ISO 14001 GAP ANALYSIS CHECKLIST
FOR REVIEW OF HOTEL'S ENVIRONMENTAL MANAGEMENT PRACTICES

I. ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)
  GENERAL REQUIREMENTS

An EMS is a management system that provides a mechanism for an organisation to operate in an environmentally responsible manner, anticipate and meet growing environmental performance expectations, and ensure ongoing compliance with regulatory and legislative requirements. An EMS allows an organisation to address, control and improve the short-term and long-term impacts of it's activities, products and services on the environment.

Person Responsible to Complete Entry*	ISO 14001 Clause Ref.	ISO 14001 EMS Environmental Management System (EMS) Requirements	Hotel's Current Environmental Management Practices &Findings	Document Reference	Is the EMS Requirement Satisfied? (Yes/Partly/No)	Recommendations?
EMSM	4.1	Has the hotel established and maintained a documented EMS?				
EMSM	4.1	Are all clauses of the ISO 14001 Standard addressed in the EMS?				
EMSM	4.1	Does the scope of the EMS cover all the hotel's activities, products & services?				

II. ENVIRONMENTAL POLICY

An Environmental Policy states the intentions and principles of an organisation in relation to its overall environmental performance, which provides a framework for action and for the setting of its environmental objectives and targets

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GM / EMSM	4.2	Has the hotel's top management defined an environmental policy stating the principal objectives to be achieved and the environmental commitments of the hotel?				
GM / EMSM	4.2	Does the General Manager endorse the hotel's environmental policy?				
EMSM	4.2.a	Is the hotel's environmental policy appropriate to the nature, scale & environmental impacts of the hotel's activities, products and services?				
EMSM	4.2.b	Does the hotel's environmental policy include a commitment to the continual improvement of: • environmental performance? • pollution prevention?				
EMSM	4.2.c	Does the hotel's environmental policy include a commitment to comply with relevant environmental legislation, regulations & other requirements?				
EMSM	4.2.d	Does the hotel's environmental policy provide a framework for setting & reviewing environmental objectives & targets?				

EMSM	4.2.e	Is the hotel's environmental policy documented, implemented, maintained, reviewed and made known to all staff?				
EMSM	4.2.f	Is the hotel's environmental policy available to the public?				

III. PLANNING ACTIVITIES
1. Environmental Aspects

An Environmental Aspect is an element of an organisation's activities, products or services that can interact with the environment. **A significant environmental aspect** is an environmental aspect that has or can have a significant environmental impact. Environmental aspects can either have an adverse or beneficial impact upon the environment.

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EMSM/ DH / SH	4.3.1	Has the hotel identified significant environmental aspects and impacts of all departments / sections, and compiled them in a register format?				
EMSM/ DH / SH	4.3.1	Does the hotel have a method or a written procedure for identifying environmental aspects and impacts, and evaluating their significance?				
EMSM/ DH / SH	4.3.1	Does the hotel's register of significant environmental aspects and impacts include: a) emissions to air? b) releases to water? c) waste management? d) contamination of land? e) impact on communities? f) use of raw materials and natural resources? g) other local environmental issues?				
EMSM/ DH / SH	4.3.1	Does the hotel's register of significant environmental aspects and impacts cover significant environmental aspects and impacts arising from: • all normal operating conditions? • all abnormal operating conditions? • all accidents and potential emergency conditions?				

EMSM / **DH** / **SH**	4.3.1	Is the hotel's register of significant environmental aspects and impacts reviewed regularly and revised where necessary?				
EMSM / **DH** / **SH**	4.3.1	Does the hotel consider all identified significant environmental aspects when setting environmental objectives?				

III. PLANNING ACTIVITIES
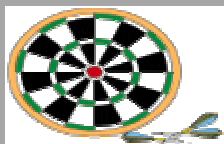**2.   Legal & Other Requirements**

Legal and other requirements refers to environmental legislation and other requirements such as industry codes of practice, agreements with public authorities and non-regulatory guidelines to which an organisation subscribes, that are applicable to the environmental aspects of its activities, products or services.

