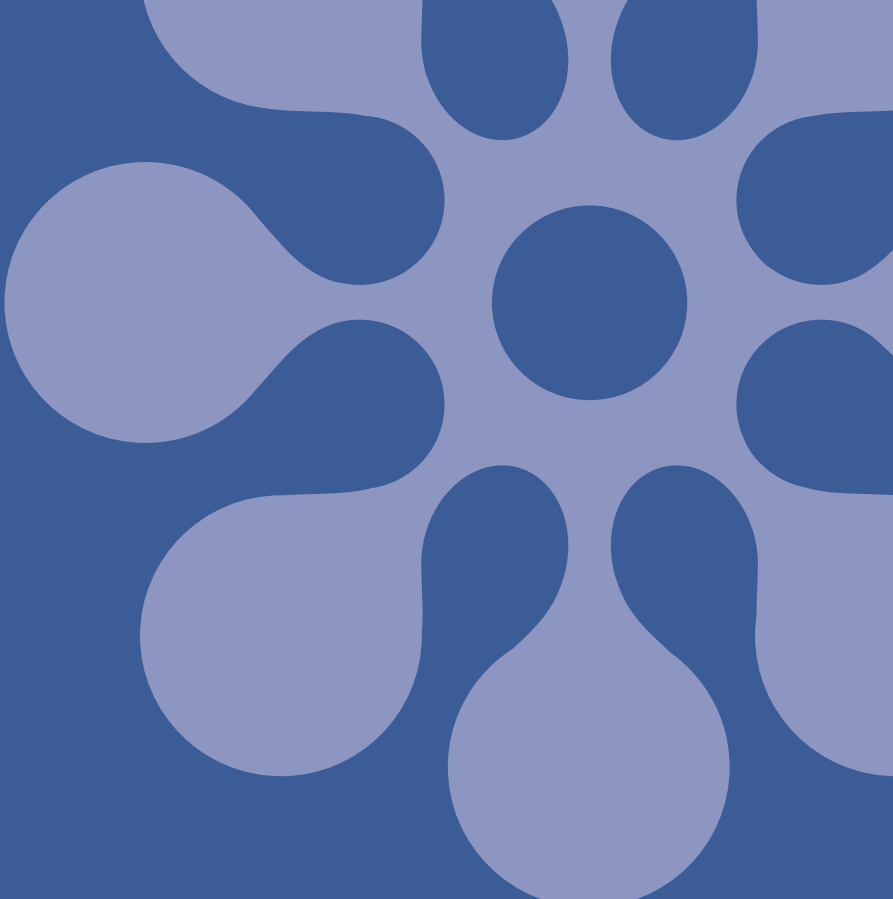




Global Social Compliance Programme

Reference Environmental Audit Process & Methodology

November 2010



About the GSCP

Global Social Compliance Programme

/ GSCP objectives and scope

The Global Social Compliance Programme is a business-driven programme for the continuous improvement of working and environmental conditions in global supply chains. The GSCP was created by and for global buying companies (manufacturers and retailers) wanting to work collaboratively on improving the sustainability (social and environmental) of their often-shared supply base. To this end, these companies seek to harmonise existing efforts to deliver a shared, global and sustainable approach.

The scope of the Programme encompasses:

- social and labour practices,
- site-specific environmental practices (not product related).

The Programme can be applied at all levels of the supply chain.

The Programme is neither a monitoring initiative, nor a substitute to existing systems. **The GSCP will not undertake accreditation or certification activities** as it must remain a non-aligned, neutral reference framework.

/ The GSCP Reference tools

To drive convergence, the GSCP has developed a set of Reference tools and processes that provide a common interpretation, based on best existing practice, of fair labour/social and environmental requirements and their implementation in the supply chain.

/ Users & Usage

These tools are openly available for all to use. Users can include GSCP member and non-member buying companies, suppliers and employment sites. Multi-Stakeholder Initiatives and other initiatives, auditing bodies and other scheme owners can and are encouraged to also use the GSCP Reference tools.

The Reference tools can voluntarily either be:

- integrated by users into their respective systems; or
- utilised by users as a reference against which to compare their existing tools through the GSCP Equivalence Process¹.

/ Responsibility

The GSCP does not monitor nor audit in any way the compliance by a user's supply chain with the GSCP Reference tools or any standards.

The adoption of part or all of one or more Reference tools cannot be put forward as a proof of adequate due diligence. The responsibility of the implementation of these tools, of the monitoring of the user's supply chain's compliance and of any due diligence linked to it, resides with the user. Any use of the GSCP name or logo has to follow the terms established by the GSCP. These terms are available on the GSCP website (www.gscpnet.com).

1. The Equivalence Process is a mechanism by which a social and/or environmental compliance scheme is objectively benchmarked against the requirements defined in one or more GSCP Reference tools, to determine their level of equivalence. Through the Equivalence Process, the GSCP enables the comparison of various standards and schemes against the GSCP Reference tools, aiming at bringing convergence in requirements and approaches and building mutual recognition.

The Consumer Goods Forum

The GSCP is housed by The Consumer Goods Forum, a retailer and manufacturer parity industry body, driven by its members². It brings together retailers, manufacturers and suppliers to collaborate across the value chain to enrich shopper and consumer value in all markets. It supports processes and practices that optimize the value chain as an interrelated whole, in accordance with all anti-trust laws.

2. For more information, please visit www.theconsumergoodsforum.com

Acknowledgments

Thank you to those who contributed to this Reference tool

This Reference tool has been developed by supply chain experts from GSCP member companies, with input from key stakeholders, including other brands and retailers, initiatives and international organisations, auditing and certification bodies and civil society representatives. The GSCP would like to thank all those who have helped with the development and continuous improvement of this Reference tool.



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/ List of appendices:

There are seven reference tools available that complement the audit process described above by providing further reference guidelines and templates for carrying out the described process. These are:

- Appendix 1: GSCP Reference Environmental Self Assessment Questionnaire**
 - Appendix 2: GSCP Reference Environmental Pre-Audit Employment Site Profile**
 - Appendix 3: GSCP Reference Environmental Audit Checks**
 - Appendix 4: GSCP Reference Environmental Alert Notification**
 - Appendix 5: GSCP Reference Environmental Audit Report**
 - Appendix 6: GSCP Reference Environmental Supplementary Audit Information**
 - Appendix 7: GSCP Reference Environmental Summary of Findings and Corrective Actions**
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ABOUT THE GSCP REFERENCE TOOLS ON ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY

Scope & usage:

The reference tools on Environmental Audit Process and Methodology are part of the GSCP set of reference tools designed to provide a common interpretation of environmental requirements and their implementation.

The reference tools on Environmental Audit Process and Methodology detail the requirements that should be met by buying companies and auditors to conduct best practice environmental audits of an Employment Site's performance. The reference tools cover all steps to be taken prior, during and after an audit and include, where relevant, templates to

complement the audit process. They apply to the auditing of sites from all sectors, categories and countries. They are applicable to first party, second party and third party audits.

The reference tools on Environmental Audit Process and Methodology are based on the GSCP Environmental Reference Requirements but can be adopted and tailored to other codes of environmental practice.

The reference tools are not a substitute for existing audit process or existing systems.

Overview of the audit process

The **REFERENCE TOOL ON ENVIRONMENTAL AUDIT PROCESS** is designed to provide best practice guidance for the audit process. After benchmarking existing processes, the members of the Expert Working Group on Audit Process & Methodology developed the following process.

Involvement of suppliers in the audit process

Suppliers should be involved as much as possible in the audit process.

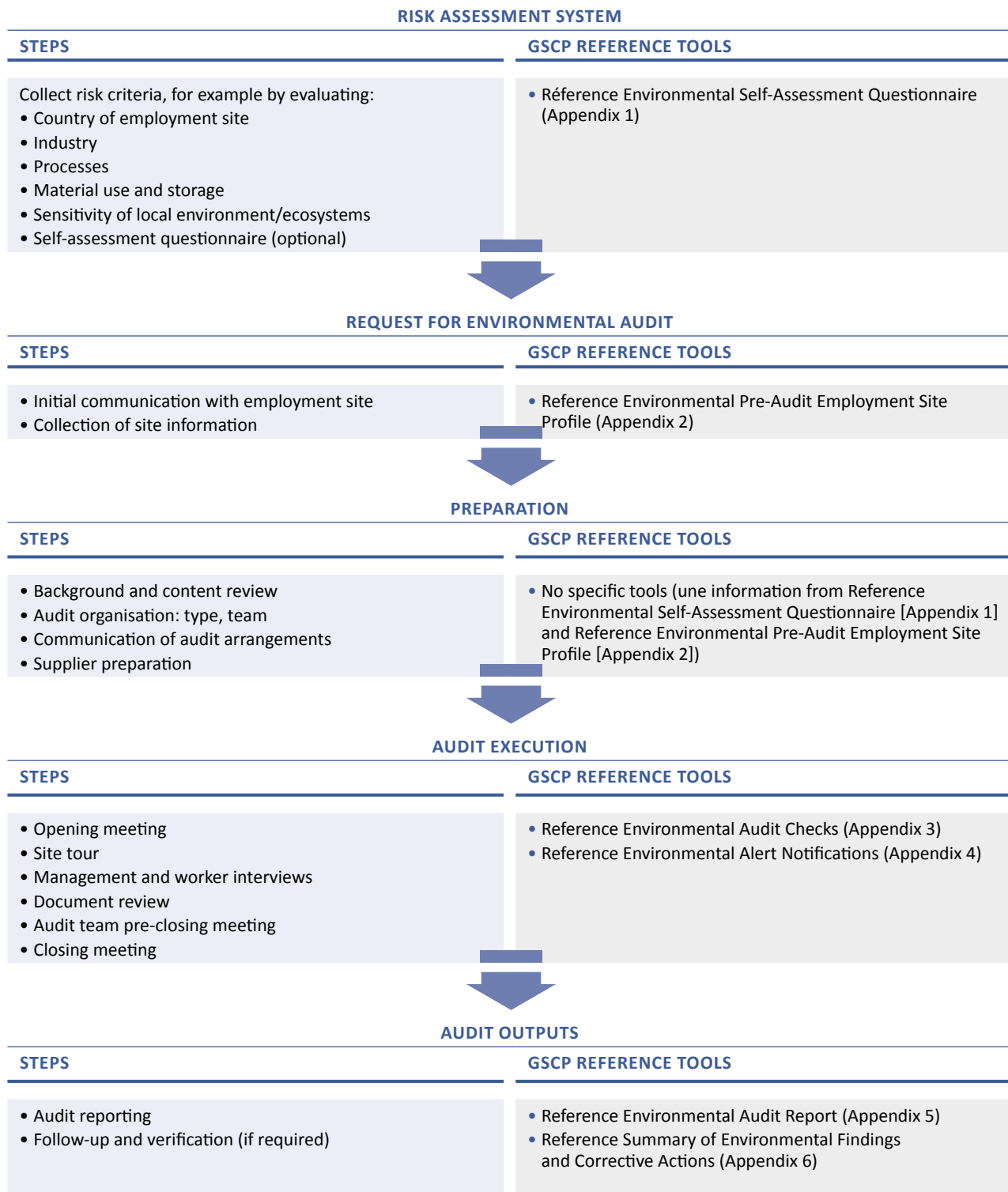
This can be done:

