



IAF Mandatory Document

TRANSITION REQUIREMENTS FOR ISO 37001:2025

Issue 1

(IAF MD 30:2025)

The International Accreditation Forum, Inc. (IAF) facilitates trade and supports industry and regulators by operating a worldwide mutual recognition arrangement among Accreditation Bodies (ABs) in order that the results issued by Conformity Assessment Bodies (CABs) accredited by IAF members can be accepted globally.

Accreditation reduces risk for business and its customers by assuring them that accredited CABs are competent to carry out the work they undertake within their scope of accreditation. ABs that are members of IAF and their accredited CABs are required to comply with appropriate international standards and IAF mandatory documents for the consistent application of those standards.

ABs that are signatories to the IAF Multilateral Recognition Arrangement (MLA) are evaluated regularly by an appointed team of peers to provide confidence in the operation of their accreditation programs. The structure of the IAF MLA is detailed in IAF PL 3 - Policies and Procedures on the IAF MLA Structure and for Expansion of the Scope of the IAF MLA. The scope of the IAF MLA is detailed in the IAF MLA Status document.

The IAF MLA is structured in five levels: Level 1 specifies mandatory criteria that apply to all ABs, ISO/IEC 17011. The combination of a Level 2 activity(ies) and the corresponding Level 3 normative document(s) is called the main scope of the MLA, and the combination of Level 4 (if applicable) and Level 5 relevant normative documents is called a sub-scope of the MLA.

- The main scope of the MLA includes activities e.g. product certification and associated mandated standards e.g. ISO/IEC 17065. The attestations made by CABs at the main scope level are considered to be equally reliable.
- The sub scope of the MLA includes conformity assessment requirements e.g. ISO 9001 and scheme specific requirements, where applicable, e.g. ISO 22003-1. The attestations made by CABs at the sub scope level are considered to be equivalent.

The IAF MLA delivers the confidence needed for market acceptance of conformity assessment outcomes. An attestation issued, within the scope of the IAF MLA, by a body that is accredited by an IAF MLA signatory AB can be recognized worldwide, thereby facilitating international trade.

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Issue No 1

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INTRODUCTION TO IAF MANDATORY DOCUMENTS

The term “should” is used in this document to indicate recognised means of meeting the requirements of the standard. An Accreditation Body (AB) can meet these in an equivalent way. The term “shall” is used in this document to indicate those provisions which, reflecting the requirements of the relevant standard, are mandatory.

Transition Requirements for ISO 37001:2025

1. INTRODUCTION

All documents that provide information on transitions of normative documents will be mandatory documents to be followed by IAF MLA Accreditation Body (AB) signatories and accredited Conformity Assessment Bodies (CABs), with the scope as detailed in this document. This document is developed by an appointed task force of the IAF Technical Committee and in accordance with IAF PR 7 *Requirements for Producing IAF Mandatory Documents on Transitions*. The document is mandatory for all IAF MLA AB signatories and accredited CABs.

2. TRANSITION REQUIREMENTS

Normative Document:	ISO 37001:2025
Replacing:	ISO 37001:2016
Current Status (at time of MD publication):	Published in February 2025
Transition Period:	28 February 2027

3. SUMMARY OF KEY CHANGES

- Subclauses were added on climate change and stressing the importance of the compliance culture.
- Conflicts of interest were addressed.
- The concept of the anti-bribery function was clarified.
- The wording was harmonized with other standards where appropriate and reasonable.
- The latest harmonized structure was introduced.

4. KEY TIMESCALE

Activity	Due Date
AB to be ready to assess to support the new version of ISO 37001 and announce transition process	As soon as possible, no later than 30 November 2025 <i>Nine months from publication of standard.</i>
CABs to submit self-declaration to AB for transition for ISO 37001:2025 before	30 November 2025 <i>Nine months from publication of standard.</i>
AB transitions of CABs completed	28 February 2026 <i>One year from publication of standard, three months from when CABs are to submit self-declaration to ABs.</i>
Initial certification and recertification by CAB to ISO 37001:2025 only, to begin no later than	31 August 2026 <i>18 months from publication date of standard.</i>
CAB transitions of certified clients completed either during a scheduled audit (e.g., surveillance) prior to this date or during a special transition audit prior to this date	28 February 2027 <i>Two years from publication date of standard.</i>
Data required to be submitted to IAF (if considered relevant)	Upon Request

5. TRANSITION PROCESS

5.1. Accreditation Body Actions and Process

AB Activity	Yes / No	Notes
AB Actions / Arrangements	Yes	a. AB shall establish its transition arrangement for ISO 37001:2025 considering the requirements of this document.

		<ul style="list-style-type: none"> b. Plan and prepare to be ready to assess to the new version at the earliest opportunity and at latest November 2025. c. Identify the changes between new and old version. d. Ensure timely communication to CABs on required transition arrangements. e. In keeping with this IAF MD, utilize a CAB self-declaration for transition, see Annex A. f. Execute needed training and verification of competence of assessors and other staff. g. It is the AB's responsibility to demonstrate it has an adequate process and competence for the revised standard. h. AB shall make available to IAF, upon request, data and detail related to the transition. i. AB follow-up will take place during normal scheduled peer evaluation activity. j. If an AB is not ready as required in this document, a complaint should be filed with IAF. IAF should be prepared for immediate resolution in order to not delay the transition process.
CAB Document Review	No	Not required for this transition.
CAB's Technical Document Review	No	Not required for this transition.
CAB's Head Office Assessment	No	<p>Not required for this transition.</p> <p>The CB's head office assessment following the transition decision shall focus on the verification of the implementation of the transition arrangement and self-declaration, including progress of the transition for certified clients.</p>
CAB's Witnessed Assessment(s)	No	<p>Not required for this transition.</p> <p>All witness assessments selected following the transition decision shall be audits to ISO 37001:2025.</p>
AB Transition Decision	Yes	<ul style="list-style-type: none"> a. ABs are required to make a transition decision, in accordance with the declaration (Annex A).