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EMSM	4.3.2	Has the hotel identified environmental legislation and other requirements relevant to its activities and operations, and compiled them in a register format?				
EMSM	4.3.2	Does the hotel have a method or a written procedure for identifying and having access to environmental legislation and other requirements relevant to its activities and operations?				
EMSM	4.3.2	Is the hotel's register of environmental legislation and other requirements kept up to date and revised where necessary?				
EMSM / DH / SH	4.3.2	Does the hotel comply with all environmental legislation and other requirements relevant to its activities and operations?				

III. PLANNING ACTIVITIES
3. Objectives & Targets

An environmental objective is an overall environmental goal, arising from the environmental policy, that an organisation sets itself to achieve, and which is quantified where practicable.
An environmental target is a detailed performance requirement, quantified where practicable, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.

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EMSM / DH	4.3.3	Has the hotel established objectives and targets to improve environmental performance?				
EMSM / DH	4.3.3	Are the objectives consistent with the environmental policy?				
EMSM / DH	4.3.3	Are the objectives established at company level, departmental level and/or sectional level?				
EMSM / DH	4.3.3	Have the objectives considered: • the identified significant environmental aspects of the hotel 's activities, products or services? • the identified environmental legislation and other requirements? • the views of internal and external interested parties? • the technological options? • the hotel's financial, operational and business requirements?				
EMSM / DH	4.3.3	Are the objectives specific, realistic, achievable, and supported with sufficient human and financial resources?				

EMSM / DH	4.3.3	Have targets been set to meet the objectives established?			
EMSM / DH	4.3.3	Are the targets measurable where practicable?			
EMSM / DH	4.3.3	Do the objectives and targets take preventative measures into account wherever practicable?			
EMSM / DH	4.3.3	Have the objectives and targets been documented and implemented, and are they regularly reviewed and revised, where necessary, with the endorsement of top management?			

III. PLANNING ACTIVITIES
4. Environmental Management Programmes

Environmental Management Programmes refer to an environmental action plan for meeting defined objectives and targets.

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EMSM / DH	4.3.4	Has the hotel established environmental management programmes to meet the established objectives and targets?				
EMSM / DH	4.3.4 a	Have responsibilities for achieving the objectives and targets been designated in the environmental management programmes?				
EMSM / DH	4.3.4.b	Do the environmental management programmes establish detailed programme steps, schedules & time frames for achieving the objectives and targets?				
EMSM / DH	4.3.4	Are the environmental management programmes regularly reviewed and revised where necessary?				
EMSM / DH	4.3.4	Are the environmental management programmes revised in the light of any new activities, products or services?				
EMSM / DH	4.3.4	Are the environmental management programmes documented?				

IV. IMPLEMENTATION AND OPERATION
1. Structure and responsibilities

> **Roles, responsibility and authorities** within an organisation's EMS shall be defined, documented, communicated in order to facilitate effective environmental management.

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EMSM	4.4.1	Have roles, responsibilities and authorities for implementing the hotel's EMS been: • defined? • documented? • approved and endorsed by top management? • communicated within the hotel?				
GM / EMSM	4.4.1	Has the hotel's top management supported these roles, responsibilities and authorities by providing appropriate human, financial, training and technical resources?				
EMSM	4.4.1	Does the hotel have an EMS team structure for the implementation of the EMS?				
EMSM	4.4.1	Do the communication and reporting lines within the EMS team structure follow that of the hotel's organisational structure?				
GM / EMSM	4.4.1 a & b	Has the hotel's General Manager appointed specific management representative(s) (EMS Manager(s)) and defined their responsibilities for: • ensuring that the EMS is established, implemented and maintained in accordance with the ISO 14001 Standard? • reporting on the performance of the EMS to top management for periodic review?				

4. IMPLEMENTATION AND OPERATION
3. Training, Awareness and Competence

Environmental Training Programmes in an organisation may include:
- ISO 14001 General Awareness Training Programmes
- Training on environmental legislation and other requirements
- Training on work specified in EMS procedures, such as training on emergency preparedness and response (e.g. fire drill) and EMS internal auditor training
- Other training to enable relevant staff has appropriate skills and knowledge in performing their tasks which can cause significant impacts on the environment

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EMSM / DH	4.4.2	Does the hotel have a method or a written procedure for identifying training needs of staff with respect to the requirements of the EMS?				
EMSM / DH	4.4.2	Has the hotel appropriately trained those personnel whose work may have a significant impact on the environment?				