- by sharing briefing notes with the supplier explaining the background, process, applicable codes and audit methodology;

- by developing a Best Practice manual giving examples of "what good looks like" against each topic, with practical advice on ways to address common environmental compliance issues;
- by encouraging suppliers to request environmental compliance audits themselves. This can be promoted as a way of prompting continuous improvement or of demonstrating their own commitment to environmental compliance.



Audit process





1. RISK ASSESSMENT SYSTEM

A buying company should have in place an efficient process to measure environmental compliance and identify potential risks in its supply chain. This will enable the company to focus attention on key areas of potential risk and direct its audit resources accordingly.

Relevant environmental risk criteria may include: geographical area, sensitivity of local environment/ecosystems, employment site function, energy use, emissions to air, land and water, hazardous substances use and storage, waste management, pollution prevention, major incident prevention and management, environmental nuisance, licences and permits,

and/or previous audit results. However, it should be noted that this is not intended to be an exhaustive list.

This information upon which the risk assessment is based should be provided by the supplier or employment site either through a self-assessment questionnaire (Appendix 1) or through other existing tools. The risk assessment approach should ensure that potential risks are prioritised and are appropriate and representative of the employment site and the nature of its activities.

1.1 Self-assessment questionnaire

The self-assessment questionnaire is an optional tool and can be used by:

- a buying company to risk assess suppliers/employment sites (e.g. to provide a basis for the development of an audit programme);
- a supplier or employment sites as an aid to their own risk reviews and/or preparation for their own self audit programmes; and
- an auditor to focus on site investigation on high risk areas.

Companies should communicate the following to employment sites when requesting this information:

- reason for the information request;
- how the risk assessment fits within the audit process;
- to whom to send the completed self assessment (or how to upload the self assessment on to a database);
- timeframe for completion;
- process and timeframe for updating the self-assessment.

A reference self-assessment questionnaire is available in Appendix 1.



2. AUDIT REQUEST

2.1 Launching the audit request

An audit request may be made by:

- the employment site;
- the supplier;
- the buying company;

- any other party with an interest in the commercial relationship and environmental performance of the employment site. For example, industry or monitoring bodies.

Any company/organisation requesting an audit is termed an 'audit requestor'.

2.2 Pre-audit employment site profile

When an audit request is made, the auditor may supply the employment site with a pre-audit employment site profile questionnaire. However, the use of the pre-audit employment site profile questionnaire is at the discretion of the audit requestor. The pre-audit employment site profile questionnaire asks for general information about the site, for example its: location, size, production processes, licences and permits, energy use, sources of emissions to air, land and water, hazardous substances use and storage, waste management, pollution prevention measures, major incident prevention and management and environmental nuisance. This information allows auditors to:

- prepare relevant briefing materials (industry or country-specific);
- plan the assessment, for example in relation to the experience and language capabilities of the audit team members and the required number of auditor days (cf. 3.2.2 Audit length);
- focus the audit on potential high environmental risk areas.

The audit company should communicate the following to each employment site to be audited and any relevant parties, such as agents, in the supply chain:

- the importance of accuracy in completing the pre-audit employment site profile;
- timeframe for completion of the pre-audit employment site profile;
- to whom to send the completed pre-audit employment site profile.

Recommended timeframe:

- the auditor should supply the pre-audit employment site profile to the employment site within five working days of the audit being confirmed;

- the pre-audit employment site profile should be completed and returned to the auditor two weeks from the date of the request being made;
- if an audit is requested and scheduled in less than two weeks, the auditor and employment site should work together to ensure the pre-audit employment site profile is returned as soon as possible, and in any event before the audit is carried out.

A pre-audit employment site profile should have four main areas:

1. supplier overview;
2. employment site overview;
3. employment site details;
4. a summary of activities routinely undertaken by contractors on-site.

Where the employment site itself is the audit requestor, the auditor should ensure that an agreement is in place with the employment site to allow the auditor to communicate audit findings and alert notifications to relevant customers.

A reference pre-audit employment site profile is available in Appendix 2.



3. PREPARATION

3.1 Background and context review

The auditing organisation or auditor must be fully aware of the conditions, challenges and issues prevailing in the country, region and industry where the audit is to be conducted. The auditing organisation and/or the auditor should be knowledgeable and aware of the issues which could impact the environment in the country, region or industry/industrial sector concerned. The auditing organisation or auditor should have a detailed awareness of the local and national

environmental legislation and regulatory requirements that may apply to the employment site. This should include an understanding of non-mandatory schemes and certifications such as those for environmental management systems (EMSs) to the internationally recognised standards of ISO14001 or EMAS. The auditing organisation or auditor should also have knowledge of what constitutes operational best practice within the industrial sector in question.

3.2 Audit organisation

3.2.1 Audit type

Audits should take place during a period when the employment site is in operation.

Audits may be:

- unannounced (the employment site has no prior warning of the audit);
- semi-announced (whereby the employment site is aware that an audit will take place during a given time period, but the actual date of audit is not communicated);
- announced (at a mutually convenient date agreed with employment site).

In all cases, the buying company should clearly communicate its audit policy and process (including the reference standard against which audits are conducted as well as the expectations in case of non-compliance detected) to suppliers and employment sites as part of its commercial terms. The buying company's policy may include provision for all types of audit under certain circumstances.

The risk assessment process can be used to influence the type of audit selected. For example, the audit requestor may decide to execute semi-announced audits in all high risk employment sites. However, other considerations such as the relationship with the employment site should be taken into account since semi-announced and unannounced audits can negatively impact supply chain relationships.

> Unannounced audits

Unannounced audits allow auditors to assess the operations and activities at the employment site in their 'normal state', since the employment site has not had the opportunity to make any special preparations.

To minimise the event that - due to the lack of special preparations - necessary information and personnel may not be available on the day of the visit to complete the audit, the buying company should clearly communicate its policy on unannounced audits to suppliers and employment sites. The policy should state that:

- audits may occur at any time on an unannounced basis;
- employment sites may be required to provide self assessment information on a regular basis and this information must be accurate;
- auditors presenting the correct credentials should be allowed full access to the employment site;
- the necessary records should always be kept on the employment site or be readily available (cf. 3.4 Supplier Preparation).

> Semi-announced audits

Buying companies should clearly communicate their policy on semi-announced audits to suppliers and employment sites. The policy should include the following points:

- the buying company will specify a window during which an audit may take place. Audit windows may range between 2 weeks and 2 months;
- all employment sites are required to provide up-to-date and accurate pre-audit and, when requested, self assessment information at the beginning of the window;
- auditors presenting the correct credentials during the audit window should be allowed full access to the employment site;
- the necessary records should be kept at the employment site during the window.



> Announced audits

The right to perform an announced audit should be a normal part of the commercial relationship. However there is a risk that employment sites may make special preparations for the audit and best practice is to use a mix of announced, semi-announced and unannounced audits to mitigate this risk. Buying companies should clearly communicate their policy on announced audits to suppliers and employment sites. The policy should include the following points:

- the buying company will agree an audit date with the employment site in advance;
- the employment site is required to provide up-to-date and accurate pre-audit and, when requested, self assessment information in advance of the audit;
- auditors presenting the correct credentials on the date of the audit should be allowed full access to the employment site;
- the necessary records and the concerned personnel should be available at the employment site on the day of the audit.

3.2.2 Audit length

The number of auditor days at the employment site should be based on, for example, the size and complexity of the site and the type of operations with the potential to impact the environment. The length of the audit should allow sufficient time to undertake a site tour of the complete site, interview a number of workers, including individuals who have direct environmental roles and responsibilities and to undertake a review of applicable documentation. The length of the audit should be agreed between the audit requestor and the auditor based on existing knowledge of the site and area and the information provided in the Self-Assessment and/or Pre-Audit Employment Site Profile questionnaire.

In the case of agricultural businesses, consideration should be given to the size and geographical spread of the business and the number of growing locations to ascertain person days required.

The following provides an *indication* of the length of audit for different sites:

SITE DESCRIPTION	INDICATIVE LENGTH OF AUDIT
Less than a 50 employees, single small geographical area site, low pollution/hazard potential (no hazardous substances handled or emissions to air/land/water), simple manufacturing/processing operations	1-2 person days on site
50-500 employees, larger single geographical site or more than one site, higher pollution/hazard potential (e.g. handling hazardous substances, on-site waste treatment activities)	2-3 person days on site
500+employees, large single geographical site or multiple sites, high inherent pollution- hazard potential (e.g. handling highly hazardous substances on site), complex processing operations	4-6 person days on site

However, the information provided in the table above is intended as an indication only. The actual length of audit should be agreed between the audit requestor and the auditing company.

