IDB

Environmental and Social, Health and Safety Management System ESHSMS

Small Hotels and Resorts

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CONTENTS

INTRODUCTION

When investing in small and mid size hotel projects, IDB, as a general rule, requires that the Sponsor develop and implement an environmental and social management system (ESHSMS).[1] The ESHSMS is typically developed after completion of the Environmental Assessment Process which, depending on the project, would include development of either an Environmental Impact Assessment (EIA) or an Environmental and Social Analysis (ESA).[2]

An ESHSMS is a framework developed to identify and manage environmental and social aspects of each principal phase of project development (i.e., siting and design, construction, and operation[3]). Development of an ESHSMS ensures environmental and social issues associated with each phase of the project are identified, evaluated, and managed in a systematic way, and that management of those issues is integrated into every aspect of the project.

An effective ESHSMS is a dynamic, continuous process initiated by management and involving the Borrower (project sponsor), its workers and contractors, and the local communities directly affected by the project. An ESHSMS is not only an internal management system; it also is a mechanism for communicating performance to outside entities.

IDB requires an ESHSMS for the Borrower's activities, operations, and facilities, to be consistent with ISO 140001 (Environmental Management Systems) addressing environmental aspects, and with OHSAS 18001 (Occupational Health and Safety Management Systems) for health and safety aspects.[4] Environmental and Social Management Systems include policies and procedures, management plans, performance indicators, responsibilities, and training and inspection protocols. The system may consist of either a combined ESHSMS addressing both environmental and social aspects, or separate systems (i.e., an Environmental Management System and a Social Management System). In either case, the system(s) must address all criteria established in the referenced standards, and can include references to the noted protocols.

The referenced standards draw on the established business management process of "plan, implement, check and act", and require a thorough assessment of potential social and environmental impacts (both positive and negative) and risks from the early stages of project

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[1] Social elements consist of health, safety and socioeconomic aspects of a project. Socioeconomic impacts from project activities include those related to the community, employment and workforce to include diversification, working conditions, community involvement and development, public services, and aesthetic and cultural aspects.

[2] See "IDB Technical Note for Environmental and Social Analysis for Small Hotels and Resorts (Category B)" for details on IDB requirements.

[3] Site closure and restoration phases may also be required to be addressed.

[4] ISO14001 and OHSAS 18001 are the most common internationally accepted protocols for development of management systems. OHSAS 18001 is an international occupational health and safety management system specification, embracing BS8800, AS/NZ 4801, NSAI SR 320 and a number of other publications. The essential difference between ISO 14001 and OSHAS 18001 is that ISO 14001 focuses on managing the impact on the external environment, and OHSAS focuses on managing the "internal" environment to ensure a safe and healthy workplace. Structurally the two standards and their requirements are essentially identical. Only the intent and focus are different. Thus the same quality management system framework can be also applied to incorporate other areas of impact such as socioeconomic impacts, and be integrated into an EHSMS.

design, through construction and operation, and provide a system for mitigating and managing the social and environmental risks and opportunities. Standard elements of an ESHSMS include:[5]

- Identification and review of the social and environmental impacts and risks of project siting, construction and operation;
- Definition of a set of policies and objectives for social and environmental performance;
- Establishment of a management program to achieve these objectives;
- Monitoring performance against these policies and objectives;
- Reporting of the results appropriately; and,
- Review of the system and outcomes, striving for continuous improvement.

The ESHSMS will draw upon the Environmental Assessment Process (the EIA or ESA) in that the ESHSMS is the mechanism to ensure the information, findings, and decisions from the ESA or EIA project evaluation are captured and fully incorporated into an ESHSMS for project management.

The ESHSMS is site specific, so the basic steps for developing an ESHSMS are the same whether the project is part of a larger development, an addition to a corporate franchise of properties, a stand-alone development, or an expansion to an existing property. While there may be an existing ESHSMS or defined management standards established by entities with ownership or operational management over one or more phases of the project, the elements discussed herein must be evaluated and addressed for each individual project. In cases where there is an applicable existing ESHSMS there would typically be a process or procedure which governs the preparation and integration of the project specific ESHSMS for a new endeavor.

As stated, the basic steps for developing an ESHSMS are the same regardless of the location, size, type, and structure of the project. This Technical Note provides an indicative content for such a system, as well as criteria for development of content elements. The document is designed to assist project sponsors in understanding what IDB requires for an ESHSMS for a project of this type. This document is not intended to provide complete or detailed guidance on the preparation of an ESHSMS, but rather the basic requirements. An indicative list of typical plans and procedures which may be developed to support system implementation is also provided in Annex A.[6] Many of these plans are required at different phases of the project; however, each will be tailored to the specific aspects, size and complexity of the project and to each phase. As such, plans may be individual per phase or may cross all phases of the project and some are only required in specific cases. For additional information and sector specific guidance for preparation of plans and procedures please refer to the bibliography at the end of this document.

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[5] IFC Guidance Note 1 Social and Environmental Assessment and Management Systems (see attached Annotated Bibliography for source reference).
[6] Additionally, specific plans or procedures to be included in the ESHSMS may also be required by the IDB as a loan requirement.

INDICATIVE CONTENTS FOR AN ESHSMS

1. INTRODUCTION TO THE COMPANY[7]

This section should provide a general description of the project and ownership structure and organization as specifically related to environmental and social aspects of the project. Applicable distinctions between the roles and responsibilities of the owner(s) and operator(s) and the role/relationship to the Project Sponsor should also be specifically described.

2. OBJECTIVE AND SCOPE

This section should describe the objective and scope of the ESHSMS. Primary objectives should be:

- To document and implement an ESHSMS to ensure that all environmental and social aspects and impacts of project[8] related activities, products, and services are identified; and,
- Ensure compliance with applicable regulatory requirements, IDB policies and guidelines (to include conformance with ISO 14001, and OHSAS 18001 protocols), and other applicable established standards of performance[9] and/or best management practices.[10]

Additional objectives of an ESHSMS are to:

- Serve as a management tool to achieve and maintain compliance with relevant laws and regulations;
- Ensure that environmental and social company policy objectives are met;
- Align with existing environmental and social laws, regulations, and applicable best management practices;
- Drive continuous improvement in the management of environmental and social issues to achieve the best social and environmental outcomes; and,

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[7] As noted below, since the ownership and management structure and associated roles and responsibilities for each phase of development of small hotel and resorts may differ, the term "Company" herein applies to each specific entity with management control over one or more aspects of the development.

[8] The term "project" includes all activities associated with siting, construction and operations of the hotel/resort.

[9] Current generally accepted standards for ESMS development include IFC Performance Standard 1 (and Guidance Note 1) for Social and Environmental and Management Systems, and Sector Sustainable Management Certification Programs such as the Green Globe Certification for the Travel and Tourism Sector, and the Sustainable Tourism Eco-Certification Program. The ISO is also in the process of developing management system standards for the sector. See attached Annotated Bibliography for additional information.

[10] Industry best management practices include those contained in the International Tourism Partnership (ITP) Guide to Sustainable Hotel Siting, Design, and Construction and companion Guide to Environmental Management for Hotels, and the Green Globe Environmental Standards for the Accommodations Sector. Occupational Health and Safety guidance for can also be found in a number of published guidance materials. IFC has additionally developed an on-line Tool Box and a separate Manual for Implementation of ESMS in Small and Medium Sized Enterprises (SMEs). See attached Annotated Bibliography for references and additional information.

- Identify actions required to ensure environmental and social issues are addressed in a systematic manner.

The scope of an ESHSMS typically includes:

- A Policy statement that clearly communicates the organization's commitment to maintaining the social, cultural, and physical environment and complying with applicable legal requirements and applicable institutional standards;
- An action plan to guide the project's actions and expenditure of resources;
- An implementation protocol for the ESHSMS that encompass all of the property's actions relative to the environmental and social aspects of project development and design, construction, and operation, including awareness and training, staff procedures, incentive programs and community outreach;
- Corrective action and/or monitoring programs to ensure the ESHSMS performs as expected; and,
- A continual review process, typically by senior management, to determine how to improve the ESHSMS and the level of compliance with the project's/ownership's environmental policy

As stated, a successful ESHSMS is based on the "Plan-Implement-Check-Act" Model and consists of the development steps below. Much of the information for Steps 1 – 5 should be able to be obtained from the ESA/ESIA (e.g., project related risks and impacts for each stage of the project cycle and associated management and mitigation recommended actions). The ISO standard nevertheless requires each step be fully documented in the manner described in Sections below.

