



3.0 Community Health and Safety

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This section complements the guidance provided in the preceding environmental and occupational health and safety sections, specifically addressing some aspects of project activities taking place outside of the traditional project boundaries, but nonetheless related to the project operations, as may be applicable on a project basis. These issues may arise at any stage of a project life cycle and can have an impact beyond the life of the project.

3.1 Water Quality and Availability

Groundwater and surface water represent essential sources of drinking and irrigation water in developing countries, particularly in rural areas where piped water supply may be limited or unavailable and where available resources are collected by the consumer with little or no treatment. Project activities involving wastewater discharges, water extraction, diversion or

impoundment should prevent adverse impacts to the quality and availability of groundwater and surface water resources.

Water Quality

Drinking water sources, whether public or private, should at all times be protected so that they meet or exceed applicable national acceptability standards or in their absence the current edition of WHO Guidelines for Drinking-Water Quality. Air emissions, wastewater effluents, oil and hazardous materials, and wastes should be managed according to the guidance provided in the respective sections of the General EHS Guidelines with the objective of protecting soil and water resources.

Where the project includes the delivery of water to the community or to users of facility infrastructure (such as hotel hosts and hospital patients), where water may be used for drinking, cooking, washing, and bathing, water quality should comply with national acceptability standards or in their absence the current edition of WHO Drinking Water Guidelines. Water quality for more sensitive well-being-related demands such as water used in health care facilities or food production may require more stringent, industry-specific guidelines or standards, as applicable. Any dependency factors associated with the deliver of water to the local community should be planned for and managed to ensure the sustainability of the water supply by involving the community in its management to minimize the dependency in the long-term.

Water Availability

The potential effect of groundwater or surface water abstraction for project activities should be properly assessed through a combination of field testing and modeling techniques, accounting for seasonal variability and projected changes in demand in the project area.

Project activities should not compromise the availability of water for personal hygiene needs and should take account of potential future increases in demand. The overall target should be the availability of 100 liters per person per day although lower levels may be used to meet basic health requirements.⁷⁹ Water volume requirements for well-being-related demands such as water use in health care facilities may need to be higher.

3.2 Structural Safety of Project Infrastructure

Hazards posed to the public while accessing project facilities may include:

- Physical trauma associated with failure of building structures
- Burns and smoke inhalation from fires
- Injuries suffered as a consequence of falls or contact with heavy equipment
- Respiratory distress from dust, fumes, or noxious odors
- Exposure to hazardous materials

Reduction of potential hazards is best accomplished during the design phase when the structural design, layout and site modifications can be adapted more easily. The following issues should be considered and incorporated as appropriate into the planning, siting, and design phases of a project:

- Inclusion of buffer strips or other methods of physical separation around project sites to protect the public from major hazards associated with hazardous materials incidents or process failure, as well as nuisance issues related to noise, odors, or other emissions
- Incorporation of siting and safety engineering criteria to prevent failures due to natural risks posed by earthquakes, tsunamis, wind, flooding, landslides and fire. To this end, all

project structures should be designed in accordance with engineering and design criteria mandated by site-specific risks, including but not limited to seismic activity, slope stability, wind loading, and other dynamic loads

- Application of locally regulated or internationally recognized building codes⁸⁰ to ensure structures are designed and constructed in accordance with sound architectural and engineering practice, including aspects of fire prevention and response
- Engineers and architects responsible for designing and constructing facilities, building, plants and other structures should certify the applicability and appropriateness of the structural criteria employed.

International codes, such as those compiled by the International Code Council (ICC)⁸¹, are intended to regulate the design, construction, and maintenance of a built environment and contain detailed guidance on all aspects of building safety, encompassing methodology, best practices, and documenting compliance.

Depending on the nature of a project, guidance provided in the ICC or comparable codes should be followed, as appropriate, with respect to:

- Existing structures
- Soils and foundations
- Site grading
- Structural design
- Specific requirements based on intended use and occupancy
- Accessibility and means of egress
- Types of construction
- Roof design and construction
- Fire-resistant construction
- Flood-resistant construction

⁷⁹ World Health Organization (WHO) defines 100 liters/capita/day as the amount required to meet all consumption and hygiene needs. Additional information on lower service levels and potential impacts on health are described in "Domestic Water Quantity, Service Level and Health" 2003. http://www.who.int/water_sanitation_health/diseases/wsh0302/en/index.html

⁸⁰ ILO-OSH, 2001. <http://www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf>

⁸¹ ICC, 2006.