3.2.3 Audit team

The audit should be conducted by a competent environmental auditor, who may be self-employed or be employed by a commercial organisation, NGO or industry body³. Auditors and auditing bodies should be selected based on:

- audit training and skills;
- audit experience;
- local and industry knowledge;

- language skills;
- ethnic/national background reflecting that of the workforce;
- reputation;
- integrity;
- commitment to improving environmental compliance and performance.

To prevent any conflict of interest, the auditor must not have any connection with the employment site. It would be recommended that an audit be performed by two auditors, particularly if the site is remote and/or there is the potential for safety/security issues to be associated with the audit.

3. The GSCP has launched an Expert Working Group that works exclusively on auditor competence. Its role is to identify and gather best practice in that area in order to build reference requirements for recognition of auditors and auditing bodies.



3.3 Communicating the audit arrangements

3.3.1 Information for the employment site

The buying company and/or auditor should communicate the following information to the employment site at least 2 weeks before the audit. This should be communicated in writing and in the relevant local language.

- Confirmation of receipt of the Pre-Audit Employment Site Profile and any further information required from the employment site.
- Identity of the audit requestor.
- Information about the audit requestor's policies towards environmental compliance and the requirements and code of conducts against which the employment site is being audited.
- Introduction of the audit team.
- The audit agenda including:
 - / timetable;
 - / topics to be covered.
- Key personnel invited to participate in the audit, including but not limited to:
 - / management;
 - / engineering/maintenance;
 - / environmental;
 - / manufacturing/operations;
 - / purchasing/procurement.
- Information which the employment site should communicate to relevant workers **before** the audit covering the audit process, purpose, ground-rules for worker interviews, confidentiality of worker interviews.
- List of documents (where applicable) that the employment site will need to make available to the audit team on the day of the audit, including:
 - / management structure (e.g. organogram);
 - / environmental committee meeting minutes;
 - / employee handbooks;
 - / previous environmental reports/Corrective Action Plan Report;
 - / employment site layout/floor plan;
 - / maps of the surrounding area, if available;
 - / information on nearby protected habitats (e.g. local nature reserves) including distance from site, if available;
 - / information on the site geology and hydrogeology, if available;
 - / company environmental policies;
 - / government/agency Inspection Reports, e.g. environmental compliance, etc.;

- / procedures (e.g. waste handling and disposal, spill containment etc.);
- / training records;
- / details of permits, consents and licences (or documented exemptions where applicable) for:
 - water abstraction;
 - effluent wastewater discharges;
 - storm water discharges;
 - emissions to air;
 - chemical and fuel storage;
 - on-site waste management and storage; and
 - off-site waste disposal information including contractor's licences;
- / hazardous substances list/inventory;
- / safety data sheets for hazardous substances;
- / emission sources inventories (e.g. emissions to air, land and water);
- / inspection/service logs and inspection reports for environmental-critical equipment e.g. abatement equipment etc.;
- / spill/incident log and remedial steps taken including correspondence with authorities regarding e.g. spills, leaks, odour, noise etc.;
- / environmental emergency procedures;
- / inventory (or similar) of air emission points;
- / air emission monitoring log/results;
- / greenhouse gas data (use, release etc.);
- / energy use data;
- / water sources (e.g. from abstraction borehole), uses (e.g. process water, cooling etc.) and consumption data;
- / employment site drainage plan;
- / wastewater monitoring log/results;
- / waste documentation including manifests for off site disposal, waste contractor licences and permits etc.;
- / site audits of waste contractors;
- / bulk tank inventory (including contents, capacity etc.);
- / bund/secondary containment inventory;
- / tank/bund inspection logs/reports;
- / tank/bund integrity testing logs/reports;
- / asbestos survey reports, asbestos register, management plan and inspection reports;
- / ozone depleting substances (ODS) inventory and inspection logs/reports;
- / polychlorinated biphenyls (PCBs) inventory and inspection logs/reports;
- / ionizing radiation sources registration, disposal records and inspection records;



- / intrusive soil and groundwater investigation reports and on-going monitoring requirements;
- / major incident risk assessments and/or incident reports;
- / nuisance/complaints log;
- / notices of violation or fines from a regulating agency;

- / communications with environmental regulating agencies/ authorities relating to environmental violations and pollution incidents (air, water, effluent, wastes, odour and noise).

3.3.2 Sample Audit Agenda

CLIENT NAME	AUDIT DATE(S)	JOB N°
Employment site name and address		
DAY 1 – DATE		
DURATION	AUDITOR 1	AUDITOR 2
Morning	Opening meeting & plant tour Site tour: • Internal production areas • Internal areas including boiler room, compressor house, waste handling areas etc. • External areas (e.g. waste storage, wastewater treatment plant) and including site perimeter survey • Worker interviews	Site tour: • Internal production areas • Internal areas including boiler room, compressor house, waste handling areas etc. • External areas (e.g. waste storage, wastewater treatment plant) and including site perimeter survey • Worker interviews
Lunch time	Lunch break/Auditors' meeting	
Afternoon	One-to-one Interviews: • Environmental manager • Engineering/maintenance manager and or department personnel • Manufacturing/operations manager • Procurement/purchasing personnel • Representatives from contractors on-site	Document review
	Clarification/Auditor meeting	
	Closing meeting/End of the audit	



3.4 Supplier preparation

Employment site management should ensure that:

- all documentation is available on the day of the audit. This includes information and documents that are usually stored at another location (e.g. a central office where environmental data or records are held such as waste documentation or monitoring results);
- relevant personnel are at the employment site;
- supervisors and managers are instructed to allow unobstructed access to auditors.

Sample communication

On *(insert date)*, representatives from *(insert audit company)* will be visiting *(insert employment site name)* to assess environmental performance and compliance. The representatives will be looking at the following areas:

- environmental management systems;
- energy use and Greenhouse Gas (GHG) emissions;
- water use;
- wastewater effluent;
- emissions to air (including ozone depleting substances (ODS));
- waste management;
- pollution prevention/hazardous and potentially hazardous substances;
- major incident management;
- contaminated land/soil and groundwater pollution prevention;
- land use and biodiversity;
- nuisance.

3.4.1 Information for workers

Clear information about the audit should be communicated by the employment site to applicable workers explaining the purpose of the visit and the process. This information should be available in the principal languages spoken by workers and should include:

- purpose and scope of the audit;
- introduction to the auditors and their role (emphasising they are independent and external);
- process including confidentiality of worker interviews (where required);
- contact details for the auditor and for any whistle-blowing facility supported by the audit requestor.

The visit will primarily consist of meetings with management, a facility inspection, and document reviews.

A limited number of worker interviews with identified workers who have specific roles and responsibilities for managing environmental issues or environmental compliance will also be undertaken. Worker interviews may also be undertaken to establish the level of awareness of environmental issues across the facility and to help identify any issues or good practice on-site. The interviews are strictly confidential and the identity of workers who participate will remain anonymous.

You may be asked questions by the representatives from *(insert audit company)* as they walk around *(insert employment site name)*. The selection of workers is based on a representative sample and you are not required to participate in interviews.

If you would like to get in touch with the representatives from *(insert audit company)* to discuss the audit or any other issues, please do not hesitate to get in contact using the contact details below:

(Insert contact details of audit company)



4. AUDIT EXECUTION

The audit should include the following:

- opening meeting;
- employment site tour (and perimeter survey) – this may require visits to separate geographical locations if these are part of the activities operated by the employment site relevant to the products being produced for the buying company requesting the audit;
- management and worker interviews;
- document review;

4.1 Opening meeting

The opening meeting must be conducted in the language spoken by management. It should be attended by relevant people including:

- environmental Manager (or similar);
- senior site management;
- managers responsible for key functions, e.g. Production Manager, Maintenance Manager.

This should be formally presented in a format agreed with the audit requestor to ensure the audit requestor's perspective is clearly communicated in an appropriate tone.

In the opening meeting, the audit team should:

- introduce the audit team;
- explain the purpose and scope of the audit, including:
 - / potential benefits to the employment site (opportunity for management to identify and manage risk, opportunity to engage in continuous improvement, opportunity to meet customer needs, opportunity to save money through environmental improvement, improved compliance with environmental legislation etc.);
 - / clarify that the purpose of an audit is continuous improvement;
 - / the standard against which the audit will be conducted (the GSCP Environmental Reference Requirements and customer requirements, applicable local, national and international laws, whichever are the more stringent);
- explain that the minimum expectation on the employment site in relation to the audit is transparency;
- outline the audit process;

- audit team pre-closing meeting;
- closing meeting, including summary of findings;
- agreement of findings.

This chapter sets out best practice for each step of the audit.

As a general principle, the conduct of the audit team at all times must be in the best interest of the workers.

- establish the audit agenda and indicate the personnel required at each stage of the inspection;
- review the information provided in the pre-audit employment site profile (including previous corrective action report and follow-up actions);
- provide the employment site management with the list of the documents to be reviewed during the audit [[see section 3.3.1 Information for the Employment Site](#)];
- confirm key workers and personnel who have responsibilities for environmental issues and their availability for interview/participation during the course of the audit;
- confirm any special arrangements/precautions required for the employment site tour;
- confirm permission to take photographs.

Agree process for communicating issues as they arise during the audit. It is best practice to communicate issues as they arise to build consensus around findings and corrective actions and allow management to:

- provide additional evidence where necessary;
- address issues immediately;
- confirm the importance of attendance at the closing meeting and ensure that all key personnel can attend;
- provide an opportunity for questions and to address concerns;
- confirm the process for presenting audit findings to the employment site and confirm how audit findings will be followed-up.