Step 1 - Identification of applicable regulatory and other requirements and governing institutional standards (e.g., IDB Guidelines/ Commitments).

Step 2 - Identification of *environmental and social aspects*. These are project activities that have a relationship with the environment, socioeconomic conditions[11] and operations that pose health and safety hazards.

Step 3 - Identification of environmental and social aspects which have one or more *impacts* (positive and negative) to the physical environment, socioeconomic environment, and the health and safety of employees or the public.

Step 4 - Identification of *significant* environmental and socioeconomic impacts, and impacts which pose significant health and safety risks based on established significance criteria/weights

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[11] For example, aspects of the project that may involve social and economical conditions in the area include population and settlement patterns, social organization/groupings/indigenous people, services, health and education, local infrastructure, cultural resources, etc.

Step 5 - Identification of *objectives*. These are identified actions/procedures for mitigating/ managing/monitoring (as determined necessary and appropriate) the identified significant impacts.

Step 6 - Identification of t*arget actions* to meet objectives. These are specific actions and timelines for meeting the above objectives

Step 7 - Identification of Control Procedures – Under ISO, control procedures (e.g., Standard Operating Procedures [SOPs]) are only necessary to the extent that their absence could cause a significant impact. ISO does not specify or dictate either the method of controls, the number, format, or content of the controls, or whether they even need to be referenced in the ESHSMS. However, most projects will have a number of developed control procedures.

The Objective and Scope Section will also indentify related developed procedural and supporting documents to include the ESA/EIA.[12] Annex A contains an indicative list of required documentation to include the supporting programs, plans, and procedures identified herein as well as commonly developed project specific additional documentation.

3. SUSTAINABILITY POLICY OF THE COMPANY[13]

The ESHSMS must have a policy statement14. Guiding principles in developing a policy are that it must:

- Be clearly documented and understood at all levels;
- Commit to complying with the law;
- Be publicly available;
- Commit to the protection of the environment, conservation of resources, and the protection of the safety and health of site personnel, visitors, and the public;
- Commit to continually striving for improvement by setting objectives and targets;
- Be relevant to the operations of the project; and,
- Contain a statement of commitment by management at all levels to the successful implementation of the ESHSMS.

An example policy is presented in Annex B.

4. DESCRIPTION OF COMPANY ACTIVITIES AND ORGANIZATION

This section should identify activities conducted in each discrete phase of the project (e.g., siting and design, construction, and operation), and the company's organization and responsibilities in the development and implementation of the ESHSMS.

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[12] A distinct numbering system should be developed to identify specific procedural documents.

[13] As described previously, there should be detailed clarification as needed of the ownership and operational structure and responsibilities as it relates to the term "Company."

[14] Even if there is an existing policy in an ESMS established by entities with ownership or operational management control over one or more phases of the project, the policy must be reviewed and evaluated for applicability to the specific project.

Development of a description of the company organization could be challenging for small hotels and resorts where there is no clearly defined organizational structure. The previously noted certification and best management standards organization's publications contain sector-specific guidance which can be referenced for development of the required descriptive information. Annex C provides an example description of a current corporate hotel management chain's organization with respect to environmental and social aspect management.

This section also should describe general responsibilities for managing and implementing the ESHSMS. It would identify the main entities who figure prominently throughout the ESHSMS. These should include:

- The Environmental Health and Safety Department (or applicable name). This would be the company entity/person responsible for compliance with environmental and social regulatory requirements and internal policies and procedures. The Department would have the responsibility for checking and monitoring environmental and social issues to ensure related legal and other requirements are met. The Department would also have responsibility for ensuring programs meet IDB standards. For small projects this "Department" may consist of only one or two individuals.
- The Environmental and Social Site Representative(s) (or applicable name) – This would be the site representative(s) of the above referenced Department that has/have responsibilities for ensuring the site complies with company environmental and social policies and procedures of the ESHSMS. This includes ensuring contractors comply with company protocols. Again, for small projects this may be one of the above referenced companies Environmental Health and Safety Departmental individuals.
- Other Departments – Responsible for complying with applicable elements of ESHSMS (e.g. Procurement [responsibilities include ensuring contracts for services contain appropriate language concerning compliance and oversight], Human Resources, Community Relations, Maintenance, and Facilities).

This ESHSMS section should reference a developed Organizational Chart.

5. LEGAL AND OTHER ENVIRONMENTAL AND SOCIAL REQUIREMENTS

A register of applicable regulatory and other requirements and governing institutional standards (e.g., IDB Guidelines/Commitments) must be developed for each phase of the project. The Legal Register displays all environmental and social legislation applicable to the project. As part of the ESHSMS, processes must be developed for:

- Determination of the applicability of the requirements relative to the identified environmental and social aspects (see Section 6 Identification of Environmental and Social Aspects and Impacts);
- Identifying and monitoring legislative, regulatory, and institutional changes that would impact the property, and updating the legal register; and,
- Communicating the requirements to contractors, employees and other interested parties.

The anticipated requirements would at a minimum include those identified in the ESA to include:

- IDB's environmental and social policies that are applicable to the operation, and the project's level of compliance with those policies;
- Applicable national and local environmental, health and safety and labor regulatory authorizations and permits required (including any tourism permits required);
- Any other requirements or standards to which the Project must or will comply to include company standards[15], other applicable frameworks such as LEED[16] or the previously referenced sector specific certification standards or international guidelines for sustainable tourism, etc.

This ESHSMS section should reference any associated developed supporting documents/plans to include:

- ➢ The Legal Register (list of above requirements)
- ➢ Process for Identification and Continual Review of current and pending legal and other requirements, and reporting/actions related to the review in accordance with a developed Recordkeeping Procedure
- ➢ Records Retention Procedure

6. IDENTIFICATION OF ENVIRONMENTAL AND SOCIAL ASPECTS AND IMPACTS

6.1 Environmental and Social Aspects Identification

This section should identify and describe the organization's activities for each phase of project development that interact directly or indirectly with:

- The environment
- Health and safety of site personnel, visitors, and the public
- Socioeconomic aspects of the project setting

The ESA/EIA identified environmental and social risks and impacts can be referenced for development of this element of the ESHSMS. However, even if environmental and social aspects were identified in the ESA, they should be reviewed against current project plans. If the project is part of a larger development or corporate portfolio for which an existing ESHSMS exists, it is likely that the new project can also utilize an existing aspects register as an additional reference tool for development of the project-specific aspects inventory.

Environmental aspects include consideration of each activity's interaction with air (e.g., controlled and uncontrolled emissions), water (e.g., controlled and uncontrolled discharges), waste (e.g., solid and other types), soils (e.g., land use or contamination), vegetation and resource

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[15] As applicable (i.e., if affiliated entities/parent organizations have an existing ESMS and/or company policies that are more stringent than or in addition to others listed)
[16] Leadership in Engineering and Environmental Design (LEED) Green Building Rating Systems

depletion, aesthetics (noise, odor, dust, vibration, aesthetic & visual aspects), indirect aspects (use of land, water resources and energy), cumulative impact aspects, beneficial aspects associated with the activities, and consideration of present and future conditions, and normal and abnormal conditions (e.g., weather, emergencies, etc).

Health and safety aspects would include for each activity, all health and safety hazards and risks to site personnel, visitors, and the public/community associated with performance of the activity. A hazard can be defined as something or a situation with the potential to cause injury or illness to people, damage to property, or disruption to productivity. Hazard identification is the process of recognizing that a hazard exists and defining its characteristics.