- Construction materials
- Interior environment
- Mechanical, plumbing and electrical systems
- Elevators and conveying systems
- Fire safety systems
- Safeguards during construction
- Encroachments into public right-of-way

Although major design changes may not be feasible during the operation phase of a project, hazard analysis can be undertaken to identify opportunities to reduce the consequences of a failure or accident. Illustrative management actions, applicable to hazardous materials storage and use, include:

- Reducing inventories of hazardous materials through inventory management and process changes to greatly reduce or eliminate the potential off-site consequences of a release
- Modifying process or storage conditions to reduce the potential consequences of an accidental off-site release
- Improving shut-down and secondary containment to reduce the amount of material escaping from containment and to reduce the release duration
- Reducing the probability that releases will occur through improved site operations and control, and through improvements in maintenance and inspection
- Reducing off-site impacts of releases through measures intended to contain explosions and fires, alert the public, provide for evacuation of surrounding areas, establish safety zones around a site, and ensure the provision of emergency medical services to the public

3.3 Life and Fire Safety (L&FS)

Applicability and Approach

All new buildings accessible to the public should be designed, constructed, and operated in full compliance with local building

codes, local fire department regulations, local legal/insurance requirements, and in accordance with an internationally accepted life and fire safety (L&FS) standard. The Life Safety Code⁸², which provides extensive documentation on life and fire safety provisions, is one example of an internationally accepted standard and may be used to document compliance with the Life and Fire Safety objectives outlined in these guidelines. With regard to these objectives:

- Project sponsors' architects and professional consulting engineers should demonstrate that affected buildings meet these life and fire safety objectives.
- Life and fire safety systems and equipment should be designed and installed using appropriate prescriptive standards and/or performance based design, and sound engineering practices.
- Life and fire safety design criteria for all existing buildings should incorporate all local building codes and fire department regulations.

These guidelines apply to buildings that are accessible to the public. Examples of such buildings include:

- Health and education facilities
- Hotels, convention centers, and leisure facilities
- Retail and commercial facilities
- Airports, other public transport terminals, transfer facilities

Specific Requirements for New Buildings

The nature and extent of life and fire safety systems required will depend on the building type, structure, construction, occupancy, and exposures. Sponsors should prepare a Life and Fire Safety Master Plan identifying major fire risks, applicable codes, standards and regulations, and mitigation measures. The Master

⁸² US NFPA.
<http://www.nfpa.org/catalog/product.asp?category%5Fname=&pid=10106&target%5Fpid=10106&src%5Fpid=&link%5Ftype=search>

Plan should be prepared by a suitably qualified professional, and adequately cover, but not be limited to, the issues addressed briefly in the following points. The suitably qualified professional selected to prepare the Master Plan is responsible for a detailed treatment of the following illustrative, and all other required, issues.

Fire Prevention

Fire prevention addresses the identification of fire risks and ignition sources, and measures needed to limit fast fire and smoke development. These issues include:

- Fuel load and control of combustibles
- Ignition sources
- Interior finish flame spread characteristics
- Interior finish smoke production characteristics
- Human acts, and housekeeping and maintenance

Means of Egress

Means of Egress includes all design measures that facilitate a safe evacuation by residents and/or occupants in case of fire or other emergency, such as:

- Clear, unimpeded escape routes
- Accessibility to the impaired/handicapped
- Marking and signing
- Emergency lighting

Detection and Alarm Systems

These systems encompass all measures, including communication and public address systems needed to detect a fire and alert:

- Building staff
- Emergency response teams
- Occupants
- Civil defense

Compartmentation

Compartmentation involves all measures to prevent or slow the spread of fire and smoke, including:

- Separations
- Fire walls
- Floors
- Doors
- Dampers
- Smoke control systems

Fire Suppression and Control

Fire suppression and control includes all automatic and manual fire protection installations, such as:

- Automatic sprinkler systems
- Manual portable extinguishers
- Fire hose reels

Emergency Response Plan

An Emergency Response Plan is a set of scenario-based procedures to assist staff and emergency response teams during real life emergency and training exercises. This chapter of the Fire and Life Safety Master Plan should include an assessment of local fire prevention and suppression capabilities.

Operation and Maintenance

Operation and Maintenance involves preparing schedules for mandatory regular maintenance and testing of life and fire safety features to ensure that mechanical, electrical, and civil structures and systems are at all times in conformance with life and fire safety design criteria and required operational readiness.

