

ISO 9001:2026 TRANSITION BRIEFING

ISO 9001:2015 to ISO 9001:2026 — What Needs to Change?

Most organizations will not need to rebuild their QMS. They will need to identify the revised requirements that apply, update affected processes and documented information and manage the transition in a controlled way.



16 Clauses Highlighted in This Briefing

Content reflects the new edition's text as currently available. Confirm exact wording against the final published standard once released.

EXPLAINED IN DETAIL

A full comparison slide follows for each.

- **4.1** Organizational context
- **4.2** Interested parties
- **5.2** Quality policy
- **6.1.2** Risks
- **6.1.3** Opportunities
- **7.1.3** Infrastructure
- **7.1.4** Process environment

ADDITIONAL CHANGES

Summarized in the table on page 11.

- **4.4.2** QMS process information
- **5.1** Leadership
- **6.2** Quality objectives
- **6.3** Planning changes
- **8.1** Operational planning
- **8.2.1** Customer communication
- **9.1.2** Customer satisfaction
- **9.2.2** Internal audit
- **10.1** Improvement

This briefing provides CBG's interpretation of the approved draft and does not reproduce or replace the official standard. Organizations should verify requirements against the published edition.

Four Types of Change in ISO 9001:2026

Type	Meaning
New or expanded requirement	May require a new activity or an expansion of an existing process
Restructured requirement	Existing subject matter is reorganized or separated
Updated guidance or note	Broadens considerations without automatically adding a separate auditable requirement
Editorial or terminology change	Clarifies language and may require little or no operational change

BOTTOM LINE First determine whether a change affects a requirement, supporting guidance, or only the organization of the standard — then size your transition response to match.

Understanding the Organization and Its Context

ISO 9001:2015

Determine internal and external issues relevant to your strategic direction and the QMS's intended results and monitor them over time.

2024 CLIMATE AMENDMENT

Adds the requirement to determine whether climate change is a relevant issue for the organization's context.

ISO 9001:2026

Carries both forward. The climate-change requirement is now integrated into the base text, not a separate amendment.

TRANSITION IMPLICATION If your QMS already reflects the 2024 climate amendment, this is not a new 2026 gap.

Needs and Expectations of Interested Parties

ISO 9001:2015

Determine interested parties relevant to the QMS and their requirements, based on their effect on conforming products and services. (2024 amendment: parties may have climate-related requirements.)

ISO 9001:2026

Adds a third step — decide which of those requirements the QMS will actually address. The 2024 climate note, monitoring and review carry forward unchanged.

TRANSITION IMPLICATION Be explicit about which interested-party requirements your QMS actually addresses — climate-related ones included.

WORKED EXAMPLE

Worked Example: Interested-Party Requirements

EXAMPLE *A major customer requests quarterly reporting on supplier sustainability performance, but the request is not part of the contract.*

Transition Question	Example Answer
Is the customer a relevant interested party?	Yes
Is the expectation relevant to the QMS?	Potentially; supplier performance may affect conformity and customer confidence
Will the QMS address it?	Yes, through supplier monitoring and management review
Which process is affected?	External-provider control
What may need updating?	Supplier evaluation criteria and management review inputs
What evidence would demonstrate implementation?	Supplier evaluations, performance results and management review records

BOTTOM LINE Clause 4.2 does not mean every interested-party expectation enters the QMS. The organization decides which relevant requirements the QMS needs to address — and can explain that decision.

Quality Policy: Stronger Connection to Context and Strategy

ISO 9001:2015

Top management establishes a quality policy suited to the organization's purpose and context, providing a framework for objectives and commitments to applicable requirements and continual improvement.

ISO 9001:2026

Same four requirements, retitled “Quality policy.”
Now explicitly ties implementation and maintenance to the organization's context and strategic direction.

TRANSITION IMPLICATION Most policies won't need rewriting. Revisit yours only if context, strategy, customers or risk profile have changed materially.

Actions to Address Risks

ISO 9001:2015

Plan actions addressing risks and opportunities together, integrate them into QMS processes, and evaluate effectiveness — proportionate to potential impact on conformity.

ISO 9001:2026

Risk now has its own clause: identify, analyze and evaluate risks that could affect conforming delivery — including risk to delivery after an operational disruption.

TRANSITION IMPLICATION Confirm your process identifies, evaluates and follows up on risk clearly — especially risk of disruption to delivery.

Actions to Address Opportunities

NEW CLAUSE

ISO 9001:2015

No standalone requirement — opportunities were handled alongside risk in 6.1.2, with examples appearing only in an explanatory note.

