Prepared by Angela Chan

ISO 14001 General Awareness Training Manual for Hotels

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</table>
Objectives of the ISO 14001 General Awareness Training Manual in Hotel

The objectives of the ISO 14001 General Awareness Training Manual is to allow hotels to understand the requirements of an Environmental Management System (EMS) as defined by ISO14001, and to set up an EMS based on the requirements. The benefits of an EMS are discussed. After reading the manual, the reader should be able to understand the following:

♦ What is an EMS?
♦ What is ISO 14001 EMS Requirements?
♦ How to establish and implement the EMS by different levels of staff in hotel?
♦ What is EMS Benefits in hotel?
1.0 Environmental Management System (EMS)

Environmental Management System is the part of the overall management system that includes organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining the environmental policy.

An EMS is management system that provides a mechanism for a hotel 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 a hotel to address, control and improve the short-term impacts of its products, services, and services provided on the environment.

2.0 ISO 14000 and ISO 14001

ISO 14000 refers to a series of environmental management standards that is voluntary and based on international consensus. The ISO 14001 Standard is designed to enable any organisation to establish an effective environmental system to achieve continual improvement of environmental performance and establish, as a minimum, regulatory and legislative compliance. The ISO 14001 Standard is now the only standard in the ISO 14000 series against which an organisation can become certified.

3.0 Recommended stages to establish an EMS

Before setting up an EMS, the Hotel needs to obtain commitment and understand the current environmental situation. The recommended stages of establishing an EMS are as follows:

- **GET STARTED**
- **Obtain Commitment**

**Appoint Management Representatives**

Top management should designate (a) specific management representative(s) with defined responsibility and authority for implementing the EMS while EMS manager(s) is the person in charge of the EMS among the Representatives.
Carry out an Initial Environmental Review (IER)

i. Gap Analysis
   Gap Analysis is an environmental audit or analysis of current operations and management practices against requirements of ISO 14001. It can let the management know what is missing in the existing EMS elements in order to comply with all the ISO 14001 EMS Standard.

ii. Aspects identification of the hotel
   Identify all the environmental aspects and impacts of the hotel in different departments in order to control and improve those significant environmental aspects.

The “Deming model” of Quality Management, follows a basic Plan-Do-Check-Improve sequence, provides the framework for most Environmental Management Systems. The EMS has 5 main stages:

- Environmental Policy
- Planning
- Implementation & Operation
- Checking & Corrective Action
- Management Review

Based on the 5 main stages, ISO 14001 EMS requirements have 17 elements which are:
- Environmental Policy
- Environmental aspects
- Legal and other requirements
- Objectives and targets
• Environmental management programme(s)
• Structure and responsibility
• Training, awareness and competence
• Communication
• Environmental management system documentation
• Document control
• Operational control
• Emergency preparedness and response
• Monitoring and measurement
• Nonconformance and corrective and preventive action
• Records
• Environmental management system audit
• Management review

Slide 4
4.0 ISO 14001 Requirements

Based on the 5 stages of an EMS, ISO 14001 Standards have 17 Requirements. The 17 Requirements and the implementation of these requirements in hotel will be quoted and discussed respectively as follows:

### 4.1 General Requirements

**Definition**

**Environment**

surroundings in which an organisation operates including

- air
- water
- land
- natural resources
- flora
- fauna
- humans and their interrelation

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**4.1 General Requirement**

- establish & maintain an EMS according to ISO 14001 Requirements

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**IMPLEMENTATION IN HOTEL**

The hotel shall establish and maintain an EMS that should comply with the ISO 14001 Requirements.
4.2 Definition

Environmental Policy
- Statement by the organisation of its intentions & principles in relation to its overall environmental performance which provides a framework for action & for the setting of its environmental objectives & targets

IMPLEMENTATION IN HOTELS

Distribution of environmental policy

EMS Manager should:
- The EMS Manager(s) is responsible for posting the latest version of environmental policy statement on all notice boards in the hotel.
  - The EMS Manager(s) is also responsible for maintaining an Environmental Policy Distribution List, and distributing the latest environmental policy statement to external parties.

Department / Section Head should:
- All Department /Section Heads should distribute copies of updated environmental policy to the junior staff.
  (SEE EXAMPLE 1)

Review and revision of environmental policy
General Manager and EMS Manager should:

- The General Manager and the EMS Manager(s) should review the environmental policy based on the results of EMS audit and Management Review. The environmental policy will be revised when:
  
  (a) the results of EMS audit reveal that the environmental policy cannot fully cover the hotel’s operation, and activities, products and services provided;
  (b) there are changes in the hotel’s activities, products and services provided; and
  (c) the significant environmental aspects are revised.

- The General Manager is responsible for revising the environmental policy statement. The EMS Manager(s) should assist the General Manager in replacing all outdated environmental policy statements on all notice boards by updated ones.

Department / Section Head should:

- All Department / Section Heads are responsible for collecting all obsolete environmental policy statements from the staff, and distributing and explaining the updated environmental policy statements to the staff.
EXAMPLE. 1 Hotel Environmental Policy

Hotel Generic Hongkong

Environmental Policy

Hotel Generic Hongkong is an environmentally conscious hotel which not only aims to provide quality services for its guests, but is also committed to taking appropriate measures for pollution prevention and resources conservation. To fulfil the requirements of ISO 14001 Standard, the environmental policy statement for Hotel Generic Hongkong is as follows.

- The hotel is committed to complying with all local environmental legislation and continuously seeks to improve its environmental performance.
- The hotel management and staff understand and support the Environmental Policy and are committed to continuous improvement of environmental performance by identifying ways to minimise both wastage of natural resources and pollution to the environment.
- The hotel will continuously identify ways to minimise waste arising at source and develop and implement resource and waste management strategies. The hotel will also adopt best environmental practices to control and minimise all wastewater discharges.
- The hotel will identify and implement practices to optimise energy and water usage without affecting the quality of services provided to its guests.
- The hotel will take appropriate measures to eliminate environmental, occupational and health risks and is prepared to respond to emergencies at all times.
- The hotel will support purchasing initiatives that are committed to sustainable environmental development, and continuously seek environmentally friendly products and services that represent genuine value for money. The hotel will encourage and influence its suppliers to take part in the environmental protection initiatives, and to understand its purchasing policy, and to provide products and services that have the minimum adverse impact on the environment.
- The hotel will carry out regular internal programmes of education and training to enhance environmental awareness amongst staff. The hotel will also actively participate in external environmental activities, as well as various training and development programmes, to broaden its horizon.
- The hotel will share its environmental experience with other organisations in the community, raise the interests of its stakeholders by explaining the hotel's environmental philosophy, and seek their co-operation in improving their own attitude towards environmental concerns.

__________________________
General Manager

Date: _____________________
4.3 Planning

4.3.1 Environmental Aspects

**Definition**

**Environmental aspects**
- element of an organisation's activities, products or services that can interact with the environment

**Environmental impacts**
- any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's activities, products or services

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**4.3 Planning**

4.3.1 Environmental aspects
- establish & maintain procedures to identify the environmental aspects of its activities, products or services that it can control
- ensure that all aspects related to significant impacts are considered in setting its environmental objectives
- keep them up-to-date

*(SEE EXAMPLE 2)*

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**Environmental Aspects Vs. Impacts**

<table>
<thead>
<tr>
<th>Activity</th>
<th>Aspects</th>
<th>Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Use of computer</td>
<td>Consumption of electricity</td>
<td>Depletion of energy resources</td>
</tr>
</tbody>
</table>

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Environmental Aspects Vs. Impacts

<table>
<thead>
<tr>
<th>Activity</th>
<th>Aspects</th>
<th>Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Making Report</td>
<td>Consumption of paper</td>
<td>Depletion of natural resources</td>
</tr>
</tbody>
</table>

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Environmental Aspects Vs. Impacts

<table>
<thead>
<tr>
<th>Activity</th>
<th>Aspects</th>
<th>Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Delivery of goods by suppliers</td>
<td>Use &amp; disposal of packing materials</td>
<td>Create unlimited solid waste</td>
</tr>
</tbody>
</table>

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Definition

A significant environmental aspect is an environmental aspect that has or can have a significant environmental impact.
IMPLEMENTATION IN HOTEL

Identification of environmental aspects

- The present and future operations of the Hotel under normal, abnormal and emergency situations shall be considered while identifying the environmental aspects. The following methods shall be adopted in the identification process:

EMS Manager and the Green Committee should:
(a) review all environmentally related activities and processes in the Hotel including:

- Handling and disposal / discharge of chemicals
- Consumption of water and discharge of wastewater
- Emission of air pollutant to the environment
- Contamination of land
- Generation of noise
- Management of waste
- Consumption of energy
- Purchase, utilisation and storage of resources
• Occupational health and safety issues

(b) Conduct site visit;
(c) perform document review; and
(d) conduct interviews with Department Heads and relevant staff.