L&FS Master Plan Review and Approval

- A suitably qualified professional prepares and submits a Life and Fire Safety (L&FS) Master Plan, including preliminary drawings and specifications, and certifies that the design

meets the requirements of these L&FS guidelines. The findings and recommendations of the review are then used to establish the conditions of a Corrective Action Plan and a time frame for implementing the changes.

- The suitably qualified professional conducts a review as part of the project completion test at the time of life and fire safety systems testing and commissioning, and certifies that construction of these systems has been carried out in accordance with the accepted design. The findings and recommendations of the review are used as the basis for establishing project completion or to establish the conditions of a Pre-Completion Corrective Action Plan and a time frame for implementing the changes.

Specific Requirements for Existing Buildings

- All life and fire safety guideline requirements for new buildings apply to existing buildings programmed for renovation. A suitably qualified professional conducts a complete life and fire safety review of existing buildings slated for renovation. The findings and recommendations of the review are used as the basis to establish the scope of work of a Corrective Action Plan and a time frame for implementing the changes.
- If it becomes apparent that life and fire safety conditions are deficient in an existing building that is not part of the project or that has not been programmed for renovation, a life and fire safety review of the building may be conducted by a suitably qualified professional. The findings and recommendations of the review are used as the basis to establish the scope of work of a Corrective Action Plan and a time frame for implementing the changes.

Other Hazards

- Facilities, buildings, plants, and structures should be situated to minimize potential risks from forces of nature (e.g.

earthquakes, tsunamis, floods, windstorms, and fires from surrounding areas).

- All such structures should be designed in accordance with the criteria mandated by situation-, climatic-, and geology-specific location risks (e.g. seismic activity, wind loading, and other dynamic loads).
- Structural engineers and architects responsible for facilities, buildings, plants and structures should certify the applicability and appropriateness of the design criteria employed.
- National or regional building regulations typically contain fire safety codes and standards⁸³ or these standards are found in separate Fire Codes.^{84,85} Generally, such codes and regulations incorporate further compliance requirements with respect to methodology, practice, testing, and other codes and standards⁸⁶. Such nationally referenced material constitutes the acceptable fire life safety code.

3.4 Traffic Safety

Traffic accidents have become one of the most significant causes of injuries and fatalities among members of the public worldwide. Traffic safety should be promoted by all project personnel during displacement to and from the workplace, and during operation of project equipment on private or public roads. Prevention and control of traffic related injuries and fatalities should include the adoption of safety measures that are protective of project workers and of road users, including those who are most vulnerable to road traffic accidents⁸⁷. Road safety initiatives proportional to the scope and nature of project activities should include:

⁸³ For example, Australia, Canada, South Africa, United Kingdom

⁸⁴ Réglementation Incendie [des ERP]

⁸⁵ USA NFPA, 2006.

⁸⁶ Prepared by National Institutes and Authorities such as American Society for Testing and Materials (ASTM), British Standards (BS), German Institute of Standardization (DIN), and French Standards (NF)

⁸⁷ Additional information on vulnerable users of public roads in developing countries is provided by Peden et al., 2004.

- Adoption of best transport safety practices across all aspects of project operations with the goal of preventing traffic accidents and minimizing injuries suffered by project personnel and the public. Measures should include:
 - Emphasizing safety aspects among drivers
 - Improving driving skills and requiring licensing of drivers
 - Adopting limits for trip duration and arranging driver rosters to avoid overtiredness
 - Avoiding dangerous routes and times of day to reduce the risk of accidents
 - Use of speed control devices (governors) on trucks, and remote monitoring of driver actions
- Regular maintenance of vehicles and use of manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction or premature failure.

Where the project may contribute to a significant increase in traffic along existing roads, or where road transport is a significant component of a project, recommended measures include:

- Minimizing pedestrian interaction with construction vehicles
- Collaboration with local communities and responsible authorities to improve signage, visibility and overall safety of roads, particularly along stretches located near schools or other locations where children may be present. Collaborating with local communities on education about traffic and pedestrian safety (e.g. school education campaigns)⁸⁸
- Coordination with emergency responders to ensure that appropriate first aid is provided in the event of accidents
- Using locally sourced materials, whenever possible, to minimize transport distances. Locating associated facilities such as worker camps close to project sites and arranging worker bus transport to minimizing external traffic

⁸⁸ Additional sources of information for implementation of road safety measures is available at WHO, 1989, Ross et al., 1991, Tsunokawa and Hoban, 1997, and OECD, 1999

- Employing safe traffic control measures, including road signs and flag persons to warn of dangerous conditions

