ISO 14001:2026 Gap Analysis Plan

Programme for implementing gap closure actions when certifying an Environmental Management System to ISO 14001:2026

Start Date (Monday): Mon 4 May 2026 **Status Date:** Fri 1 May 2026

Overall Progress: 0.0% **Target Finish:** Fri 23 Oct 2026

Instructions

1. Set the Start Date in cell C4 — must be a Monday. All Gantt week dates and default task dates derive from this anchor.
2. Review each gap closure action's planned Start (column G) and Finish (column H) dates and adjust to your organization's circumstances. Duration (column I) and the Gantt bars update automatically.
3. Transfer the identified gaps into single rows below, from Cell C20 onwards
4. As work progresses, update Progress % in column J. Status (column K) and Gantt bar colour update automatically (grey=not started, blue=in progress, amber=at risk, green=complete, red=overdue)

Gap Ref.	Clause (ISO 14001:2026)	Description of Gap Identified	Proposed Remedial Action	Responsibilities & Resources	Deliverables & Outputs	Start Date	Finish Date	Duration (days)	Progress %	Status	Milestone	Notes
1	4.1	Climate-relevant external/internal issues are not considered in the analysis of context.	Refresh context analysis to include climate-related risks and opportunities (physical, transition, regulatory).	EMS Coordinator (lead); Top Management; Sustainability Lead. Resources: half-day workshop, climate-risk reference data.	Updated context register with climate dimension; meeting minutes.	2026-05-04	2026-05-15	10	0%	Not Started	N	Use ISO 14001:2026 Annex A.4 for guidance; cross-reference TCFD where relevant.
2	4.2	Interested parties' climate-related expectations not assessed (regulators, investors, customers, communities).	Update interested-parties register; for each party, evaluate whether climate change is a relevant requirement.	EMS Coordinator (lead); Procurement; Communications; HR.	Revised interested-parties register flagging climate-relevant requirements.	2026-05-11	2026-05-22	10	0%	Not Started	N	ISO 14001:2026 Amd 1 explicitly requires this assessment.
3	4.3	EMS scope statement does not reflect lifecycle perspective; outsourced processes not explicit.	Revise scope to include lifecycle boundaries, outsourced processes and upstream/downstream considerations.	Top Management (approve); EMS Coordinator (draft); Operations.	Approved revised scope statement; communication to staff.	2026-05-18	2026-05-22	5	0%	Not Started	Y	Milestone — must be approved before procedure rewrites.
4	4.4	EMS processes and their interactions are not documented; process map outdated.	Map EMS processes, define inputs/outputs, sequence and interactions; integrate climate-relevant processes.	EMS Coordinator (lead); process owners.	EMS process map; process interaction matrix.	2026-05-18	2026-06-05	15	0%	Not Started	N	Use turtle diagrams per QMS suite pattern.
5	5.1	Top management commitment statements do not reference climate change or sustainability obligations.	Revise leadership commitment to include climate-action obligations; communicate via internal channels.	Top Management; Communications.	Updated leadership commitment statement; all-staff communication.	2026-05-25	2026-05-29	5	0%	Not Started	N	Visible commitment is part of 5.1 a) and applies to climate.
6	5.2	Environmental Policy does not explicitly commit to climate-action and continual improvement of EMS performance.	Revise Environmental Policy to include climate-action commitment, lifecycle perspective and continual improvement.	Top Management (approve); EMS Coordinator (draft).	Revised Environmental Policy signed by Top Management; published internally and on website.	2026-06-01	2026-06-12	10	0%	Not Started	Y	Milestone — gates the rest of the EMS document set.
7	6.1.1 / 6.1.2	Risk and opportunity register does not address climate-relevant risks; aspect identification methodology not refreshed.	Refresh aspect identification (incl. lifecycle); rebuild risks/opportunities register; integrate climate-related risks.	EMS Coordinator (lead); Engineering; Operations; Facilities.	Updated aspects register (F0612-02); risks & opportunities register; significance ranking method.	2026-06-08	2026-07-03	20	0%	Not Started	N	Cross-reference P0612-01 / P0613-01 procedures.
8	6.1.4 (new 2026)	No documented climate change actions; new clause 6.1.4 of ISO 14001:2026 not addressed.	Identify, evaluate and document climate-action actions (mitigation and adaptation) integrated into EMS planning.	Top Management (approve); EMS Coordinator (lead); Sustainability Lead; Operations.	Climate Action Plan; updated risk register; KPIs for climate actions.	2026-06-15	2026-07-10	20	0%	Not Started	Y	Milestone — flagship 2026 amendment requirement.