Evaluation of significant environmental aspects

• In line with the environmental policy, the Hotel is committed to improve environmental performance by controlling and improving environmental aspects properly. There are many methods to evaluate the significance of the aspects and ISO 14001 did not specify a specific method to evaluate its significance. The hotel can decide their own mechanism provided that a consistent method is adopted within the hotel. All environmental aspect should be assessed against the evaluation system to evaluate its significance.

Updating the environmental aspects

Department Heads should:

• Department Heads, with the assistance of the EMS Manager, shall update the identified environmental aspects and significant environmental aspects whenever there are changes. A comprehensive update shall be prepared at least every year.

• Department Heads shall report any changes in the environmental aspects and the significant environmental aspects of their departments to the EMS Manager who shall keep the Register of Significant Environmental Aspects up-to-date (SEE EXAMPLE 2). Each significant environmental aspect in the Register shall cross-reference to relevant operational control procedures and / or environmental objective & target and environmental management programme.
### EXAMPLE 2.
**REGISTER OF SIGNIFICANT ENVIRONMENTAL ASPECTS**

**HONGKONG GENERIC HONGKONG**

**DEPARTMENT/SECTION: HOUSEKEEPING**

<table>
<thead>
<tr>
<th>Environmental Aspect</th>
<th>Impact</th>
<th>Significant Aspect &amp; Target</th>
<th>Operational Control Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Air</td>
<td>Water</td>
<td>Land</td>
</tr>
<tr>
<td>1. Use and replacement frequency of bedding linen and bathroom towels</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>2. Consumption of paper by putting 2 sets of telephone directories in each guest room</td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>3. Use of plastic bottled bathroom amenities and disposal of plastic containers For executive floors: -bath gel, body lotion, shampoo, hair conditioner For regular floors: -foam bath, shampoo/conditioner</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>4. Disposal of plastic bottle or aluminum can (Guest room mini bar soft drink items)</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Disposal of empty glass bottles of distilled water</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. Consumption of toilet paper in the bathrooms of guest rooms</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>
4.3 Planning

4.3.2 Legal and other requirements

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4.3 Planning

4.3.2 Legal & other requirements

- establish & maintain a procedure to identify & access to legal & other requirements to which the organisation subscribes
- applicable to the environmental aspects of its activities, products or services.

(SEE EXAMPLE 3)

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4.3 Planning

<table>
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<th>4.3.2 Legal &amp; other requirements</th>
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<td>Sewage Services Ordinance</td>
</tr>
<tr>
<td>Air Pollution Control</td>
</tr>
<tr>
<td>Ozone Layer Protection Ordinance</td>
</tr>
<tr>
<td>Road Traffic Ordinance</td>
</tr>
<tr>
<td>Waste Disposal</td>
</tr>
<tr>
<td>Noise Control</td>
</tr>
<tr>
<td>Dangerous Goods</td>
</tr>
<tr>
<td>Radioactive Materials</td>
</tr>
<tr>
<td>Public Health &amp; Municipal Service</td>
</tr>
</tbody>
</table>

Implementation in Hotels

Identification, review and revision of legal and other requirements

EMS Manager should:

- The EMS Manager shall assist the Department Heads to consult the advice of government departments (e.g. Environmental Protection Department), the Hong Kong Hotels Association or professional organizations (e.g. Hong Kong Polytechnic University) if necessary.

- The EMS Manager shall base on the identified legal and other requirements to establish a Register of Legal and Other Requirements (SEE EXAMPLE 3). The Register shall be reviewed annually, and revised if necessary to ensure that the Register is up-to-date and is relevant to the current operations and activities of the Hotel.
Department Head should:
• Department Head shall identify the legal and other requirements which are directly applicable to the Hotel’s operations, and activities, products and services provided.

Evaluation of compliance of legal and other requirements

EMS Manager should:
• The EMS Manager shall consolidate the non-compliance reported by Department Heads to a Legal Compliance Evaluation Report every half year, and present and discuss the Report in the EMS Management Review Meeting.
### EXAMPLE 3. Register of Legal and Other Requirements

**HOTEL GENERIC HONGKONG**

<table>
<thead>
<tr>
<th>Ordinance/Regulation</th>
<th>Requirements</th>
<th>Relevant Reference Publications</th>
<th>Areas of Applicability to the Hotel</th>
</tr>
</thead>
</table>
| **Water Pollution Control Ordinance (WPCO)** | The WPCO provides for the declaration of Water Control Zone (WCZs) and the establishment of water quality objectives, and requires that effluent discharge in a WCZ must have a license from the Environmental Protection Department (EPD). The licenses are normally valid for five years and have to be renewed. EPD may require the licensee to undertake regular monitoring of the discharge and submit the analysis results and EPD has authority to take independent samples for confirmatory analysis. | Statement of Water Quality Objectives (Victoria Harbor (Phase Two) Water Control Zone)  
A Guide to the Water Pollution Control Ordinance  
Water Pollution Control Ordinance Victoria Harbor (Phase Two) Water Control Zone Information Booklet (Sep 95) | As Hotel Generic Hongkong is situated in TST, effluent from the Hotel is controlled by the Victoria Harbor (Phase II) Water Control Zone.  
In Hotel Generic Hongkong, the major sources of aqueous discharge include wastewater from kitchens during food and beverage preparation which may contain a high oil & grease content, and wastewater from laundry and toilet facilities which is expected to have high Biological Oxygen Demand (BOD), Chemical Oxygen Demand (COD), suspended solids and E. coli contents. Wastewater created from engineering maintenance practices is also a significant source of aqueous discharge. Other wastewater sources include guestrooms and swimming pool.  
The Ordinance / Regulations are relevant to the activities and operations of the following Departments / Sections:  
Kitchen  
Housekeeping  
Engineering |
| **Water Pollution Control (Sewage) Regulation** | The regulation requires owners of private premises to collect and convey their effluent discharge to communal sewers. | Technical Memorandum on Standards for Effluents Discharged into Drainage and Sewerage Systems, Inland and Coastal Waters (Feb 91) |                                                                                                                                                                                                                                      |
| **Sewage Services (Sewage Charge) Regulation** | The Regulation specifies the charging scheme for SC. All wastewater generators including domestics; commercial; and industrial generators are required to pay the SC. This regulation is enforced by Drainage Service Department (DSD). |                                                                                                                                                                               |                                                                                                                                                                                                                                      |
4.3 Planning

4.3.3 Objectives and targets

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**Definition**

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Targets</th>
</tr>
</thead>
<tbody>
<tr>
<td>Overall environmental goal arising from environmental policy</td>
<td>Detailed performance requirement</td>
</tr>
<tr>
<td></td>
<td>quantified where practicable</td>
</tr>
<tr>
<td></td>
<td>set in order to achieve objectives</td>
</tr>
</tbody>
</table>

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**4.3 Planning**

**4.3 Objectives & Targets**

- establish & maintain documented environmental objectives & targets at each function & level within the organisation
- consider the legal & other requirements, significant environmental aspects, technological options
- consistent with the environmental policy, including the commitment to prevention of pollution.

---

**IMPLEMENTATION IN HOTEL**

**Establishment of environmental objectives and targets**

- While establishing environmental objectives and targets, the followings shall be considered:
  (a) the identified legal and other requirements;
  (b) the identified significant environmental aspects;
  (c) available technology;
  (d) financial status of the Hotel;
  (e) views of interested parties; and
  (f) consistency with environmental policy.

**Department Head should:**

- Department Heads shall base on the current situation of the Hotel to establish corporate level s or departmental level s environmental objectives and targets, which are realistic and achievable.
• The followings are the procedures for the establishment of environmental objectives and targets:

(a) Identify significant environmental aspects;
(b) Review all EMS procedures and documents (e.g. Hotel Environmental Procedures and Operational Control Procedures, etc.) to see whether all significant environmental aspects are under proper control;
(c) Establish environmental objectives and targets for those significant environmental aspects that are under improper control or even not under control;
(d) After established environmental objectives and targets, the EMS Manager shall revise relevant EMS procedures and documents appropriately and inform relevant Department Heads. The Department Heads shall then inform their staff to make appropriate modifications and arrangements in their operations;
(e) The Hotel can establish environmental objectives and targets to achieve a higher level of environmental performance once all significant environmental aspects are under proper control.

