Step 7 – Implementation Checklist

Gap Analysis

Implementation Summary

Activity	Description	Responsibilities	Deliverables/Outputs
Conduct a gap analysis against the requirements of each standard to identify priority remediation	A gap analysis compares current organizational practices against each requirement of the standards within the EHS, identifying which are met, partially met, or not met. It is conducted with small groups of staff, including the owner of each process, reviewing existing practices, controls and documentation against the requirements, including a walk through the production and storage areas. For the environment, the ISO 14001:2026 Gap Analysis Checklist (GA002-03) is used. For organizations transitioning from ISO 14001:2015, it focuses on the new and strengthened requirements: Clauses 4.1/4.2 (climate change, biodiversity), 6.3 (planning of changes), 8.1/8.2 (documented processes) and 9.2.2 (audit programme objectives). For OH&S, the ISO 45001 Gap Analysis Checklist (GA002-04) is used, including consultation and participation of workers (Clause 5.4), hazard identification (Clause 6.1.2) and the Amendment 1:2024 climate change additions. Workers take part in identifying OH&S gaps. The findings from each checklist feed one prioritized gap register and action plan in the EHS Gap Analysis Plan (GA002-01), with each gap classified by severity and assigned a remediation owner, deliverables and timeframe. Gaps drive the 'Close Priority Gaps' work in the Do phase. This step is a programme MILESTONE. Its output feeds the 1st Management Review and the certification readiness assessment. It also informs resourcing for the implementation phases that follow.	EHS Lead Heads of Department Process Owners Implementation Team Environmental Coordinator Health & Safety Advisor	• Gap analysis covering all ISO 14001:2026 clauses (GA002-03) • Gap analysis covering all ISO 45001:2018 clauses (GA002-04) • Prioritized gap register and action plan (GA002-01) with severity, owner, resources and target date • High-priority gaps allocated to corrective action procedure • Gap analysis report presented at 1st Management Review • Action plan approved by the EHS Lead and reported to top management

Implementation Checklist

Description	Evidence
Check that every clause of ISO 14001:2026 has been assessed (GA002-03), including explicit evaluation of the new Clause 6.3 (Planning of Changes) and of climate change integration in Clauses 4.1 and 4.2.	
Check that every clause of ISO 45001:2018 has been assessed (GA002-04), including consultation and participation of workers (Clause 5.4) and the Amendment 1:2024 climate change additions, and that workers took part in identifying OH&S gaps.	
Check that the gap analysis was conducted with small groups of staff, including each process owner, reviewing existing practices, controls and documentation against the requirements.	

SAMPLE

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