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DBN ENVIRONMENTAL AND SOCIAL MANAGEMENT GUIDANCE FOR THE HOTEL & RESORTS INDUSTRY

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The table below serves to track the key revisions made to this document for change control purposes.

1. DEFINITIONS, TERMS & ABBREVIATIONS

DBN	Development Bank of Namibia
EOHS&S risks	Environmental, Occupational Health and Safety and Social
ESIA	Environmental and Social Impact Assessment
SEP	Stakeholder Engagement Plan
PPE	Personal Protective Equipment
VOC's	Volatile organic compounds

2. INTRODUCTION

This guideline is designed to be used by the Development Bank of Namibia (DBN) clients to understand the nature of environmental, occupational health and safety and social (EOHS&S) risks associated with existing operations in this sector and suggested actions for businesses to manage these EOHS&S risks.

It also provides guidance for clients on potential due diligence questions to discuss with management to understand how their business is managing these EOHS&S risks. This guideline focuses on material EOHS&S risks; it is not an exhaustive list of EOHS&S risks. In managing EOHS&S risks, all businesses should be compliant with relevant EOHS&S laws and regulations and best practices.

This guideline focuses on hotels and other lodging places such as guesthouses and resorts with reference to the International Finance Corporation's Environmental, Health and Safety (EHS) General Guidelines. The EHS Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). Restaurants and other catering facilities are described in the Subsectoral guideline Eating and Drinking Places.

3. SCOPE

This guidance is applicable to all the Development Bank of Namibia's (DBN) clients/customers who intends to or have set up operations in this sector category and, extends to their assets, facilities, operations, projects and activities, including activities undertaken by any contractor on behalf of the Company, business units and managed operations including corporate/administration offices and other facilities located off site.

4. INTENT

The intent of this guidance note is to assist prospective clients to develop a thorough Environmental and Social Management Plan (ESMP) for their activities and merely act as a guidance and is not comprehensive nor exhaustive.

5. BACKGROUND TO THE SECTOR

Hotels typically provide paid-for accommodation on a short-term basis. The cost and quality of a particular hotel is usually indicative of the range and type of services available. Other activities and services typically associated with hotels include administration, laundry, air conditioning, and leisure facilities, (e.g. swimming pool, gym, tennis courts, etc.). Catering facilities are also usually located on site to provide meals.

Hotels range from small, family-owned guest houses to large purpose-built resorts, owned by multinational hotel companies. Increased tourism worldwide and customer demand to travel to remote and exotic locations has resulted in the increased development and expansion of hotels and resorts in areas of high natural biodiversity and environmental sensitivity.

Hotels and resort constructed in Namibia may have been constructed in environmentally-sensitive areas and may not meet international standards for waste, water management, food hygiene etc., due to gaps between national legislation and best practice. Chemicals are likely to be used for many different hotel operations such as the maintenance of swimming pools and spa areas, wash-downs, cleaning and kitchen hygiene.

The safe handling, storage and use of chemicals, waste and other projects in support of the hotel industry has implications for the level of environment and social impact.

6. KEY EOHSS RISKS

Below are the material EOHSS risks associated with this sector and key measures to manage them. Where gaps are found in the management of key EOHSS risks, the DBN E&S risk management measures may form part of a corrective E&S action plan agreed with clients.

6.1. Air Emissions

Air emissions associated with hotels and resorts typically include combustion emissions (carbon monoxide, carbon dioxide, nitrogen and sulphur oxides, and hydrocarbons) and particulates from oil, gas and coal-fired boilers, stoves and generators.

Volatile organic compounds (VOC) may also be emitted from dry-cleaning, refrigeration, and air conditioning units.

6.1.1. Mitigation and Management Measures

- Consider changes to refrigerants (if the cooling system is old and uses inefficient or phasedout refrigerants) and/or sealing of leakages in the refrigeration system;
- Use only refrigerants with low global warming potential and avoid the use of ozone-depleting refrigerants;
- Insulate any refrigeration/freezer rooms and ensure that regular inspection and maintenance is undertaken;
- Maintain and monitor generators and other emission sources in line with manufacturer's instructions.