EMSM / DH	4.4.2	Does the hotel have documented procedures to ensure that personnel at all levels of operation are aware of: • the importance of conformance with the environmental policy and environmental procedures? • the importance of conformance with the requirements of the EMS? • the significant environmental impacts, actual or potential, of their work activities? • the environmental benefits of improved personal performance? • their roles and responsibilities in achieving conformance with the environmental policy and environmental procedures? • their roles and responsibilities in achieving conformance with the requirements of the EMS including emergency preparedness and response requirements? • the potential consequences of departure from specified operating procedures?				
EMSM / DH	4.4.2	Has the hotel ensured that personnel at all levels of operation, the suppliers and contractors have the appropriate level of competence, training and/or experience to minimise the significant environmental impacts associated with the hotel's activities, products or services, and comply with the requirements of the EMS?				

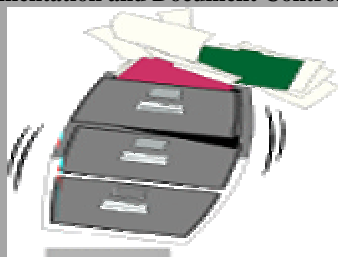**IV. IMPLEMENTATION AND OPERATION**

4. Communications

> **Internal communication** is the communication between the various levels and function involved in the implementation and maintenance of an organisation's EMS.
>
> **External communication** is the communication of external interested parties who are affected by the organisation's EMS.

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EMSM	4.4.3 a	Does the hotel have a method or a written procedure for internal communications between the various levels and functions concerning the significant aspects and impacts, and the EMS?				
EMSM	4.4.3 b	Does the hotel have a method or a written procedure for receiving, documenting and responding to external communications from relevant interested parties (e.g. government authorities, guests, suppliers & contractors, green groups, and other companies) concerning the significant aspects and impacts, and the EMS?				
EMSM	4.4.3	Has the hotel decided whether to communicate its significant environmental aspects to external interested parties?				

IV. IMPLEMENTATION AND OPERATION
4/5. EMS Documentation and Document Control

The **EMS Documentation** of an organisation typically includes:
- Environmental Policy
- Environmental Management Manual
- Environmental Procedures and Operational Control Procedures
- Environmental Objectives & Targets and Environmental Management Programmes
- Register of significant environmental aspects and Register of legal and other requirements
- Initial Environmental Review (IER) Report
- Environmental records

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EMSM	4.4.4.a	Has the hotel established and maintained an environmental management manual (in paper or electronic form) which includes: • the hotel's environmental commitments and an introduction of its activities, products and services? • an overview of the hotel's EMS, its components and their interactions? • a description of the hotel's EMS team structure, environmental responsibilities of staff at all levels, and organisational structure? • the environmental policy? • environmental procedures and operational control procedures? • environmental objectives & targets and environmental management programmes? • register of significant environmental aspects and impacts and register of environmental legislation and other requirements • other records needed for the implementation and maintenance of the EMS?				

EMSM	4.4.4.b	Does the environmental management manual provide direction to related EMS documentation?				
EMSM	4.4.5	Does the hotel have a method or a written procedure for controlling (preparing, storing, issuing, reviewing and revising) the EMS documentation?				
EMSM	4.4.5	Does the hotel have methods or written procedures for ensuring that the EMS documentation: • is locatable? • is periodically reviewed, revised as necessary? • is authorised by the hotel's top management? • is updated and available at necessary locations? • is removed promptly from all points of issue and points of use if it is outdated? • is clearly marked if it is retained for reference?				
EMSM	4.4.5	Does the hotel ensure that the EMS documentation: • is legible? • is dated (with dates of revision)? • is clearly marked with document title, number and version? • is maintained / filed in an orderly manner? • is retained for a specified period?				

IV. IMPLEMENTATION AND OPERATION
5. Operational Control

Operational control is a set of procedures / work instructions to control the activities and operations of an organisation that are associated with the identified significant environmental aspects.

