods Safety Advisors



Health, Safety
& Environmental
Management

ISO 14001:2026: What to expect and how to prepare

The revised ISO 14001:2026 environmental management standard was published in April 2026. Existing 14001:2015 system accreditations are valid until at least June 2027 and there will be a transition phase which has previously been a three year period (2029).

Begin planning now by reviewing your system against the summary below. There are no new requirements, only more specific and detailed exploration of existing clauses and some additional clauses are required as a result.

Peak HSE can offer guidance and practical support through this transition to make sure your organisation is fully prepared. Please contact us at enquiries@peakhse.co.uk or call 0114 272 0335.

Clause Revisions

Clause 4 – Context of the Organisation

There is greater focus on external environmental factors that may impact the organisation to include supply chains.

There is a greater requirement to consider climate change impacts, to reflect the growing global alarm for the need to address critical environmental and ecological issues.

4.1 Environmental conditions such as pollution, climate, biodiversity and ecosystem health must be considered as external factors.

4.2 Stakeholder needs may include environmental conditions and they may have requirements to address climate change which must be identified.

4.3 EMS scope MUST reflect a life-cycle approach which must be actively applied in environmental planning.

Key documents must be available as documented information.

Clause 4 - Action

1. Update your context analysis, stakeholder maps and scope definition.
2. Update your context analysis to include specific environmental conditions.
3. Revisit your stakeholder analysis and evaluate new environmental expectations.
4. Ensure your EMS scope takes a lifecycle perspective into account.
5. Review how you make key EMS documents available to interested parties.



Clause 5 – Leadership

There will be greater accountability and personal involvement required of leadership and top management to drive environmental performance. Ultimate responsibility for progress and cultural change and engagement will rest with leadership.

5.1 Top management **MUST** support all roles not just those in management.

The term ‘meet compliance obligations’ replaces ‘fulfil’.

There is greater emphasis on conserving natural resources and ecosystem protection.

Clause 5 - Action

1. Revise your environmental policy to reflect revised terminology and broader commitments and ensure executive engagement.
2. Ensure top management understands the broader scope of leadership in the EMS.
3. Ensure that the environmental policy is accessible to all stakeholders both internally and externally.

Clause 6 – Planning

Clarification has been made to environmental aspects by requiring clear links between aspects and compliance obligations, with actions planned to address them.

The aim is to engage proactive and strategic approaches to environmental performance. Change management is required to drive positive outcomes and ensure a ‘catch-all’ approach to impacts.

6.1.1 Planning to address risk and opportunities will be split into:

6.1.2 When evaluating environmental aspects and impacts, emergency situations must be separate from ‘abnormal’ operations, e.g., normal, abnormal, and emergency.

6.3 This new clause requires a structured approach to EMS change management.

6.1.4: identify risks and opportunities, and;

6.1.5: plan actions accordingly

Clause 6 - Action

1. Review planning documentation to reflect new clause references.
2. Separate planning processes into:
 - a. Identification (6.1.4)
 - b. Action (6.1.5)
3. Refresh your risk register, aspect and impact register, and other planning documentation as needed.
4. Introduce a structured change management approach as required by Clause 6.3.
5. Update your aspect and impact analysis to include potential emergencies.
6. Reassess the effectiveness of your objectives and KPIs in Clause 6.2.



Clause 7 – Support

Growing use of AI/data analytics/digital is encouraged as part of solutions to drive environmental performance. It is suggested that organisations explore new technology to monitor, report and subsequently manage performance to drive efficiencies and enable better accountability.

Updated Terminology: EMS records **MUST** be available rather than previously ‘maintained’ as documented information.

7.4 Communication **MUST** empower employees to contribute to continual improvement.

Clause 7 – Action

1. Review communication and training processes, ensuring evidence is documented and accessible.
2. Ensure that top management and all relevant personnel involved in the EMS are aware of the upcoming changes and their potential impact of their roles and responsibilities.
3. EMS communications, both internal and external, are traceable and transparent.
4. Adjust process descriptions to align with revised terminology.

Clause 8 – Operation

The revision now states that organizations **must control or influence** externally provided processes, products, or services that are *relevant to their EMS, including those from suppliers*.

Suppliers should be encouraged to adopt sustainable practices.

The level of control must be clearly defined and documented to ensure a consistent approach to supply chain sustainability.

8.1 Outsourced processes are referred to as ‘externally provided processes, products or services’.

Operational control must extend to suppliers and partners.

8.2 Emergency preparedness must align with risk planning (Clause 6.1.2).

Clause 8 – Action

1. Strengthen supplier management by identifying all externally provided processes and assessing existing control mechanisms.
2. Review supplier evaluation and environmental performance checks.
3. Review existing emergency response plans to ensure they reflect updated planning causes.
4. Ensure operational documentation is accessible and consistently maintained.



Clause 9 - Performance Evaluation

The management review process has been **reorganised** into sub-clauses:

9.3.1 General,

9.3.2 Inputs, and;

9.3.3 Results

This is to provide clearer audit trails to demonstrate the organisation is driving real improvements.

9.1.1. Explicit requirement to evaluate environmental performance and EMS effectiveness.

9.2.2 Internal audits must define objectives, in addition to the scope and criteria.

9.3 Management reviews are restructured into three sub-clauses: inputs, process, and results.

Clause 9 – Action

1. Update internal audit and management review processes.
2. Update internal audit protocols to include defined objectives.
3. Ensure performance evaluation includes EMS effectiveness, not just data points.
4. Revise management review process to follow the new substructure of Clause 9.3.

Clause 10 – Improvement

Continual improvement remains core to the Standard.

10.3 has been removed, and its content is now integrated into Clauses 10.1 and 10.2.

There is a more structured approach to nonconformity and corrective action.

There are clear links between Clause 9 findings and continual improvement.

Clause 10 – Action

1. Strengthen root-cause analysis and improvement tracking.
2. Update internal audit protocols to include defined objectives.
3. Ensure performance evaluation includes EMS effectiveness, not just data points.