6.2. Asbestos

Asbestos has been used on a large scale for many years as a fire proofing and insulation material and may be encountered in a wide range of forms within buildings including asbestos cement boards, as fire retardant gaskets in pipe work and as fire retardant insulation around boilers and furnaces.

6.2.1. Mitigation and Management Measures

- Where the presence of asbestos is known or suspected, seek professional advice in order to commission an asbestos survey and removal programme;
- Particular attention should be paid to facilities constructed prior to the 1990's.

6.3. Biodiversity and Ecosystem

The construction and operation of large hotel complexes can impact biodiversity through the clearance and alteration of natural habitats, the development of larger 'avoidance areas' for wildlife as they seek to avoid the disturbed areas, the use of non-native species to create hotel 'landscapes', the

creation of linear barriers to wildlife movement (roads, fences etc.) and alterations to the surface water regime.

Discharges of wastewater and solid waste to the aquatic environment and, in particular, the marine environment may impact fish and fisheries, corals and other marine habitats. Corals are particularly sensitive to changes in currents and water temperature; the use of speedboats, jet skis and other motorised equipment may impacts marine habitats.

Land clearance and construction may cause damage to sensitive areas or areas protected by legislation such as areas of high ecological value, or archaeological or historic interest.

6.3.1. Mitigation and Management Measures

- Undertake an Environmental and Social Impact Assessment (ESIA) as appropriate prior to construction;
- Develop an Environmental and Social Management Plan
- Include an assessment of risks to habitats, flora and fauna;
- Identify species present together with any sensitivities in terms of breeding periods, noise, light or other pollution sensitivity;
- Undertake assessments (if applicable) of the near-shore environment and ensure that steps are taken to avoid or minimise impacts to corals and other coastal habitats;
- Avoid the introduction of non-native species as part of landscaping;
- Provide appropriately-sized culverts under access and approach roads to facilitate natural drainage;
- Manage waste, and domestic/food waste in particular, to avoid the build-up of pests and rodents and to control odour emissions;
- Ensure that local and national planning authorities are consulted and all necessary approvals and permits are obtained, prior to construction;
- Consult the local community, as appropriate, prior to major construction, land conversion or other activities that may impact community quality of life and environment;
- Use sites, wherever possible, that are not classified as protected habitat or sensitive areas.

6.4. Community Relations

Community engagement is important to maintain good relations with the communities within which the hotel operates.

Apart from the environmental impacts of the company's operations on local communities, there may also be significant social and economic impacts, which might be positive or negative. Hotels can significantly contribute to local economies when employment and procurement policies and practices are developed with local benefits in mind.

6.4.1. Mitigation and Management Measures

- Consult with local communities when planning to open or extend new hotels;
- Assess opportunities for the involvement of the local community in direct employment or in the provision of goods and services;
- Engage with the local community and other interested and/or affected stakeholders, on a regular basis, to maintain good social relations;
- In areas of high population density or high community interest, prepare and implement a Stakeholder Engagement Plan (SEP) to manage and coordinate communications;
- If necessary, establish a community Grievance Mechanism to ensure that feedback from the community is received and addressed.

6.5. Corruption and Bribery

The hotel and property development sectors are characterised in some parts of the world in extreme cases by high incidences of corruption and bribery. Companies face reputation and legal risks where neglect of sound environmental and safety practices and standards, as a result of corruption, lead to environmental damage or injury and death.

6.5.1. Mitigation and Management Measures

- Ensure anti-corruption and bribery policies as well as whistle-blowing procedures are in place;
- Ensure contactors sign up to company policies.

6.6. Energy use

Hotels and resorts consume large amounts of energy in the form of heat and power. Energy consumption is directly linked to building location, design, construction and operational uses.

6.6.1. Mitigation and Management Measures

- Consider the hotel's energy efficiency at the design phase including passive solar design, building orientation, installation of renewable technologies and selection of building materials (e.g. insulation, high-efficiency light bulbs, occupancy sensors and daylight controls);
- Undertake an Energy Audit to examine means for energy saving and implement energy saving measures;
- Examine options for heat recovery and insulation to reduce/supplement energy consumption;
- Implement energy savings initiatives involving heat recovery, buying energy efficient equipment, optimising and monitoring room temperatures, optimisation of refrigeration and cooling systems etc.;

6.7. Fire Safety

Hotels pose a fire risk to guests, visitors and employees. This is a specific risk to be addressed. A number of areas could cause a fire including exposed electrical wiring, kitchens, boiler rooms, high voltage areas or a smoking accident in a guest room.

