Working Material 2.8

# Operational Control of Energy and Utilities

*ISO 14001:2026 · Material date: 25 October 2026*

*This sheet puts the working parts of subchapter 2.8 into editable form: the Verification Pact, the review questions, the common mistakes as a self-check and the Operative Synthesis as an action plan. The empty columns are for your property. The reasoning behind each row is in the book.*

**GUIDING QUESTION**

An environmental objective can be well designed, properly resourced, and technically achievable — and still be quietly undone, setting by setting, by a colleague with administrative access who has never heard it exists.

## Verification Pact: Market Claims Against the Standard

*The first three columns are copied from the book. In the last one, note whether this claim circulates in your property — in a proposal, a brochure, a supplier's pitch or your own documents — and what you now hold instead.*

| What is claimed | Binding? | What actually holds | In our property |
|---|---|---|---|
| Installing a sophisticated building management system and setting an ambitious objective within it constitutes operational control of the system | No | Control requires the operating criteria to actually govern the system's operation in practice, not only its technical capability to be configured a certain way | |
| Engineering's legitimate authority to respond to guest comfort complaints is inherently in tension with an environmental objective and cannot be reconciled | No | The tension is real but reconcilable through logging, visibility, and coordinated response design — the Doha case shows what happens absent any attempt at reconciliation, not that reconciliation is impossible | |
| A local override capability retained for legitimate operational reasons falls outside the scope of clause 8.1's control requirement | No | Any capability that can materially affect a significant environmental aspect is part of the process the organisation needs to control, regardless of the legitimate reason it exists | |
| Monthly aggregate energy data provides sufficient monitoring of an objective's operational integrity | Not on its own | Aggregate data revealed that something was wrong without revealing what — genuine operational visibility requires monitoring capable of identifying the specific mechanism of variance, not only its net effect | |
| Individually reasonable actions by different functions cannot, by definition, produce an unplanned systemic deviation | They can | The Doha case demonstrates precisely this: dozens of individually reasonable engineering decisions accumulated into a substantial, entirely unplanned deviation from the approved objective | |
| Responsibility for an objective's failure to perform as modelled rests with whoever designed the objective, regardless of who controls the system it depends on | No | Clauses 5.3 and 8.1 call for assigned responsibilities and controlled processes; in practice that means coordinating the objective's criteria with whoever holds day-today control of the relevant system | |

## A Checklist for the Next Building System Review

*Answer each question with Yes, Partly, No or N.A., and name the evidence: a record, a date, a person, a place someone can go and look. An answer without evidence is an opinion.*

| Question | Why it matters | Answer | Evidence |
|---|---|---|---|
| For our most significant energy-related objective, who holds actual day-to-day authority over the system it depends on? | The single question the entire Doha case turns on | | |
| Does any override capability affecting that system generate a log visible to environmental management? | Unlogged overrides are, by definition, invisible to the monitoring meant to catch exactly this pattern | | |
| Do overrides carry a default reversion window, or can they persist indefinitely once made? | An open-ended override is functionally a silent, permanent objective change | | |
| Was this objective designed with direct input from whichever function retains actual system authority, or handed to them after the fact? | Doha's original design process never asked engineering whether the modelled setpoints were operationally realistic | | |
| Do the two functions review performance data together, or does each work from its own separate view of the system? | Separate views, as at Doha for most of the affected year, can each look internally consistent while missing the interaction entirely | | |

## Common Mistakes — Self-Check

*Tick every mistake you recognise in your own property today, and write next to it where you saw it. A ticked box is not a nonconformity; it is a place to look before an auditor or an incident does.*

| ☐ | Mistake (from the book) | Where we see it |
|---|---|---|
| ☐ | Assuming installing a sophisticated system and setting an ambitious objective constitutes actual operational control of that system. | |
| ☐ | Designing an environmental objective without direct input from the function that retains actual day-to-day authority over the system it depends on. | |
| ☐ | Leaving legitimate operational override capability entirely unlogged and disconnected from environmental tracking. | |
| ☐ | Relying on aggregate monthly data alone to monitor an objective, without visibility into the specific mechanism of any variance. | |
| ☐ | Assuming individually reasonable actions by different functions cannot accumulate into a substantial, unplanned systemic deviation. | |
| ☐ | Responding to a discovered gap by restricting operational authority entirely, without considering the legitimate operational need that authority served. | |
| ☐ | Failing to build a defined reversion window into override capability, allowing exceptions to persist indefinitely by default. | |
| ☐ | Treating environmental management and facilities engineering as functions that need not coordinate directly over a shared physical system. | |

| ☐ | Mistake (from the book) | Where we see it |
|---|---|---|
| ☐ | Setting objectives so operationally aggressive that maintaining them requires constant informal correction, rather than incorporating genuine operational tolerance from the outset. | |
| ☐ | Retrofitting cross-functional coordination only after a gap is discovered, rather than building it into system design from initial installation. | |

## Operative Synthesis — Action Plan

*The three horizons and their actions are copied from the book. Owner and due date are yours to fill: an action without both is a wish.*

| Horizon | Action from the book | Owner | Due date |
|---|---|---|---|
| **Act on immediately** | For the property's most significant energy-related objective, ask directly who holds day-to-day operational authority over the system it depends on, and whether any mechanism logs or connects their actions back to the objective's own monitoring. | | |
| **Plan for** | Build automatic logging and a defined reversion window into any override capability affecting a system tied to an active environmental objective; and establish a standing joint review between environmental management and facilities engineering specifically examining override patterns, not only aggregate performance data. | | |
| **Monitor going forward** | Treat unexplained variance between modelled and actual performance as a signal to investigate operational mechanism, not only external conditions — and design future objectives with direct input from whichever function retains actual system authority, building genuine operational tolerance in from the outset rather than discovering the need for it through a year of silent informal correction. | | |

> **WHAT THIS SHEET IS NOT**
>
> *ISO 14001 does not prescribe this form. No clause asks for this worksheet, its columns or a register of market claims; the standard sets requirements and leaves the means to the organisation. This sheet is a working aid drawn from the book: use it, change it or set it aside. Where it touches a requirement, the text of ISO 14001:2026 is the authority, not this page — and nothing on it replaces your own reading of that text.*

Source: Francesco Dore, The Helm and the Lens, Volume 1a — ISO 14001:2026, subchapter 2.8. Edizioni Effedore 2026. © 2026 Francesco Dore. Free to adapt for use in your own property. enbooks.effedore.com