Monitoring procedures

**EMS Manager should:**

(a) The EMS Manager shall discuss with the relevant Department Heads regularly to monitor the progress made towards achieving environmental objectives and targets, co-ordinate and optimize the utilization of resources, and understand their difficulties in implementation;
(b) Before the target date of each environmental objective and target, the EMS Manager shall evaluate its effectiveness with relevant Department Heads, and decide whether to continue, revise or cancel the environmental objective and target;
(c) After the environmental objective and target are achieved, the EMS Manager shall decide whether to monitor the results over a certain period to ensure its sustainability. All environmental objectives and targets of the Hotel are complied in the Environmental Management Manual.
4.3 Planning

4.3.4 Environmental management programme(s)

Establishment of environmental management programme

**Department Head should:**

(a) Relevant Department Heads, with the assistance of the EMS Manager, are required to establish a technically and financially feasible implementation plan for achieving each established environmental objective and target within a reasonable time period. The implementation plan shall be easy to implement, and shall not affect the quality of services or products provided.

(b) The environmental management programme shall also include the designation of responsibility for achieving the environmental objectives and targets, and the means and the time frame by which they are to be achieved. *(SEE EXAMPLE 4)*

(c) Department Heads shall assign personnel with appropriate skills to carry out the programme to ensure that resources are effectively utilized and the progress will not be delayed.

**Monitoring procedures**

**EMS Manager should:**

(a) The EMS Manager shall review and discuss the environmental management programmes with relevant Department Heads regularly to ensure that the progress is in the right track and the environmental objectives and targets shall be achieved within the time frame. Before the environmental management programme is completed, the EMS Manager shall evaluate its progress and achievement with

(b) relevant Department Heads to see whether it is necessary to revise the programme, and see whether relevant records are kept.

(c) Upon completion of the environmental management programme, the EMS Manager shall decide whether to monitor the programme over a certain period to ensure its sustainability.
EXAMPLE 4. Environmental Management Programme

HOTEL GENERIC HONGKONG

<table>
<thead>
<tr>
<th>Objective and Target</th>
<th>Target Period/ Date</th>
<th>Responsibilities</th>
<th>Implementation Programme</th>
<th>Monitoring and Measurement Procedures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Objective: Minimise the disposal and wastage of non-reusable items.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Target: Progressively replace the use of disposable ball pens by refillable ones</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Environmental Management Programme**

<table>
<thead>
<tr>
<th>Implementation Programme</th>
<th>Timescale</th>
<th>Responsible Person</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Source refillable ball pens from the market.</td>
<td>From PM</td>
<td></td>
</tr>
<tr>
<td>2. Select the best product in terms of cost and quality.</td>
<td>To PM</td>
<td></td>
</tr>
<tr>
<td>3. Raise Purchase Request to buy refillable ball pens for replacement.</td>
<td></td>
<td>PM</td>
</tr>
<tr>
<td>4. Issue memo to each Department Head about the change in Purchasing Policy.</td>
<td></td>
<td>PM</td>
</tr>
<tr>
<td>5. Start issuing refillable ball pens to staff after the stocks of disposable ball pens are clear.</td>
<td></td>
<td>PM</td>
</tr>
</tbody>
</table>

- EMS Manager shall review and record progress monthly.
4.4 Implementation and operation

4.4.1 Structure and responsibility

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Roles, responsibility & authorities shall be defined, documented & communicated

Provides resources essential to the implementation & control of the EMS
– Specialised skills
– technology
– financial resources

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Appoint management representatives who shall have defined roles, responsibilities & authority for:
– ensure that EMS requirements are established, implemented & maintained according to ISO 14001
– reporting on the performance of the EMS to top management

IMPLEMENTATION IN HOTEL

• The environmental roles, responsibilities and authorities of the General Manager, the Executives, the EMS Manager, Department Heads, and all staff in the Hotel are defined in the Hotel’s EMS procedures (i.e. Hotel Environmental Procedures and Operational Control Procedures).

• The communication and reporting lines within the EMS team structure should follow the organizational structure of the Hotel.

EMS Manager should:
• The EMS Manager is responsible for revising the environmental roles, responsibilities and authorities of the EMS team structure defined in EMS procedures and the organizational structure of the hotel whenever there are changes to ensure that it is appropriate to the current situation of the Hotel.
### 4.4 Implementation and operation

#### 4.4.2 Training, awareness and competence

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**4.4 Implementation & operation**

<table>
<thead>
<tr>
<th>4.4.2 Training, awareness &amp; competence</th>
</tr>
</thead>
<tbody>
<tr>
<td>- identify training needs</td>
</tr>
<tr>
<td>- establish &amp; maintain procedures to</td>
</tr>
<tr>
<td>make its staff:</td>
</tr>
<tr>
<td>- aware of the importance of</td>
</tr>
<tr>
<td>conformance with EMS requirement</td>
</tr>
<tr>
<td>- sign. Environmental impacts of</td>
</tr>
<tr>
<td>their work</td>
</tr>
<tr>
<td>- their roles &amp; responsibility</td>
</tr>
<tr>
<td>- staff whose work may create sign.</td>
</tr>
<tr>
<td>Environmental impact shall be</td>
</tr>
<tr>
<td>competent &amp; received appropriate</td>
</tr>
<tr>
<td>training.</td>
</tr>
</tbody>
</table>

---

**IMPLEMENTATION IN HOTEL**

#### Planning and organization of training programmes

**EMS Manager and Department Heads should:**

- The EMS Manager is responsible for planning and organizing various environmental training programmes (on-the-job training and off-the-job training) every year.

- The nature and the frequency of training depend on how well the overall EMS is implemented, what training needs are proposed by the staff, and which nonconformances are frequently detected. The EMS Manager and Department Heads shall arrange relevant staff to attend each training, and ensure that the training is adequate to the staff.

- The EMS Manager and Department Heads shall evaluate the effectiveness of each training by requiring each attendant to complete a Post-Course Evaluation Form after each training, and analysing the results.

- The EMS Manager and Department Heads shall consider attending external training, seminars and workshops to acquire latest information on environmental issue and share environmental experience with other professionals.

**Operational Staff should:**

- Every staff can propose any training need to their Department Heads and the Department Heads shall in turn reflect their ideas to the EMS Manager.

**Training records**

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*Page 23 of 64*
EMS Manager and Department Heads should:

- The EMS Manager and Department Heads are responsible for keeping all training records (e.g. staff attendance records, Post-Course Evaluation Forms, etc.) and a copy of each training manual for reference. All staff training records shall be kept at least three years.

Revision of annual environmental training plan

EMS Manager should:

- The EMS Manager is responsible for revising the annual environmental training plan in accordance with the Hotel’s situation, and evaluating the effectiveness of the training provided annually to ensure that the training can cater for the changing environmental legislation and the continually improving environmental management system.
4.4 Implementation and operation

4.4.3 Communication

Internal communication

**General Manager should:**
- The General Manager shall hold monthly meetings with the EMS Manager and Department Heads to evaluate the effectiveness of internal communication mechanism. The EMS Manager is responsible for keeping all meeting minutes.

**EMS Manager should:**
- The EMS Manager shall announce environmental activities and information of the Hotel internally through notice boards, staff newsletters, staff meetings and internal information circulation, etc.

**Department Heads should:**
- Department Heads shall then complete the Environmental Communication Form (SEE EXAMPLE 5) and submit it to the EMS Manager to follow up.

**Operational Staff should:**
- All staff is free to make suggestions, inquiries or complaints about environmental affairs to their Department Heads.

External communication

**General Manager should:**
- General Manager shall involve in announcing environmental activities and information of the Hotel externally through press release, advertisement, hotel newsletter, conferences and seminars etc.
- The General Manager shall hold monthly meetings with the EMS Manager and Department Heads to evaluate the effectiveness and strategy of external communication. The EMS Manager is responsible for keeping all meeting minutes.
EMS Manager and Public Relations Manager should:

- The EMS Manager shall assist the General Manager and Public Relations Manager in announcing environmental activities and information of the Hotel externally through press release, advertisement, hotel newsletter, conferences and seminars etc.

