EHS Gap Analysis Plan

Programme for implementing gap closure actions when certifying the integrated environmental and OH&S management system — ISO 14001:2026 / ISO 45001:2018 EHS Edition

tart Date (Monday):	Mon 4 May 2026	**Status Date:**	Tue 17 Nov 2026
Overall Progress:	0.0%	**Target Finish:**	Fri 16 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 Date and Finish Date and adjust them to your organization's circumstances. Duration and the Gantt bars update automatically.
3. Transfer each gap identified on the gap analysis checklists (listed below the table) into a single row. The example rows show typical gaps — overwrite or delete them. Gap Ref. numbers update automatically.
4. As work progresses, update Progress %. Status and Gantt bar colour update automatically (grey = not started, blue = in progress, amber = at risk, green = complete, red = overdue). Enter the Date Completed when an action closes; Days Late i

Gap Ref.	Clause	Description of Gap Identified	Proposed Remedial Action	Responsibilities & Resources	Deliverables & Outputs	Start Date	Finish Date
1	4.1	Climate-relevant external and internal issues are not considered in the context analysis.	Refresh the context analysis (per P0410-01) to address climate change as an external issue — physical, transition and regulatory risks and opportunities; update the context register.	EHS Lead (lead); Top Management; Sustainability Lead. Resources: half-day workshop, climate-risk reference data.	Updated F0410-01 Context Analysis Register; meeting minutes; management review input.	2026-05-04	2026-05-15
2	4.1	Environmental conditions affecting, or affected by, the organization (pollution, natural resources, climate change, biodiversity, ecosystem health) are not determined.	Add environmental conditions to the context analysis; use ISO 14001:2026 Annex A.4 for guidance and cross-reference TCFD-aligned disclosures where relevant.	Environmental Coordinator (lead); Sustainability Lead.	Context register with an environmental conditions section.	2026-05-04	2026-05-15
3	4.2	Interested parties' relevant requirements (including climate-related expectations of regulators, investors and communities) are not formally assessed.	Update the interested-party analysis (per P0420-01); for each party, evaluate relevant requirements, including climate-related expectations, and decide which are addressed through the EHS.	EHS Lead (lead); Procurement; HR; Communications.	Revised F0420-01 Interested Parties Register flagging climate-relevant requirements.	2026-05-11	2026-05-22
4	4.2, 5.4	Needs and expectations of workers and other interested parties are not determined; workers are not consulted on them.	Determine the needs and expectations of workers (including contractors and temporary workers) and other interested parties; consult workers through the Health & Safety Committee (per P0540-01).	Health & Safety Advisor (lead); Worker Representatives; HR.	Interested-party register entries for workers; F0540-02 Safety Committee Minutes.	2026-05-11	2026-05-29
5	4.3	EHS scope statement does not specify boundaries, sites, activities, products and services.	Revise the EHS scope (per P0430-01) to specify boundaries, sites, activities, products and services; obtain approval and communicate it.	Top Management (approve); EHS Lead (draft); Operations.	Approved F0430-01 Scope Statement; communication to staff.	2026-05-18	2026-05-22
6	4.3	Scope does not reflect the life cycle perspective; outsourced processes are not explicit.	Revise the scope to include life cycle boundaries, outsourced processes and upstream/downstream considerations.	Environmental Coordinator (draft); Operations.	Scope statement covering life cycle boundaries and outsourced processes.	2026-05-18	2026-05-22
7	4.3	Scope does not include all activities, products and services under the organization's control or influence that can affect OH&S performance.	Revise the scope to cover all work activities, sites and workers (including contractors) that can affect OH&S performance.	Health & Safety Advisor (draft); Operations.	Scope statement covering OH&S activities and workers.	2026-05-18	2026-05-22
8	4.4	EHS processes and their interactions are not documented; process map outdated or absent.	Map EHS processes; define inputs, outputs, sequence, interactions, controls and KPIs (per P0440-01); integrate climate-relevant processes.	EHS Lead (lead); Process Owners.	EHS process map; F0440-01 Process Responsibility Matrix; KPI register.	2026-05-18	2026-06-05
9	5.1	Top management commitment not visibly demonstrated; leadership-and-commitment evidence weak.	Establish a leadership-commitment communication plan covering the EHS Policy, objectives, climate-related commitments and continual improvement; communicate via internal channels.	Top Management; Communications; EHS Lead.	Documented leadership commitment statement; all-staff communication; meeting minutes.	2026-05-25	2026-05-29
