The Obligations You Have to Check

GUIDING QUESTION *Find the place in your system where compliance with energy obligations is recorded and read the most recent entry. Then ask two questions about it: who performed the evaluation that entry reports, and on what date? In most properties the answer to the first is nobody in particular and the answer to the second is the same day the entry was written, which means the record describes a declaration rather than an evaluation.*

Property: _____ Completed by: _____ Date: _____

How to use this sheet: work through the five parts with the people who own the process. The text in the left-hand columns comes from the book; the empty columns are for what is true in your property.

1. Verification Pact: what is commonly believed, what actually holds, and your property

What is commonly believed	What actually holds	In our property
«We have a register of legal and other requirements.»	That addresses access. Evaluating compliance is a separate obligation, performed at planned intervals and producing results.	
«The review recorded that we are compliant.»	An absence of contrary information is not an evaluation. The standard requires results to be retained, and a declaration has none.	
«The law has not changed.»	Probably not. Your brand standards, client contracts and lease terms change on commercial cycles, and nobody announces it.	
«The clause is in the register.»	It has been catalogued. The requirement is to determine how it applies here, which is a sentence saying what somebody must do.	
«Maintenance would have known.»	The obligation sat in a register held by the energy function. The people replacing plant were reading other documents.	
«We subscribe to an update service.»	That supplies access. It cannot determine how anything applies to your building, which is the obligation that matters.	

2. What the standard requires, and what demonstrates it

From Table 2.14.a. The third column of the book (what is method, not requirement) is left out here: write what your property actually holds as evidence.

What is required	What demonstrates it in a hotel	In our property
Access to applicable legal and other requirements	The lease, the contracts and the brand standards held by the property	
Determining how they apply	A sentence per requirement saying what somebody here must do	
Ensuring they are taken into account	The obligation reaching the person who would breach it	
Reviewing requirements at defined intervals	A date that has passed, and a note of what had changed	
Evaluating compliance at planned intervals	An evaluation with a date, a name and a method	
Retaining results and any action taken	One page recording what was checked and what was found	
Policy commitment to satisfy requirements	A decision in which the commitment cost something	

3. The instrument: Table 2.14.b, The register, translated

The instrument of this subchapter. The second and third columns are what turn a catalogue into a control.

Requirement	What it obliges us to do here	Who does it	Changes when
Legal and regulatory obligations	As determined with advisers	Named function	Slowly; announced
Lease clauses on energy and plant	Notify the landlord of plant changes; supply data on request	Maintenance	At renewal or variation
Brand or franchise standards	Report on the stated basis and interval	The energy function	On reissue; not announced
Corporate client contract terms	Supply the agreed figures on the agreed cadence	The energy function	At each renewal
Lender or investor conditions	Whatever the facility requires	Finance	At refinancing
Concession and service agreements	Measurement, bands, notification	Operations	At renewal
Requirements of the system itself	Everything this volume describes	The energy function	When the system changes

The rows above are the book's; the empty rows are for lines your property needs to add.

4. Common mistakes: self-check

Common mistake	Present here? (Yes / Partly / No)	Where we see it
Treating the existence of a register as compliance with the evaluation requirement.		
Recording compliance in a management review minute on the basis that nothing has gone wrong.		
Never reviewing the register, on the reasonable ground that the law has not changed.		
Cataloguing a requirement without determining what it obliges this property to do.		
Keeping obligations with the energy function, away from the people who would breach them.		
Buying access to requirements in order to solve a problem of applicability.		

5. Action plan

Step from the book / gap found	Action in our property	Owner	Deadline
Separate the register from the evaluation. They are two obligations and two documents.			
Translate every entry into a sentence saying what somebody here must do.			
Give each translated obligation to the person who would otherwise breach it.			
Schedule the register review: lease, brand standards, client contracts, loan conditions.			
Schedule the evaluation separately: a date, a person, a list, a result per item.			

Step from the book / gap found	Action in our property	Owner	Deadline
Check the commercial requirements first; nobody else is watching them.			
Record what was checked, not only what was found.			
Read the documents you have already signed, once, with energy in mind.			
Treat not determinable as a finding, and translate the entry that produced it.			

In brief

Two obligations sit in different parts of the standard and properties merge them into one. Ensuring access to requirements, determining how they apply, ensuring they are taken into account and reviewing them at intervals is one set. Evaluating compliance at planned intervals and retaining the results is another, and a register, however good, has no bearing on the second.

Source: The Helm and the Lens, Volume 4a: The Helm, subchapter 2.14. This sheet does not reproduce the text of the standard; work with your own copy of ISO 50001:2018 from an authorised source.