- The EMS Manager and Public Relations Manager are responsible for receiving, documenting and responding to suggestions, inquiries or complaints about environmental affairs by external parties. They should also record it in the Environmental Communication Form. The EMS Manager shall also keep all correspondences.
---

**EXAMPLE 5. Environmental Communication Form**  
**HOTEL GENERIC HONGKONG**  
**Environmental Communication Form**

<table>
<thead>
<tr>
<th>Record No.:</th>
<th>(For EMS Manager(s) use only)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Types:</td>
<td>Internal communication ✔</td>
</tr>
<tr>
<td></td>
<td>External communication</td>
</tr>
</tbody>
</table>

Name of staff / person / organisation who makes the suggestion / inquiry / complaint:

____________________________________________________________________________________

Date: ________________________________________________________________________________

Means: letter / verbal / phone / others: ___________________________________________________

Summary of suggestion / inquiry / complaint:

____________________________________________________________________________________

Record person: __________________________ Date: __________________________

Action taken (For EMS Manager(s) use only)

<table>
<thead>
<tr>
<th>Nature of suggestion / inquiry / complaint</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ General</td>
</tr>
<tr>
<td>☐ Non-conformance with EMS (Please fill in EMS Non-Conformance Form)</td>
</tr>
</tbody>
</table>

Proposed action

Details:

____________________________________________________________________________________

Responsible person: ________________________________________________________________

Completion date: __________________________

EMS Manager(s): __________________________ Date: __________________________

Follow up action (For EMS Manager(s) use only)

<table>
<thead>
<tr>
<th>Is the proposed action implemented?</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>(Please fill in a new form)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Is the person who makes the suggestion / inquiry / complaint satisfied?</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>(Please fill in a new form)</td>
</tr>
</tbody>
</table>

EMS Manager(s): __________________________

Date: __________________________
4.4 Implementation and operation

4.4.4 Environmental management system documentation

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IMPLEMENATION IN HOTEL

The hotel should establish environmental management system documents which will describe the core elements of the management system and their interaction. Generally, there are four levels of documents, with Environmental Policy at the top, which are:

Level 1  Environmental Management Guide (See Example 6)
Environmental Management Guide includes the Hotel’s environmental policy specifying the principal objectives to be achieved and the environmental commitments of the hotel, and a board description of how the hotel address the ISO 14001 requirements. It serves as an interface to interpret the relationship between the Environmental Management System of the Hotel and the ISO 14001 Standard.

Level 2  Hotel Environmental Procedures (See Example 7)
Hotel Environmental Procedures are all procedures specified in the ISO 14001 Standard and contain information about who should do what, how and when. These procedures provide a detailed description for all EMS elements.

Slide 27
Level 3  Operational Control Procedures
Operational Control Procedures are instructions or procedures, with defined responsibilities, to control the identified significant environmental aspects associated with the Hotel’s operations and activities.

Level 4  Environmental Records
Environmental records are records which arise from the implementation of the Hotel’s Environmental Management System Procedures (Hotel Environmental Procedures and Operational Control Procedures) and include Register of Significant Environmental Aspects, Register of Legal and Other Requirements, Environmental Objectives and Targets List, monitoring and measurement results, and other plans, forms, checklists, reports, reference manuals, records, etc.
Chapter 1.0 Environmental Policy

1.1 ISO 14001 Standard Requirements

This Chapter conforms to ISO 14001 Standard Section 4.2 Environmental Policy which states that top management shall define the organisation’s environmental policy and ensure that it

a) is appropriate to the nature, scale and environmental impacts of its activities, products or services;

b) includes a commitment to continual improvement and prevention of pollution;

c) includes a commitment to comply with relevant environmental legislation and regulations, and with other requirements to which the organisation subscribes;

d) provides the framework for setting and reviewing environmental objectives and targets;

e) is documented, implemented and maintained and communicated to all employees;

f) is available to the public.

1.2 Applicability to the Hotel

Within an EMS, the environmental policy is the direction of the organization with respect to its environmental intention. It is defined by senior management and provides a public declaration of the organization’s environmental responsibilities and commitment.

To comply with Standard requirements, the environmental policy of Hotel Generic Hongkong includes commitments to continual improvement of environmental performance, comply with all local environmental legislation, and prevention of pollution that the Hotel is continuously striving for. It also expresses the attitude of the Hotel towards environmental protection and resources conservation to employees and external interested parties. The environmental policy also provides the overall direction and criteria for senior management to set and review environmental objectives and targets to improve the environmental performance of the Hotel.

The environmental policy shall be reviewed and revised where necessary by senior management during the EMS Management Review Meeting every year to ensure that the policy reflects the current situation of the Hotel and is relevant to the Hotel’s activities, products and services provided.

Hotel Generic Hongkong makes the updated environmental policy available and accessible to staff at all levels and publishes it externally for the public. It is the responsibility of Department Heads to ensure their subordinates are familiar with the updated environmental policy.

1.3 Related Documentation
1.3.1 Detailed procedures for distributing, reviewing and revising the environmental policy can be found in the Hotel Environmental Procedure “HEP-001: Environmental Policy” in this manual which is maintained by the EMS Manager.
EXAMPLE 7. Hotel Environmental Procedure

Title: Hotel Environmental Procedure
Document No.: HEP-002
Revision No.: 1
Date Issued: 1 February 1999
Page 1 of 3

Compiled by: EMS Manager(s)
Signed:
Date:

Authorized by: General Manager
Signed:
Date:

Procedure Name: Environmental Aspects

1.0 Purpose

To explain how to identify the environmental aspects and the significant environmental aspects of the hotel’s activities, products and services provided, which will be considered in setting environmental objectives and targets.

2.0 Scope

The identification of environment aspects serves as a means to recognize the significant impacts of hotel’s activities, products and services provided on the environment. The environmental aspects / significant environmental aspects of the hotel are listed on the Register of Significant Environmental Aspects which shows the environmental impacts associated with each environmental aspect and the significance of each environmental aspect.

3.0 Responsibilities

3.1 EMS Manager(s) and Department / Section Heads

Department / Section Heads, with the assistance of the EMS Manager(s), are responsible for:

(a) identifying the environmental aspects that are relevant to their departments / Sections;
(b) analyzing and evaluating the significance of the identified environmental aspects;
(c) establishing and maintaining a Register of Significant Environmental Aspects; and
(d) reporting any information that contributes to changes of environmental aspects / significant environmental aspects to the EMS Manager(s).

4.0 Procedure

4.1 Identification of environmental aspects

4.1.1 The present and future operations of the hotel under normal, abnormal and emergency situation will be considered while identifying the environmental aspects. The following methods will be adopted in the identification process:

(b) reviewing all environmentally related activities in the hotel and all processes including:
   - waste management, minimisation, recycling and disposal;
   - resource utilisation, storage and delivery;
   - leakage (e.g. chemicals);
   - wastewater discharge and air pollutant emission; and
   - other polluting activities.

(e) conducting site visit and document review; and

(f) conducting interviews with Department / Section Heads and operational staff in the hotel.

4.1.2 The Department / Section Heads should review the identified environmental aspects constantly, and add / delete and modify the existing environmental aspects / significant environmental aspects by revising any changes in the hotel’s activities, products and services provided.

4.1.3 Department / Section Heads should keep the Register of Significant Environmental Aspects up-to-date and report any changes to the EMS Manager(s).
4.2 Evaluation of significant environmental aspects

In line with the environmental policy, the hotel is committed to improve environmental performance by controlling and improving environmental aspects properly. A conservative evaluation system is therefore adopted to evaluate the significance of each environmental aspect. Each environmental aspect will be assessed against the following 8 criteria to evaluate its significance:

<table>
<thead>
<tr>
<th>Environmental Aspect</th>
<th>Significant?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Is the aspect controlled through either legal or other requirements?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>⇒ Yes</td>
</tr>
<tr>
<td>2. Is the aspect likely to have a high severity of consequence to the environment or human health?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>⇒ Yes</td>
</tr>
<tr>
<td>3. Did any environmental accidents or incidents occur in the past?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>⇒ Yes</td>
</tr>
<tr>
<td>4. Have any legitimate complaints been received related to the aspect?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>⇒ Yes</td>
</tr>
<tr>
<td>5. Does the aspect result in large quantities of waste?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>⇒ Yes</td>
</tr>
<tr>
<td>6. Are large quantities of resources consumed?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>⇒ Yes</td>
</tr>
<tr>
<td>7. Does use/disposal of the product create concern?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>⇒ Yes</td>
</tr>
<tr>
<td>8. Is the aspect a business concern, or a concern of interested parties?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>⇒ Yes</td>
</tr>
</tbody>
</table>

Not a significant aspect

5.0 Relevant records and reference materials

5.1 Relevant records
Register of Significant Environmental Aspects

5.2 Reference materials
Initial Environmental Review (IER) Report

End of procedure
4.4.5 Document control

Establish & maintain procedures for controlling all documents:
- can be located
- periodically reviewed & revised
- current version are readily available at all locations
- obsolete documents are promptly removed

**IMPLEMENTATION IN HOTEL**

**Labelling of EMS documentation**

- To indicate the current status of each document, and to prevent the staff from using obsolete or outdated documents, the following information shall be stated on each EMS document or procedure:

  1. Title
  2. Document / Procedure name
  3. Document number
  4. Revision number and date issued
  5. Compiled person, date and his / her signature
  6. Authorized person, date and his / her signature (for controlled EMS documents only)
  7. Page number
  8. Electric path and filename

**EMS Manager should:**

- The EMS Manager is responsible for establishing, revising and updating the above information.