Poorly constructed and maintained buildings may lead to injury and death.

6.7.1. Mitigation and Management Measures

- Conduct a third party life and fire safety audit to assess if construction/refurbishment design is in compliance with local building codes, local fire department regulations, local legal/insurance requirements;
- Ensure the hotel facilities are always in compliance with above-mentioned requirements;
- Ensure that the facility has a Fire Safety Master Plan (or equivalent) in place;
- Ensure that regular checks, maintenance and reviews of fire equipment and systems is undertaken by a qualified and experienced third party;
- Ensure that fire response plans are well communicated to all staff and that regular fire training and drills are undertaken
- Establish a clear understanding and recognition of responsibility for maintenance of building fabric items and fire equipment, between the building owner and the building tenant/occupier where relevant.

6.8. Hazardous Materials

Hazardous materials may be used for the operation of dry cleaning units, spas, general cleaning and housekeeping, swimming pool chlorination, pest control etc.

Incorrect storage or handling of these substances may be a source of environmental contamination or health risk. Inhalation or ingestion of hazardous or toxic substances, for example chlorine fumes from water/swimming pool treatment, cleaning materials, descaling agents, pesticides/herbicides, paints and other coatings may also be a health risk.

Some fuel oil (for example for the use of back-up generators) may be stored on site and if not stored or handled properly spillage can occur which may lead to contamination of soils and watercourses.

6.8.1. Mitigation and Management Measures

- Record all hazardous materials held on site in a site inventory with Materials Safety Data Sheets (MSDSs) available in the appropriate language;
- Maintain storage areas (such as pool and water treatment chemicals) to ensure that they are organised, secure, clean and dry;
- Design storage facilities with appropriate signage, ventilation and secondary containment, and ensure proper management, i.e. locked and accessible only to trained and approved personnel;

- Inspect storage facilities on a regular basis to ensure that leaks and spillages do not occur;
- Train staff in the correct selection, use and maintenance of PPE. Inspect PPE regularly and maintain or replace as necessary;
- Prepare and implement procedures for the handling and treatment of hazardous materials in the event of spillage.

6.9. Machine & Electrical Safety

In a catering environment, and through the operation of lifts etc., it is common to have injuries where people interact with machinery or moving and rotating equipment.

This can be owing to moving or falling objects such as crates and boxes, using equipment such as forklifts, bag carriers and delivery vehicles/trucks, all of which can lead to serious injury or death.

Maintenance of hotel (internal and external areas) will also require the operation of machine and electrical tools.

6.9.1. Mitigation and Management Measures

- Separate people from vehicle movements to ensure the safety of workers, the community and the public;
- Train vehicle and forklift drivers to properly operate the machinery and equipment;
- Assess machine safety in consultation with machine operators, reduce hazards according to the hierarchy of controls and undertake modifications/install guards and interlocks as required;
- Ensure that all electrical work is only conducted by qualified personnel and that regular electrical surveys/tests of fixed and mobile electrical equipment and installations is undertaken by qualified personnel;
- Assess electrical installations and ensure that appropriate insulation, earthling and residual current devices (RCDs) are in place;
- Ensure that a traffic plan is in place to maximize separation of pedestrians and vehicles, and that this plan is communicated to all relevant staff.

6.10. Manual Handling

Lifting, repetitive work and posture injuries occur as a result of lifting and carrying heavy or awkward shaped items such as food products, drinks crates and solid wastes.

Repetitive tasks can lead to musculoskeletal injuries and work-related upper limb disorders.

6.10.1. Mitigation and Management Measures

- Assess tasks throughout the process, with a particular focus on heavy and repetitive tasks;
- Rotate packing tasks to vary posture and reduce musculoskeletal problems;

• Install mechanical lifting aids where possible and rotate work tasks to reduce repetitive activities.