4.2 Employment site tour

4.2.1 Process

The purpose of the employment site tour is to enable the audit team to observe the current practices in all areas of the employment site and to form a view of how these practices measure up to the GSCP Environmental Reference Requirements, applicable legal and regulatory requirements and other applicable requirements, e.g. customer requirements/policies. The findings from the tour are triangulated with evidence from management and key personnel interviews and document review.

As a general principle, the auditor should be able to visit all the areas of the employment site and should set the pace of the tour. However, in some cases, employment sites may prohibit visitors from walking unaccompanied through employment site production areas or forbid photography for reasons of safety or commercial confidentiality. The auditor should note restrictions on access or photography in the audit report, and if restrictions seem unreasonable should escalate according to the audit requestor's policy.

Auditors should make every effort to ensure production is not disrupted during the employment site tour, whilst ensuring that they are able to view the production area during busy production periods. It should be possible to move around the site without delaying or halting production.

The ability for management to continue production at the site during a visit is crucial to gaining an accurate idea of current practices and to securing management co-operation for the remainder of the visit. Further, the safety of the auditor and the persons accompanying them on the site tour is of paramount importance. Auditors should keep this in mind during the site tour. In order to achieve this, the auditor should for example:

- ask that they be accompanied by only one or two people; usually the site or environmental manager, or whoever is best placed to answer questions on environmental issues (e.g. facility maintenance or operations representatives);
- be aware of site traffic and stay on dedicated pedestrian routes (wherever possible);
- avoid walking where workers are trying to move or transport product from one area to another.

The audit team should walk around the employment site, external areas and site perimeter (where feasible), internal production areas, raw material/chemical and waste storage areas, bulk storage areas, boiler rooms, compressor houses and other applicable areas with managers in order to:

- understand the work done at the employment site;
- evaluate environmental practices;

- identify potential sources and impacts to the environment;
- note other physically observable evidence that relate to other areas of the standards;
- identify and confirm off-site contractors or suppliers that provide environmental services to the employment site (e.g. waste contractors, maintenance service providers of environment-related equipment);
- observe management systems and practices, including the relationship and interactions between management and workers.

The team should raise issues as they arise during the employment site tour, giving managers the opportunity to seek clarification, respond, and provide explanations or further evidence.

The auditors should look to identify areas where there is high potential for pollution or other environmental incidents. The audit should consider routine site operations and activities, but also non-routine operations and activities, e.g. maintenance, cleaning and operations and activities undertaken on-site by contractors.

4.2.2 Perimeter survey

A perimeter survey should be undertaken, where feasible, to provide supplementary information about the employment site and its local context and to identify specific risk issues to the environment and/or the surrounding areas.

The perimeter survey should focus on:

- the general nature of the surrounding environment (e.g. rural, industrial, residential neighbourhood, business district, etc.);
- the nature of immediate neighbouring facilities (e.g. manufacturing, waste treatment/disposal, etc.);
- areas of potential off-site impact to the employment site (e.g. pollution or contamination associated with off-site bulk storage tanks, off-site waste storage areas, etc.);
- areas of potential impact from on-site activities (e.g. distressed vegetation, the nature and quality of external surface areas etc.);
- other facilities located on the employment site property (e.g. waste water treatment plants, electricity substations etc.);
- other production units within the employment site property, which are not part of the scope of the audit.



4.3 Interviews

Interviews with managers and a limited number of worker interviews with key workers who have specific roles and responsibilities for managing environmental issues or environmental compliance will be undertaken. Worker interviews may also be undertaken to establish the level of awareness of environmental issues across the facility and to help identify any issues or good practice on-site. The interviews are strictly confidential and the identity of workers who participate will remain anonymous.

4.3.1 Worker interviews

Points raised by workers should be fed back as early as possible to members of the team carrying out management interviews or document review to facilitate verification.

Audit team members carrying out worker interviews must have the skills to make workers feel at ease. It is best practice to use interviewing techniques to encourage interviewees to identify the issues of most importance to them. In any case, the interviewer should use appropriate body language (e.g. avoid sitting behind a desk, make regular eye contact, smile, etc.)

Selection:

- the interviewer should aim to talk to a number relevant workers, taking into account:
 - / different departments, including workers associated with managing waste, undertaking environmental monitoring as well as production workers;
 - / health & safety representatives/personnel, where appropriate;
 - / environmental committee representative(s), if applicable;
 - / new employees/trainees (to evaluate training quality);
 - / employees from different shifts.

Location:

- formal interviews should take place in a quiet, private area away from management offices with no representatives of management present;
- informal interviews may also take place during the physical tour of the employment site, at lunch time or in breaks;
- where possible, worker interviews should be held in the interviewee's language, where this is not possible worker interviews may be conducted through a translator. Translators must be independent of employment site management and must speak the language concerned.

Protection of workers:

- auditors should ensure that problems raised by workers are discussed with management in a non-attributable way. Auditors must ensure that the comments they report cannot be traced back to an individual worker;
- auditors/worker interviewers should leave a contact telephone number, preferably their mobile number and their local office phone number, with all workers interviewed so that workers can alert the worker interviewer if there are reprisals or intimidation;
- the auditor should keep a confidential note of who is being interviewed.

Interview structure:

- introduction: The audit team should introduce themselves and communicate the purpose of the audit. They should assure interviewees that all information shared during the interview will remain unattributed;
- confidentiality: No manager or representative of the employment site, apart from the workers concerned, should be present during any worker interview.



4.4 Document review

In countries where there are data protection requirements (e.g. all EU countries), auditors should respect data protection requirements during reviews of environmentally-related documents. Auditors should also, where applicable,

obtain the written permission of workers to view personnel files during any interviews (e.g. when reviewing training records etc.). Workers should be assured that they are able to refuse permission to view their files if they so wish.

Example data protection consent form

In order to administer your employment, your employer collects and uses certain personal information (such as your contact details, roles and responsibilities and training records/attendance). This information constitutes your personnel file.

(Insert Audit Company Name) has been engaged to review the environmental practices of your employer for the purposes of ensuring compliance with the *(Insert Code(s))*

about environmental standards. As part of this review, *(Insert Audit Company Name)* may need access to your personnel file.

You have confirmed that you are happy for *(Insert Audit Company Name)* to have access to your personnel file for the purposes of the review.

Please sign below to give your permission.

4.4.1 Document sampling

The documentation requested by the auditor should be available on-site, including, but not limited to, applicable licences/permits, internal and external reports, emission sources inventories, spill or incident release records and notifications, maintenance records, integrity testing records, waste documentation, environmental committee meetings or minimisation projects, monitoring data and training materials. Auditors should review documentation from the previous 2 years (e.g. monitoring data, maintenance records), however, older documentation may reasonably be requested where it is necessary to demonstrate compliance. If records for the previous 2 years are not available, the employment site should explain why this is the case. For example, the employment site has been operational for less than 2 years.

The auditor should go through a comprehensive document trail including the following (this is not an exhaustive list):

- management structure (e.g. organogram);
- environmental committee meeting minutes;
- employee handbooks;
- previous environmental reports/Corrective Action Plan Report;
- employment site layout/floor plan;
- maps of the surrounding area, if available;
- process diagrams;
- information on nearby protected habitats (e.g. local nature reserves) including distance from site, if available;

- information on the site geology and hydrogeology, if available;
- company environmental policies;
- government/agency Inspection Reports, e.g. environmental compliance, etc.;
- procedures (e.g. waste handling and disposal, spill containment etc.);
- training records;
- details of permits, consents and licences (or documented exemptions where applicable) for:
 - / water abstraction;
 - / effluent wastewater discharges;
 - / storm water discharges;
 - / emissions to air;
 - / chemical and fuel storage;
 - / on-site waste management and storage; and
 - / off-site waste disposal information including contractor's licences;
- hazardous substances list/inventory;
- safety data sheets for hazardous substances;
- emission sources inventories (e.g. emissions to air, land and water);
- inspection/service logs and inspection reports for environmental-critical equipment e.g. abatement equipment etc.;
- spill/incident log and remedial steps taken including correspondence with authorities regarding e.g. spills, leaks, odour, noise etc.;



- environmental emergency procedures;
- inventory (or similar) of air emission points;
- air emission monitoring log/results;
- greenhouse gas data (use, release etc.);
- energy use data;
- water sources (e.g. from abstraction borehole), uses (e.g. process water, cooling etc.) and consumption data;
- employment site drainage plan;
- wastewater monitoring log/results;
- waste documentation including manifests for offsite disposal, waste contractor licences and permits etc.;
- site audits of waste contractors;
- bulk tank inventory (including contents, capacity etc.);
- bund/secondary containment inventory;
- tank/bund inspection logs/reports;
- tank/bund integrity testing logs/reports;
- asbestos survey reports, asbestos register, management plan and inspection reports;
- ozone depleting substances (ODS) inventory and inspection logs/reports;
- polychlorinated biphenyls (PCBs) inventory and inspection logs/reports;

4.5 Alert notifications

Where a 'critical' non-compliance (whether a non-compliance with legal requirements or the GSCP Environmental Reference Requirements) is identified, the auditor should, wherever possible, inform the audit requestor as soon as possible. If the audit requestor is on site, the auditor should communicate the critical non-compliance immediately. This will enable the audit requestor and the employment site to work together to plan an appropriate and timely resolution to the issue.

- ionizing radiation sources registration, disposal records and inspection records;
- intrusive soil and groundwater investigation reports and on-going monitoring requirements;
- major incident risk assessments and/or incident reports;
- nuisance/complaints log;
- notices of violation or fines from a regulating agency;
- communications with environmental regulating agencies/authorities relating to environmental violations and pollution incidents (air, water, effluent, wastes, odour and noise).

Particular emphasis should be placed on evidence that there is a systematic approach to managing all aspects of the relevant codes or requirements.

4.4.2 Document inconsistencies

Inconsistencies between different types of documents and worker testimony may be considered a critical non-compliance, depending on the potential environmental issues and risks presented by those inconsistencies. Where deemed to be a critical non-compliance, it should be raised appropriately with employment site management and as per the Alert Notification process.