**Distribution of controlled EMS documents**

- The EMS Manager shall distribute copies of controlled EMS documents, which are defined as any EMS documents or procedures that the current version shall be in use for the implementation of the EMS, to relevant personnel whenever updated versions are available. The EMS Manager is responsible for establishing and maintaining a Distribution List of Controlled EMS Documents which record the names of Department Heads or staff to whom copies of controlled EMS
documents are distributed. The Department Heads shall also establish a Distribution or Circulation list of their respective department.

(b) All copies of controlled EMS documents shall be clearly marked with the term “ISO 14001 Controlled Copy”.

(c) The ISO 14001 controlled copies cannot be reproduced. The staff shall obtain the controlled documents directly from the EMS Manager or relevant Department Heads when needed.

EMS Manager should:

- The EMS Manager shall base on the Distribution List of Controlled EMS Documents to collect the outdated version of controlled EMS documents from relevant Department Heads and distribute the updated version to ads whenever updated versions are available.

- The EMS Manager is required to post the revision number and issuing date of latest controlled EMS document on notice boards.

Department Head should:

- Department Heads are also required to distribute the updated version of controlled EMS documents and collect the outdated version of controlled documents from their staff (based on their distribution list) and return to EMS Manager.

Revision of EMS documentation

(a) All EMS documents and procedures are constantly reviewed and revised by relevant personnel (e.g. the EMS Manager and Department Heads). Any staff can reflect the need to revise the EMS documents or procedures (e.g. Operational Control Procedures) to his / her Department Head. Department Heads are responsible for reporting any changes in the content of EMS documents or procedures to the EMS Manager.

(b) All revised controlled EMS documents shall be authorized and signed by the General Manager prior to implementation.

(c) The EMS Manager is responsible for recording all revisions of EMS documentation. Revision of EMS documents or procedures can be traced from:

- Environmental Management Manual
  Summary of Revision of Environmental Management System Documentation
- EMS documents or procedures
  Revision Record of each EMS document or procedure

(d) A complete set of the updated EMS documentation is maintained and located at the Human Resources Department for staff reference.

General Manager should:

- General Manager shall authorize and sign the EMS documents prior to implementation.
EMS Manager should:
- EMS Manager is responsible for recording all revision of EMS documentation.

Department Heads should:
- Department Heads are responsible for reporting any changes in the content of EMS documents or procedures to the EMS Manager.

Operation Staff should:
- Any staff can reflect the need to revise the EMS documents or producers.

Removal of outdated / obsolete documents

(a) Whenever updated versions are available, outdated / obsolete documents shall be collected and exchanged by updated documents immediately according to the Distribution List of Controlled EMS Documents. Outdated / obsolete documents shall not be kept and shall be returned to EMS Manager as soon as possible.

EMS Manager should:
- The EMS Manager shall keep a copy of each outdated / obsolete document for one year for reference.

Department Heads should:
- Department Heads can also keep a copy of the outdated / obsolete documents for reference purpose. However, such documents shall be clearly marked with the term "ISO 14001 Obsolete Copy". The stamp is available in Human Resources Department.

Numbering system of EMS documentation

The numbering system of EMS documentation is as follows:

- Environmental Management Guide: EMG-xx
- Hotel Environmental Procedure :HEP-xx
- Environmental Objectives & Targets and Environmental Management Programme: EMP-yy-xx
- Operational Control Procedure: OCP-yy

xx - Procedure number  yy - Meaningful abbreviations

e.g. EX: Executive Offices
PR: Public Relations Department
SM: Sales & Marketing Department
4.4 Implementation and operation

4.4.6 Operational control

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IMPLEMENTATION IN HOTEL

Establishment of operational control procedures

Operational control procedures established for the Hotel generally cover the following aspects:

- Handling and storage of chemicals;
- Control of laundry loading, water consumption and wastewater discharge;
- Control of air pollutant emission;
- Waste management, reduction and recycling;
- Purchasing considerations;
- Prevention of fire occurrence;
- Control of energy consumption;
- Resources utilisation and storage;
- Engineering maintenance practices; and
- Control of other polluting activities.

General Manager should:
- All operational control must be authorized and signed by the General Manager.

Department Heads should:
- Department Heads shall establish appropriate operational control procedures for those operations or activities that are under improper control or not under control.
- Where practicable, Department Heads shall establish operational control procedures for controlling environmental aspects which are evaluated as insignificant.
- Department Heads shall review and revise existing operational control procedures constantly so as to fulfil the requirements of the ISO 14001 Standard, and report any changes in the content of operational control procedures to the EMS Manager.
Monitoring the implementation of operational control procedures

EMS Manager should:
• The EMS Manager shall hold monthly meetings with Department Heads to monitor the effectiveness of operational control procedures, and check (e.g. spot-checking) whether the procedures are implemented properly.

Department Heads should:
• Department Heads shall ensure that their staff knows, understands and follows relevant operational control procedures in performing their tasks.

• Department Heads shall revise the operational control procedures in accordance with the practical situation of the Hotel, in order to ensure that the operational control procedures can be implemented effectively thus fulfilling the requirements of the ISO 14001 Standard.

• Department Heads shall ensure the latest version of operational control procedures is easily accessed by their staff.

• Department Heads, with the assistance of the EMS Manager, shall communicate relevant operational control procedures and requirements to suppliers and contractors (e.g. responsible person of contract-out services) wherever practicable.
EXAMPLE 8. Operational Control Procedure

HOTEL GENERIC HONGKONG

1.0 Purpose
To manage and minimise solid waste and control electricity consumption in Executive Offices so as to minimise the adverse environmental impacts.

2.0 Scope
- Disposal of all solid waste.
- Electricity consumed by office equipment and lighting & air-conditioning.

3.0 Responsibilities
All staff in Executive Offices are responsible for following the established waste management and energy conservation practices. (Staff are encouraged to be actively involved in the execution of the EMS and for suggesting improvements).

The Executive Secretary is responsible for:
- ensuring all staff understand and implement the waste management and energy conservation practices accordingly;
- maintaining the OCP’s for the Executive Offices (in consultation with the Deputy General Manager and the EMS Manager); and
- maintaining relevant records.

The Deputy General Manager is responsible for:
- auditing and monitor the routine activities in Executive Offices;
- organising monthly meeting to obtain feedback from the staff and respond to their inquiries;
- arranging training for the staff on an as-needed basis; and
- checking whether appropriate notices are clearly visible and in the correct locations.

4.0 Procedures
Materials and Waste:

Paper waste
- Staff shall minimise the use of non-recyclable NCR paper.
- Staff shall discontinue use of unnecessary forms, consider reducing the size of forms or combine different forms with similar function.
- The Executive Secretary shall convey suggestions to the Purchasing Department.
- Whenever possible staff shall review draft documents on computer screens rather than printing it out.
- A minimum of copies shall be kept for record keeping.
- Staff shall avoid unnecessary photocopying, by determining exact number of copies required and ensuring correct machine settings before photocopying.
- Double-sided copying shall be used where possible.
- Two labelled paper collection boxes shall be placed next to photocopiers. One box to be used to store paper that can be reused. Another box (waste paper recycling box) is used to collect waste paper for recycling.
4.4 Implementation and operation

4.4.7 Emergency preparedness and response

IMPLEMENTATION IN HOTEL

The potential accidents and emergency situations in the Hotel generally include:

(a) Leakage and spillage of chemicals and dangerous goods, and their wastes;
(b) Accidental release and discharge of hazardous substances to air, water and land;
(c) Explosion of flammable substances;
(d) Fire occurrence;
(e) Accidents as a result of equipment failure; and
(f) Accidents as a result of staff negligence, lack of awareness, and incompetence.

