

ISO 14001:2026 – Capability-Based Gap Analysis Framework

Element 1 – Context & Scope Management

Assessment Criterion

The organisation understands its context, interested parties, and environmental conditions well enough to define a clear, defensible scope for the EMS.

Evidence to Seek

- Documented analysis of **internal and external issues**, explicitly including environmental conditions (e.g. climate, biodiversity, pollution).
- Identification of **interested parties** and which needs become **compliance obligations**.
- Defined EMS **scope**, including lifecycle stages and areas of influence.
- Evidence the scope is **current, accessible, and used**.

Rating Guidance

- **N**  – No structured understanding of context or scope.
- **P**  – Context and scope discussed informally; environmental conditions weakly considered.
- **L**  – Context, parties, and scope documented but inconsistently applied.
- **F**  – Context and scope actively inform planning, risk, and operational decisions.

Element 2 – EMS Design & Integration**

Assessment Criterion

The EMS is intentionally designed and integrated into business processes to achieve intended environmental outcomes.

Evidence to Seek

- Description of EMS processes and interactions.
- Evidence of EMS integration into core business processes (planning, operations, procurement).

- Defined responsibilities beyond “management roles”.
- Examples where EMS requirements influenced operational decisions.

Rating Guidance

- **N**  – EMS exists only as documentation.
- **P**  – EMS partially implemented; operates in parallel to the business.
- **L**  – EMS processes defined and generally followed.
- **F**  – EMS embedded into how the organisation operates day-to-day.

Element 3 – Leadership & Environmental Policy

Assessment Criterion

Leadership actively drives the EMS through policy, role clarity, and visible commitment to meeting compliance obligations and protecting the environment.

Evidence to Seek

- Environmental policy addressing **compliance, biodiversity, natural resources, and climate**.
- Evidence leadership supports and enables EMS roles across the organisation.
- Clear assignment and communication of EMS responsibilities.
- Examples of leadership reinforcing EMS expectations through actions.

Rating Guidance

- **N**  – Policy exists only to satisfy certification.
- **P**  – Leadership endorses EMS but involvement is limited.
- **L**  – Leadership roles and commitments are documented and visible.
- **F**  – Leadership consistently reinforces EMS priorities through behaviour and decisions.

Element 4 – Environmental Risk, Aspects & Obligations

Assessment Criterion

Environmental aspects, compliance obligations, risks, and opportunities are systematically identified

and kept current.

Evidence to Seek

- Environmental aspect register covering **normal, abnormal, emergency, and lifecycle stages**.
- Identification of **compliance obligations**, available as documented information.
- Risk and opportunity assessment linked to **context, stakeholders, and scope**.
- Evidence registers are reviewed and updated.

Rating Guidance

- **N**  – No structured identification.
 - **P**  – Registers exist but are outdated or incomplete.
 - **L**  – Risks, aspects, and obligations are documented and reviewed.
 - **F**  – Risk information actively informs objectives, controls, and change decisions.
-

Element 5 – Planning & Objectives

Assessment Criterion

Environmental objectives and actions are deliberately planned, measurable, resourced, and aligned with policy and risk.

Evidence to Seek

- Measurable environmental objectives aligned with policy.
- Action plans defining **resources, responsibilities, timeframes, and evaluation methods**.
- Evidence objectives are monitored and adjusted.
- Integration of actions into EMS and business processes.

Rating Guidance

- **N**  – Objectives absent or symbolic.
 - **P**  – Objectives exist but lack planning discipline.
 - **L**  – Objectives and plans documented and tracked.
 - **F**  – Objectives drive prioritisation, investment, and improvement.
-

Element 6 – Change Management

Assessment Criterion

Changes affecting the EMS are planned, assessed, and managed to protect intended outcomes.

Evidence to Seek

- Defined process for managing change impacting the EMS.
- Risk assessment of changes (process, organisational, external).
- Evidence change impacts are reviewed and controlled.
- Post-change evaluation.

Rating Guidance

- **N**  – Changes unmanaged.
 - **P**  – Change handled reactively.
 - **L**  – Change process defined and used.
 - **F**  – Change management is proactive and risk-based.
-

Element 7 – Capability, Awareness & Communication

Assessment Criterion

People are competent, aware, and able to contribute to EMS effectiveness and continual improvement.

Evidence to Seek

- Defined competence requirements and training records.
- Awareness of policy, roles, and consequences of nonconformance.
- Communication plans defining **what, when, how, and with whom**.
- Evidence workers contribute to EMS improvement.

Rating Guidance

- **N**  – EMS knowledge limited to specialists.

- **P**  – Awareness activities occur but are inconsistent.
 - **L**  – Competence and communication managed systematically.
 - **F**  – Workforce actively supports and improves the EMS.
-

Element 8 – Documented Information Control

Assessment Criterion

Documented information required for the EMS is controlled, accessible, and fit for use.

Evidence to Seek

- Document control procedures.
- Evidence documents are reviewed, updated, and available.
- Control of externally required documented information.
- Access provided to relevant interested parties where required.

Rating Guidance

- **N**  – Documents uncontrolled or missing.
 - **P**  – Basic control but inconsistent access or currency.
 - **L**  – Document control process applied.
 - **F**  – Information supports effective decision-making and assurance.
-

Element 9 – Operational Control & Emergency Preparedness

Assessment Criterion

Operational processes and emergency arrangements reliably control environmental risks.

Evidence to Seek

- Operational controls linked to environmental aspects and risks.
- Management of **externally provided processes**.
- Emergency preparedness and response plans.

- Evidence plans are tested and updated.

Rating Guidance

- **N**  – Controls largely absent.
 - **P**  – Controls exist but are inconsistently applied.
 - **L**  – Controls defined and implemented.
 - **F**  – Controls tested, reviewed, and continuously improved.
-

Element 10 – Performance Evaluation

Assessment Criterion

The organisation evaluates EMS performance, compliance, and effectiveness using reliable evidence.

Evidence to Seek

- Monitoring and measurement results.
- Compliance evaluation records.
- Internal audit programme with defined objectives, scope, and criteria.
- Management review inputs and results.

Rating Guidance

- **N**  – Little or no evaluation.
 - **P**  – Evaluation occurs but is superficial.
 - **L**  – Structured evaluation and review.
 - **F**  – Evaluation drives informed decisions and improvement.
-

Element 11 – Improvement

Assessment Criterion

Nonconformities are corrected at root cause level and the EMS is continually improved.

Evidence to Seek

- Corrective action records with root cause analysis.
- Evidence actions are effective.
- Identification of improvement opportunities from audits, reviews, and performance data.
- Demonstrated linkage to intended outcomes.

Rating Guidance

- **N**  – Issues recur.
 - **P**  – Fixes applied but causes remain.
 - **L**  – Corrective actions systematically managed.
 - **F**  – Improvement is proactive and outcome-driven.
-