Socioeconomic aspects of the project include employment and community impact aspects (both positive and negative). This would include the previously noted aspects of the project that would involve social and economic conditions in the area, population and settlement patterns, social organization/groupings/indigenous people, services, health and education, local infrastructure, cultural resources, etc.

Any format can be used as long as it identifies each discrete activity, and each aspect of the activity. Annex D contains three example formats for aspects inventories, and the previously identified certification and best management standards organizations publications contain sector-specific guidance which can be used for development of the aspects inventory.

Also to be addressed in this section are actions triggering a review of the identified aspects (e.g., when there is a change in the process, raw materials usage, equipment/machines, product or service).

This ESHSMS section should reference developed supporting documents/plans to include:

> Environmental and Socioeconomic Aspect Inventory(ies)[17]
> Hazard and Risk Inventory

6.2 Environmental and Social Impacts Identification

For each environmental and social aspect, and for each principal phase, all associated impacts (positive or negative) to the environment, health and safety of site personnel, visitors and the public, or socioeconomic conditions must be identified. Again, even if this task is addressed in the ESA or an existing ESHSMS, the impacts should be reviewed based on current project plans and formally documented. As with the aspects identification, the previously identified certification and best management standards organization's publications also contain sector-specific guidance which identify sector-specific typical impacts associated with each aspect and example templates for documentation. The example Annex D format also addresses impacts depiction for environmental aspects.

This ESHSMS section should reference related developed procedural and supporting documents and plans to include:

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[17] Aspects can be presented in combined or separate inventories. Most inventories are in table format.

- ➢ Environmental and Socioeconomic Aspect and Impacts Inventory(ies)
- ➢ Hazard and Risk Impact Inventory

6.3   Assessment of Impact Significance

For each aspect's impact, the significance of the impact should be assessed and documented where:

Significance = Severity of Impact X Probability of Occurrence

The standards also require consideration of impacts under normal, abnormal, and emergency conditions.

The ESA/EIA can be referenced for a description of impacts, and Annex E and the referenced guidance contains examples of impact significance criteria and formats for documentation.

This ESHSMS section should reference related developed procedural and supporting documents and plans to include:

- ➢ Inventory of Significant Environmental and Socioeconomic Impacts
- ➢ Inventory of Significant Hazard and Risk Impacts

7.   OBJECTIVES AND TARGETS/INDICATORS

Objectives are identified goals for mitigating/managing/monitoring (as determined necessary and appropriate) significant impacts. The establishment of measurable objectives helps to ensure that the organization is meeting the intent of the standard and the established policy described in Section 3.

Targets are detailed performance requirements, quantified where appropriate, to meet the stated objectives. Targets would include specific actions and timelines for meeting objectives.

Thus, this section details the process for setting the objectives and targets (to include a no action and/or ongoing monitoring activity). The section should identify the requirements for implementing and managing the objectives and targets as documented in the Management Program plans, procedures, programs (see Section 8).

Management Objectives and Targets must be developed for significant impacts over which the company has control/influence, and must be:

- • Specific;
- • Measurable;
- • Agreed and Understood;
- • Realistic; and,
- • Trackable.

For example, an objective may be to reduce water consumption for the entire property by 10%. Each objective is supported by a set of specific targets, such as introduction of a towel and linen reuse program by a certain date, or installation of low-flow shower heads in guest rooms by a certain date. The ESA/EIA can be referenced for impact mitigation and monitoring recommendations, and Annex F contains an example format for the register of objectives and targets. The referenced standards and guidance also contain comprehensive sector-specific management objectives and targets which can be used to develop project specific objectives and targets.

The Objectives and Targets ESHSMS section should reference related developed procedural and supporting documents and plans to include:

➢ Register of Environmental Targets and Objectives

8. PROGRAMS, PLANS AND PROCEDURES

This section describes the management program established to meet the Section 7 Objectives and Targets and defines the procedure for maintaining the ESHSMS[18]. Specific programs, plans and procedures to meet the objectives and targets are prepared once the objectives and targets are finalized and assigned to specific departments/individuals for implementation. The programs/plans/procedures must clearly define levels of participation and responsibilities, and define activities, persons responsible, time frames and resources to achieve the objectives and targets.

Interaction/interdependencies between objectives/targets and programs and documentation must be addressed. There must also be a process for regular review of objectives and targets and responsibilities assigned for tracking and reporting progress. Finally, the triggers for amendments to the programs/plans/procedures must be identified.

Development programs, plans and procedures typically include:

- Documented work instructions;
- Procedures;
- Monitoring programs; and.
- Performance criteria.

A list of typically developed plans and procedures to meet the project ESHSMS objectives and target activities is contained in the referenced Annex A Indicative List of ESHSMS Programs, Plans, and Procedures.

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[18] The ESA can be referenced for development of this section, but typically the ESA only includes a basic framework for development of needed management programs, plans and procedures.

9. ESHSMS IMPLEMENTATION AND OPERATION

9.1 Structure and Responsibilities

The roles, responsibilities and authorities of personnel who manage, perform and verify activities having an effect on the environmental, health, safety and socioeconomic risks and impacts of the organization's activities, facilities and processes, must be defined, documented and communicated in order to facilitate ESHSMS implementation. This expands on the Section 4 description of main organizational entities and their general responsibilities to include specific responsibilities for implementation of the ESHSMS defined objectives and targets and for:

- Providing Resources;
- Initiating Action;
- Identifying Problems;
- Recommending Solutions;
- Verifying Implementation of Solutions;
- Controlling Further Activities; and,
- Acting in Emergencies.

The section will also reference any associated developed related procedural documents to include:

- ➢ Organizational Chart
- ➢ Applicable Annex A developed procedures/plans

9.2 Training, Awareness, and Competence

A description of the program for training for all staff and site contractors whose work may contribute to significant impacts (roles which may cause or control significant impacts) must be provided. Training must be provided to the following individuals:

- Company managers involved in policy formulation and resource allocation;
- Auditors/monitors;
- Specialists;
- EHS managers; and,
- Awareness training for employees.

Established procedures must be developed to ensure that these employees are adequately and properly trained. The training must address all areas of competency as applicable to employees, contractors, and guests. The program and procedure must identify the type, scope, duration and frequency of required training/awareness and include:

- Implementation triggers and protocols;
- Responsibilities for implementation; and,
- Effective measures of documenting and tracking training activities

This ESHSMS section should reference any associated developed procedural and supporting documents and plans to potentially include:

 ➢ Training, Awareness and Competence Procedure

9.3   Contractors and Vendors

This section establishes the principles and objectives to manage contractors and vendors to ensure compliance with applicable provisions of the ESHSMS and specifically includes measures to address the safety of contractors on site.

This ESHSMS section should reference any associated developed related procedural documents to potentially include:

 ➢ Control of Contractors and Vendors Procedure

9.4   Consultation and Communication

This section addresses the procedures for internal and external communication. Internal communication procedures should address communication on such topics as environmental protection, health and safety, and community interaction, policies, objectives and targets, management programs and other environmental and social issues. For example, this section would include a discussion of efforts to encourage employees to participate in matters of environmental protection/compliance and safety. These measures may include having employee representation on accident investigation teams and environmental and safety committees, providing employee briefings, using notice boards, plant TV, bulletin board, newsletters, poster, etc. to communicate and promote awareness.

External communication procedures will address protocols for receiving, documenting, and responding to relevant communication from external parties including customers, suppliers, agencies, media, and the public. It will incorporate or contain references to any developed Community Relations Plan as applicable.

9.5   Recordkeeping, Documentation and Document Control

The goal of the document control program is to identify, maintain, and store all appropriate ESHSMS records. Thus this section should address the establishment and maintenance of ESHSMS information, in a suitable form such a paper or electronic, and describe the core elements of the management system and their interaction and provide direction to related documentation. It will include a description of the areas of responsibility for management of the documentation.

A procedure for controlling all documents and data required under the management system should be developed. An organization is not required to develop this documentation in any particular format and may use any and all existing policies and procedures as part of their management system. However, the organization is required to document how all of the

procedures and policies, etc. relate to each other. This section also should address the manner in which these documents are periodically reviewed and revised as necessary, and that obsolete documents will be managed appropriately.