3.5 Transport of Hazardous Materials

General Hazardous Materials Transport

- Projects should have procedures in place that ensure compliance with local laws and international requirements applicable to the transport of hazardous materials, including:
 - IATA requirements⁸⁹ for air transport
 - IMDG Code⁹⁰ sea transport
 - UN Model Regulations⁹¹ of other international standards as well as local requirements for land transport
 - Host-country commitments under the Basel Convention on the Control of Transboundary Movements of Hazardous Waste and their disposal and Rotterdam Convention on the prior Inform Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade, if applicable to the project activities
- The procedures for transportation of hazardous materials (Hazmats) should include:
 - Proper labeling of containers, including the identify and quantity of the contents, hazards, and shipper contact information
 - Providing a shipping document (e.g. shipping manifest) that describes the contents of the load and its associated hazards in addition to the labeling of the containers. The shipping document should establish a chain-of-custody using multiple signed copies to show that the waste was properly shipped, transported and received by the recycling or treatment/disposal facility

⁸⁹ IATA, 2005. www.iata.org

⁹⁰ IMO. www.imo.org/safety

⁹¹ United Nations. Transport of Dangerous Goods - Model Regulations. 14th Revised Edition. Geneva 2005. http://www.unece.org/trans/danger/publi/unrec/rev14/14files_e.html

- Ensuring that the volume, nature, integrity and protection of packaging and containers used for transport are appropriate for the type and quantity of hazardous material and modes of transport involved
- Ensuring adequate transport vehicle specifications
- Training employees involved in the transportation of hazardous materials regarding proper shipping procedures and emergency procedures
- Using labeling and placarding (external signs on transport vehicles), as required
- Providing the necessary means for emergency response on call 24 hours/day

Major Transportation Hazards

Guidance related to major transportation hazards should be implemented in addition to measures presented in the preceding section for preventing or minimizing the consequences of catastrophic releases of hazardous materials, which may result in toxic, fire, explosion, or other hazards during transportation.

In addition to these aforementioned procedures, projects which transport hazardous materials *at or above the threshold quantities*⁹² should prepare a Hazardous Materials Transportation Plan containing all of the elements presented below⁹³.

Hazard Assessment

The hazard assessment should identify the potential hazard involved in the transportation of hazardous materials by reviewing:

- The hazard characteristics of the substances identified during the screening stage
- The history of accidents, both by the company and its contractors, involving hazardous materials transportation

⁹² Threshold quantities for the transport of hazardous materials are found in the UN – Transport of Dangerous Goods – Model Regulations cited above.

⁹³ For further information and guidance, please refer to International Finance Corporation (IFC) Hazardous Materials Transportation Manual. Washington, D.C. December 2000.

- The existing criteria for the safe transportation of hazardous materials, including environmental management systems used by the company and its contractors

This review should cover the management actions, preventive measures and emergency response procedures described below. The hazard assessment helps to determine what additional measures may be required to complete the plan.

Management Actions

- *Management of Change:* These procedures should address:
 - The technical basis for changes in hazardous materials offered for transportation, routes and/or procedures
 - The potential impact of changes on health and safety
 - Modification required to operating procedures
 - Authorization requirements
 - Employees affected
 - Training needs
- *Compliance Audit:* A compliance audit evaluates compliance with prevention requirements for each transportation route or for each hazardous material, as appropriate. A compliance audit covering each element of the prevention measures (see below) should be conducted at least every three years. The audit program should include:
 - Preparation of a report of the findings
 - Determination and documentation of the appropriate response to each finding
 - Documentation that any deficiency has been corrected.
- *Incident Investigation:* Incidents can provide valuable information about transportation hazards and the steps needed to prevent accidental releases. The implementation of incident investigation procedures should ensure that:
 - Investigations are initiated promptly
 - Summaries of investigations are included in a report
 - Report findings and recommendations are addressed

- Reports are reviewed with staff and contractors
- *Employee Participation:* There should be a written plan of action regarding the implementation of active employee participation in the prevention of accidents.
- *Contractors:* The plan should include procedures to ensure that:
 - The contractor is provided with safety performance procedures and safety and hazard information
 - Contractors observe safety practices
 - Verify that the contractor acts responsibly

The plan should also include additional procedures to ensure the contractors will:

 - Ensure appropriate training for their employees
 - Ensure their employees know process hazards and applicable emergency actions
 - Prepare and submit training records
 - Inform employees about the hazards presented by their work
- *Training:* Good training programs on operating procedures will provide the employees with the necessary information to understand how to operate safely and why safe operations are needed. The training program should include:
 - The list of employees to be trained
 - Specific training objectives
 - Mechanisms to achieve objectives (i.e. hands-on workshops, videos, etc.)
 - Means to determine the effectiveness of the training program
 - Training procedures for new hires and refresher programs

Preventive Measures

The plan should include procedures to implement preventive measures specific to each hazardous material offered for transportation, including:

- Classification and segregation of hazardous materials in warehouses and transport units
- Packaging and packaging testing
- Marking and labeling of packages containing hazardous materials
- Handling and securing packages containing hazardous materials in transport units
- Marking and placarding of transport units
- Documentation (e.g. bills of lading)
- Application of special provisions, as appropriate

Emergency Preparedness and Response

It is important to develop procedures and practices for the handling of hazardous materials that allow for quick and efficient responses to accidents that may result in injury or environmental damage. The sponsor should prepare an Emergency Preparedness and Response Plan that should cover:

- *Planning Coordination:* This should include procedures for:
 - Informing the public and emergency response agencies
 - Documenting first aid and emergency medical treatment
 - Taking emergency response actions
 - Reviewing and updating the emergency response plan to reflect changes and ensuring that the employees are informed of such changes
- *Emergency Equipment:* The plan should include procedures for using, inspecting, testing, and maintaining emergency response equipment.
- *Training:* Employees should be trained in any relevant procedures

3.6 Disease Prevention

Communicable Diseases

Communicable diseases pose a significant public health threat worldwide. Health hazards typically associated with large development projects are those relating to poor sanitation and living conditions, sexual transmission and vector-borne infections. Communicable diseases of most concern during the construction phase due to labor mobility are sexually-transmitted diseases (STDs), such as HIV/AIDS. Recognizing that no single measure is likely to be effective in the long term, successful initiatives typically involve a combination of behavioral and environmental modifications.

Recommended interventions at the project level include⁹⁴:

- Providing surveillance and active screening and treatment of workers
- Preventing illness among workers in local communities by:
 - Undertaking health awareness and education initiatives, for example, by implementing an information strategy to reinforce person-to-person counseling addressing systemic factors that can influence individual behavior as well as promoting individual protection, and protecting others from infection, by encouraging condom use
 - Training health workers in disease treatment
 - Conducting immunization programs for workers in local communities to improve health and guard against infection
 - Providing health services
- Providing treatment through standard case management in on-site or community health care facilities. Ensuring ready

access to medical treatment, confidentiality and appropriate care, particularly with respect to migrant workers

- Promoting collaboration with local authorities to enhance access of workers families and the community to public health services and promote immunization

Vector-Borne Diseases

Reducing the impact of vector-borne disease on the long-term health of workers is best accomplished through implementation of diverse interventions aimed at eliminating the factors that lead to disease. Project sponsors, in close collaboration with community health authorities, can implement an integrated control strategy for mosquito and other arthropod-borne diseases that might involve:

- Prevention of larval and adult propagation through sanitary improvements and elimination of breeding habitats close to human settlements
- Elimination of unusable impounded water
- Increase in water velocity in natural and artificial channels
- Considering the application of residual insecticide to dormitory walls
- Implementation of integrated vector control programs
- Promoting use of repellents, clothing, netting, and other barriers to prevent insect bites
- Use of chemoprophylaxis drugs by non-immune workers and collaborating with public health officials to help eradicate disease reservoirs
- Monitoring and treatment of circulating and migrating populations to prevent disease reservoir spread
- Collaboration and exchange of in-kind services with other control programs in the project area to maximize beneficial effects
- Educating project personnel and area residents on risks, prevention, and available treatment
- Monitoring communities during high-risk seasons to detect and treat cases

⁹⁴ Additional sources of information on disease prevention include IFC, 2006; UNDP, 2000, 2003; Walley et al., 2000; Kindhauser, 2003; Heymann, 2004.

- Distributing appropriate education materials
- Following safety guidelines for the storage, transport, and distribution of pesticides to minimize the potential for misuse, spills, and accidental human exposure

3.7 Emergency Preparedness and Response

An emergency is an unplanned event when a project operation loses control, or could lose control, of a situation that may result in risks to human health, property, or the environment, either within the facility or in the local community. Emergencies do not normally include safe work practices for frequent upsets or events that are covered by occupational health and safety.