6.11. Noise

Sources of noise are typically associated with mechanical rooms (containing boilers, generators and air conditioning units), kitchens and laundries, waste management areas e.g. compactors, garages, entertainment areas, and lobby areas.

Noise may pose an inconvenience to local residents and other business owners, and to wildlife.

6.11.1. Mitigation and Management Measures

- Locate and design facilities to avoid sensitive receptors to noise or minimise their exposure through appropriate siting and the use of noise screening;
- Enclose noisy machinery to isolate people from noise where practicable and eliminate noise exposure through the hierarchy of controls;
- Identify sources of elevated noise and demarcate these;
- Provide Personal Protective Equipment (PPE) (e.g. hearing protection) where workers and visitors have to enter noisy areas and ensure appropriate use of PPE;
- Rotate tasks to minimise workers' time spent in noisy areas over an eight hour period;
- Conduct regular hearing tests for workers.

6.12. Labour and Working Conditions

Due to the nature of the hotel industry there is a requirement for a large number of staff. Employment is often informal and seasonal exposing employees to exploitation. Hotels are often located in remote regions and forced or compulsory labour, child labour and discrimination may occur.

Employees may be required to work for long hours in poor or difficult conditions.

Hotel operations may use both casual and contract labour. During hotel construction, worker accommodation standards, particularly for temporary/casual labourers, may not reach the standard required for permanent employees.

6.12.1. Mitigation and Management Measures

- Comply with the Labour Act No. 11 of 2007, No 156 Labour Act 1992 Regulations relating to the health and safety of employees at work and the International Labour Organisation (ILO) requirements on working hours, pay, overtime, child labour, forced labour etc;
- Ensure fair working hours and a minimum age of workers;
- Develop a policy on ethical procurement to ensure that there are no labour standard violations in the supply chain;

- Include minimum labour standards in contracts for all third-party contractors working on-site. These standards should include provisions related to illegal, child and forced labour;
- Ensure that labour standards, contracting and remuneration are in line with Namibian law and are consistent with the average for the sector and apply to permanent employees and casual and contract labour;
- Undertake checks on workers right to work (including work permits, age etc.);
- Provide appropriate worker accommodation which meets, at a minimum, the basic needs of workers and national legislation.

6.13. Sexual Exploitation

In certain regions of the world, both adults and children are subjected to commercial sexual exploitation. Hotels and other accommodation are often the places where sexual exploitation takes place, as well as acting as the hub for the growth of this illegal industry.

6.13.1. Mitigation and Management Measures

• Ensure that hotel management and security staff are adequately trained to identify and eradicate sexual exploitation.

6.14. Waste

The main types of solid wastes generated at hotels include paper and cardboard items, glass and aluminium products, plastic items, organic waste, building materials and furniture, and used oils and fats.

Hazardous wastes may include batteries, solvents, paints, pesticides/herbicides and some packaging wastes.

Increased use of local waste management infrastructure can have a significant impact on the local community. If locations have limited infrastructure (combined with multiple hotels), waste may have to be transported over long distances; alternatively, the hotel operators may need to work with the local authorities to develop new capacity.

6.14.1. *Mitigation and Management Measures*

- Reduce the amount of packaging that is being introduced into the waste streams and order in bulk;
- Implement composting measures for organic waste;
- Segregate other reusable/recyclable wastes and arrange for collection for recycling; it may be easier to find a waste contractor that will take single waste types rather than mixed recyclables;
- Store all food and solid wastes in adequate, sealed or lockable containers away from vermin and segregate where possible to simplify and encourage recycling;

- Encourage suppliers to use reusable containers rather than disposable packaging;
- Replace individual packaged portions and sachets with tamper-proof dispensers to reduce packaging waste.

6.15. Wastewater

A hotel's largest wastewater source is domestic wastewater from toilets, showers and bathing. Nevertheless, smaller wastewater streams often present a greater environmental risk particularly streams from laundry and dry-cleaning, housekeeping, maintenance, and kitchen departments, as well as recreational facilities, such as swimming pools (as this water may be loaded with chemicals).