This ESHSMS section should reference any associated developed related procedural documents to potentially include:

- ➢ Records and Documentation Control Procedure
- ➢ Record Retention Policy

9.6   Operational Control

This section provides the general protocol for exerting control over the ESHSMS. It requires identification and implementation of operational control procedures for operations identified as having significant impacts or risks, where their absence could result in significant impacts/risks (to include non-compliance with regulatory or other applicable standards). The project sponsor must plan for these activities in order to ensure that they are carried out in a manner that protects the environment and the safety and health of those around the activity. The ISO standards are specific as to what must be considered and included in the operation controls that are developed.

These operational controls will then be communicated to those employees that have specific roles or responsibilities outlined within those procedural controls. Control documents must be made available at relevant areas and points of use, and must be established by the relevant department. The controls should cover at a minimum:

- Process operations and criteria (process flow diagrams can be developed to address operating processes and criteria and operational control of environmental effects);
- Process for review of operational controls when there is a change in process, facility or use of new equipment;
- Control of vendors and contractors;
- Methods of chemical storage, handling, and transfer;
- Spill response;
- Waste disposal;
- Summary of potential hazards;
- Maintenance of equipment and/or systems; and,
- Safety Requirements.

9.7   Emergency Preparedness and Response

Plans and procedures must be developed and maintained for identifying the potential for, and responses to, incidents and emergency situations and for preventing and mitigating the likely illness or injury that may be associated with such occurrences. The ISO standard also requires that these procedures be reviewed and tested periodically and whenever an incident occurs. The risks of site operations must be actively assessed to ensure that the emergency response procedures prepare the site to effectively respond to emergency situations, to test the planned response and then effectively deal with the situations that may arise from an unplanned event.

Proper emergency equipment must be identified and a program for practice drills must be developed to ensure response measures are effective and understood.

This ESHSMS section should reference any associated developed related procedural documents to potentially include:

- ➤ A Contingency Plan
- ➤ Reporting Investigations of Incidents and Accidents

9.8   Program Implementation Documentation

Monitoring and Measurement

A description should be provided of the program for monitoring and measurement of activities that have/pose significant environmental or social impacts. This is principally accomplished by providing references to procedural documentation contained in the site Monitoring Program. These documents will address parameters, methods and criteria for monitoring and measuring activities and/or conditions to:

- Ensure conformance with established objectives and targets
- Ensure compliance with legal requirements/commitments

This section should reference related developed procedural and supporting documents and plans to include:

- ➤ Environmental and Social Monitoring Program

Accidents and Incidents

Procedures should be developed for defining responsibility and authority for the handling and investigation of accidents, mitigating consequences that arise from accidents, the initiation of corrective action and tracking of corrective and preventive actions. There should be clear procedures that detail how accidents are to be reported and investigated. This process will allow the organization to collect proactive data that can be used to further improve safety performance. Accident analysis will seek the root cause of the incident which will typically be an underlying non-conformance.

Performance Evaluations/Auditing

Procedures must be established and maintained for monitoring, measuring, and documenting performance on a regular basis. This section establishes the principles and objectives for performance evaluations and auditing. The purpose of the evaluations/audits is to determine the overall effectiveness of the ESHSMS and to report findings to management for review. Auditing and Inspections when the system is in place and working properly is also needed to determine that:

- Environmental and social management activities conform to the program; and,
- The system is effective in relation to the established environmental and social policy.

The process should include methods, type (internal/external), scope, frequency, reporting, and corrective action protocols and typically includes one or more of the following:

- Audit Schedule;
- Audit Procedures;
- Checklists;
- Audit Reports; and
- Follow-up and Corrective Action.

Measurements will include proactive measures in addition to reactive measures. Proactive measures include performance of checks and/or balances that occur prior to an incident or accident occurring. These may include activities such as inspections, equipment testing, training, communication activities that discuss near miss occurrences, etc.. Reactive means of monitoring include activities such as accident investigation and analysis of historical accident data.

This section should reference any related developed procedural and supporting documents and plans to and can include:

➢ Internal Audit Program
➢ External Audit Program
➢ Inspection Program
➢ Nonconformance and Corrective Action Program

10. RECORDS AND RECORD MANAGEMENT

A system is required to confirm that the ESHSMS works and that compliance can be demonstrated. Procedures must be developed for identification, maintenance and disposition of program records and other related documents. These records include required regulatory components and documentation demonstrating that the ESHSMS operates effectively.

This section should reference any related developed procedural and supporting documents and plans to include:

➢ EHS Records and Documentation Control Procedure
➢ Record Retention Policy

11. MANAGEMENT REVIEW

This element of the standard requires periodic top management review of the ESHSMS. Management review of the management system provides the avenue for management to ensure that the system remains suitable for achieving the organization's environmental and social goals and objectives.

This section should reference any related developed procedural and supporting documents and plans to potentially include:

➢ Management Review Program/Template

REFERENCES/ANNOTATED BIBLIOGRAPHY

Applicable International Finance Corporation (IFC) and Inter-American Development Bank (IDB) Standards/Guidance

- **IDB Environment Division, "Environment and Safeguards Compliance Policy," Publication Number ENV-148, March, 2006.**

  This policy document was prepared: (1) to enhance long-term development benefits by integrating environmental sustainability outcomes in all IDB operations and activities and strengthening environmental management capacities in its borrowing member countries; (2) to ensure that all IDB operations and activities are environmentally sustainable; and (3) to foster corporate environmental responsibility within IDB. Further, this current document includes policy directives related to mainstreaming environmental considerations as an integral feature of economic and social development projects, plans, and programs. It also includes such directives for safeguarding the environment via mitigation and management of environmental impacts and risks. Definitions of operations in Categories A, B, and C, and their relevance to document preparations are also included. Small hotels and resorts are in Category B; that is, their operations are likely to cause mostly local and short-term negative environmental and associated social impacts and for which effective mitigation measures are readily available. These operations will normally require an ESA, according to and focusing on, the specific issues identified in the screening process, and an environmental and social management plan (ESMP). To summarize, this policy document includes broad information on environmental mainstreaming and safeguards that is applicable to small hotels and resorts. http://idbdocs.iadb.org/wsdocs/getdocument.aspx?docnum=1481950

- **IDB Environment Division, "Technical Note for Environmental and Social Analysis for Small Hotels and Resorts (Category B)," 2011 Sustainable Development Department, Inter-American Development Bank, Washington, D.C.**

  The objective of this Technical Note is to describe the necessary Bank requirements for the content of an ESA, with a focus on the particular issues related to small hotel and resort expansions and developments. The Bank requires that, as part of the overall preparation and design process of Bank operations, Category A and B operations be subject to Environmental Assessments (EA), according to the nature and significance of the potential impacts of the operation. This EA is the responsibility of the project sponsor/borrower, and this Technical Note is a basic document designed to assist borrowers (project sponsors) understand what IDB requires on an ESA for a project of this type. This Technical Note is currently being finalized and can be obtained from IDB.

- **IFC Performance Standard 1 – Social and Environmental Assessment and Management Systems, April 30, 2006.**

  This performance standard applies to IFC financed projects and addresses requirements for performance of Social and Environmental Assessments and development of Environmental and Social Management Systems. As stated in the standard, IFC requires clients to establish and maintain a Social and Environmental Management System appropriate to the nature and scale of the project and commensurate with the level of social and environmental risks and impacts. Performance Standard 1 describes the required basic content for development of the Management System and specifies it incorporate the following elements:

  - Social and Environmental Assessment;
  - Management program;
  - Organizational capacity;
  - Training;
  - Community engagement; and
  - Monitoring and reporting.