If a non-compliance related to permit or licence requirements/conditions is identified, the audit team should identify the context of the issue, and its frequency, and the department(s) concerned both at the closing meeting and in the audit report.

If an auditor believes they might be at risk as a result of communicating a critical non-compliance, the audit team should wait until it is removed from that situation before issuing the alert notification.

Examples of non-compliances can be found in paragraph "4.6.1 Non-compliances, Observations and Good Practices Evaluation"

A reference alert notification is available in Appendix 4.



4.6 Audit team pre-closing meeting

The audit team should meet before the closing meeting to discuss the findings of the audit (interviews, document checks, employment site tour) and agree the performance level demonstrated by the site in relation to each of the 11 defined Performance Areas and identify inconsistencies, non-compliances, observations, and good practice. The analysis of evidence gathered is a pre-requisite to the closing meeting. It must be completed even if the auditor is alone at the employment site.

The audit team should prepare for the closing meeting by identifying and agreeing:

- the performance level demonstrated by the site in relation to each of the 11 defined Performance Areas;
- level 1 Non-compliances identified including:
 - / their status/severity (critical, major, minor);
 - / supporting evidence;
 - / recommended corrective actions, how these can be verified, and a suggested timeframe for completion;
- systematic problems and issues from one-off, isolated, non-systematic issues;
- the root cause of problems, where possible;
- good practice examples;
- a prioritisation of issues;
- any requests for additional information or evidence.

A note on Corrective Actions

Audit requestors (companies and/or individuals) may take a number of different approaches with respect to corrective actions, for example:

- require auditors solely to identify corrective actions and require the employment site to develop the corrective action plan following the audit or
- require auditors to identify evidence-based findings and work with the employment site to develop a corrective action plan or
- require auditors to identify evidence-based findings, develop the appropriate corrective action and agree with the employment site on their follow-up.

However, reference is made here to both 'findings and corrective actions' on the understanding that the identification of corrective actions may be required.

The reference Summary of Findings and Corrective Actions (Appendix 6) has been designed to provide a structure to the audit team's findings and help the audit team develop a corrective action plan and structure a closing meeting.

The reference Summary of Findings and Corrective Actions includes:

- audit findings: Confirmation of performance level in relation to each of the 11 Performance Areas, summary of non-compliances, good practice, and evidence found;
- classification of non-compliances;
- reference to the applicable code of conduct and/or law which has been contravened;
- recommended corrective actions: Auditors suggestion on how the audit findings can be resolved;
- person/party responsible for corrective action;
- verification method:
 - / a desk-based follow up may be used to verify corrective actions for minor non-compliances but provide less assurance than a follow-up audit. Desk-based verification should check corrective actions through photos, copies of certificates/licences/permits, monitoring data, etc. submitted by the employment site. Desk-based follow-up cannot be used where actions need to be verified through worker testimony;
 - / follow-up audit are recommended for critical or major non-compliances or when corrective actions can be evaluated only through interviews and extensive documentation reviews [\[see section 5.4 for guidance on conducting follow-up audits\]](#);
- timescale for completion: The amount of time required for the issue to be closed. The time allocated for corrective actions to be completed should be appropriate, realistic and timely.

The Summary of Findings and Corrective Actions should:

- be clearly described and presented in both English and the language spoken by the employment site management;
- be distributed as follows:
 - / one original, signed copy for the employment site manager;
 - / a second original, signed copy retained by the auditor together with other audit documentation;
 - / a hard or soft copy to the audit requestor.

4.6.1 Confirmation of performance level and evaluation of non-compliances, observations and good practices

Auditors should confirm the level that the employment site demonstrates in relation to each of the 11 Performance Areas and the evidence upon which this is based (an employment site can demonstrate different levels of performance against different Performance Areas).



For the employment site to be identified as meeting a particular performance level in relation to a Performance Area, it must be meeting *all* of the individual requirements in that (and any preceding) performance level. For example, a site cannot achieve performance level 2 unless it is meeting all of the level 1 and level 2 requirements. An employment site can be fully meeting a particular performance level and be demonstrating that it meets *some* of the requirements of the next performance level.

Auditors should classify non-compliances against Level 1 Requirements and observations and examples of good practice against all performance level.

Should any critical or major legal non-compliance be identified in relation to a particular Performance Area, then the employment site cannot be considered as meeting the basic requirements associated with Level 1 for that Performance Area.

In relation to Level 1 Requirements, Auditors should record non-compliances, whether they be non-compliances with legal requirements or non-compliances with the Environmental Framework Requirements themselves.

Non-compliances should be categorised as:

- minor non-compliance;
- major non-compliance; or
- critical non-compliance.

The auditor should record in the Audit Report (Appendix 5) whether a non-compliance identified is a non-compliance with specific legal requirements.

If no non-compliances are identified, then the Employment Site is considered to have met the Level 1 Requirements for that Particular Performance Area. However, should any critical or major non-compliances be identified in relation to a particular Performance Area, then the employment site cannot be considered as meeting the basic requirements associated with Level 1 for that Performance Area. If only minor non-compliances are identified, then it will be judgement decision by the Auditor (and possibly by the Audit Requestor) as to whether the Employment Site is considered to have met the Requirements of Level 1 in relation to that particular Performance Area.

Non-compliances and observations should be classified according to:

- the frequency of the problem or whether the issue is an isolated occurrence;
- the potential severity of the problem;
- the probability of recurrence of the problem.

The auditor must be able to justify his/her classification with detailed evidence.

Follow-up audits are recommended for critical or major non-compliances or when corrective actions can be evaluated only through interviews and extensive documentation reviews [\[see section 5.4 for guidance on conducting follow-up audits\]](#).

4.6.1.1 Categorisation examples

The below provides **guidance** on how to categorise different issues as minor, major or critical non-compliances. The list gathers examples and **is not intended to be exhaustive**. It gives an indication of how various issues should be considered in light of the reference guidelines and the reference code and taking into account the potential environmental impact of the issues identified and the regulatory regime of the country. These examples are for illustration only; auditors should still use their discretion when classifying non-compliances.

Minor

- basic environmental management structure and defined management responsibilities are in place, however, this is not documented;
- site has identified and is managing its potentially significant aspects and impacts but has not documented this process/ the results;
- relevant inventory/register established in relation to a particular Performance Area, but not actively maintained;
- an occasional or isolated compliance issue e.g. missing records/documentation in relation to permit/consent/licence requirements;
- the site has a mechanism to remain up to date with applicable local legal requirements, but has not documented this process;
- an issue which presents a risk to the environment (low risk) (either on-site or the surrounding areas);
- site has a procedure to ensure that external third parties utilised by the site for environmental matters (e.g. waste removal/disposal) are appropriately licensed, but has not documented this process;
- occasional or isolated instances of missing monitoring/performance data (that is not a legal requirement).

Major

- basic management structure/defined management responsibilities not in place, either in relation to overall environmental management or particular Performance Area;
- site has identified that it has potentially significant environmental aspects/impacts, but has not acted on this information;
- site is not aware of its legal requirements in relation to a particular performance area;



- site has no mechanism for remaining up to date with applicable legal requirements;
- site not aware of relevant permit/ licence/ consent/exemption requirements;
- breaches of legislation or permit/licence/consent requirements which represents risk of moderate harm to the environment e.g. exceedance of wastewater discharge limits, exceedance of air emission limit concentration etc.;
- a systemic breach or violation of a legal requirement;
- a breach of a legal requirement or environmental permit/ licence/consent which is considered likely to attract regulator intervention;
- site has not confirmed that all external third parties utilised by the site for environmental matters (e.g. waste removal/ disposal) are appropriately licensed;
- relevant inventory/register not established in relation to a particular Performance Area;
- consumption/generation data not collected in relation to a particular Performance Area that is relevant to the site.

Critical

- an environmental aspect which represents imminent risk of serious or significant impact to the environment (e.g. major damage to a local ecosystem, closure of a potable water abstraction point, known on-site or off-site impact to soil, groundwater or surface water);
- site has identified that permit/licence/consent/exemption required, but has not obtained it;
- relevant inventory/register not established in relation to a particular Performance Area, which has the potential to result in non-compliance with permit/licence/consent requirements or which results in mis-management of environmental matters with the potential for significant impact to the environment;
- site currently under threat of prosecution, fine and/or enforcement in relation to an environmental issue;
- an attempt to pervert the course of the audit through fraud, coercion, deception or interference;
- a systemic violation of a legal requirement that has attracted (or could likely attract) regulator intervention (e.g. continued illegal disposal of waste materials, either on-site or off-site);
- auditors denied access or obstructed from conducting a proper audit;

- non-operation of critical abatement equipment e.g. air emission scrubber, incineration unit etc.;
- evidence of the deliberate provision of false information to auditors or regulators so as to disguise non-compliances with permit/licence/consent requirements;
- performance or monitoring data manipulated or misreported to intentionally mislead regulators;
- a major non-compliance from a previous audit that has not been addressed or for which no significant improvement has been made by the time of a follow up audit and which has increased the level of environmental risk, e.g. of causing incidents;
- site knowingly utilises illegal/unlicensed external third parties in relation to environmental matters (e.g. waste removal/disposal);
- site has not provided identified and/or provided training to employees on environmental matters which represent a serious or significant impact to the environment.

Critical non-compliances should trigger an alert notification [\[see section 4.5\]](#).

An Observation

- a possible issue which could develop into a non-compliance if action is not taken by the Employment Site (i.e. a potential non-compliance);
- an issue, on which the auditor has some evidence to indicate that it may be present, but is not confirmed by more than one data point;
- an opportunity for improvement e.g. how the employment site can meet the requirements of the next performance level.

Good Practice

A positive, innovative or novel approach, technology or a process to managing environmental issues in relation to a particular Performance Area that improves performance over and above the standard.