• The established emergency preparedness and response measures can be integrated to the operational control procedures of relevant departments.

EMS Manager should:
• The EMS Manager shall hold monthly meetings with Department Heads to monitor and check the adequacy and effectiveness of emergency preparedness and response measures to ensure they are complete and effective. After the occurrence of accidents or emergency situations, the EMS Manager and relevant Department Heads shall review and revise the emergency preparedness and response procedures where necessary. The EMS Manager shall also write a Post Accident Report with relevant Department Heads.

Department Heads should:
• Department Heads shall review and revise the emergency preparedness and response procedures where necessary.
• Department Heads, with the assistance of the EMS Manager, shall provide appropriate and adequate emergency preparedness and response training or
demonstration to relevant staff so that the staff can know how to prevent or respond to accidents and emergency situations.

- On the other hands, they can understand the adverse environmental impacts that may be associated with them. Department Heads are also responsible for making their staff understand that it is the responsibility of them to report all occurrences of accidents to their Department Heads.

- Department Heads shall then inform necessary changes in the content of emergency preparedness and response measures to the EMS Manager. Department Heads shall also ensure that their staff knows and understands the latest emergency preparedness and response measures.

- Department Heads shall assign right personnel (internal staff or external contractors) with appropriate skills to check, maintain and examine the tools and equipment (e.g. fire extinguishers, smoke detectors, etc.) needed for the emergency preparedness and response measures regularly.

Operational Staff should:

- Staff is responsible for reporting all occurrences of accidents to their Department Heads.

- Staff shall inform any comments or suggestions to revise the emergency preparedness and response measures to their Department Heads where necessary.
4.5 Checking and corrective action

4.5.1 Monitoring and measurement

IMPLEMENTATION IN HOTEL

Establishment of monitoring and measurement plan

**EMS Manager should:**

- The EMS Manager shall hold monthly meetings with Department Heads to monitor whether the monitoring and measurement plans are complete and accurate, whether the monitoring and measuring data comply with relevant environmental legislation, whether the operational control procedures are adequate and effective. The EMS Manager is responsible for keeping meeting minutes. The EMS Manager shall also check (e.g. spot-checking) whether the monitoring and measurement plans and operational control procedures are implemented properly.

- The EMS Manager shall discuss with the relevant Department Heads regularly to monitor the progress made towards achieving environmental objectives and targets (refer to HEP-004: Environmental Objectives and Targets). In case of non-conformance, appropriate corrective actions shall be taken immediately.

- The EMS Manager is responsible for keeping all EMS Non-conformance Reports which shall be presented and discussed in the annual EMS management review meeting.

- EMS Manager should follow up and check the corrective and preventive actions.

**Department Heads should:**

Department Heads, with the assistance of the EMS Manager, shall establish monitoring and measurement plans in the following areas:

- **Sewage discharge:** the mass concentrations of Biochemical Oxygen Demand (BOD) and Oil & Grease of two samples of sewage collected from sewage discharge pit at G/F.;
• **Air pollutant emission:** Boiler emissions (carbon dioxide, smoke density and flue gas temperature);
• **Solid waste disposal:** number of bins of general solid waste disposed by F&B Department and other departments in the Hotel;
• **Waste recycling:** weight of recycling items (waste paper, newspaper, cartoon boxes and aluminum cans) collected by recycling company;
• **The conformance of environmental objectives and targets; and**
• **The adequacy and effectiveness of operational control procedures for controlling the significant environmental aspects.**

• In case of non-conformance, relevant Department Heads shall investigate the cause of nonconformance and establish appropriate corrective and preventive actions. The corrective and preventive actions shall be followed up and checked by the EMS Manager.

• Each monitoring and measurement plan shall include the monitoring and measuring frequency, method, equipment used, responsibilities, and records or reports that shall be kept. The monitoring and measurement plans are integrated to the operational control procedures of relevant departments.

**Change of monitoring and measurement plan**

**Department Heads should:**
• The monitoring and measurement plans shall be reviewed and revised annually by relevant Department Heads according to changes in legislative requirements and the practical situation of the Hotel. Besides, appropriate adjustments shall also be made on monitoring and measurement plans as a result of continual improvement of environmental performance and changes in preventive and corrective actions.
4.5 Checking and corrective action

4.5.2 Nonconformance and corrective and preventive action

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**IMPLEMENTATION IN HOTEL**

**EMS Manager should:**

- If it is necessary to revise the established corrective and preventive actions, the EMS Manager shall revise such actions with relevant Department Heads.

- The EMS Manager shall hold monthly meetings with the General Manager and Department Heads to assess the adequacy of the nonconformance mechanism. The EMS Manager is responsible for keeping all meeting minutes.

- Before the annual EMS Management Review meeting, the EMS Manager shall ensure that the corrective and preventive actions are finally incorporated into relevant EMS procedures / documents.

**Department Heads should:**

- The Department Head shall investigate the cause of nonconformance, and suggest corrective and preventive actions, in consultation with the EMS Manager, to mitigate the environmental impact and minimize the recurrence of the problem and the potential for nonconformance.

- The corrective and preventive actions adopted shall be appropriate, effective, legible with defined responsibilities. The Department Head shall then complete the EMS Non-conformance Report immediately, and submit the Report to the EMS Manager for approval prior to implementation. (SEE EXAMPLE 9)

- If it is necessary to revise the established corrective and preventive actions, Department Heads shall ensure that relevant staff knows and understands clearly any changes in the corrective and preventive actions.
• Department Heads shall advise the EMS Manager on progress on corrective and preventive actions taken. The area where the non-conformity occurred shall be re-checked independently by the EMS Manager to ensure that the corrective and preventive actions are implemented successfully.

Operational Staff should:

• When a non-conformance is found in the Hotel’s EMS, the staff shall report to his / her Department Head immediately.

• All EMS Non-conformance Reports shall be presented and discussed in the annual EMS management review meeting.
## EXAMPLE 9. EMS Non-conformance Report

**HOTEL GENERIC HONGKONG**

EMS Non-conformance Report

<table>
<thead>
<tr>
<th>Report no.:</th>
<th>(For EMS Manager(s) use only)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department / Section:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Reason of non-conformance:</th>
<th>Monitoring and Measurement</th>
<th>Communication</th>
<th>Accident</th>
<th>EMS audit</th>
<th>Others</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<table>
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<th>Findings:</th>
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<td></td>
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<tr>
<td></td>
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<table>
<thead>
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<th>Time of occurrence:</th>
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<tbody>
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<td></td>
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<td></td>
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<tr>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Department / Section Head*:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Auditee*:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Auditor*: From: (Department / Section)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date: From: (Department / Section)</th>
</tr>
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<tbody>
<tr>
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</table>

* Please fill in appropriate box(es)

<table>
<thead>
<tr>
<th>Suggested corrective and preventive actions:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
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<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Responsible person and estimated completion date:</th>
</tr>
</thead>
<tbody>
<tr>
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| Department / Section Head: Date: |
|-------------------------------|-------------------------------|
|                               |                               |

| Approved by EMS Manager(s): Date: |
|-----------------------------------|-------------------------------|
|                                  |                               |

<table>
<thead>
<tr>
<th>Review of follow up action:</th>
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| EMS Manager(s): Date: |
|-----------------------|-----------------------|
|                       |                       |
4.5 Checking and corrective action

4.5.3 Records

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**IMPLEMENTATION IN HOTEL**

**Maintenance of environmental records**

**General Manager should:**
- All environmental records must be authorized by the General Manager.

**EMS Manager should:**
- The EMS Manager shall hold monthly meetings with Department Heads to see whether relevant records are kept.
- The EMS Manager shall also ensure that environmental records, which belong to controlled EMS documents (e.g. Register of Significant Environmental Aspects and Register of Legal and Other Requirements), are periodically reviewed by responsible personnel according to the environmental management system documents / procedures and revised where necessary, authorized by the General Manager, and distributed to relevant personnel whenever updated versions are available.

**Department Heads should:**
- All environmental records shall be completed by responsible personnel, and verified or approved by Department Heads or authorised personnel. The environmental records shall be established and maintained according to the environmental management system documents / procedures.

**Storage and retrieval of environmental records**
- Relevant personnel shall store all environmental records in a systematic way, with record title and other useful information clearly shown so that they can be retrieved easily.
Retention and disposition of environmental records

EMS Manager should:

- The EMS Manager is responsible for ensuring that the retention times and the responsibilities of maintaining environmental records are defined on EMS procedures. Environmental records without specifying the retention times shall normally be kept by responsible personnel for at least two years.

