

Transition Guide

From ISO 14001:2015 to ISO 14001:2026

A transition guide for hotels

Updated 25 October 2026 · replaces the August 2026 version

ISO 14001:2026, the fourth edition of the standard, was published in April 2026. It cancels and replaces ISO 14001:2015 and its Amendment 1:2024 on climate change. Most of a working environmental management system carries over unchanged: the changes are few, specific and checkable against the text.

This update replaces the August 2026 version of this guide. Two things are new. First, the accreditation timetable is now fixed by Global ACI-TECH-3-TR 2029-04-30 (M), version 1.0, issued 4 September 2026, applicable from 14 September 2026, so the dates below are no longer provisional. Second, the list of changes now also covers the new defined term “indicator”, the note on the hierarchy of controls in 8.1, and the edition’s replacement of Amendment 1:2024.

One rule runs through the whole guide, as it runs through the book: a requirement is what the text of the standard says “shall”. A note, an annex, an auditor’s preference or a good practice is not a requirement, and the guide marks the difference each time.

1 What changed in ISO 14001:2026

Eight points, each checked against the text. The last column says what kind of text it is.

Clause	What changed	What it asks of a hotel	Status
4.1 Context of the organization	The environmental conditions to be considered are now named in the requirement itself, introduced by “such as”: pollution levels, availability of natural resources, climate change, biodiversity and ecosystem health. The 2015 text already required environmental conditions to be considered; the named list used to sit in Annex A.	Check that your context determination has looked at each named condition in both directions — what the property does to it, and what it can do to the property. “Such as” gives examples: it is not a closed list and it does not ask for five separate studies.	Requirement
6.1.4 Risks and opportunities (new subclause)	Determining risks and opportunities now has a subclause of its own. In 2015 it sat inside 6.1.1.	Your existing determination may already cover the content. Make sure it addresses environmental aspects, compliance obligations and the issues and requirements from 4.1 and 4.2, and that records refer to 6.1.4.	Requirement
6.1.5 Planning action	What was 6.1.4 “Planning action” in 2015 is now 6.1.5. The content is carried over.	Update cross-references in procedures, audit checklists and the management review agenda.	Requirement (renumbered)
6.3 Planning of changes (new)	A new planning requirement for changes that affect or can affect the environmental management system. In 2015 change was handled downstream, mainly in operational control (8.1: control planned changes, review the consequences of unintended ones) and in several other clauses. The 2026 edition moves it upstream, into planning.	Decide how a change — a new kitchen line, an outsourced laundry, a renovation, a new concession — is planned before it is made, and who looks at its environmental side. An existing management-of-change practice under 8.1 can often be extended rather than replaced.	Requirement

Clause	What changed	What it asks of a hotel	Status
Section 10 Improvement	Section 10 now has two subclauses: 10.1 Continual improvement and 10.2 Nonconformity and corrective action. The former 10.1 “General” is gone; continual improvement moves from 10.3 to 10.1.	Replace references to 10.3 with 10.1. References to 10.2 stay valid.	Requirement (restructured)
Clause 3 — new definition “indicator”; 6.2.2 e) and 9.1.1	The standard now defines “indicator”. The requirements that use it are 6.2.2 e), on how the results of objectives are evaluated, and 9.1.1, on evaluating environmental performance. Both already spoke of indicators in 2015; what is new is a defined term your indicators can be read against.	Check each indicator used for objectives and for performance evaluation against the definition — above all, whether it can show a change over time rather than only a running total.	Definition used by requirements
8.1 Operational planning and control — note on the hierarchy of controls	A note now refers to the hierarchy of controls (from eliminating a hazard or impact through substitution to administrative measures).	Nothing has to be changed because of it. It is a note: useful when choosing controls, not a requirement to document a hierarchy.	Note — not a requirement
Foreword — edition statement	The 2026 edition replaces ISO 14001:2015 together with Amendment 1:2024. The climate-change wording introduced by the amendment is now part of the main text.	Replace references to “ISO 14001:2015 + Amd 1:2024” with “ISO 14001:2026” in your documents and in what you say about your certificate.	Edition statement

2 What to rework, and what to leave alone

Rework

- The context determination under 4.1 — so that the named environmental conditions are visibly considered, in both directions.
- The risks-and-opportunities record — aligned to 6.1.4, with planning of action under 6.1.5.
- A way to plan changes under 6.3 — often an extension of how changes are already controlled under 8.1.
- The indicators used for objectives (6.2.2 e)) and for performance evaluation (9.1.1) — checked against the new definition.
- Clause cross-references wherever they appear: 10.3 becomes 10.1, 6.1.4 “planning action” becomes 6.1.5.
- The internal audit programme and the management review agenda — so that both cover the changes before the transition audit.