Level 2 and Level 3 findings

Given that the GSCP Environmental Reference Requirements at levels 2 and 3 are intended to drive performance improvement. As such, the Auditor should record only whether the Employment Site has met or not met a particular Requirement, together with observations and examples of good practice, if applicable. Where the auditor identifies that a Requirement is not met, they should provide a short description as to why.



4.7 Closing meeting

The purpose of the closing meeting is to go through the findings, agree them and agree the corrective action plan which sets out areas for improvement, actions and timeframes. Corrective actions should focus on long term sustainable solutions which take account of the root cause of any problem. This meeting should involve all those attending the opening meeting and should:

- reconfirm the purpose of the assessment;
- confirm the performance level for each of the 11 Performance Areas;
- recognise good practices;
- agree any non-compliances;
- record non-compliances which can be corrected immediately;

- answer questions that management have;
- explain when the full report will be completed and who it will be sent to;
- get sign-off on the Summary of Findings and Corrective Actions by both auditor and employment site:
 - / when agreed with the audit requestor, a copy of the corrective action plan should be left with management;
 - / the corrective actions should include a timeframe for completion and the type of verification needed;
- if the Summary of Findings and Corrective Actions is not agreed, the auditor should leave a copy with the employment site and report disputed points to the audit requestor, copying the employment site.



5. AUDIT OUTPUTS

5.1 Audit report

The context, findings, issues and actions, where applicable, against each of the 11 Performance Areas should be reported to the audit requestor. The report should be available in English to ensure that it can be shared with various stakeholders, as well as in the language of the management wherever this is possible. The report should be delivered to the audit requestor within 10 business days of the audit.

The report should include:

- a summary of the auditors' evaluation of the employment site's performance against each of the 11 Performance Areas;
- identified non-compliances which indicate that the employment site is not meeting Level 1 of the GSCP Environmental Reference Requirements;
- observations and good practices.

For each environmental Performance Area, the report should:

- describe the current situation including which of the GSCP Environmental Reference Requirements the site is currently meeting;
- provide evidence and information to substantiate the findings;

- for each non-compliance or observation, provide a:
 - / description of the non-compliance or observation and its frequency;
 - / evidence found to substantiate it;
 - / classification to applicable law, code of conduct, etc.

The report must not include any information that could be used to identify specific workers – such as names, ID numbers, job descriptions and/or work location.

The report should include photos⁴ of the employment site such as:

- outside general overview;
- inside general overview;
- key activities and processes that have potential environmental impact;
- waste handling and storage areas;
- hazardous substance storage areas;
- areas of potential impact to soil and groundwater including staining and distressed vegetation;
- bulk storage tanks and secondary containment;

4. Photographs should only be taken with the permission of the employment site as they may contain or reveal confidential information.



- wastewater treatment areas;
- abatement equipment;
- good practices where these can be photographed;
- non-compliances where these can be photographed.

A reference audit report is available in Appendix 5.

Unless agreed by all parties in writing, the audit organisation will not distribute the report to any entities except the audit requestor. However, the audit requestor should share the report with the employment site/customer/supplier as soon as possible in order to facilitate co-operation on continuous improvement.

5.2 Supplementary audit information

Auditors may feel the need to separately report to the audit requestor in the event that, for example, the auditor has:

- information that is too sensitive for the audit report itself;
- concerns which cannot be substantiated through evidence and/or interviews;
- commentary/insight on the attitude of management towards the non-compliances or where management was obstructive to the audit process;

- concerns about the possibility of falsified records.

The process for reporting such information should be agreed between the audit requestor and the auditor in advance of the audit.

A template for reporting additional information is available in Appendix 7, Reference Environmental Supplementary Audit Information.

5.3 Information management

Within 10 days of the completion of each audit, the auditor should provide the following documents to the audit requestor:

- the Pre-Audit Employment Site Profile;
- the completed audit report, including photographs;
- summary of findings (and corrective actions, if applicable);
- supplementary audit information, where applicable;
- copies of any alert notifications that were issued during the audit.

The auditor or audit organisation should:

- be available after the audit to further clarify or explain decisions and ratings to the employment site and/or audit requestor as needed;
- have an appeals procedure should the employment site or audit requestor challenge one of the findings and in case of any complaint by the employment site against the auditor.

5.3.1 Audit records

All documents (unless they are “business confidential”), hand written notes, signed Summary of Findings and Corrective Actions and audit report should be retained by the auditor for reference for at least five years.

It is recommended that the auditor retain copies of at least the following documents assuming that this has been agreed between the audit requestor and the employment site:

- official documents on legal status of the company (business licence);
- insurance policies/certificates (relating to buildings and people);

- environmental licences and permits;
- surveys (e.g. asbestos surveys);
- key environmental monitoring results;
- communications or notices of violations issued by regulatory authorities;
- evidence relating to non-compliances, wherever possible.

If copying facilities are not available, auditors should photograph these documents.

Data and privacy laws in some countries prohibit copies being made of certain documents; in such cases, auditors should respect these restrictions.



5.4 Audit follow-up

Audit follow-up focuses on the corrective actions agreed during the audit and closing meeting, if applicable (i.e. the identification of corrective actions was part of the audit scope).

Where such corrective actions were agreed:

- the auditor will be responsible for verifying whether actions have been taken and recording verification of actions;
- for corrective actions where desk-based verification is adequate, the auditor will review evidence submitted [\[see section 4.6\]](#);
- where a follow-up audit is required, the length of time taken at the follow-up should be related to the number and severity of issues to be verified;

Follow-up audits may be commissioned by the audit requestor, typically in relation to critical or major non-compliances identified in relation to Level 1 issues, and/or when corrective actions can be evaluated only through interviews and extensive documentation reviews.

- a partial follow-up audit does not include a full review but only focuses on the issues identified in the corrective action plan;
- a full follow-up audit should include a full review of all areas of the standard audit process, including the complete re-sampling of documents, conducting interviews and the employment site tour. The auditor should focus on identifying changes which would address issues raised in the initial report, but also investigate potential additional issues.

Typically, a full follow-up audit would only be necessary where the non-compliances identified in the initial audit indicated that an environmental management system was not in place or that there were extensive/systematic failings associated with the site's existing environmental management system.

Follow-up Audit Guidance:

- the audit should be carried out once the deadline for addressing all of the issues has passed;
- follow-up audits should generally take place within six months of the date of the initial audit;
- a follow-up report should be issued. This is an updated version of the original report, with all new issues and updates to previous issues clearly highlighted;
 - / for all sections where non-compliances have previously been raised there should be a clear explanation of the evidence reviewed, comments on applicability and effectiveness and whether the issue is now considered closed or remains open;
 - / improvements should be mentioned even if the non-compliances are not fully corrected;
 - / if new non-compliances are found these should be recorded and marked as "new" and should be reported in as much detail as they would have been in the initial report;
 - / a desk-based follow up may be used to verify corrective actions for minor non-compliances but provide less assurance than a follow-up audit. Desk-based verification should check corrective actions through photos, copies of certificates, invoices, submitted by the employment site. Desk-based verification cannot be used where actions need to be verified through worker testimony.

Glossary of terms

A

Announced audit

An audit which is undertaken on a specified date that is chosen in agreement with the employment site.

Audit requestor

Generic term referring to any entity that has requested and commissioned an audit, including the requesting entity's customers (where known) where agreements allowing such disclosure are in place.

C

Code of conduct

A set of standards concerning environmental practices adopted by a company and applied to its suppliers, employment sites and subcontractors.

Comply/compliance

To meet local environmental laws and regulations and/or the GSCP Environmental Reference Requirements, applicable codes of conduct and international labour standards requirements.

Continuous improvement

The recurring process of enhancing the environmental management system in order to achieve improvements in overall environmental performance consistent with an organisation's environmental policy.

Corrective action

Measures taken to eliminate a non-compliance identified during an audit.

Corrective action plan

A plan of action drawn up at the end of an audit that records what measures have to be taken and within what time limit to remedy the non-compliance.

E

Employment site

An individual/specific production site, farm, winery, quarry, mine, service site etc. (including where applicable selected sub-contractors/homeworkers).

EMAS

The European Union (EU) Eco-Management and Audit Scheme (EMAS), is a voluntary initiative designed to help companies evaluate, report on and improve their environmental performance. Its aim is to recognise and reward those organisations that go beyond minimum legal compliance and continuously improve their environmental performance. It is a requirement of the scheme that participating organisations regularly produce a public environmental statement that reports on their environmental performance.

EMS – Environmental Management System

A management system is a set of interrelated elements used to establish policy and objectives and to achieve those objectives.

Environmental audit (hereafter referred to as 'audit')

Systematic, independent and documented process for obtaining evidence and evaluating it objectively to determine the extent to which environmental standards criteria are met.



F

First party audit

An internal audit that an organisation performs on itself to evaluate conformity with procedures or a defined standard, for example an audit could solely be against regulatory requirements.

Follow-up audit

An audit to assess the effectiveness of corrective actions, undertaken to address issues from a previous audit. A follow-up audit can be either a full or a partial follow-up audit (see definitions below).

Full follow-up audit

An audit to assess the effectiveness of corrective actions, undertaken to address issues from a previous audit. The audit should include a full review of all areas of the standard audit process, including the complete re-sampling of documents, conducting interviews and the employment site tour.

G

Good practice

A positive, innovative or novel approach, technology or a process to managing environmental issues in relation to a particular Performance Area that improves performance over and above the standard.

Greenhouse gas intensity

The quantity of greenhouse gases emitted, for example, per unit of production. This is normalised data (as opposed to absolute data), which allows comparison of greenhouse gas emissions even if there are increases or decreases in production.

Grey water (also referred to as grey water or gray water)

Wastewater, typically generated from domestic-style activities, for example washing machines, showers, bathtubs, hand washing, and sinks, together with some industrial processes, which is recycled/re-used and put to a different use, for example, use in toilet flushing, cleaning or irrigation. The grey water may require some treatment (physical, biological or chemical) to ensure that it is of sufficient quality for the new use. Grey water must NOT be used as potable (drinking) water.