ISO 9001:2026

A new clause: identify opportunities that could benefit conforming delivery, plan and integrate actions, and evaluate effectiveness — the same discipline now applied to risk.

TRANSITION IMPLICATION Establish a repeatable way to identify opportunities, decide which ones to pursue, integrate the selected actions into relevant processes, and evaluate the results.

Infrastructure and the Work Environment

CLAUSE 7.1.3

Infrastructure

Same requirement to determine, provide and maintain the infrastructure needed for conforming products and services. New: infrastructure for remote and hybrid working, where applicable.

CLAUSE 7.1.4

Environment for the Operation of Processes

Same requirement to maintain the environment needed for conformity. The supporting note now also covers technological factors (current technology) and cultural factors (quality culture, ethical conduct).

TRANSITION IMPLICATION If remote or hybrid work, technology, or organizational culture affect conformity, treat them as part of the QMS — not just an IT or HR concern.

ALSO WORTH A LOOK

Other Changes Worth Knowing

Clauses with smaller edits that still deserve a look during transition.

Clause	Area	What to Check
4.4.2	Process information	What information the organization retains
5.1	Leadership	How leaders support quality culture and ethical conduct
6.2	Quality objectives	Connection to context and strategic direction
6.3	QMS changes	How consequences and resources are considered
8.1	Operational control	Criteria and retained evidence
8.2.1	Customer communication	Channels, records and feedback
9.1.2	Customer satisfaction	How information is analyzed and used
9.2.2	Internal audit	Coverage of revised requirements
10.1	Improvement	Environmental and climate effects



Confirm exact wording — especially for 10.1 — against the final published standard once released.

Where Transition Evidence May Already Exist

These are possible sources of evidence, not mandatory documents prescribed by ISO 9001.

QMS Area	Examples of Existing Evidence to Review
Organizational context	Context analysis, strategic planning records, management review inputs
Interested parties	Interested-party register, customer requirements, regulatory obligations
Risks and opportunities	Risk register, process risks, action plans, effectiveness reviews
Quality policy	Approved policy, employee communication, evidence of awareness
Infrastructure and work environment	IT controls, remote-work arrangements, workplace assessments
Internal audit	Audit programme, audit criteria, findings and follow-up
Improvement	Improvement plans, performance trends, corrective actions

BOTTOM LINE The transition usually begins with reviewing existing QMS evidence. Create new documented information only when the organization needs it to operate or demonstrate control.

Common Transition Mistakes

- ✗ Treating every revised note as a new auditable requirement.
- ✗ Updating procedures without training or communicating the change.
- ✗ Rewriting documents before determining whether the current process already conforms.
- ✗ Recording actions without verifying their effectiveness.
- ✗ Assigning the entire transition to the quality manager.
- ✗ Waiting for the certification audit to identify transition gaps.

BOTTOM LINE A document update does not complete the transition unless the affected process also works as intended.

Knowing What Changed Is Only the First Step

A successful transition still requires your organization to determine what applies, identify affected processes and documented information, assign responsibility, establish deadlines, and retain evidence of completion.



NEXT The QMS Transition Program turns these five steps into a 29-activity checklist you can hand to your team.

Turn the Requirements Into a Documented Transition Plan

#	Content of Activities	Process
1	Conduct personnel training on the new edition of ISO 9001, tailored by audience: – Quality managers, internal auditors and heads of department — full course, 16 hours; – Senior management — short course, 4 hours (focus on quality culture, ethical behaviour and the reinforced leadership commitments of cl.5.1.1, 5.1.2); – Employees (by department) — overview, 1–2 hours (general QMS structure, updated terminology, and department-level process changes).	
2	Form a transition team to implement this Program. Distribute responsibility and authority; determine deadlines and the reporting format.	
3	NEW – 2026 Review the Context of the Organization (cl.4.1). In the ‘Management Review’ process, add an explicit determination of whether climate change is a relevant issue for the organization, and document the conclusion (even if the answer is “not relevant”) as a modification to the Quality Manual.	

Actual excerpt from the QMS Transition Program (Word, editable).

The QMS Transition Program provides 29 activities for reviewing, planning, and documenting your transition. Assign responsibility, set deadlines, estimate resources, and record how progress will be reported.

- Editable Microsoft Word checklist
- Four landscape pages
- 29 transition activities
- 10 new-for-2026 activities clearly identified

[VIEW THE QMS TRANSITION PROGRAM](#)

c-bg.com/9001/QMS-Transition-Program.html

Developed by ISO management-system practitioners for organizations transitioning an existing QMS.