		<p>b. Follow-up will take place during normal scheduled assessment activity.</p> <p>c. In cases of extenuating circumstances, at the discretion of the AB, the AB may require additional transition activity prior to the transition decision. For example, if a CAB's accreditation is suspended, the decision may not be able to be made through a declaration, and further follow-up (e.g. assessment) may be required.</p>
Others	No	NA
Is extra time likely to be needed for the transition?	No	Not required for this transition
Impact to Accreditations	Yes	<p>a. Accreditations for the previous version of the document are no longer valid after the transition end date.</p> <p>b. All new accreditation activity shall be to the revised standard per the timeline above.</p>

5.2. Conformity Assessment Body Actions and Process

CAB Activity	Yes / No	Notes
CAB's Actions / Arrangements	Yes	<p>a. CAB shall establish its transition arrangement for ISO 37001:2025 considering the requirements of this document and the transition arrangement of the related AB.</p> <p>b. CABs are to declare, to their ABs, their readiness for the transition, using the attached declaration template (Annex A).</p> <p>c. Plan and prepare to apply to AB for transition via self-declaration (Annex A) by 30 November 2025, within nine months of the publication of the standard.</p>

		<p>d. Develop transition plan to address the following:</p> <ul style="list-style-type: none"> – Identify the changes between new and old version. Typical processes considered for changes can include sales/quoting, auditing process, competence management and communication with existing certified clients. – Analyze impact of changes on relevant activities / processes and identify required actions to ensure conformance (e.g., management system/documents, IT tools). – Implement required actions. – Ensure that relevant personnel affected by the changes are trained and competent for the revised version and transition process. Relevant personnel may include sales personnel, auditors, technical reviewers, decision makers, application reviewers, etc. <p>e. It is the CAB's responsibility to demonstrate it is adequately addressing requirements and competence needs for the revised document.</p> <p>f. CABs shall provide to their ABs, upon request, the transition plan and supporting documentation.</p>
Transition audit	Yes	<p>a. CAB shall conduct the transition audit in conjunction with the surveillance audit, recertification audit or through a separate audit.</p> <p>b. The transition audit shall include, but not be limited to an audit of all the changes to ISO 37001:2025 from the prior version, as well as the need for changes to the client's management systems.</p> <p>c. CAB may conduct the transition audit remotely if they ensure the transition audit objectives are met.</p>
Is extra time likely to be needed for the transition?	Possibly	<p>a. While time may be needed, how much will be based on the changes to the client's management system and if the transition audit is conducted during a surveillance, recertification or as a separate audit.</p>

		b. The CB shall determine the time needed including justification for the calculation; in accordance with ISO/IEC 17021-1.
Accredited Certification Impact	Yes	<ul style="list-style-type: none"> a. The CB shall make the transition decision based on the results of the transition audit. b. Accredited certifications for the previous version of the document are no longer valid after 28 February 2027, the transition end date. c. All new accredited certification activity shall be to the revised standard per the timeline above.

6. OTHER

6.1. If an accredited CAB does not intend to transition to the new revision, the CAB shall inform the AB as early as possible, and the CAB shall have its accreditation withdrawn at the end of the transition for the given document.

6.1.1. If the accredited CAB decides not to transition, the CAB shall inform the affected clients about this decision within nine months from the publication date of the standard.

6.1.2. The AB and CAB shall follow the accreditation and certification withdrawal processes, respectively, to be effective at the end of the transition period.

6.1.3. Accreditations for the previous version of the document are no longer valid after the transition end date.

6.2. If an affected (e.g. certified) client chooses to not transition, the CAB may conduct the audit to the previous version. In this case, the CAB shall inform its client on the certification validity ending at the end of the transition period.

ANNEX A**Declaration by Accredited Conformity Assessment Body for ISO 37001:2025**

I (name below) declare that from the date of this declaration, CAB (CAB name below):

- Has implemented changes required under this transition,
- Conforms with the requirements necessary for transition, and
- Can demonstrate evidence of implementation.

I further acknowledge that:

- AB, which CAB is accredited by, will review the implementation of transition against this declaration at the next assessment(s).
- A declaration that is false or cannot be substantiated is a breach of the Conditions of Accreditation and is grounds for required corrections and corrective actions. If not properly resolved within set timelines this will be grounds for suspension or withdrawal.
- The following activity has been completed:
 - Transition Plan
 - Documentation revised to support transition and/or revised requirements
 - Necessary competence has been determined for the revised document and CAB has sufficient auditors and other personnel (e.g. application reviewer, certification decision maker) deemed competent to support the revised certification program.
 - CAB has a process to determine audit duration that supports the revised certification program (if applicable).
 - CAB has a process to manage control of certifications to the revised document that includes (a) issuing accredited certificates only after the AB transition decision and (b) managing appropriate expiration dates for previously issued certificates.

Signature:	
Name:	
Title:	
CAB Name:	
Date:	

End of IAF Mandatory Document Transition Requirements for ISO 37001:2025.

Further Information:

For further information on this document or other IAF documents, contact any member of IAF or the IAF Secretariat.

For contact details of members of IAF see the IAF website: <http://www.iaf.nu>.

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