



ISO 14001:2026 Transition

Gap Assessment Checklist for MENA SMEs

A single-session diagnostic across clauses 4–10

Walk through the 15 items with your EMS manager and one operations lead.
Use the result as your transition workplan.

April 2026

1 CHECKLIST

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How to use this checklist

Designed to be walked through in a single working session.

This is the same gap assessment HAC uses in the opening phase of every ISO 14001:2026 transition engagement. It is deliberately short – fifteen items, not fifty – so a real working session can cover it in under two hours.

For each item, mark one of three statuses: **Ready** (documented, current, operating well), **Partial** (exists but incomplete or out of date), or **Gap** (not addressed). If three or more items come back as Gap, the transition requires meaningful work – not an update. That is still manageable in the three-year window. It is not manageable in a six-month rush.

BEFORE YOU START

Who should be in the room

Your EMS manager leads. Bring one operations lead familiar with day-to-day aspect management, and one procurement representative given the expanded Clause 8 scope. If you have an internal auditor, include them – several items relate directly to audit programme design.

ORGANIZATION

SITE(S) IN SCOPE

LEAD ASSESSOR

DATE



Ready

Documented & operating



Partial

Exists but incomplete



Gap

Not yet addressed

Clauses 4 & 5 – Context and leadership

Items 1 through 5. Context register, interested parties, EMS scope, leadership engagement, policy wording.

CLAUSE 4 · CONTEXT OF THE ORGANIZATION

- | | | |
|----|---|--|
| 01 | Context register explicitly names climate change, biodiversity, ecosystem health, pollution levels, and natural-resource availability – with sector-specific commentary, not boilerplate. | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| 02 | Climate-linked interested parties (regulators, insurers, investors, neighbouring communities, EU buyers under CSDDD) added to interested-parties register with documented needs and expectations . | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| 03 | EMS scope statement applies a life-cycle perspective and justifies inclusion or exclusion of upstream and downstream stages the organization can control or influence. | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |

CLAUSE 5 · LEADERSHIP AND COMMITMENT

- | | | |
|----|--|--|
| 04 | Documented evidence that top management supports persons in all relevant roles – not only managers – with resource allocation and recognition. Include operators, procurement staff, supervisors. | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| 05 | Environmental policy uses "meeting compliance obligations" (not "fulfil") and commits explicitly to protecting natural resources and ecosystems – beyond pollution-only wording. | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |

Clauses 6 & 7 — Planning and support

Items 6 through 11. Risks, emergencies, change management, compliance obligations, documented information.

CLAUSE 6 · PLANNING

- | | | |
|----|--|--|
| 06 | Risks-and-opportunities process restructured for the new 6.1.4 / 6.1.5 split and integrated with climate and biodiversity risks, not treated as a separate parallel register. | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| 07 | Aspects register covers " all potential " emergencies — including low-probability, high-consequence climate events (flooding, sandstorms, extreme heat) and cyber-physical events — separated from abnormal operations. | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| 08 | Clear documented distinction between compliance-obligations identification (Clause 6.1.3) and evaluation of compliance (Clause 9.1.2). These are routinely conflated in 2015 systems. | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| 09 | New Clause 6.3 Planning-of-Changes procedure drafted, approved, and tested against a real recent change (new product, new site, M&A, supplier switch). No exceptions — this is the only entirely new clause. | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |

CLAUSE 7 · SUPPORT

- | | | |
|----|---|--|
| 10 | Training records refreshed to include ISO 14001:2026 awareness for all personnel whose work affects environmental performance — not only the EMS team. | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| 11 | Documented information consistently phrased " available as documented information, " with register distinguishing mandatory records from supporting material . Communication procedure has feedback loops reaching Clause 10. | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |

Clauses 8–10 — Operations, evaluation, improvement

Items 12 through 15. The heaviest operational weight sits here.

CLAUSE 8 · OPERATIONS

- 12** **Externally provided processes, products, services** re-mapped, classified by EMS relevance, and assigned proportionate control-or-influence mechanisms. Procurement and contracts formally inside the EMS.
- 13** Emergency procedures **traceable back to Clause 6.1.2 aspects and risks**, and tested by drill within the past twelve months. No orphaned response plans.

CLAUSES 9 & 10 · EVALUATION AND IMPROVEMENT

- 14** Monitoring KPIs cover **both environmental performance and EMS effectiveness**; each internal audit has documented *objectives* in addition to scope and criteria. Conformance-only audits will fail.
- 15** Management review template restructured into **Inputs, Process, Results** with all mandatory inputs documented; former Clause 10.1 content merged into nonconformity and continual-improvement processes.

INTERPRETING YOUR RESULT

What to do based on the count of "Gap" items

Gap count	What it means
0–2	You are close to ready. Target a combined transition audit with your next surveillance visit in 2027.
3–6	Meaningful work required, but manageable. Start the transition workplan this quarter. Aim for audit in mid-2028.
7+	Substantial rebuild needed. Engage external support. Budget a 9–12 month implementation window before booking your transition audit.

NEXT STEP**Turn your gap count into a transition workplan.**

HAC runs clause-by-clause gap assessments across the GCC and Egypt. Hesham Abbas brings 35+ years of regional ISO expertise, including 23 years at Intertek. We convert this checklist into a costed, sequenced transition workplan in under two weeks.

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