

Hazardous waste Management

PROCEDURE VALIDATION

Version	Corporate area	Approved by:	Approval date
1	Operations	SVP Operations	15/11/2021
	Sustainable Business	Sustainable Business Director	

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OBJECTIVE AND SCOPE

As a legal and internal requirement, all companies must manage their hazardous waste generation to comply with regulations (storage, segregation, hotels' legal permits and hazardous waste management company). As a part of the Environmental and Energy management system implemented in NH Hotel Group, all hotels must record their hazardous waste generation in Sustainfocus tool.

This procedure applies to all hotels in all Business Units, regardless of their management model.

SUMMARY

1. How to manage hazardous waste in hotels
 - 1.1 What hotels should segregate?
 - 1.2 How hotels should storage hazardous waste?
 - 1.3 How hotels should manage hazardous waste disposals?
2. Reporting procedure (Sustainfocus)
 - 2.1 Example: How to upload data for a fluorescents and lamps residues disposal carried out in October
3. Related documents
4. Templates and file periods

1 HOW TO MANAGE HAZARDOUS WASTE IN HOTELS

Due to the especially severe potential impact of this type of waste on the environment, the NH Hotel Group shall, in compliance with the applicable legislation, pay particular attention to any hazardous waste generation.

1.1 What hotels should segregate?

HAZARDOUS WASTE SEGREGATED BY NH HOTEL GROUP:

1. Empty contaminated containers.
2. Paint and varnish and solvent
3. Contaminated absorbents and rags.
4. Aerosols.
5. Fluorescent tubes and lamps
6. Electrical and electronic equipment
7. Button batteries.

SPECIAL WASTE SEGREGATED BY NH HOTEL GROUP: not hazardous waste but same procedure

1. Alkaline batteries
2. Tonner
3. Cooking oil

1.2 How hotels should storage hazardous waste?

CONDITION FOR THE CORRECT STORAGE OF HAZARDOUS WASTE (HW):

1. A special area shall be provided for HW storage, meeting the following conditions: a. It must be covered by a roof and suitably sheltered, to ensure that rainfall will not cause an increase in volume or the washing away of waste. The storage facility must likewise shelter hazardous waste from direct sunlight. The floor shall be waterproof, preferably made of mortar or concrete, and capable of withstanding the physical and chemical properties of the stored waste. The facility shall not be connected by any means whatsoever to the sewer, effluent or rainwater drainage system, to avoid potential contamination caused by accidental spillage.
2. Powdery or other waste shall not be stored in open areas, in conditions allowing their dispersion by the wind.
3. The waste containers or vessels and their closing devices shall be sturdy and resistant, made of materials capable of withstanding degradation by their content and inert to chemical reaction with the waste materials.
4. There can be no elements constituting a source of potential additional hazards (switchboards, compressors, electric pumps, etc.).
5. The use of underground or embedded facilities shall be avoided for the storage of hazardous waste.

Hazardous waste may under no circumstances be mixed with non-hazardous waste; in the event of the two types being mixed, the entire resulting mixture shall be considered hazardous waste.

1.3 How hotels should manage hazardous waste disposal?

The hazardous waste management company shall:

1. Report to the Administration the transfer of the waste with the required prior notice when so required by law.
2. Upon delivery of the waste materials, suitable supporting documents shall be completed to ensure their proper control and monitoring.
3. The transport company shall comply with the legal requirements regarding containers, labelling and prohibitions applicable in the country involved, in accordance with the currently effective legislation.

For operations carried out by both management and transport companies, such companies must hold the appropriate permits issued by the relevant Administration. Said companies shall not be allowed to carry out any operations involving waste material codes for which they do not hold valid permits complying with the currently effective legislation.

2. REPORTING PROCEDURE (SUSTAINFOCUS)

Responsible parties: Hotel General Manager / Maintenance Manager

Hotel General Manager will be responsible for compliance with the procedure and reporting data.

Maintenance Managers must upload the hazardous waste withdrawals information monthly as additional information of the usual consumption data upload process (thru Sustainfocus tool).