Management of obsolete environmental records

EMS Manager, Deputy EMS Manager and Department Heads should:

- The EMS Manager, the Deputy EMS Manager and Department Heads shall normally dispose obsolete records. Records that are kept for reference purpose shall be isolated from useful records and clearly labelled.
4.5 Checking and corrective action

4.5.4 Environmental management system audit

Slide 34

4.5.4 EMS audit
- shall have procedures for periodic EMS audits to determine if EMS:
  - conforms to planned arrangement
  - properly implemented & maintained
- provide audit results to management

Slide 35

4.5.4 EMS audit
- Audit programme shall be based on
  - potential environmental impact of activity
  - results of previous audits
- Audit procedures cover:
  - audit scope, frequency & methodologies
  - responsibilities & requirements for conducting audits & reporting results

IMPLEMENTATION IN HOTEL

EMS Audit Plan

- Audits are conducted according to the EMS Audit Plan which details the schedule for the audits, the members of the audit team and the scope of the audits. This plan is reviewed annually and based on the scope and schedule for the EMS audits. These criteria suggest that a half-yearly audit be carried out for some EMS elements, either in the first or second half of the year. Those areas that require auditing quarterly shall be carried out in addition. This schedule shall ensure that all areas are audited during a twelve-month period and that the audit process does not become too demanding on staff resources.

Audit methodology
EMS Manager should:
• To facilitate each quarterly audit, an EMS Audit Checklist is prepared, and serves to ensure that all key activities are examined. This checklist is distributed by the EMS Manager to the audit team members.

• The area where the non-conformance occurred is re-checked independently by the EMS Manager to ensure that the corrective and preventive actions are implemented successfully. This implementation is then reported to the audit team who include it as an addendum to the EMS Non-conformance Report. The EMS Non-conformance Reports are consolidated to an EMS Audit Report by the EMS Manager and a copy is circulated to the General Manager, the Executives and Department Heads.

Department Heads should:
• When a non-conformance is found in the EMS, the auditor shall complete the EMS Non-conformance Report (SEE EXAMPLE 9) and inform the relevant Department Head immediately. The relevant Department Head shall establish necessary corrective and preventive actions and state such actions on the EMS Non-conformance Report. He / She shall advise the EMS Manager on progress on corrective and preventive actions taken.

Operational Staff should:
• During the audit, activities are audited against the EMS. Special attention is paid to the activities that were previously found to be deficient. Staff shall be questioned as part of the audit to ensure that written instructions are being carried out and appropriate training given.
4.5 Management Review

Management shall review the EMS to ensure its
- continuing suitability
- adequacy & effectiveness

Review shall be documented

4.5 Management Review

Based on EMS audit results, changing circumstances & commitment to continual improvement.

Management review shall address
- possible need for changes to policy, objectives & other elements of EMS

IMPLEMENTATION IN HOTEL

The EMS management review shall be conducted at least once a year. The General Manager, the Executives, Department Heads and the EMS Manager shall attend the EMS management review meeting.

EMS Manager should:
Before each EMS management review meeting, the EMS Manager is responsible for preparing an agenda to state the review topics. The EMS Manager shall also prepare an EMS Management Review Checklist to list all information necessary for the meeting.

The EMS Manager is required to write an EMS Management Review Report to document the review results, suggestions and proposed actions for continual improvement, and all other information.
The agenda and the checklist shall be circulated to the General Manager, the Executives and Department Heads before the EMS management review meeting. The EMS Manager and Department Heads shall ensure that the information on the checklist is compiled to allow for a proper management review. Such information may include:

- The EMS Audit Report;
- EMS Non-conformance Reports which document the causes of non-conformances and the corrective and preventive actions taken;
- Progress reports of environmental objectives and targets;
- Monitoring records of achieved environmental objectives and targets;
- Monitoring records of environmental management programmes;
- Monitoring and measurement data (e.g. Energy consumption record which indicate the monthly consumption of electricity, water, gas and fuel by the Hotel);
- Legal Compliance Evaluation Report;
- Suggestions, inquires or complaints documented in Environmental Communication Forms;
- Monitoring records of operational control procedures;
- Post Accident Reports;

and other information related to:

- Changes in business environment that may influence policy, objectives and targets;
- New or changed legislation and other requirements;
- New or changed expectations and requirements of customers and interested parties;
- Changes in applicable technology;
- The Hotel’s financial and competitive position; and
- Changes in the activities, products or services provided by the Hotel.

The followings shall be included in the EMS management review meeting:

(a) Review of the Hotel’s overall environmental performance and degree of improvement;
(b) Evaluation of the effectiveness of the EMS, allocation and utilization of resources, and roles, responsibilities and authorities of staff;
(c) The progress, achievement and effectiveness of environmental objectives and targets;
(d) Whether to establish new environmental objectives and targets;
(e) Review of the findings of the EMS audits and propose appropriate actions for improvement;
(f) Review and revise environmental aspects and significant environmental aspects;
(g) Evaluation of the suitability of the environmental policy and the need for changes in the light of:
   - changing legislation;
   - changing expectations and requirements of and interested parties;
   - changes in the activities, products or services provided by the Hotel;
   - technological changes;
   - lessons learned or experience gained from environmental incidents such as complaints and accidents;
• preferences in the Hotel industry; and
• suggestions and views of staff and external interested parties.

(h) Identification of opportunities for continual improvement by:

• identifying areas of opportunity for improvement of the EMS which lead to improved environmental performance (e.g. increase in effectiveness, cost reduction, better resources utilization, etc.);
• determining the root causes of non-conformances or deficiencies, and developing and implementing plans of corrective and preventive actions and providing appropriate training to address root causes;
• strengthening the communication between Department Heads and their staff, and documenting specifically any changes in operation procedures during the implementation of the corrective & preventive actions, and verifying the effectiveness of the corrective & preventive actions;
• selecting proper methodology, procedures and staff to establish and implement environmental management programmes for achievement of environmental objectives and targets.
5.0 EMS Benefits

Setting an EMS in hotel can help the hotel to approach environmental issues systematically and to integrate environmental care as a normal part of their operations and business strategy. It can also help to protect human health and the environment from the potential impacts of its activities and to assist in maintaining and improving the quality of the environment. Below are the environmental benefits that the hotel gains when setting up an EMS:

1. **Fully-utilise resources and reduce operating cost**

   When implementing an EMS in hotel, all the operating activities such as: product design, purchase of raw materials, product inspection, product packaging, product usage and disposal will be under systematic control in order to minimize the environmental impacts. It can reduce pollution, fully-utilize the natural resources, and reduce energy consumption. In other words, it can reduce pollution expense. Hence, it can save the utility cost of the hotel.

2. **Creditability for loans and insurance**

   Banks and insurance companies are increasingly reviewing the environmental liabilities of a company before securing the capital asset for financing or selling insurance. A hotel with lower environmental risks can obtain project financing more easily, at more favorable conditions, and insurance at lower cost. Therefore, it can gain financial creditability from Banks and Insurance Company.

3. **Compliance to Environmental Legislation**

   In Hong Kong, the environmental legislation relevant to hotel operations are: Water Pollution Control, Air Pollution Control, Waste Disposal, Noise Control, Dangerous Goods, Radioactive Materials and Public Health & Municipal Service. Organization implementing an EMS will try to establish and maintain procedure to identify and have access to legal and other requirements so as to comply with the environmental legislation and prevent the risk of prosecution.

4. **Prevent accidents**

   Hotel will establish and maintain procedures for potential accidents and emergency situation. It can reduce the possibility of accidents and mitigate the environmental impacts that may be associated with them. Moreover, it can minimize the loss or damage
incurred by the accidents. In case there is any accidents occurred (e.g. leakage of chemicals), they have a systematic system to handle and control.

5. Meet guest expectation

As increase in public awareness on environmental protection, guests who are environmental conscious will be more likely to choose and patronize the hotel with sound environmental performance. Implementing EMS System in hotel can ensure that their management system is running smoothly and efficiently. It can also help to heighten guest awareness of the hotel’s management skills and serve as a basis for quality service.

6. Enhance public image

As the improvement in the standard of living and increase in public interest on Environmental Protection, a hotel who can exert sound environmental concern can build up a green image as well as to establish a good reputation to the public. Hotel can distinguish themselves from others by showing their guests that their products and services are provided in an environmental friendly manner.
EMS Environmental Benefits

- Fully-utilise resources & reduce utility cost
  - fully-utilise natural resources
  - reduce energy consumption
- Creditability for loans & insurance
  - Hotel with lower environmental risks can obtain project financing more easily, at more favourable conditions, & insurance at lower cost.