I

Initial audit

The first audit undertaken on an employment site which assesses compliance against a specific code of conduct, or is requested by a specific customer.

M

Management

People who identify and achieve organizational objectives through the deployment of appropriate resources. A manager can have responsibilities in one or more of five key areas: managing activities; managing resources; managing information; managing people; and managing him- or herself at the same time as working within the context of the organizational, political, and economic business environments.

P

Partial follow-up audit

An audit to assess the effectiveness of corrective actions, undertaken to address issues from a previous audit. The audit does not include a full review, but only focuses on the issues identified in the corrective action plan.

R

Re-audit

A new audit which is performed on an employment site that has already been audited under the same code of conduct or by the same customer.

S

Second party audit

An external audit of one organisation (e.g. supplier of products or services) performed by another organisation (typically a customer for those products or services) to evaluate conformity with procedures or a defined standard.



Semi-announced audit

An audit which is undertaken on an un-specified date, scheduled within a set period (between 2 weeks and 2 months), which is agreed with the employment site. The employment site will be informed that an audit will take place during this period but will not be informed of the exact date.

Stakeholder

Any person, company, organisation or other party that is affected by the activity and/or operations of a company.

Subcontractor

An individual or a group of individuals to whom a contractor outsources the manufacture of a product or part-product.

Summary of findings and corrective actions

A summary document which provides information about all issues and other findings from an audit, as well as corrective actions and time frames for completing these.

Supplier

Any contract partner which supplies the retailer/brand with goods or services.

T

Target (environmental)

A detailed performance requirement (quantified where possible and applicable to all or parts of the organisation), that arises from the setting of environmental objectives and which needs to be set and met in order to achieve those objectives.

A specific task in the achievement of an environmental objective. Environmental targets must be stated in a measurable and quantifiable manner.

ISO14001:2004

Targets can be based on absolute data or normalised data.

Third party audit

An external audit of an organisation, conducted by an independent party or body, to evaluate conformity with procedures or a defined standard. The audit may, for example, be on behalf of another organisation or be performed by a certification body to assess compliance with the international management systems standard ISO14001.

U

Unannounced audit

An audit carried out without prior warning to the employment site.

V

Verification

Examination of claims made about the actual observance of code or standard provisions by suppliers or of claims made about the activities that a company undertakes to give effect to its code. Verification implies that participating companies must have internal auditing or monitoring systems in place.

W

Worker

A person working on an employment site, in any capacity.

APPENDIX 1

GSCP Reference Environmental Self-Assessment Questionnaire

This tool forms part of the GSCP set of reference tools designed to provide a common interpretation of local and international environmental standards and requirements and environmental reference codes (if available and applicable). The Environmental Reference Requirements reflect a common understanding of good environmental practice and are applicable to all raw material processing, agricultural, manufacturing and logistics sites in the supply chain. The Environmental Reference Requirements provide a model for a site in the supply chain to demonstrate continuous improvement in its environmental performance from basic compliance to leading-edge performance (across three defined 'levels' for eleven different performance areas).

The reference tools on Environmental Audit Process and Methodology are based on the GSCP Environmental Reference Requirements but can be adopted and tailored to other codes of environmental practice.

The self-assessment questionnaire can be used by:

- a buying company to risk assess suppliers/employment sites (e.g. to provide a basis for the development of an audit programme);
- a supplier or employment sites as an aid to their own risk reviews and/or preparation for their own self audit programmes; and
- an auditor to focus on site investigation on high risk areas.

The self assessment reference tool below is structured in accordance with the GSCP Draft Environmental Framework Requirements but is not designed to be used as a self audit against these Requirements. Buying companies or suppliers may tailor the reference self-assessment to their specific by adding or removing questions to meet their specific requirements.

Companies should communicate the following to employment sites when requesting this information:

- reason for the information request;
- how the risk assessment fits within the audit process;
- to whom to send the completed self assessment (or how to upload the self assessment on to a database);
- timeframe for completion;
- process and timeframe for updating the self-assessment;
- confidentiality arrangements when sharing information provided in this questionnaire.

Employment sites should be encouraged to answer the self assessment questionnaire in full and add commentary and/or evidence against each point rather than just marking Yes or No.



APPENDIX 1: GSCP REFERENCE ENVIRONMENTAL SELF ASSESSMENT QUESTIONNAIRE

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REFERENCE SELF-ASSESSMENT QUESTIONNAIRE

COMPANY OVERVIEW

Name of company which owns the employment site to be audited

Ownership type (e.g. joint venture, partnership, corporation, foreign investment, other):

Registered head office address

Ownership type (e.g. joint venture, partnership, corporation, foreign investment, other)

Year company formed

Does the company own any other employment sites?

If yes, how many and in which countries?

Annual turnover of company (USD\$)

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GSCP Reference Environmental Alert Notification ☐ GSCP Reference Environmental Audit Checks ☐ GSCP Reference Environmental Pre-Audit Employment Site Profile ☐ **GSCP Reference Environmental Self Assessment Questionnaire** ☒ GSCP Reference Environmental Audit Information ☐ GSCP Reference Environmental Audit Report ☐ GSCP Reference Environmental Summary of Findings and Corrective Actions ☐



■ APPENDIX 1: GSCP REFERENCE ENVIRONMENTAL SELF ASSESSMENT QUESTIONNAIRE

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■ **GSCP Reference Environmental Self Assessment Questionnaire** □ GSCP Reference Environmental Pre-Audit Employment Site Profile □ GSCP Reference Environmental Audit Checks □ GSCP Reference Environmental Alert Notification
□ GSCP Reference Environmental Audit Report □ GSCP Reference Environmental Supplementary Audit Information □ GSCP Reference Environmental Summary of Findings and Corrective Actions

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EMPLOYMENT SITE OVERVIEW

Employment site name

Full address

Country

Employment site website

Employment site manager

Name of person completing
this questionnaire

Job Title/Role of person completing
this questionnaire

Telephone number of person completing
this questionnaire

Email address of person completing
this questionnaire



APPENDIX 1: GSCP REFERENCE ENVIRONMENTAL SELF ASSESSMENT QUESTIONNAIRE

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EMPLOYMENT SITE PRODUCTION SYSTEMS AND PROCESSES

Industry sector:

Principal products:

Main production processes
(e.g. Stitching, labelling, injection, moulding, baking, harvesting, dyeing etc.):

Main raw materials used:



■ APPENDIX 1: GSCP REFERENCE ENVIRONMENTAL SELF ASSESSMENT QUESTIONNAIRE

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EMPLOYMENT SITE SIZE AND LOCATION

What is the employment site size?

acres/hectares/m² (please state units used)

Approximately, what area of the site is covered by buildings (%):

What age are the buildings on-site (if known)?

Is the site owned or leased?

☐ Owned ☐ Leased

Are there any other parties on site as tenants or sub-tenants?

☐ Yes ☐ No

If yes, please name them

Describe surrounding land use (residential, industrial, rural etc.) and identify neighbouring facilities and types:

North:

South:

East:

West:

State the distance to, and size of, the nearest residential communities

Are there any sensitive habitats nearby, such as nature reserves, national parks, wetlands or sites of special scientific interest?

If yes, please describe

What is the location of the nearest surface water course (river, stream, canal, lake, reservoir, pond, etc.)?

Are there any boreholes/wells or natural springs either on-site or in the surrounding area?

When was the site first developed from greenfield (if known)?

Please summarise the previous land-uses of the site (if known), e.g. type of operation, occupier of the site etc.?



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1. ENVIRONMENTAL MANAGEMENT SYSTEMS

1.1	Does your site have a policy defining its approach to environmental management? <i>If yes, please attach</i>	☐ Yes ☐ No
1.2	Is your site committed to any industry or governmental environmental codes? <i>If yes, please provide details</i>	☐ Yes ☐ No
1.3	Does your site have a dedicated manager who is responsible for environmental issues? <i>If yes, please specify exact title and name</i>	☐ Yes ☐ No Name: Title:
1.4	Has your site assessed its environmental risks?	☐ Yes ☐ No
1.5	Does your site have a system or process for assessing environmental risks associated with the introduction of new (or changes to existing) materials, processes or activities?	☐ Yes ☐ No
1.6	Does your site set environmental objectives and targets to improve environmental performance (e.g. reductions in water use, reductions in energy use, reductions in wastes generated)? <i>If yes, please provide details</i>	☐ Yes ☐ No
1.7	Does your site have a system in place that will alert relevant personnel to changes in any applicable environmental laws?	☐ Yes ☐ No
1.8	Does your site have defined standards for suppliers (e.g. suppliers of services, contractors, raw material suppliers) that prescribed expected levels of environmental performance? <i>If yes, please attach a copy</i>	☐ Yes ☐ No
1.9	Does your site have a procedure in place to evaluate and select suppliers (e.g. suppliers of services, contractors, raw material suppliers) based on their ability to meet the standards mentioned in Q1.8? <i>If yes, please attach a copy</i>	☐ Yes ☐ No
1.10	Is there a site environmental committee? <i>If yes, does this include representatives from various business functions?</i>	☐ Yes ☐ No ☐ Yes ☐ No

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ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

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1. ENVIRONMENTAL MANAGEMENT SYSTEMS

1.11	Does your site have procedures in place to control the way work is done or activities are completed that address environmental issues?	☐ Yes ☐ No
1.12	Does your site have specific written environmental procedures (e.g. for waste handling and disposal, spill prevention etc.)?	☐ Yes ☐ No
1.13	Are all workers (including temporary workers) trained on relevant environmental matters and how they, as individuals, may impact the environment?	☐ Yes ☐ No
1.14	Is this training repeated on a regular basis? <i>If yes, how often does this occur?</i>	☐ Yes ☐ No
1.15	Does your site have records of the names of all personnel trained and the dates they were trained?	☐ Yes ☐ No
1.16	Are visitors provided with any instructions or information in relation to environmental matters and site rules?	☐ Yes ☐ No ☐ N/A
1.17	Are contractors/third party workers provided with training in relation to environmental matters and site environmental procedures?	☐ Yes ☐ No ☐ N/A
1.18	Does your site have a process for periodically reviewing its environmental performance? <i>If yes, please describe</i>	☐ Yes ☐ No