  IFC Guidance Note 1 (see below) provides guidance and additional information for development of the Management System.
  http://www.ifc.org/ifcext/sustainability.nsf/AttachmentsByTitle/pol_PerformanceStandards2006_full/$FILE/IFC+Performance+Standards.pdf

- **IFC Guidance Note 1 – Social and Environmental Assessment and Management Systems, July 31, 2007.**

  This document contains prescriptive guidance for development of each of the above referenced IFC Performance Standard Environmental and Social Management System content elements.
  http://www.ifc.org/ifcext/sustainability.nsf/AttachmentsByTitle/pol_GuidanceNote2007_full/$FILE/2007+Updated+Guidance+Notes_full.pdf

- **IFC Manual for Implementing Environmental Management Systems in Small and Medium-Sized Enterprises**.

  This manual is a "step-by-step" guide designed to help a company develop and implement Environmental Management Systems and comply with IFC's environmental policies. It contains detailed guidance and information to include case studies and example formats, forms and content elements for planning, implementing, monitoring, and improving performance of an EMS.

http://www.ifc.org/ifcext/enviro.nsf/AttachmentsByTitle/pro_EMS/$FILE/EMS.pdf

Guidance for Development of Environmental and Social Management Systems and Components

- **International Tourism Partnership (ITP) Environmental Management for Hotels – The Industry Guide to Sustainable Operation, Third Edition, 2008**.

  This publication and its companion publication, Sustainable Hotel Siting, Design and Construction (see entry below) is the result of a joint venture between Conservation International and ITP. This document is a comprehensive guide to environmental management in hotels, and is an excellent reference guide for use in developing Environmental Management Systems for hotel and resort operations. It not only provides a detailed a step-by-step user friendly guide to management of environmental aspects of hotel operation, from establishing a policy to developing and implementing a management system, it also identifies hotel-specific environmental aspects, impacts, objectives, targets and management planning related to:

  - Energy
  - Water
  - Waste
  - Air
  - Food safety and environmental health
  - Purchasing and supply chains
  - Hazardous materials
  - Refurbishment and Landscaping
  - Wider Responsibilities (community engagement and poverty reduction, cultural heritage and historic sites, wildlife and biodiversity conservation, staff awareness, guest awareness, safety)

  http://www.tourismpartnership.org/Publications/Publications.html

- **International Tourism Partnership (ITP) Sustainable Hotel Siting, Design and Construction, 2005**.

  This publication and its companion publication, Environmental Management for Hotels (see entry above) is the result of a joint venture between Conservation International and ITP. As the previous document provided a comprehensive guide to environmental management in hotels operations, this manual provides a similar level of coverage and content relative to hotel siting, design and construction. It addresses issues to include:

  - Finance, project team formation and objective setting

- Pre-Design (site selection, community consultation and involvement, environmental impact assessment)
- Creating the Design Brief (key criteria to include protection and enhancement of the site, socioeconomic effects, aesthetics and building efficiency, quality of outdoor and indoor environment, energy efficiency, water efficiency, construction and development impact, performance monitoring, and ensuring high sustainability standards)
- Architectural and Physical Design (addressing biodiversity, green roofs, grounds and landscaping, golf courses, swimming pools, etc.)
- Operational Design (energy, water, waste, materials, noise, air quality, hazardous materials)
- Construction and Refurbishment (sustainable development, pre-construction, recruitment, safety, training, minimizing social impacts, minimizing environmental impacts, refurbishment)
- Commissioning and Operation (planning and design, installation monitoring, pre-commissioning, testing and commissioning, operator training and handover, post occupancy evaluation)
- Interior Design

http://www.tourismpartnership.org/Publications/Publications.html

- **U.S. Agency for International Development (USAID) Natural Resources Management & Development Portal.**

USAID's Sustainable Tourism's online portal houses general guidance and information (including an on-line learning/tutorial program) as well as country/region-specific guidance through the Global Sustainable Tourism Alliance (GSTA). GSTA is a public-private initiative of governments, NGO's, foundations, and the private sector aimed at identifying innovative and implementable approaches to enhance sustainable tourism concepts. In each GSTA country leading tourism development institutions, conservation organizations, tourism practitioners, private sector tourism industry leaders, and USAID jointly designed, co-financed, and implemented activities that adhered to the GSTA's core principles to:

- Make optimal use of environmental resources, conserve biodiversity, and protect natural heritage;
- Respect the socio-cultural authenticity of host communities – including their traditional values and heritage;
- Provide fairly distributed socio-economic benefits to all stake holders; and
- Encourage investment in sustainable tourism products, services and related infrastructure

The result of this program includes developed guidelines and tools to assist industry members in developing and implementing environmental and social sustainable management programs.
http://rmportal.net/library/content/usaid-sustainable-tourism-collection

Health and Safety Specific Guidance

- **Work Cover Corporation, Occupational Health and Safety in Hospitality – Supervisors Training Manual, March 2003 and Managing Occupational Health and Safety in the Hospitality Industry – Small Businesses, September 2000**.

  The Work Cover Corporation (WCC) manages the South Australian Workers Rehabilitation and Compensation Scheme which provides protection to workers and employers in the event of workplace injury. The organization also provides guidance materials for development and management of health and safety programs for sector specific industries to include the hospitality sector. The Supervisor's Training Manual provides guidance on development of an Occupational Health and Safety (OHS) Risk Management system, including identification of hazards and risks, and management and mitigation methods and programs for addressing specific hazards (also by specific service areas – grounds-keeping, housekeeping, kitchen/food preparation areas, etc.). Additional guidance is provided on OHS consultation and communication, documentation, workplace injury management, and emergency management. The document "Managing Occupational Health and Safety in the Hospitality Industry for Small Businesses" provides guidance, templates, and examples for development of an OHS Management System.

  Managing Occupational Health and Safety in the Hospitality Industry – Small Businesses
  http://www.safework.sa.gov.au/contentPages/docs/hospOHSHospitalitySmallBus.pdf

  Supervisor's Training Manual
  http://www.workcover.nsw.gov.au/formspublications/publications/Documents/ohs_in_the_hospitality_industry_4133.pdf

- **Journal of Hospitality and Tourism Research, "Implementing Environmental Management Systems in Small-and-Medium-Sized Hotels: Obstacles," Journal of Hospitality and Tourism Research 2010 35:3**.

  This paper discusses findings of a study performed by The Hong Kong Polytechnic University study to identify barriers to the adoption and implementation of a formal EMS by Small and Medium Sized Hotels (SMHs). The study identified nine factors that can hinder the adoption of an EMS, five of which were identified as unique to these hotels.

Accepted International Management System Standards

The following are accepted international standards for formal environmental, health and safety and social management systems. All referenced standards are compatible with one another.

- **International Organization for Standardization (ISO) Family of Standards**
  ISO has developed over 18,500 International Standards on a variety of subjects and some 1100 new ISO standards are published every year. An ISO International Standard represents a global consensus on the state of the art in the subject of that standard. http://www.iso.org/iso/home.htm.

  The following are applicable ISO published standards:

  - **ISO9001-2008** - The ISO 9000 family of standards represents an international consensus on good quality management practices. It consists of standards and guidelines relating to quality management systems and related supporting standards. ISO 9001:2008 is the standard that provides a set of requirements for a quality management system, regardless of what the user organization does, its size, or whether it is in the private, or public sector.
    http://www.iso.org/iso/iso_catalogue/management_and_leadership_standards/quality_management.htm

  - **ISO 14001-2004 - Environmental Management Systems**. This standard details the requirements for an environmental management system to enable an organization to develop a policy and objectives, taking into account legislative requirements and information about significant environmental impacts.
    http://www.iso.org/iso/iso_catalogue/management_and_leadership_standards/environmental_management.htm

  - **ISO Technical Committee on Environmental Management - Technical Committee 228 (Tourism and Related Services).** Environmental Management standards are being developed by ISO for the tourism and related services sector. Current working group's developed guidance includes Recreational Diving, Health Tourism, Tourism Information, Golf, Beaches, Natural Protected Areas, and Adventure Tourism. Also in progress are ISO standards for Environmental Management for Accommodations.
    http://www.iso.org/iso/about/about/iso_members/iso_technical_committee.html?commid=375396