Leave alone

- The aspects register, compliance obligations, objectives, operational controls, emergency preparedness, competence, awareness and document control — unless your gap check shows something specific. Their requirements carry over.
- The environmental policy, unless your gap check against the text shows a specific gap.
- The structure of your documentation. The standard does not require a manual, and it does not require your documents to follow its clause numbers.
- Records that carry no clause numbers: they need no renumbering.

3 A sequence of steps

A sequence that works, not a sequence the standard prescribes. Steps 3 to 7 can run in parallel in a small property.

Step	What	How
1	Get the text and read the changed clauses	4.1, 6.1 (all five subclauses), 6.2.2, 6.3, 8.1, 9.1.1, section 10 and the definition of “indicator” in clause 3. Read the text, not a summary of it — including this one.
2	Make a one-page gap check	For each row of the table above: where your system stands today, and what — if anything — is missing. Most rows will be short.
3	Update the context determination (4.1)	Go through the named conditions in both directions. Keep it proportionate: the length of the document is not a requirement.
4	Separate risks and opportunities (6.1.4) from planning action (6.1.5)	Often a matter of structure and references rather than new content.
5	Set up the planning of changes (6.3)	Decide what counts as a change for your property, who plans it and where that is recorded.
6	Review your indicators	Against the definition, for the objectives and for performance evaluation.
7	Update cross-references	Procedures, audit checklists, the management review agenda, training material.
8	Audit and review before the transition audit	Run an internal audit that covers the changes, then a management review that looks at the result.
9	Agree the transition audit with your certification body	In good time before 30 April 2029. Ask whether it can be combined with a scheduled surveillance or recertification audit, and what its own internal deadlines are.

4 What you do not need to buy

Often offered	What the standard actually says
A new environmental manual	The standard does not require a manual.
A Scope 1, 2 and 3 carbon inventory	ISO 14001:2026 does not prescribe one. A property may choose one for other reasons; the standard does not ask for it.
Alignment with TCFD or another external climate-reporting framework	The standard does not prescribe alignment with any external reporting framework.
A climate risk study of a set length	The 4.1 determination has to be adequate for the property, not of a particular size.
A formal ecological survey for biodiversity	Biodiversity is one of the named conditions to consider; the standard does not prescribe a survey method.
Software or a dashboard platform	No tool is prescribed. A spreadsheet that can show a trend meets the purpose as well as a platform.

The one thing worth having is the text of ISO 14001:2026 itself: it is the only document against which any of these claims can be checked.

5 The accreditation timetable

Date	Milestone	Whom it binds
31 October 2026	Accreditation bodies ready for the transition to ISO 14001:2026	Accreditation bodies
31 January 2027	Certification bodies' transition declaration	Accredited certification bodies

Date	Milestone	Whom it binds
30 April 2027	Accreditation transition decisions completed	Accreditation bodies
After 31 October 2027	New initial certifications only to ISO 14001:2026	Accredited certification bodies
30 April 2029	Transition of certified clients completed, including issue of the certificate	Accredited certification bodies

WHO THESE DATES BIND

Source: Global ACI-TECH-3-TR 2029-04-30 (M), version 1.0, issued 4 September 2026, applicable from 14 September 2026.

These dates bind accreditation bodies and accredited certification bodies. No law obliges a hotel to be certified to ISO 14001, and these dates do not create one. For a certified hotel they matter through its certificate: by 30 April 2029 the transition audit must be done and the 2026 certificate issued. Your certification body may set earlier internal dates — ask it.

6 Where the book covers each topic

By subchapter, without page numbers, so that the table stays valid across printings.

Topic	Clause	Volume 1a
Context and the named environmental conditions	4.1	1.2; 1.14
Interested parties and their link to environmental conditions	4.2	1.3; 1.14
Risks and opportunities; planning action	6.1.4; 6.1.5	1.8 (also 1.2, 1.3, 1.10, 1.14)
Objectives and how their results are evaluated	6.2.1; 6.2.2	1.11; 1.12
Planning of changes	6.3	Appendix A
Operational control	8.1	2.6; 2.7; 2.8 (the hierarchy-of-controls note itself is not discussed in the book)
Indicators and performance evaluation	9.1.1	2.12
Management review	9.3	2.13
Nonconformity and corrective action	10.2	2.14
Continual improvement	10.1	2.15
Climate change and the absorbed Amendment 1:2024	4.1; 4.2	1.14; Sources and Research Methodology
Reading what a revision actually requires	—	1.14, "A Checklist for the Next Revision or Standard Change"

This guide is updated when the accreditation timetable or the reading of the text changes, and archived once the transition period closes on 30 April 2029. It is not legal advice and it does not replace the text of the standard.

Source: Francesco Dore, The Helm and the Lens, Volume 1a — ISO 14001:2026. Edizioni Effedore 2026. © 2026 Francesco Dore. enbooks.effedore.com