These wastewater streams may include cleaning agents, disinfectants, and linen-washing agents, including liquid bleach, chlorine products, and detergents. Detergents typically contain phosphates which, if discharged untreated, may cause eutrophication (such as algal blooms) of natural waterways. Kitchen effluents may also contain oils and greases.

If the local wastewater infrastructure is unable to treat the increased wastewater discharge from a new hotel development, such that water is discharged directly to the environment, it can lead to significant water pollution. This may require the installation of an on-site wastewater treatment plant.

6.15.1. Mitigation and Management Measures

- Consider discharges to water resources under the requirements of the Water Act No 54 of 1956 and Water Resources Management Act, No 24 of 2004 and local environmental regulations and permitting requirements;
- Ensure that hotel wastewater discharges have appropriate treatment technologies in place, and assess whether any upgrades are required to comply with local and national permitting requirements;
- Regularly inspect and maintain the condition of any storage facilities, outfall pipes and discharge points. Undertake visual inspection of the state of the surrounding environment to identify any indicators of potential problems;
- Implement measures to control odour coming out of wastewater treatment facilities, sewage outlets and other waste streams.

6.16. Water consumption

Significant quantities of water are used in the hotel industry. Water consumption is directly linked to personal use by guests and the site's requirements for housekeeping, laundry, cooking, swimming pools, spa facilities, watering (for example for golf courses) and other ground maintenance.

Use of surface or ground water in arid regions may cause water shortage issues for other water users. Abstraction of groundwater for hotel activities may result in the lowering of the water table and may affect agricultural or industrial users; changes in the water table may also affect sensitive habitats such as rivers and wetlands.

Water use issues are more serious where hotels are clustered together in a small area (for example, along a beach or river) and local infrastructure planning may not have accounted for the level of water demand or waste water discharged.

Water storage containers may also be a source of legionellosis (a bacteria associated with water storage); Legionnaires' disease is most commonly transmitted through the inhalation of water droplets (for example from a shower) and/or soil particles contaminated with the bacteria.

Water sources where warm temperatures allow the bacteria to thrive include hot-water tanks, cooling towers and evaporative condensers of large air-conditioning systems, such as those commonly found in hotels and large office buildings.

6.16.1. Mitigation and Management Measures

- Evaluate abstraction from water resources under the requirements of the Water Act No 54 of 1956 and Water Resources Management Act, No 24 of 2004 and applicable local environmental regulations and permitting requirements;
- As far as possible, select a location where a water supply is available with minimal impacts on surrounding water users;
- Obtain abstraction or water use permits which detail the allowable volumes of water abstraction/use. Where changes take place in product volumes, this should be reflected in the permit;
- Evaluate and use, as appropriate, water conservation techniques to reduce overall demand for water, including:
 - water recycling and reuse;
 - o use of water-efficient equipment;
 - use of rainwater collection systems;
 - Maintenance of water equipment (hoses, sprayers, pipelines to avoid losses).
- Undertake regular testing of water quality, whether municipal or from groundwater abstraction to ensure that water is safe for consumption or domestic use and meets local and international water quality standards and targets;
- Where there is Legionella exposure risk (for example where there are cooling towers or significant water systems), assess the level of risk and implement protective measures where needed (such as biocide treatment);
- Conduct routine testing of stored water (tanks, air-conditioning units etc.) to monitor for the presence of Legionella.

6.17. Slip, trip and fall hazards

Many hotel injuries happen as a result of workers tripping over physical obstructions or slipping due to bad ground conditions. Other conditions such as insufficient lighting, poor housekeeping, wet & slippery floors and a lack of guard rails or hand rails on platforms or staircases can contribute to slips, trips and falls.

Facility guests may also be susceptible to slip and fall accidents in hotel room showers or common areas (e.g. Lobbies, restaurants as recreational areas).

6.17.1. Mitigation and Management Measures

- Use anti-slip equipment such as anti-slip mats in areas that are often wet or oily.
- Provide and ensure the usage of appropriate PPE. For example, provide and ensure that antislip shoes are worn in areas that are often wet or oily.
- Repair damaged flooring immediately (e.g., broken tiles, holes).
- Practice good housekeeping.
- Keep walkways clear of obstructions (e.g., boxes, electrical cables).
- Clean spillages immediately.
- Provide handrails at staircases
- Erect signs to warn passers-by about slippery floors during and after cleaning.
- Ensure that there is adequate lighting at all work areas.
- Always keep floors and stairs dry and clean.
- Ensure that carpets and rugs are free of holes and loose edges.