- **ISO 22000:2005 Food Safety Management Systems** – This standard specifies requirements for a food safety management system where an organization in the food chain needs to demonstrate its ability to control food safety hazards in order to ensure that food is safe at the time of human consumption. It is applicable to all organizations, regardless of size, which are involved in any aspect of the food chain and want to implement systems that consistently provide safe products.
  http://www.iso.org/iso/iso_technical_committee.html?commid=583916

- **ISO 5001:2011 Energy Management Standards** – This standard establishes a framework to manage energy for industrial plants; commercial, institutional, or governmental facilities; or entire organizations. ISO 50001 gives organizations the requirements for energy management systems (EnMS).
  http://www.iso.org/iso/iso_catalogue/management_and_leadership_standards/specific-applications_energy.htm

- **EMAS - Eco-Management and Audit Scheme (European Commission, 1995)**
  EMAS is a voluntary management tool for companies and other organizations to evaluate, report, and improve their environmental performance. The scheme has been available for participation by companies since 1995 and was originally restricted to companies in industrial sectors.
  http://ec.europa.eu/environment/emas/index_en.htm

- **BS[19] OHSAS 18001** - **Occupational Health and Safety Assessment Series**
  OHSAS 18000 is an international occupational health and safety management system specification. It comprises two parts, 18001 and 18002 and embraces a number of other publications. It is intended to help an organization control occupational health and safety risks. It was developed in response to widespread demand for a recognized standard against which to be certified and assessed. The (OHSAS) specification gives requirements for an occupational health and safety (OH&S) management system, to enable an organization to control its OH&S risks and improve its performance. It does not state specific OH&S performance criteria, nor does it give detailed specifications for the design of a management system.
  http://www.ohsas-18001-occupational-health-and-safety.com/

- **SA8000 - Social Accountability 8000**
  This is a voluntary workplace standard developed by Social Accountability International (SAI), SAI is an international Non-Governmental Organization (NGO) whose focus is on improvement of workplaces for employees. The SA8000 standard is an auditable certification

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[19] British Standards (BS) are the standards produced by BSI Group which is incorporated under a Royal Charter (and which is formally designated as the National Standards Body (NSB) for the UK).The BSI Group produces British Standards under the authority of the Charter.

standard based on international workplace norms of International Labor Organization (ILO) conventions, the Universal Declaration of Human Rights and the UN Convention on the Rights of the Child. This standard is the benchmark against which companies can measure their performance. SA8000 elements include: Forced and Compulsory Labor, Health and Safety, Freedom of Association and Right to Collective Bargaining, Discrimination, Disciplinary Practices, Working Hours, Remuneration, Management Systems.
http://www.sa-intl.org/index.cfm?fuseaction=Page.viewPage&pageId=1140&parentID=473

- **BS8800**
  This is a guide to occupational health and safety management systems. It was last published in July 2004 (ISBN 0580439879), and is intended to assist in developing a framework for managing OHS. It explains how the various elements in developing an OH&S management system can be tackled and integrated into day-to-day management arrangements, and how the system can be maintained as OH&S evolves, responding to internal and external influences. A greater focus on business drivers is intended to help OH&S managers in gaining senior management commitment. It also offers guidance and help on issues such as promoting an effective safety management system, risk assessment/control, and hazardous event investigation, and reflects the referenced OHSAS standards.

- **U.S. Green Building Council (USGBC): Leadership in Engineering and Building Design (LEED) Certification**
  LEED is the nationally accepted benchmark for the design, construction and operation of high performance green buildings. Developed by the U.S. Green Building Council in 2000 through a consensus based process, LEED serves as a tool for buildings of all types and sizes. LEED certification offers third party validation of a project's green features and verifies that the building is operating exactly the way it was designed to. As stated, LEED certification is available for all building types including new construction and major renovation; existing buildings; commercial interiors; core and shell; schools and homes. LEED is a point based system where building projects earn LEED points for satisfying specific green building criteria. Within each of the seven LEED credit categories, projects must satisfy particular prerequisites and earn points. The five categories include Sustainable Sites (SS), Water Efficiency (WE), Energy and Atmosphere (EA), Materials and Resources (MR) and Indoor Environmental Quality (IEQ). An additional category, Innovation in Design (ID), addresses sustainable building expertise as well as design measures not covered under the five environmental categories. The number of points the project earns determines the level of LEED Certification the project receives. The official USGCB site has useful guidance on certification and more comprehensive documents available for purchase. USGDB also has an active Hospitality Industry Working Group which focuses on standards for the sector and produces guidance and other helpful information for development of energy initiatives and ultimate certification.

http://www.usgbc.org/DisplayPage.aspx?CMSPageID=2119

Sector Specific Management Standards and Certification Protocols

- **Sustainable Tourism Certification Network of the Americas**
  This site contains a list and descriptive information and links to currently developed sustainable tourism certification frameworks and standards. The list contains both country-specific and worldwide existing sector-specific management system certification programs.
  http://www.certificationnetwork.org/members/index.html

  Programs listed include:

  - Brazilian Standard NBR ABNT 15.401 - Sustainable Management for Accommodations
    http://www.ecobrasil.org.br/publique/cgi/cgilua.exe/sys/start.htm?tpl=home
  - Certification for Sustainable Tourism (CST), Costa Rica
    http://www.turismo-sostenible.co.cr/index.php?lang=es
  - GREAT Green Deal, Central America, the Caribbean and Mexico
    http://www.sellosverdes.com/
  - Green Globe, Worldwide (see separate description below)
    http://www.greenglobe.com/
  - Green Seal, USA
    http://www.greenseal.org/
  - Mexican Regulation NMX-AA-133-SCFI-2006, Mexico
    http://www.semarnat.gob.mx/Pages/Inicio.aspx
  - Smart Voyager, Ecuador
    http://ccd.ec/pages/turismo_en.htm
  - Sustainable Tourism Eco-Certification Program (STEP), USA
    http://www.sustainabletravelinternational.org/documents/op_steplearn.html

- **Sustainable Travel International "Guide to Sustainable Tourism"**
  This is an online tool for development of sustainable tourism management plans and programs. It provides guidance and additional links/references relative to sustainability policy development and measurement and management of eleven categories of impact to include environmental, socio-cultural, and economic impacts.
  http://sustainabletravelinternational.org/documents/gi_tp_guide1.html

- **Green Globe program of the World Travel & Tourism Council**.
  Green Globe is one of the best known worldwide benchmarking and certification programs for the travel and tourism industry. It is based on Agenda 21 and principles for Sustainable Development endorsed by 182 governments at the United Nations Rio de Janeiro Earth

Summit in 1992. Green Globe operates in 50 countries. Sustainable management standards and guidelines include:

- Implementation of a Sustainability Management System
- Legal Compliance
- Employee Training
- Customer Satisfaction
- Local zoning, design and construction
- Sustainable design and construction of building and infrastructure – new and existing buildings
- Communications
- Health and Safety
- Socioeconomic (community development, local employment, fair trade, exploitation, equitable hiring, employee protection, basic services)
- Cultural Heritage
- Environmental (conserving resources, purchasing policy, consumable goods, energy consumption, water consumption, reducing pollution, greenhouse gas, wastewater, waste management plan, harmful substances, other pollutants)
- Conserving Biodiversity, Ecosystems, and Landscapes

Facilities must meet Green Globe 21's standards, including exceeding industry benchmarks and incorporating an Environmental Management System. EarthCheck is an affiliated benchmarking and certification program that also has developed guidance focused on helping companies benchmark their operations against industry best management practices.
http://www.greenglobe.com/; http://www.earthcheck.org/

ANNEX A
INDICIATIVE LIST OF ESHSMS PROGRAMS, PLANS, PROCEDURES

Presented below is an indicative list of documents, programs, plans, and procedures that might be developed for an ESHSMS. Some of these are required elements for an ESHSMS. These are identified with an asterisk (*). Others would only be required based on the size/complexity of the project or to address specific identified significant impacts.

