

ISO 14001 gap analysis checklist

ISO 14001:2026 – Environmental management systems

For each requirement, record whether your organisation conforms, partly conforms or has a gap, and note the evidence (documents, records, interviews) that supports your answer. To score the results, track corrective actions and produce a report automatically, use the free online Gap Assessment at paperwingpdf.com/iso-gap-assessment/ – it runs in your browser and nothing is uploaded.

Organisation: _____ Assessed by: _____ Date: _____

4.1 Context — Environmental conditions

Determine internal and external issues, including environmental conditions such as pollution levels, climate change, and biodiversity, and how they affect or are affected by the organization.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

4.2 Context — Interested parties

Identify relevant interested parties and determine their specific needs and expectations that are relevant to the management system. Document which requirements will be addressed by the management system. Review when the organisation's relationships with interested parties change materially. Evidence: interested-party register with requirements and monitoring frequency.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

4.3 Context — EMS scope

Define and document the management system scope — specifying which organisational units, sites, processes, products, and services are included. Justify any exclusions from the standard's requirements. The scope must be available as documented information and reflect the actual boundaries of the system. Auditors will check that the scope is defensible and consistent with the context analysis.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

4.4 Context — Management system & processes

Establish, implement, maintain, and continually improve the management system and all its constituent processes. Determine process inputs, outputs, sequence and interaction, criteria, resources, responsibilities, risks, and how processes are evaluated and improved. Maintain process documentation (e.g. process map, turtle diagrams). Demonstrate the system is actively managed, not just documented.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

5.1 Leadership — Top management commitment

Top management must personally demonstrate leadership — evidence must show direct executive engagement, not merely delegation to a department. Specific requirements include: taking accountability for system effectiveness; ensuring the policy and objectives align with strategic direction; ensuring integration of the system into business processes; ensuring adequate resources; communicating importance; promoting continual improvement; supporting relevant management roles. Auditors look for direct evidence from senior leaders.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

5.2 Leadership — Policy

Establish and maintain a documented policy that: is appropriate to the organisation's purpose and context; provides a framework for setting objectives; includes a commitment to satisfying applicable requirements; and includes a commitment to continual improvement. The policy must be communicated and understood within the organisation and available to relevant interested parties.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes:

5.3 Leadership — Roles & responsibilities

Assign, document, and communicate roles, responsibilities, and authorities for the management system throughout the organisation. Ensure persons are clear on their obligations. Assign accountability for ensuring the system meets requirements and for reporting system performance to top management. Review when organisational structure or personnel changes.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes:

6.1 Planning — Environmental aspects & compliance obligations

Identify environmental aspects and associated impacts using a strengthened life cycle perspective. Determine significant aspects including biodiversity, resource availability, and pollution levels. Identify compliance obligations.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes:

6.1.1 Planning — Climate change risks & opportunities

Determine whether climate change is a relevant issue, and address climate-related risks and opportunities as part of planning, building on the 2024 climate change amendment now integrated into the standard.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes:

6.2 Planning — Environmental objectives

Establish measurable objectives at relevant functions and levels. For each objective document: what will be done; what resources are needed; who is responsible; when it will be completed; and how results will be evaluated. Objectives must be consistent with the policy, monitored, communicated, and updated as needed. Maintain an objectives register with trend data.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes:

7.1 Support — Resources

Determine and provide the resources needed — people, infrastructure, work environment, monitoring and measuring equipment, and organisational knowledge. Maintain calibration or verification records for measurement equipment. Ensure resource allocation decisions are documented and reviewed. Demonstrate that resources are adequate relative to the risk profile and scope of the system.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes:

7.2 Support — Competence

Determine required competence for persons performing work that affects system conformance and performance. Ensure competence is achieved through appropriate education, training, or experience. Where gaps exist, take documented actions and evaluate their effectiveness. Retain evidence: training matrix, qualifications records, competency assessments.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes:

7.3 Support — Awareness

Ensure all persons under the organisation's control are aware of: the policy; relevant objectives; their contribution to system effectiveness; and the implications of not conforming to requirements. Implement and document an awareness programme (induction, refresher training, team briefings). Retain completion records.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

7.4 Support — Communication (internal & external)

Determine what needs to be communicated internally and externally, when, with whom, how, and by whom. Maintain a communications plan. Retain records of significant communications relevant to the system. Ensure communications support system understanding and stakeholder confidence.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

7.5 Support — Documented information

Create, maintain, control, and retain documented information required by the standard and by the organisation. Implement document control: version management, approval authority, distribution control, access, protection, and disposition. Retain records as evidence of conformance for defined retention periods. Distinguish between documents (instructions, policies) and records (evidence of activities).

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

8.1 Operation — Operational control (life cycle perspective)

Establish controls for significant environmental aspects with a strengthened life cycle perspective covering design, sourcing, use, and end-of-life.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

8.1.1 Operation — Externally provided processes, products & services

Extend operational control beyond outsourced processes to cover externally provided processes, products, and services across the upstream and downstream supply chain, with greater documentation and evidence requirements.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

8.2 Operation — Emergency preparedness & response

Establish processes for emergency situations. Test periodically where practicable. Review and revise after incidents or tests.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

9.1 Performance — Monitoring, measurement & compliance evaluation

Determine what to monitor and measure; the methods to use; when to perform monitoring and measurement; when to analyse and evaluate results; and who is responsible. Retain documented results as evidence. Report performance data to management on a defined schedule. Track trend data for KPIs and use results to drive decisions and improvements.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

9.2 Performance — Internal audit

Plan and conduct internal audits at planned intervals. Establish and maintain an audit programme covering scope, frequency, methods, responsibilities, and reporting. Ensure auditor independence and competence. Audit criteria: the standard's requirements plus the organisation's own system requirements. Address findings without undue delay. Retain audit programme records and reports as documented information.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

9.3 Performance — Management review

Top management reviews the management system at planned intervals (minimum annually). Review inputs must include: status of previous actions; changes in context or interested parties; system performance data (monitoring results, objectives, nonconformities, audit results); resource adequacy; and improvement opportunities. Outputs: decisions on improvement opportunities, system changes needed, and resource requirements. Retain management review minutes as documented information.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

10.1 Improvement — General

Identify and implement actions for improvement. Demonstrate that improvement is systematic, data-driven, and linked to system performance analysis and management review outputs. Maintain an improvement register. Show measurable year-on-year improvement in key performance indicators.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

10.2 Improvement — Nonconformity & corrective action

When a nonconformity occurs: react, contain, and correct it; evaluate the root cause using a structured methodology; implement corrective action; review effectiveness; update risk assessment if needed; make system changes if required. Retain documented information: nature of nonconformity, actions taken, and results of corrective actions. Track corrective actions through to verified closure.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____

10.3 Improvement — Continual improvement

Continually improve the suitability, adequacy, and effectiveness of the EMS to enhance environmental performance, including measurable progress on climate and biodiversity goals.

☐ Conforms ☐ Partly ☐ Gap ☐ Not applicable

Evidence / notes: _____