9	6.1.3	Climate-related legal and other obligations not enumerated (e.g., SECR, ETS, climate-disclosure regimes).	Refresh compliance register to include climate-related legal/voluntary obligations; assign owners.	Compliance Officer (lead); Legal; EMS Coordinator.	Updated F0613-02 Compliance Obligation Assessment; obligations register.	2026-06-22	2026-07-10	15	0%	Not Started	N	Include UK SECR, EU CSRD where applicable.
10	6.2	Environmental objectives do not include climate-related targets or measurable indicators.	Set objectives covering climate-action; define KPIs, baselines, owners and review cadence.	EMS Coordinator (lead); Top Management (approve); Functional managers.	Updated F0620-01 Objectives & KPIs Register with climate KPIs.	2026-06-29	2026-07-17	15	0%	Not Started	N	Use SMART criteria; align with risk register.
11	6.3 (new 2026)	No formal change-management procedure for environmental impact of changes (new clause 6.3 not addressed).	Develop change-management procedure with environmental impact assessment trigger; approval workflow.	EMS Coordinator (lead); Operations; Engineering.	P0630-01 Change Management procedure; F0630-01 change request form.	2026-07-06	2026-07-31	20	0%	Not Started	Y	Milestone — new 2026 clause requires documented method.
12	7.4	External and internal climate communications are ad-hoc; no procedure for stakeholder communication of climate performance.	Develop communication procedure covering climate disclosures (what, when, to whom) including reporting templates.	Communications Lead; EMS Coordinator; Sustainability Lead.	P0740-01 Communication procedure; reporting templates; stakeholder mapping.	2026-07-13	2026-07-31	15	0%	Not Started	N	Cross-reference SECR/CSRD reporting where applicable.
13	8.1	Operational controls do not consistently apply lifecycle perspective; outsourced/supplier controls weak on climate.	Update operational control procedures with lifecycle considerations; flow climate criteria to suppliers.	Operations Mgr (lead); Procurement; EMS Coordinator.	Updated work instructions; supplier evaluation criteria including climate; revised PO terms.	2026-07-27	2026-08-21	20	0%	Not Started	N	Cross-reference P0840-01 supplier procedures.
14	8.2	Emergency procedures do not consider climate-related events (flooding, heatwave, supply disruption).	Refresh emergency preparedness/response plans to address climate-related scenarios; conduct tabletop exercises.	Operations Mgr; HSE; Site Facilities.	Updated emergency procedures; exercise records; lessons-learned report.	2026-08-10	2026-08-28	15	0%	Not Started	N	Risk-based selection of climate scenarios.
15	9.1.1	Monitoring & measurement plan does not capture climate-related KPIs; data quality is not verified.	Update monitoring plan to include climate KPIs; verify measurement systems; refresh M&M procedure.	EMS Coordinator (lead); IT; Quality.	Updated F0911-03 Monitoring Plan; verification records; updated P0911-01 procedure.	2026-08-31	2026-09-25	20	0%	Not Started	N	Tie data sources to climate KPIs from action 10.
16	9.2 / 9.3	Internal audit programme and management review inputs/outputs do not cover climate-related performance.	Update internal audit programme to test climate-action effectiveness; revise management review template.	Internal Audit Lead; EMS Coordinator; Top Management.	Updated internal audit schedule; revised management review template (F0930-XX); first review meeting.	2026-09-28	2026-10-23	20	0%	Not Started	Y	Milestone — readiness gate before certification audit.
17								0	0%	Overdue	N	
18								0	0%	Overdue	N	
19								0	0%	Overdue	N	
20								0	0%	Overdue	N	
21								0	0%	Overdue	N	
22								0	0%	Overdue	N	
23								0	0%	Overdue	N	

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24								0	0%	Overdue	N	
25								0	0%	Overdue	N	
26								0	0%	Overdue	N	
27								0	0%	Overdue	N	
28								0	0%	Overdue	N	
29								0	0%	Overdue	N	
30								0	0%	Overdue	N	
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35								0	0%	Overdue	N	
36								0	0%	Overdue	N	
37								0	0%	Overdue	N	
38								0	0%	Overdue	N	
39								0	0%	Overdue	N	
40								0	0%	Overdue	N	
41								0	0%	Overdue	N	

Legend: Not Started | In Progress | At Risk | Complete | Overdue

Programme totals 235 0.0%

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8 Feb	15 Feb	22 Feb	1 Mar	8 Mar	15 Mar	22 Mar	29 Mar	5 Apr	12 Apr	19 Apr	26 Apr

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