ESHSMS Development Documents – These documents would be applicable to each phase (e.g., construction, operation[20]) of a project.
- Sustainability Policy Statement*
- Description of the Company/Project Activities and Organization*
- Environmental Structure and Areas of Responsibility*
    - Organizational Chart
- Procedure for Review of Legal and Other Applicable Requirements (e.g., LEED [or other standard] criteria compliance procedure)*
    - Legal Register*
- Environmental and Social Aspects and Impacts Identification Procedure*
    - Environmental and Social Aspects and Impacts Registers*
    - Environmental and Social Significance Determination Criteria*
    - Register of Environmental and Social Significant Impacts*
    - Register of Environmental and Social Objectives and Targets*
- Diagram of Management Program Implementation
    - ESHSMS Progress Reporting Procedure and Template*
- Implementation and Operation Programs, Plans Procedures* (as identified below under ESHSMS Programs, Plans, Procedures)
- Consultation and Communications Plan*
- Records and Document Control Plan*
    - Records Retention Procedure
- Operational Control Procedures (only for operations identified has having significant impacts or risks, and where the absence of control procedures could result in a significant impact)
- Emergency Preparedness and Response Plan and Procedures*
    - Contingency Plan*
    - Management and Reporting Investigations of Incidents and Accidents*
- Performance Evaluation and Auditing*
    - Management Review Procedure/Template
    - Internal Audit Procedure
    - External Audit Procedure
    - Internal Inspection Program
    - Non-Conformance and Corrective Action Program*

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[20] Again, depending on the organizational structure of the project, phase-specific plans (and possibly separate entire ESHSM systems) might be more appropriate/necessary.

ESHSMS Programs, Plans, and Procedures – These documents would be phase-specific and would be prepared by the entity with control over each phase.

- Siting, Design and Planning Phase
  - Procedure for site selection*
  - Procedure for contract control*
  - Procedure to ensure identification/compliance with legal requirements*
  - Community relations procedure
  - Habitat identification and restoration plan

- Construction and Operations Phases
  - Training, Awareness and Competence Procedure*
    - Training Matrix
    - Training Assessment and Planning Document
    - Training Guidelines and Procedures
    - Training Certification Program
    - Induction Training Program Procedure
    - Training Request Document
    - Training Evaluation Procedure
    - Training of Contractors and Vendors*
    - Specific Requirements for Training/Competencies (based on identified impact areas outlined and as required in the ESHSMS Programs, Plans, Procedures identified below)
    - Community Relations Training
  - Health and Safety Plan*
  - Monitoring and inspection plan*
  - Security Plan*
    - Gun control procedure
  - Control of Contractors and Vendors Plan*
  - Internal and External Communications Plan*
    - Community Relations Plan
    - Specific ESMP Applicable Procedures (based on identified impact areas as outlined and as required in the ESHSMS Programs, Plans, Procedures identified below)
  - Recordkeeping, Documentation and Document Control Procedure*
    - Records Retention Policy
  - HR, labor and working conditions plan*
  - Hazardous materials and chemical products management plan*
  - Solid and hazardous/regulated waste management/minimization plan*
  - Energy Reduction Plan

- Construction Phase
  - Storm water prevention and protection plan*
  - Procedure for archeological finds during excavation and construction*
  - Water/liquid waste management plan*
  - Air emissions control plan*

- Noise, vibration, and illumination control plans*
- Turtle management and monitoring plan
- Transportation/ access routes control plan
- Habitat restoration plan
- Landscaping plan*

- Operation Phase (often guided by the hotel management chain if applicable)
    - Energy use plan*
    - Solid waste management plan*
    - Water conservation plan*
    - Storm water management plan*
    - Landscape management plan
    - Indoor air quality plan*
    - Turtle management and monitoring plan
    - GHG emission management and monitoring plan

ANNEX B
EXAMPLE POLICY[1]

We recognize that our business has an important role to play in protecting and enhancing the environment, health, safety and welfare of current and future generations, and helping secure the long-term sustainability of the hospitality and tourism industry.

To this end, our hotel is committed to taking action:

- ✓ To achieve sound environmental, health and safety practices across our entire operation
- ✓ To comply fully with all legislation
- ✓ To minimize our use of energy, water and materials
- ✓ To minimize our waste and to reduce, re-use, and recycle the resources consumed by our business wherever practical
- ✓ To reduce our pollution to a minimum and, where appropriate to treat our effluent
- ✓ To invite our customers, suppliers and contractors to participate in our efforts to protect the environment
- ✓ To clearly state our commitment to the safety, health and welfare of our employees and the surrounding community

- ✓ Where we can, to work with others in the hospitality and tourism industry, in public agencies and the community to achieve wider environmental, socioeconomic, and health and safety goals
- ✓ To provide all employees with the training and resources required to meet our objectives
- ✓ To openly communicate our policies and practices to interested parties
- ✓ To monitor and record our impacts on a regular basis and compare our performance with our policies, objectives and targets with a view to continuous improvement over time.

[1] Source: International Tourism Partnership Guide to Environmental Management for Hotels

ANNEX C
EXAMPLE ORGANIZATION DESCRIPTION[1]

Taking responsibility for the environment and local community has been an important part of the Rezidor Hotel Group broader commitment to sustainable development for many years. In 2001, this commitment was fortified and placed within the scope of a program called Responsible Business (RB). Each hotel has a unique RB Action Plan covering areas such as community outreach, environmental improvement, employee well-being and health and safety.

Rezidor Corporate Office has a dedicated Responsible Business department providing hotels with ongoing support to implement Responsible Business practices, as well as coordinate and integrate Responsible Business into all aspects of Rezidor operations. Regional Responsible Business Coordinators support the hotels at a regional level and provide a liaison between the hotels and the corporate Responsible Business team, ensuring that Responsible Business is integrated consistently; all employees are fully engaged in the program; and the capturing of best practice. The General Manager of the hotel is ultimately responsible for the hotel's Responsible Business activities and performance and Rezidor has implemented a mandatory General Manager Certification Program that includes a dedicated Responsible Business module. The Responsible Business Coordinator reports to the General Manager and leads the Responsible Business Team, consisting of employees from different departments and all levels at each hotel. They are responsible for reviewing current practices, implementing Responsible Business across all departments and reporting progress to Corporate Office. Additionally, Rezidor requires all new employees to receive mandatory Responsible Business Training within 90 days of their arrival.

[1]http://www.responsiblebusiness.rezidor.com/

ANNEX D
ENVIRONMENTAL ASPECT AND IMPACT INVENTORY

ENVIRONMENTAL ASPECT AND IMPACT INVENTORY
EXAMPLE FORMAT 1   -

CONSTRUCTION

Activity	Environmental Aspect	Categories of Impact										
		Air Pollution	Land Pollution	Water Pollution	Nuisance	Depletion of Natural Resources/Materi	Loss of Amenity	Loss of ecosystem/ biodiversity	Human Health	Indirect Impact	Shareholder Impact	Legal
Geotechnical Analysis - Drilling	Generation of waste (soil, rock, etc.)											
	Generation of wastewater (if use drilling fluids)											
Access roads (new and improvements)– Road Construction	Water pollution from runoff											
	Air Emissions (dust and vehicle emissions)											
	Generation of Noise Pollution and dust											
	Habitat/Species Disruption											
	Cultural Resource Impacts											
	Wetlands and Sensitive Areas Disturbance											
	Road Improvements											
ETC.												
ETC												