16.18. Working at heights including ladder works

The most common work at heights activity in the hospitality industry involves ladders. Ladders are a common tool utilised by the maintenance and engineering staff in hotel and resort businesses. They enable personnel to reach higher places for a variety reasons such as hanging banners, changing light bulbs, checking sprinkler heads, dusting high areas, accessing roof areas and so much more.

16.18.1. Mitigation and Management Measures

- Ensure that workers working on heights wear proper footwear (e.g., non-slip flat shoes).
- Place the ladder on stable and level ground. Ladders should not be placed on an uneven surface.

• Prevent passers-by from walking under or near ladders in use by using barriers (e.g., cones) or have someone to act as a lookout.

- Maintain three points of contact at all times.
- Prohibit working from on the top rung of the ladder.
- Ensure that the right ladder for the job is used.
- It is recommended that the radius of the barricaded area should be approximately the same as the height of the ladder.

16.19. Permit-to-work system

Serious and fatal accidents occur during maintenance operations in tourism and hospitality industry. These include but not limited to working at heights including roof, working in confined spaces, hot work- welding, soldering, isolation of modification to fire safety system and alarms, live working on electricity supply systems.

6.19.1. Mitigation and Management Measures

- Permits to work should be required whenever there is a significant risk to safety and health during maintenance operations that are potentially risky.
- Allow work to start only after safe procedures have been defined and all foreseeable hazards have been considered.
- Ensure that staff and contractors fully understand the importance of permit-to-work system and are trained in its use.
- Ensure that the work which is intended to take place is properly authorised.

The DBN will look at the following during loan application and monitoring after disbursement;

- Perform a complete tour of the facility, accompanied by someone knowledgeable about all the activities there.
- Confirm organisational responsibilities and systems for environment, occupational health, safety and social matters and that these systems cover both employees employed directly and sub-contractors.
- During the initial site visit, the issues will vary according to the type of activities and the level of environment, occupational health and safety and hygiene management already introduced. While visiting the site it is important to discuss and review the following:

Topic	Issue to review
General Housekeeping	• What is the standard of general house-keeping on site? Do all key areas look clean and tidy? Look for localised spills, leaking pipes etc.
	• What routines are in place for regular cleaning and sanitation of food/beverage areas and equipment?
	• Check the age and condition of buildings and equipment.
Health and Safety	• Check whether Occupational Health and Safety risks have been systematically assessed, documented and addressed.
	• Check whether efforts have been made to reduce hazards through application of the hierarchy of controls i.e. eliminate, substitute, engineer, administer then issue personal protective equipment PPE as a last resort (e.g. install noise reduction equipment before resorting to issuing hearing protection).
	• If PPE is required, check that it is being supplied by the employer, is used effectively and maintained/checked regularly. Note industry-specific items such as hairnets, gloves etc. also that appropriate facilities are provided for the washing and sanitation of garments prone to food products.
	• Check that appropriate facilities for the washing, sanitation and drying/ironing of PPE are provided.
	• Note the signage around the site. Does it convey what health & safety risks might exist in areas?
	• Check whether an asbestos survey has been undertaken at the facility, have the costs for management/removal been assessed, and if asbestos exists, is an asbestos management plan in place?
	Check whether a fire safety masterplan is in place?