EMS Environmental Benefits

- Compliance to Environmental Legislation
  - manage environmental aspects effectively can reduce legal liability to prosecution
- Prevent accidents
  - identify potential for & respond to accidents & emergency situation.
  - Preventing & mitigating the environmental impacts that may be associated with them
  - reduce loss or damage in case of accident

EMS Environmental Benefits

- Meet guest expectation
  - As increase in public awareness on Environmental protection, guests who are environmental conscious will be more likely to choose & patronise the hotel with sound environmental performance.
  - EMS helps to heighten guest awareness of the hotel’s management skills & serve as a basis for quality service.
EMS Environmental Benefits

- Enhance public image
  - Hotel can distinguish themselves from others by showing their guests that their products & services are provided in an environmental friendly manner.
  - A hotel who can exert sound environmental concern can build up a green image & establish a good reputation to the public.
### ISO 14001 REQ.

<table>
<thead>
<tr>
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<th>Operation Staff</th>
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</table>

#### 4.1 General Requirements
- Appoint a EMS/Green Manager and set up a green committee
- Commit to set up an EMS that is comply with ISO 14001 requirements

#### 4.2 Environmental Policy
- Review and revise policy
- Posting the policy on notice board
- Distributing the latest policy statement to external parties
- Assist General Manager to review policy
- Distribute policy copies to junior staff
- Collect obsolete policy statement and explain the updated one

#### 4.3 Planning

##### 4.3.1 Environmental aspects
- Assist Department Heads to update the identified environmental aspects
- Keep the Register of Significant Environmental Aspects up-to-date

##### 4.3.2 Legal and other requirements
- Assist Department Heads to consult advice
- Establish a Register of Legal and Other Requirements
- Consolidate the non-compliance to a Legal Compliance Evaluation Report and present and discuss it in the review meeting
- Identify the legal and other requirements
- Review all environmentally related activities and processes in hotel
### Appendix I ACTION PLAN ISO 14001 ENVIRONMENTAL MANAGEMENT SYSTEM

<table>
<thead>
<tr>
<th>ISO 14001 REQ.</th>
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<tbody>
<tr>
<td>4.3.3 Objectives and targets</td>
<td>---</td>
<td>• Evaluate the effectiveness of the objectives and targets</td>
<td>• Regularly monitor the progress</td>
<td>• Ensure the objectives and targets are sustainable</td>
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<tr>
<td>4.3.4 Environmental Management program</td>
<td>---</td>
<td>• Assist Department Heads in establishing the implementation plan</td>
<td>• Review and discuss the EMP with Department Heads regularly</td>
<td>• Evaluate the EMP progress and achievement</td>
<td>• Ensure the EMP is sustainable</td>
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<tr>
<td>4.4 Implementation and operation</td>
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<tr>
<td>4.4.1 Structure and responsibility</td>
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<td>• Revise the roles, responsibilities and authorities of the EMS team regularly</td>
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<tr>
<td>4.4.2 Training, awareness and competence</td>
<td>---</td>
<td>• Planing and organizing environmental training programme</td>
<td>• Arrange staff to attend training</td>
<td>• Evaluate the effectiveness of the training</td>
<td>• Propose training needs to Department Heads</td>
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<tr>
<td></td>
<td></td>
<td>• Evaluate the effectiveness of the training</td>
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<td>• Keep training records</td>
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<td></td>
<td></td>
<td>• Revise annual training plan</td>
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<td>• Attend external training, workshops and seminars</td>
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<td></td>
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## Appendix I  ACTION PLAN — ISO 14001 ENVIRONMENTAL MANAGEMENT SYSTEM

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</thead>
</table>
| 4.4.3 Communication | • Hold monthly meetings with EMS Manager and Department Heads to evaluate internal and external communication  
• Announce environmental activities and information of the hotel externally | • Announce environmental activities  
• Assist GM and PR Manager in announcing environmental activities and information to externally  
• Keep minutes for the monthly meeting | • Fill in Environmental Communication Form and submit to EMS Manager when need | • Free to make suggestions, inquiries and complaints to Department Heads |
| 4.4.4 EMS Documentation & control | • Authorize and sign the EMS documents | • Establishing, constantly revising and updating the document  
• Distribute all document copies to relevant personnel  
• Establish and maintaining a distribution list  
• Base on the distribution list, collect the outdated documents and replace by the updated version  
• Post revision number and issuing date of latest document on notice board  
• Recording all revisions of EMS documentation  
• Keep copy of obsolete document for one year | • Constantly review and revise the EMS documents  
• Distribute the updated version document to the staff  
• Report any change in the content of the document  
• Keep obsolete documents for reference | • Reflect the need to revise the EMS documents and procedures |
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<tr>
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<tr>
<td>4.4.6 Operational control</td>
<td>• Authorize and sign the operational control</td>
<td>• Hold monthly meeting with Department Heads to monitor the effectiveness of operational control procedures</td>
<td>• Establish appropriate operational control procedures and evaluate whether the environmental aspects as insignificant</td>
<td>• Constantly review and revise the existing operational control procedures</td>
<td>• Ensure the staff knows, understands and follows the procedures</td>
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### 4.4.7 Emergency preparedness and response

- Hold monthly meeting with Department Heads to monitor and check the adequacy and effectiveness of the measures
- Review and revise the procedures when necessary
- Write a Post Accident Report with relevant Department Heads
- Provide appropriate and adequate training or demonstration to staff
- Making the staff understand their responsibility of reporting the occurrence of accidents
- Ensure the staff understands and knows the latest measures
- Report any change of measures to EMS Manager
- Assign a right personnel to check, maintain and examine the tools and equipment for emergency purpose
- Review and revise the measures where necessary
- Report all occurrence of accidents to the Department Heads
- Inform any comments or suggestion to revise the measures to Department Heads

### 4.5 Checking and corrective action

#### 4.5.1 Monitoring and measurement

- Establish monitoring and measurement plan and review and revise it annually
- Investigate the cause of nonconformance and take corrective actions
## Appendix I

### ACTION PLAN - ISO 14001 ENVIRONMENTAL MANAGEMENT SYSTEM

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<tr>
<td>4.5.2 Nonconformance and corrective and preventive action</td>
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<td><strong>Hold monthly meeting with Department Heads to monitor the plans are implemented properly</strong>&lt;br&gt;• Keep the meeting minutes&lt;br&gt;• Follow up and check the preventive and corrective actions&lt;br&gt;• Discuss with relevant Department Heads about the progress of implementation of objectives and targets&lt;br&gt;• Keep the nonconformance report, and present and discuss the report during the annual EMS management review meeting</td>
<td><strong>Investigate the cause of nonconformance</strong>&lt;br&gt;<strong>Complete EMS Non-conformance Report when necessary</strong>&lt;br&gt;<strong>Advise EMS Manager on progress</strong></td>
<td><strong>Report any nonconformance to Department Heads</strong></td>
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<tr>
<td>4.5.3 Records</td>
<td><strong>Store environmental records in a systematic way</strong>&lt;br&gt;<strong>Authorize the EMS documents</strong></td>
<td><strong>Store environmental records in a systematic way</strong>&lt;br&gt;<strong>Hold monthly meeting to see if relevant records are kept</strong>&lt;br&gt;<strong>Ensure all records are authorized by General Manager</strong>&lt;br&gt;<strong>Ensure responsibilities of maintaining the records and the retention time are defined</strong></td>
<td><strong>Store environmental records in a systematic way</strong>&lt;br&gt;<strong>Verify and approve all environmental records</strong></td>
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### 4.5.4 Environmental management system audit

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- Distribute the audit checklist to auditor
- Re-check nonconformance independently
- Consolidate the EMS Non-conformance Report and EMS Audit Report, then circulate to General Manager, Department Heads and Executives
- Establish necessary corrective and preventive actions when nonconformance occurs
- Advise EMS Manager the progress on corrective and preventive actions
- Be questioned as part of the audit

### 4.6 Management review

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- Attend EMS Management Review meeting
- Attend EMS Management Review meeting
- Prepare agenda and EMS Management Review Report
- Prepare agenda and EMS Management Review Report
- Ensure information on the checklist is compiled
- Write the EMS Management Review Report
- Attend EMS Management Review meeting
- Ensure information on checklist are compiled
- Be questioned as part of the audit