

WORKING MATERIAL 4.12 · CHAPTER 4 — THE CERTIFIER'S LENS

Transferring Between Certification Bodies: The Door Is Open While You Do Not Need It

Source: Francesco Dore, *The Helm and the Lens*, Volume 1b — ISO 14001:2026, subchapter 4.12

GUIDING QUESTION

You are unhappy with your certification body and want to move. At what point does that stop being a decision you are free to make?

1 · Verification Pact

Copied from the book. The third column is for your property: what holds here, and how you know.

What is claimed	What actually holds	In our property
"We can change certification body whenever we like."	Only a valid, unsuspended, accredited certification within both bodies' accredited scopes is eligible. A certification known to be suspended is not accepted for transfer.	
"ISO 14001 governs how we move between bodies."	It contains no certificate and no certification body, and therefore nothing on transfer. The rules are in the free mandatory document on transferring accredited certification.	
"We are slightly behind on our surveillance, but that is our business."	If the surveillance or recertification audit is overdue, or the audit reports are not made available, the organisation is treated as a new client — Stage 1 and Stage 2, from the beginning.	
"The pre-transfer review is an audit."	It is a review of the certification and its history, followed where needed by a visit that is expressly not an audit, conducted by someone with the competence an audit team for that scope would require.	
"Our history stays with the old body."	The accepting body reviews the initial or most recent recertification reports, the latest surveillance report, outstanding nonconformities, complaints and their handling, the audit programme, and other documentation including auditors' handwritten notes and checklists.	
"Open findings can be sorted out after we move."	Certification is not issued until corrections and corrective actions for all outstanding major nonconformities have been verified, and plans for all outstanding minor ones have been accepted.	
"If we leave, they can make life difficult for us."	The issuing body is not entitled to suspend or withdraw punitively and is expected to release the documentation requested; obstruction or unjustified suspension can be raised with the accreditation body.	

2 · Common mistakes — a self-check

Tick each mistake you recognise in your own property. The consequence is the book's.

- ☐ **Assuming a transfer is administrative, like changing a supplier** — It is conditional on good standing, and good standing is checked first.
- ☐ **Allowing a surveillance to become overdue during an ownership change or a management gap** — It converts a transfer into a new certification.
- ☐ **Trying to move away from a problem** — Suspension, unresolved majors and overdue audits are exactly what removes the eligibility to move.
- ☐ **Expecting the history to stay behind** — The accepting body reads the reports, the open findings, the complaints and, where they exist, the auditor's notes.
- ☐ **Giving a vague reason for leaving** — It is a required question and the vagueness is what gets noticed.
- ☐ **Timing the move just before a recertification** — An accepting body hesitates to inherit one, and the property is surprised.
- ☐ **Keeping no copies of your own audit reports** — Their value is discovered only when the body that holds them has ceased trading.

3 · What an auditor would ask to see

Questions drawn from the subchapter's reading of the standard and its practical application. They are questions to test your own evidence, not additional requirements.

Question	Where the evidence lives	Seen?
Is the certification valid, unsuspended and within the accredited scope of both bodies?	Certificate; accreditation registers	
Are all surveillance audits up to date?	Audit reports and dates	
Does the property hold its own copies of the initial or latest recertification report, the latest surveillance report and the status of open nonconformities?	Property's own report file	
What is the reason for the transfer, stated plainly?	Correspondence	
Are outstanding major nonconformities resolved, and is there a plan for the minor ones?	Corrective action records	
Where is the property in its cycle, and when is recertification due?	Certificate; cycle plan	

4 · From the Operative Synthesis to action

Concrete actions taken from the subchapter's Operative Synthesis. Fill in the owner and the date in your property.

Action	Owner	Due date
1. Ask every year, while the answer is still yes, what leaving would look like.		
2. Keep the conditions of eligibility in place: valid, unsuspended, surveillance current, no unresolved major findings.		
3. Protect the surveillance date through any ownership handover.		
4. Keep the property's own copy of the cycle's record.		

What this sheet is not: ISO 14001 does not prescribe this form. It is a working aid drawn from the book; the standard and, in Chapter 4, the certification body's own rules and contract govern the real case.