All projects should have an Emergency Preparedness and Response Plan that is commensurate with the risks of the facility and that includes the following basic elements:

- Administration (policy, purpose, distribution, definitions, etc)
- Organization of emergency areas (command centers, medical stations, etc)
- Roles and responsibilities
- Communication systems
- Emergency response procedures
- Emergency resources
- Training and updating
- Checklists (role and action list and equipment checklist)
- Business Continuity and Contingency

Additional information is provided for key components of the emergency plan, as follows below.

Communication Systems

Worker notification and communication

Alarm bells, visual alarms, or other forms of communication should be used to reliably alert workers to an emergency. Related measures include:

- Testing warning systems at least annually (fire alarms monthly), and more frequently if required by local regulations, equipment, or other considerations
- Installing a back-up system for communications on-site with off-site resources, such as fire departments, in the event that normal communication methods may be inoperable during an emergency

Community Notification

If a local community may be at risk from a potential emergency arising at the facility, the company should implement communication measures to alert the community, such as:

- Audible alarms, such as fire bells or sirens
- Fan out telephone call lists
- Vehicle mounted speakers
- Communicating details of the nature of the emergency
- Communicating protection options (evacuation, quarantine)
- Providing advise on selecting an appropriate protection option

Media and Agency Relations

Emergency information should be communicated to the media through:

- A trained, local spokesperson able to interact with relevant stakeholders, and offer guidance to the company for speaking to the media, government, and other agencies
- Written press releases with accurate information, appropriate level of detail for the emergency, and for which accuracy can be guaranteed

Emergency Resources

Finance and Emergency Funds

- A mechanism should be provided for funding emergency activities.

Fire Services

- The company should consider the level of local fire fighting capacity and whether equipment is available for use at the facility in the event of a major emergency or natural disaster. If insufficient capacity is available, fire fighting capacity should be acquired that may include pumps, water supplies, trucks, and training for personnel.

Medical Services

- The company should provide first aid attendants for the facility as well as medical equipment suitable for the personnel, type of operation, and the degree of treatment likely to be required prior to transportation to hospital.

Availability of Resources

Appropriate measures for managing the availability of resources in case of an emergency include:

- Maintaining a list of external equipment, personnel, facilities, funding, expert knowledge, and materials that may be required to respond to emergencies. The list should include personnel with specialized expertise for spill clean-up, flood control, engineering, water treatment, environmental science, etc., or any of the functions required to adequately respond to the identified emergency
- Providing personnel who can readily call up resources, as required
- Tracking and managing the costs associated with emergency resources

- Considering the quantity, response time, capability, limitations, and cost of these resources, for both site-specific emergencies, and community or regional emergencies
- Considering if external resources are unable to provide sufficient capacity during a regional emergency and whether additional resources may need to be maintained on-site

Mutual Aid

Mutual aid agreements decrease administrative confusion and provide a clear basis for response by mutual aid providers.

- Where appropriate, mutual aid agreements should be maintained with other organizations to allow for sharing of personnel and specialized equipment.

Contact List

- The company should develop a list of contact information for all internal and external resources and personnel. The list should include the name, description, location, and contact details (telephone, email) for each of the resources, and be maintained annually.

Training and Updating

The emergency preparedness facilities and emergency response plans require maintenance, review, and updating to account for changes in equipment, personnel, and facilities. Training programs and practice exercises provide for testing systems to ensure an adequate level of emergency preparedness. Programs should:

- Identify training needs based on the roles and responsibilities, capabilities and requirements of personnel in an emergency
- Develop a training plan to address needs, particularly for fire fighting, spill response, and evacuation

- Conduct annual training, at least, and perhaps more frequent training when the response includes specialized equipment, procedures, or hazards, or when otherwise mandated
- Provide training exercises to allow personnel the opportunity to test emergency preparedness, including:
 - Desk top exercises with only a few personnel, where the contact lists are tested and the facilities and communication assessed
 - Response exercises, typically involving drills that allow for testing of equipment and logistics
 - Debrief upon completion of a training exercise to assess what worked well and what aspects require improvement
 - Update the plan, as required, after each exercise. Elements of the plan subject to significant change (such as contact lists) should be replaced
 - Record training activities and the outcomes of the training

Business Continuity and Contingency

Measures to address business continuity and contingency include:

- Identifying replacement supplies or facilities to allow business continuity following an emergency. For example, alternate sources of water, electricity, and fuel are commonly sought.
- Using redundant or duplicate supply systems as part of facility operations to increase the likelihood of business continuity.
- Maintaining back-ups of critical information in a secure location to expedite the return to normal operations following an emergency.