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EMSM / DH	4.4.6	Has the hotel identified those operations and activities that are associated with the identified significant environmental aspects in line with its policy, objectives and targets?				
EMSM / DH	4.4.6	Has the hotel established and maintained documented operational control procedures to control these operations and activities where their absence could lead to deviations from the environmental policy and the objectives and targets?				
EMSM / DH	4.4.6	Do these operational control procedures stipulate operating or performance criteria?				
EMSM / DH	4.4.6	Has the hotel established and maintained operational control procedures related to the identifiable significant environmental aspects of goods and services used by the hotel and communicating relevant procedures and requirements to suppliers and contractors?				

IV. IMPLEMENTATION AND OPERATION
7. Emergency Preparedness and Response

Emergency preparedness & response refers to the establishment and maintenance of appropriate measures or procedures by an organisation to prevent and mitigate the environmental impacts that may be associated with accidents and emergency situations.

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EMSM / DH	4.4.7	Has the hotel established and maintained procedures for: • identifying potential for accidents and emergency situations? • responding to accidents and emergency situations? • preventing and mitigating the environmental impacts that may be associated with accidents and emergency situations?				
EMSM / DH	4.4.7	Does the hotel regularly review and revise, where necessary, the emergency preparedness and response procedures, in particular, after the occurrence of accidents or emergency situations?				
EMSM / DH	4.4.7	Does the hotel regularly test the effectiveness of the emergency preparedness and response procedures and revised them when necessary?				

V. CHECKING AND CORRECTIVE ACTION
1. Monitoring and Measurement

> **Monitoring and measurement** is the means by which an organisation identifies and quantifies its progress towards the minimisation of the impact of its activities, products and services on the environment.

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EMSM / DH	4.5.1	Has the hotel established and maintained documented procedures to monitor and measure, on a regular basis, the key characteristics of its operations and activities that can have a significant impact on the environment?				
EMSM / DH	4.5.1	Does the hotel record the results of monitoring and measuring to track environmental performance, relevant operational controls and conformance with the hotel's objectives and targets?				
EMSM / DH	4.5.1	Has the hotel established and documented acceptance criteria for the key characteristics of its operations and activities that can have a significant impact on the environment, and the action s to be taken if the results of monitoring and measuring are outside the criteria?				
EMSM / DH	4.5.1	Does the hotel calibrate and maintain all monitoring and measuring equipment, and retain relevant records according to the EMS procedures?				
EMSM / DH	4.5.1	Has the hotel established and maintained a documented procedure for periodically evaluating compliance with relevant environmental legislation and regulations?				

V. CHECKING AND CORRECTIVE ACTION

2. Non-conformance & Corrective and Preventive Action
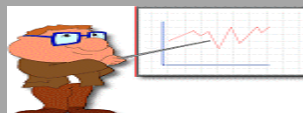
Non-conformance means any deviations from prescribed performance as stated in an organisation's EMS.

Corrective Action refers to reactive action taken to eliminate or minimise the recurrence of an existing non-conformance.

Preventive Action refers to proactive action taken to minimise the occurrence of a potential non-conformance.

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EMSM / DH	4.5.2	Do the hotel's EMS and its documentation conform to the environmental policy, objectives and targets, and the requirements of the ISO 14001 Standard?				
EMSM / DH	4.5.2	Has the hotel established and maintained procedures for defining responsibility and authority: • for handling and investigating non-conformance? • for taking action to mitigate any impacts caused? • for initiating and completing corrective and preventive action?				
EMSM / DH	4.5.2	In case of non-conformance, has the hotel investigated the non-conformance to: • determine the root cause of the non-conformance? • determine and implement appropriate corrective and preventive actions? • implemented or modified controls necessary to avoid repetition of the non conformance? • ensure procedures affected by the corrective and preventive actions taken are revised accordingly?				

EMSM / DH	4.5.2	Does the hotel ensure that any corrective or preventive actions taken to eliminate the causes of actual and potential non-conformances are appropriate to the magnitude of problems and commensurate with the environmental impact encountered?			
EMSM / DH	4.5.2	Does the hotel document and maintain a record of non-conformances?			

V. CHECKING AND CORRECTIVE ACTION
3. Records

Environmental Records needed for the implementation and operation of an organisation's EMS shall be maintained. These may include:

a) information on applicable environmental laws or other requirements;
b) complaint records;
c) training records;
d) process information;
e) product information;
f) inspection, maintenance and calibration records;
g) pertinent contractor and supplier information;
h) incident reports;
i) information on emergency preparedness and response;
j) information on significant environmental impacts;
k) audits results;
l) management reviews.