10	5.1	Top management has not taken overall responsibility for preventing work-related injury and ill health; workers are not protected from reprisals when reporting incidents, hazards and risks.	Document top management's OH&S accountabilities and a no-reprisal reporting commitment; support the Health & Safety Committee (per P0540-01).	Top Management; Health & Safety Advisor; Worker Representatives.	OH&S leadership statement; committee terms of reference.	2026-05-25	2026-06-12
11	5.4	No process for consultation and participation of non-managerial workers; no Health & Safety Committee.	Implement P0540-01 Consultation and Participation; set up the committee; remove obstacles to participation and provide time and training.	Health & Safety Advisor (lead); Worker Representatives; Top Management.	F0540-01 Safety Committee Agenda; F0540-02 Safety Committee Minutes; F0540-03 Employee Safety Survey results.	2026-06-01	2026-06-19
12	5.2	EHS Policy does not include all required commitments and is not aligned with strategic direction.	Revise F0520-01 EHS Policy to include all required commitments; ensure availability, communication and accessibility.	Top Management (approve); EHS Lead (draft); Communications.	Revised EHS Policy signed by Top Management; published internally and to interested parties.	2026-06-01	2026-06-12
13	5.2	Policy does not explicitly commit to climate action and continual improvement of environmental performance.	Add commitments to protection of the environment (including prevention of pollution, climate change mitigation and adaptation), fulfilment of compliance obligations and continual improvement; publish internally and on the website.	Environmental Coordinator (draft); Top Management (approve).	Policy text covering the environmental commitments.	2026-06-01	2026-06-12
14	5.2	Policy lacks commitments to safe and healthy working conditions, eliminating hazards and reducing OH&S risks, fulfilling legal requirements, and consultation and participation of workers.	Add the ISO 45001 clause 5.2 commitments; make the policy available to interested parties.	Health & Safety Advisor (draft); Top Management (approve).	Policy text covering the OH&S commitments.	2026-06-01	2026-06-12
15	6.1	Risk-based thinking methodology absent; no risk and opportunity register linked to context and interested parties.	Implement P0611-01 Risks and Opportunities; build the register linked to context (4.1), interested parties (4.2) and key processes; integrate climate-related risks.	EHS Lead (lead); Heads of Department; Process Owners.	F0611-01 Risk and Opportunity Register; risk methodology; treatment action plans.	2026-06-08	2026-07-03
16	6.1.2	Aspect identification methodology not refreshed (including life cycle perspective); significance criteria undefined.	Refresh aspect identification per P0612-01; define the significance ranking method.	Environmental Coordinator (lead); Engineering; Operations; Facilities.	Updated F0612-01 Aspect Identification Register; F0612-02 Aspect Identification Worksheets.	2026-06-08	2026-07-03
17	6.1.2	Hazard identification and OH&S risk assessment are not proactive or ongoing; routine and non-routine activities, contractors and visitors are not covered.	Implement P0612-02 Hazard Identification and Risk Assessment; apply the hierarchy of controls (8.1.2); involve workers.	Health & Safety Advisor (lead); Line Managers & Supervisors; Worker Representatives.	F0612-03 Hazard Identification Register; F0811-02 Health and Safety Risk Assessments.	2026-06-08	2026-07-10
18	6.1.3	Climate-related legal and other obligations are not enumerated (e.g. SECR, UK ETS, climate-disclosure regimes).	Refresh the compliance register to include climate-related legal and voluntary obligations; assign owners.	Compliance Officer (lead); Legal; Environmental Coordinator.	Updated F0613-01 Compliance Obligations and Legal Requirements Register; F0613-02 Compliance Obligation Assessment Forms.	2026-06-22	2026-07-10
19	6.1.3	OH&S legal requirements and other requirements are not identified, accessible or kept up to date.	Identify applicable OH&S legislation and other requirements; record them and determine how they apply (per P0613-01).	Health & Safety Advisor (lead); Legal; HR.	Updated F0613-01 Compliance Obligations and Legal Requirements Register (OH&S entries).	2026-06-22	2026-07-10
20	6.1.4	Environmental risks and opportunities are not determined in their own right (dedicated clause 6.1.4 in ISO 14001:2026), including climate-related risks.	Determine risks and opportunities from aspects, compliance obligations and context; document climate change mitigation and adaptation actions.	Top Management (approve); Environmental Coordinator (lead); Sustainability Lead; Operations.	Environmental entries in F0611-01; climate action plan; KPIs for climate actions.	2026-06-15	2026-07-10

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