Topic	
Health and Safety	• Check whether fire-fighting and first aid equipment is available, and is it checked/maintained regularly?
	• Have the premises been inspected recently (within the past 2 years) by the regulatory authorities for occupational health, hygiene and environment? What were their findings?
Food and Beverage Handling Practices	• Are there management control plans, specific to food safety and hygiene?
	• Does the organisation have insurance in place to cover product contamination or food hygiene issues? Have there been any recent incidents?
	• Is the facility subject to any audits by customers? What was the outcome of these audits?
Waste Management	• Check that waste disposal takes place on a regular basis;
	• Check that waste storage areas are clear of debris and that skips are covered to prevent waste escaping; for example, check that waste containers have lids or are stored in an area with a roof.
Wastewater and Surface Water Management	• Check whether drainage systems lead to wastewater treatment systems or discharge directly to surface waters.
	• Check whether the routing of wastewater drainage systems within the facility are well understood, has the facility undertaken dye tracing and/or video surveying of drain systems?
	• Check that the routing of surface water drainage systems from the facility are well understood (and are separate to the wastewater drainage system); has the facility been the subject of surface water pollution incidents; is any system in place to capture surface water in the event of a release, or a first flush system to capture an initial washdown?
	• Check the extent of treatment/capture systems for the different types of wastewater, including process water, surface water runoff and cleaning water.
	• Check if monitoring and testing is undertaken as a requirement of operating licences and the extent of compliance in recent years.
	• Note the colour and appearance of adjacent water courses.
Pollution Control	• Is the facility next to any vulnerable water bodies, sited in a floodplain, or close to groundwater sources which may be contaminated by activities?
	• Check the location and condition of fuel and chemical storage areas. Are these well controlled, appropriately constructed and is containment / spill clean-up equipment provided?

Topic	
Labour Management	• Check that labour standards, contracting and remuneration are in line with national law and are consistent with the average for the sector.
	• Check that hours worked, including overtime, are recorded and staff should receive written details of hours worked and payment received.
	• Has the Company received inspections from the local labour inspectorate in the previous three years? Have these resulted in any penalties, fines, major recommendations or corrective action plans?
	• Does the organisation have a grievance mechanism which allows employees to raise workplace concerns?
	• Are employees free to form, or join, a workers' organisation of their choosing?
	Check worker accommodation.
Incident Management	• Check if any recent incidents have taken place on site involving serious injuries, fatalities, fires/explosions, spills or gas releases? Note whether these incidents were investigated and staff trained.
Community Complaints/Grievances	• Is a grievance mechanism in place to allow the community to raise concerns regarding operations?
	• Note any history of public complaints relating to the facilities operation.
Investment	• Check if the business has budgeted line items for environment, occupational health and safety improvements - check whether there are any high value improvements in the business plan for E, OH & S issues in the coming months/years.
Regulatory Compliance	• Check if the Company has received inspections from the local labour, OH&S or Environmental inspectorate in the previous three years and whether these have resulted in any penalties, fines, major recommendations or corrective action plans.
	• Establish whether the company has undertaken a systematic, documented review of operations against national legal requirements relevant to Environmental, Occupational Health, Safety and Social performance and the extent of compliance with that legislation.

Management Plans	• Review the operational procedures and management plans available regarding the control of risks. As a minimum any business should have the following in place:
	• Environmental, Occupational Health & Safety management systems which include operational procedures that are communicated, implemented and regularly reviewed (i.e. "live" systems that are used in practice, not just kept as an office manual).
	• Monitoring programmes to monitor environmental, occupational health & safety, and hygiene risks (and where necessary, testing of water, air, noise, waste emissions etc.).
	Improvement objectives, targets and project plans.

Topic	
Management Plans	1. A training plan for personnel to include environmental and health and safety issues.
	2. Emergency plans for environment, occupational & community health & safety, and food safety incidents and site security.
	3. Food safety management plans.
	4. Environmental, Occupational Health, Safety and Food Safety audits of its operations conducted via a third party;
	5. Demonstrable involvement of senior management in environment, occupational health & safety, management and leadership.

7. **REVIEW**

The principles contained in this guidance will be reviewed on an annual basis to facilitate improvement.

8. GENERAL REFERENCES FOR STANDARD METHODS

- International Finance Corporation, 2007. Environmental, Health and Safety Guidelines, Tourism and Hospitality Development. <u>http://www.ifc.org/wps/wcm/connect/e9f48800488559c0840cd66a6515bb18/Final%2B-%2BTourism%2Band%2BHospitality%2BDevelopment.pdf?MOD=AJPERES&id=132316 254395</u>
- UK Health and Safety Executive guidance (2014) for Catering and Hospitality. http://www.hse.gov.uk/catering/