There is a section enabled in Sustainfocus to load this information called "WASTE". It will be available for loading information each month (if the hotel has not carried out any removal of hazardous waste, please answer "no" and send it to validation as usual):

2.1 Example: How to upload data for a fluorescents and lamps residues disposal carried out in October

- Click on the pencil to open the questionnaire:

There are 10 hazardous waste categories. All of them are answered as "NO" by default so hotels just must change the answer for the category that applies (example: fluorescents and lamps residues disposal).

Category	Unit	Prev. Value	Value
Have contaminated absorbents and rags residues disposal been carried out?	1		No
Have aerosols residues disposal been carried out?	1		No
Have Contaminated Containers residues disposal been carried out?	1		No
Have Fluorescents and Lamps residues disposal been carried out?	1		No
Have electrical and electronic equipment residues disposal been carried out?	1		No
Have paint, varnish and solvent residues disposal been carried out?	1		No
Have Button Batteries residues disposal been carried out?	1		No
Have Alkaline Batteries residues disposal been carried out?	1		No
Have other residues disposal been carried out?	1		No
Has cooking oil residues disposal been carried out?	1		No

- To upload data, answer “yes” and fill the questions:
 - Quantity:** please indicate how many kg have been removed by the Residue Agent
 - Date of withdrawal:** use calendar to fill the field
 - Residue Agent:** Write the name of the residue agent which carried out the withdrawal.

IMPORTANT: Any removal of hazardous waste has documentation associated with it, which, in most cases, is sent to the hotel later. For this reason, to save the data, we must enter a comment indicating that we are waiting for the documentation and, once we have it available, we must load it into the tool. The campaigns will remain open so that the maintenance managers can upload the documents when they receive it.

Legal documentation must be on file at the hotel for as long as local legislation indicates

- For adding the comment, please click on the icon highlighted:

Write the comment in the window and click on “OK”:

- Now you can “SAVE” the information. Do not click on “SUBMIT” until you have uploaded the associate documents. If you click on it, you could not add any information to the questionnaire:

Hotel Waste	Unit	Prev. Value	Value	Difference
Have contaminated absorbents and rags residues disposal been carried out?			No	
Have aerosols residues disposal been carried out?			No	
Have Contaminated Containers residues disposal been carried out?			No	
Have Fluorescents and Lamps residues disposal been carried out?			Yes	
Quantity - Fluorescents and Lamps residues	Kg		30	
Date of withdrawal			13/10/2021	
Residue Agent			name	
Have electrical and electronic equipment residues disposal been carried out?			No	
Have paint, varnish and solvent residues disposal been carried out?			No	
Have Button Batteries residues disposal been carried out?			No	
Have Alkaline Batteries residues disposal been carried out?			No	
Have toner residues disposal been carried out?			No	
Has cooking oil residues disposal been carried out?			No	

COMMENTS

Save Submit Cancel

- Once you have the documentation available, you should open the saved questionnaire and click on the icon highlighted:

Hotel Waste	Unit	Prev. Value	Value	Difference
Have Contaminated Containers residues disposal been carried out?			No	
Have Fluorescents and Lamps residues disposal been carried out?			Yes	
Quantity - Fluorescents and Lamps residues	Kg		30	
Date of withdrawal			13/10/2021	
Residue Agent			name	

A window will be opened, and you can click on “choose file” to look for the document you have saved on your computer, then click on “upload” and finally in “Attach”.

Upload Attached Files

Select a file to process. Its size should not exceed 10 MB

Click Upload to start the transfer.

The transfer may last between 10 seconds and a few minutes depending on the file size. You will receive a confirmation in this window once the transfer is done.

Cancel Upload

- Then you can click on “SAVE” or “SUBMIT”:
- Click “save” in case you have not finished to upload documents, for example, you are still waiting for documentation from other hazardous waste removal for the same month.
- Click “SUBMIT” in case you have finished to add information to the questionnaire.

3 RELATED DOCUMENTS

OI-02-GP-03 Consumption data register process

4 TEMPLATES AND FILE PERIODS

Document or template	Responsible	File period
Reporting disposal thru Sustainfocus tool	Maintenance Manager	Monthly (3 rd business day)
Attach documents associated with disposals in Sustainfocus tool	Maintenance Manager	When received
Ensure compliance with the procedure	GM	