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EMSM / DH	4.5.3	Has the hotel established and maintained methods or procedures for the identification, maintenance and disposition of environmental records needed for the successful implementation and operation of the EMS?				

EMSM / DH	4.5.3	Do the environmental records include: a) information on environmental legislation and other requirements relevant to the hotel's activities, products and services? b) internal and external complaint records related to the EMS and environmental performance? c) environmental training records? d) inspection, maintenance and calibration records of monitoring and measuring equipment? e) monitoring and measuring results? f) pertinent contractor and supplier information? g) incident reports? h) information on emergency preparedness and response? i) information on significant environmental aspects and impacts of the hotel's activities, products and services? j) audits results? k) management review?				
EMSM / DH	4.5.3	Are these environmental records: • legible? • identifiable? • traceable to the activity, product or service involved? • locatable? • dated (with retention times)?				

V. CHECKING AND CORRECTIVE ACTION
4. EMS Internal Audits

EMS Audit is a systematic and documented verification process of objectively obtaining and evaluating evidence to determine whether an organisation's EMS conforms to the EMS audit criteria set by the organisation, and for communication of the results of this process to management. The main purpose of EMS audit is to provide guidelines for maintaining the effectiveness of the organisation's EMS and to ensure continual improvement. It also ensures compliance of the system to the ISO 14001 Standard.

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EMSM	4.5.4	Has the hotel established and maintained (a) programme(s) and procedures for periodic EMS audits?				
EMSM	4.5.4	Do the audit programme(s) and procedures determine whether the EMS: - conforms to planned arrangements for environmental management (the environmental policy, environmental procedures, objectives & targets, environmental management programmes, etc.) including the requirements of the ISO 14001 Standard? - has been properly implemented and maintained?				
EMSM	4.5.4	Do the audit programme(s) and procedures cover the reporting of audit results (findings and recommendations) to top management?				
EMSM	4.5.4	Are the audit programme(s) and audit schedule based on the : - environmental importance of the activity concerned? - results of previous audits?				

EMSM	4.5.4	Do the audit procedures cover: • the audit scope, i.e. the activities and areas to be considered in audits? • the frequency of audits? • the methodology, i.e. how the audit will be conducted? • the responsibilities associated with managing and conducting audits? • requirements for conducting audits, i.e. auditor competence? • requirements for reporting and communicating audit results?				
EMSM	4.5.4	Are the auditors adequately independent of the activities and areas they audit to ensure the audit is carried out impartially and objectively?				
EMSM	4.5.4	Does the hotel's top management (General Manager & Department Heads) support the EMS audit?				
EMSM	4.5.4	Does the hotel have a procedure to ensure that the findings and the corresponding recommended corrective and preventive actions in the audit are followed up?				

VI. MANAGEMENT REVIEW

Management reviews are conducted regularly by top management of an organisation to provide the means for:
- reviewing the environmental commitment of the organisation to continual improvement
- evaluating the overall environmental performance of the organisation
- revising and updating the organisation's EMS

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EMSM	4.6	Has the hotel's top management regularly conducted a management review to review the EMS to ensure its continuing : • suitability? • adequacy? • effectiveness?				
EMSM	4.6	Is the review of the policy, objectives and procedures carried out by the level of management that defined them?				
EMSM	4.6	Has the EMS Manager established and maintained a checklist to ensure that the necessary information is collected to allow management to carry out this management review?				
EMSM	4.6	Are the management reviews (observations, conclusions and recommendations) documented?				

| EMSM | 4.6 | Does the management review address the possible need for changes to policy, objectives and other elements of the EMS, in the light of:
• EMS audit results?
• the extent to which objectives and targets have been met?
• changing circumstances?
• concerns amongst interested parties?
• the commitment to continual improvement of environmental performance?
• the efficacy of the EMS documentation? | | | | |

* Person responsible for completing the above data: **GM : General Manager** **EMSM:** **EMS Manager**   **DH: All Department Heads**   **SH: All Section Heads**