OPERATIONS

Environmental Aspect	Category of Impact	ACTIVITY						
		Housekeepi ng	Ground s- keeping	Food Preparatio n	Laundr y	Admi n	Support (Mech./Elec /etc.)	Vendors
Electricity (lighting, heating, refrigeration, ventilation, power appliances	Energy Use							
	Emissions							
Fuel (gas, oil, petrol, diesel, steam, etc.) for heating and other equipment	Energy Use							
	Emissions							
Fuel for the transportation of goods and guests	Energy Use							
	Emissions							
Furniture, Fittings, and Appliances (electrical appliances, furniture, carpets, towels, linens, crockery, cutlery)	Waste Generation (plastics, wood, metals, glass, fabrics, packaging)							
Consumables (toilet and other soft paper, toiletries, detergents and cleaning products, fertilizer & pesticides, office products)	Waste Generation (packaging, glass bottles and jars, plastic bottles, other plastic items, waste shampoo, etc., detergents, paints, fertilizers/pesticides, batteries, light bulbs/tubes, paper, ink cartridges)							
	Emissions (from manufacturing)							
Water (drinking, cleaning, guest rooms, laundry, pools, spas,	Wastewater (grey water from guest baths/basins, kitchen, sinks, etc., water							

irrigation)	contaminated by cleaning materials, water contaminated with chlorine from backwashing pools, black water from toilets)							
Food and Beverages	Waste Generation (organic waste – food, oils, grease; packaging, aluminum cans/metals, glass bottles other glass)							
Refrigeration (AC, freezers, mini-bars, chillers)	Emissions							

EXAMPLE FORMAT
HAZARD AND RISK INVENTORY

CONSTRUCTION

ACTIVITY	HAZARD
Mobilization of assets to site, transportation of equipment, supplies, and materials.	Vehicular accidents, loading and unloading hazards, over head hazards, rigging hazards, struck-by, caught between, falls, slips, trips, security
Site clearing for construction	Over head and underground utilities, naturally occurring releases, struck-by, caught between, wild life (insects, snakes, animals), heat stress, blasting effect, noise
Civil road construction grading road areas for sub-base construction.	Vehicular accidents, loading and unloading hazards, over head hazards, struck-by, caught between, falls, slips, trips
Placement of reinforcing steel for foundation	Ergonomics, rigging, overhead hazards, excavation hazards, heat/cold stresses, pinch points
Installation of concrete foundation forms	Ergonomics, rigging, overhead hazards, excavation hazards, heat/cold stresses, pinch points
Installation of Electrical conduit	Slip, trip, and falls, sprains or strains, chemical exposure and contact.
Concrete Pour	Ergonomics, slip, trip, falls, impailment, chemical exposure, overhead hazards, excavation hazards, heat/cold stresses, pinch points, exposure to Silica
Fill in excavated area around foundation	Vehicle movement, excavation hazards, noise/vibrations, struck by, caught between
Install pad mount transformers	Overhead hazards, cave-in, struck-by, caught between, rigging, exposure to radiation
Back fill excavated areas	Vehicle movement, excavation hazards, noise/vibrations, struck by, caught between
Test all breakers and switches	Electrical hazards, fire
Pest, insect, rodent, serpent control/crop-dusting	Infectious disease, poisoning
Lightening /Inclement Weather	Struck by, cold stresses, high winds
Shared Space/Sanitation	Spread of communicable diseases, illness

ANNEX E
EXAMPLE SIGNIFICANCE FRAMEWORKS

EXAMPLE SIGNIFICANCE FRAMEWORKS

Significance = Severity of Impact X Probability of Occurrence

I. ASSESS THE SEVERITY OF THE IMPACT ACCORDING TO THE FOLLOWING SCALE:

1. **Negligible/Minor**
   - Environmental: Negligible potential to result in excursions from legislative limits, small contribution to local/regional environmental, no stakeholder interest, insignificant resources required to correct impact
   - Health and Safety: Negligible potential to result in excursions from legislative limits. First aid only required and no lost time

2. **Moderate/Serious**
   - Environmental: Temporary excursion outside of legislative limits, small contribution to local/regional environment, re-established within 1-year, low potential for complaints, moderate resources required to correct impact
   - Health and Safety: Temporary excursion outside of legislative limits. The injury will require treatment by a doctor.

3. **Serious**
   - Environmental: Short term non-compliance with legislation, contribution to local/regional/global environment, recovery within 1-2 years, issue of concern to stakeholders, major resources required to correct impact
   - Health and Safety: Significant non-compliance with legislation. Injured person will lose time off work.

4. **Major**
   - Medium term non-compliance with legislation, major contribution to local/regional/global environment, recovery 2-5 years, issue of concern to stakeholders, major resources required to correct impact
   - Health and Safety: Major non-compliance with legislation. May suffer a permanent disability.

5. **Catastrophic**
   - Long term non-compliance with legislation, long term contribution to local/regional/global environment, recovery > 5 years, issue of concern to stakeholders, critical resources required to correct impact
   - Health and Safety: May be fatally injured

II. ASSESS THE PROBABILITY OF THE IMPACT ACCORDING TO THE FOLLOWING SCALE:

- Improbable – not happened before but theoretically possible
- Low Probability – occurs 5-10 times yearly
- Probable – occurs yearly
- Highly Probable – occurs monthly
- Definite – occurs daily, weekly

This method results in the following scoring matrix:

Probability	5	5	10	15	20	25
	4	4	8	12	16	20
	3	3	6	9	12	15
	2	2	4	6	8	10
	1	1	2	3	4	5
	1	2	3	3	4	5

Key	
Low Significance	
Medium Significance	
High Significance	

This methodology gives a maximum score of 25 points. Significant aspects are defined as those where the impact has a score of 12 points or more. Presented below is an example format.

CONSTRUCTION PHASE

Activity	Environmental Aspect	Air Pollution	Land Pollution	Water Pollution	Nuisance	Depletion of Natural Resources/Materials	Loss of Amenity	Loss of ecosystem/biodiversity Habitat	Human Health	Indirect Impact	Shareholder Impact	Legal	Summary of Impact	Normal Severity	Normal Probability	Normal Significance	Abnormal Severity	Abnormal Probability	Abnormal Significance	Emergency Severity	Emergency Probability	Emergency Significance	Significant Aspect Reference No
Geotechnical Analysis - Drilling	Generation of waste (soil, rock, etc.)		X	X								X	Generation and disposal of residual wastes	2	4	8	3	4	12	3	4	12	8
	Generation of wastewater (if use drilling fluids)		X	X								X	Wastewater generation and disposal	3	4	12	4	4	16	4	5	20	9
	Drilling Rig Operation				X							X	Aesthetic Impacts (Noise/Visual)	2	2	4	2	2	4	2	3	6	
Access roads (new and improvements) – Road Construction	Alteration of Land Surface	X	X	X		X	X	X	X	X		X	Surface and groundwater pollution from soil erosion (due to vegetation removal and vehicle traffic) results in slope alteration, alteration of stormwater path, increases in impervious cover all resulting in increased turbidity and salinity in	3	4	12	4	4	16	4	4	16	10

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									surface waters/wetlands. Also transmit contaminants from metals and other natural occurring contamination.									
Air Emissions (dust and vehicle emissions)	X		X				X		X	Air Pollution (PM, CO, CO2, NOx, SO2, VOC)	2	3	6	3	3	9	3	4	12	11
Generation of Noise and Dust			X					X	X	Construction Aesthetic Adverse Impacts - Noise Pollution and Visual Impacts (principally dust)	3	3	9	3	4	12	3	5	15	12

ANNEX F
OBJECTIVES AND TARGETS

ANNEX F
EXAMPLE OPERATIONS
OBJECTIVES AND TARGETS
EVIRONMENTAL

OBJECTIVE	TARGET
Reduce Energy Use	• Reduce electricity use by 10% by X date • Reduce natural gas use by 15% by X date • Obtain LEED Certification by X date
Reduce Water Use	• Reduce water use by 10% by X date
Reduce Air Emissions	• Reduce boiler emissions by 10% by X date • Improve material handling practices (use of paints, etc.) • Switch to rechargeable battery powered golf carts/service vehicles by X date
Reduce VOCs in wastewater discharges	• Increase use of aqueous cleaners by 20% by X date
Improve habitat and water quality of estuary	• Restore fish stocks and habitat by X date
Reduce solid waste generated	• Increase material recycled by 30% by X date
Reduce hazardous waste generated	• Substitute all cleaning products to certified green products by X date
Reduce hazardous material use	• Identify procurement options for non-hazardous cleaning products, pesticides and herbicides by X date • Develop a proactive procurement program by X date
Reduce metal content in stormwater discharges	• Improve stormwater collection and filtration system by X date • Investigate effectiveness of additional best management practices by X date