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2. ENERGY USE, TRANSPORT AND GREENHOUSE GASES (GHGS)

2.1	What energy sources does your site use (e.g. mains electricity, locally generated electricity, coal, oil, gas etc.)? <i>Please explain what they are and what they are used for</i>	Sources:
2.2	Does your site purchase any energy from renewable sources (e.g. solar, wind etc.)? <i>If so, please provide further details</i>	☐ Yes ☐ No
2.3	Does your site have systems or procedures in place that seek to reduce the site's environmental impact from: • Energy? • Transport? • Greenhouse gases (GHGs)	☐ Yes ☐ No ☐ N/A ☐ Yes ☐ No ☐ N/A ☐ Yes ☐ No ☐ N/A
2.4	Does your site provide training to relevant personnel in relation to: • Energy? • Transport? • Greenhouse gases (GHGs)?	☐ Yes ☐ No ☐ N/A ☐ Yes ☐ No ☐ N/A ☐ Yes ☐ No ☐ N/A
2.5	Does your site monitor and track energy consumption? <i>If yes, please specify how it tracks energy use and provide approximate consumption figures for the energy sources listed in 2.1 on an annual basis/12 month period</i>	☐ Yes ☐ No ☐ N/A
2.6	Is your site part of a recognised compliance scheme for greenhouse gas (GHG) emissions trading? <i>If yes, please provide details of the scheme (e.g. who runs it and the employment site's membership reference)</i>	☐ Yes ☐ No ☐ N/A
2.7	Has your site set any targets in relation to increase efficiency of: • Energy use? • Transport use? • Greenhouse gas (GHG) generation?	☐ Yes ☐ No ☐ N/A ☐ Yes ☐ No ☐ N/A ☐ Yes ☐ No ☐ N/A
2.8	Does your site conduct site energy audits? <i>If yes, how often are these undertaken and when was the most recent audit?</i>	☐ Yes ☐ No How often: Date of most recent audit:
2.9	Is your site required to monitor or calculate energy and/or GHG emissions to demonstrate compliance with applicable permits?	☐ Yes ☐ No ☐ N/A
2.10	Does your site monitor or routinely assess emissions of GHGs associated with site processes/activities, fuel use for on-site or off-site transportation, agricultural activities etc.?	☐ Yes ☐ No ☐ N/A
2.11	Does your site monitor or routinely assess emissions of fluorinated-gases (F-gases)?	☐ Yes ☐ No ☐ N/A



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3. WATER USE		
3.1	What sources of water are used at your site (e.g. mains drinking water, mains process water, borehole abstraction, surface water abstraction etc.)? <i>Please explain what they are and what they are used for</i>	Sources:
3.2	If your site uses water abstracted from on-site boreholes or from rivers, streams, lakes etc. does it require a permit or licence for this activity? <i>If yes, are there limits and/or conditions associated with this permit/licence?</i>	☐ Yes ☐ No ☐ N/A ☐ Yes ☐ No ☐ N/A
3.3	Does your site have systems or procedures in place that manage water consumption/use?	☐ Yes ☐ No ☐ N/A
3.4	Does your site provide training to relevant personnel in relation to water use?	☐ Yes ☐ No ☐ N/A
3.5	Has your site set any targets in relation to reducing water consumption?	☐ Yes ☐ No ☐ N/A
3.6	Does your site monitor and track water consumption? <i>If yes, please specify how it tracks water use and provide approximate consumption figures for all water sources on an annual basis/12 month period</i>	☐ Yes ☐ No
	Is monitoring and tracking of water consumption a legal requirement for your site?	☐ Yes ☐ No
3.7	Does your site conduct water audits (or other similar exercises) to identify where water is being used, whether there are any leaks, whether water is being wasted etc.? <i>If yes, how often are these undertaken and when was the most recent audit?</i>	☐ Yes ☐ No How often: Date of most recent audit:
3.8	Does your site use 'grey' water? (e.g. water typically generated from domestic-style activities, for example washing machines, showers, bathtubs, hand washing, and sinks, together with some industrial processes) and recycled on-site)	☐ Yes ☐ No
3.9	Is your site free from any fines, prosecution or warning by the regulators in relation to water use? <i>If not, please provide details (including reason for fine/prosecution/warning, the date on which it occurred, the cost of any fine/details of any custodial sentence or restriction on site activities and whether the matter has been resolved or is ongoing)</i>	☐ Yes ☐ No



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4. WASTEWATER / EFFLUENT		
4.1	What wastewater/effluent streams are generated at your site? <i>Please describe</i>	Streams:
4.2	Is there a dedicated drainage system on-site? <i>If yes, please describe the drainage systems present</i>	☐ Yes ☐ No ☐ N/A
4.3	Where does wastewater/effluent from your site discharge to (municipal sewer, river, lake, sea etc.)? <i>Please describe</i>	
4.4	Does your site treat wastewater/effluent prior to off-site discharge? Is there a dedicated onsite wastewater/effluent treatment plant?	☐ Yes ☐ No ☐ N/A ☐ Yes ☐ No ☐ N/A
4.5	Does your site hold the necessary licence or permit for discharging wastewater/effluent via the drainage system? <i>If so, please provide brief details</i>	☐ Yes ☐ No ☐ N/A
4.6	If your site does have a permit/licence, has your site been fully in compliance with the requirements and conditions of the permit/licence for the last three years?	☐ Yes ☐ No ☐ N/A
4.7	Is your site required to sample/test wastewater discharges? <i>If yes, please provide details including frequency of testing and whether this is undertaken on-site or outsourced to an external contractor</i>	☐ Yes ☐ No ☐ N/A
4.8	Does your site have systems or procedures in place that address wastewater generation and management?	☐ Yes ☐ No ☐ N/A
4.9	Does your site provide training to relevant personnel in relation to wastewater management?	☐ Yes ☐ No ☐ N/A
4.10	Has your site set any targets in relation to reducing the volume of wastewater generated?	☐ Yes ☐ No ☐ N/A
4.11	Is your site free from fines, prosecution or warning by the regulators in relation to wastewater management? <i>If not, please provide details (including reason for fine/prosecution/warning, the date on which it occurred, the cost of any fine/details of any custodial sentence or restriction on site activities and whether the matter has been resolved or is ongoing)</i>	☐ Yes ☐ No



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5. EMISSIONS TO AIR

5.1	What are the main point source emissions to air at your site (point source emissions are those which discharge via a chimney, stack, extraction system or vent)? <i>Please describe</i>	Sources:
5.2	What are the main fugitive emissions to air at your site (fugitive emissions are those which are not controlled (e.g. emissions from a plating bath into the general factory atmosphere and/or unplanned emissions, e.g. leaks from equipment, pipes etc.)?) <i>Please describe</i>	Sources:
5.3	Are there abatement or pollution prevention devices (e.g. filters, scrubbers) on point source emissions to air? <i>If so, please describe the abatement techniques employed at the site</i>	☐ Yes ☐ No ☐ N/A
5.4	Does your site hold the necessary licences or permits for emissions to air? <i>If so, please provide brief details</i>	☐ Yes ☐ No ☐ N/A
5.5	If your site does have a permit/licence, has your site been fully in compliance with the requirements and conditions of the permit/licence for the last three years?	☐ Yes ☐ No ☐ N/A
5.6	Does your site sample/test emissions to air? <i>If yes, please provide details including frequency of testing and whether this is undertaken by site personnel or outsourced to an external contractor</i>	☐ Yes ☐ No ☐ N/A
5.7	Does your site have an inventory of equipment on-site that contains ozone depleting substances (ODSs) (e.g. air conditioning equipment that contains refrigerants)? <i>If so, please describe the types and quantities of refrigerants/ODSs present on-site</i>	☐ Yes ☐ No ☐ N/A

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5. EMISSIONS TO AIR

- 5.8** Is your site phasing-out the use of ODSs? ☐ Yes ☐ No ☐ N/A
 Is the phase-out a legal requirement for your site? ☐ Yes ☐ No ☐ N/A
If yes, please provide details of phasing out

- 5.9** Is there a routine or periodic maintenance/inspection programme in place to test for leaks of ODSs? ☐ Yes ☐ No ☐ N/A
If yes, is this conducted by a specialist external contractor? ☐ Yes ☐ No ☐ N/A

- 5.10** Does your site have systems or procedures in place that manage:
 • Emissions to air? ☐ Yes ☐ No ☐ N/A
 • ODSs? ☐ Yes ☐ No ☐ N/A

- 5.11** Does your site provide training to relevant personnel in relation to:
 • Emissions to air? ☐ Yes ☐ No ☐ N/A
 • ODSs? ☐ Yes ☐ No ☐ N/A

- 5.12** Has your site set any targets in relation to reducing:
 • Emissions to air? ☐ Yes ☐ No ☐ N/A
 • Quantity of ODSs used on-site? ☐ Yes ☐ No ☐ N/A

- 5.13** Is your site free from any fines, prosecution or warning by the regulators in relation to emissions to air or ODSs? ☐ Yes ☐ No
If not, please provide details (including reason for fine/prosecution/warning, the date on which it occurred, the cost of any fine/details of any custodial sentence or restriction on site activities and whether the matter has been resolved or is ongoing)



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6. WASTE MANAGEMENT

6.1	Does your site generate hazardous waste? Typically, hazardous waste is waste that could cause harm to public health and/or the environment because of its chemical, physical or biological characteristics (e.g., it is flammable, explosive, toxic, radioactive, or infectious). <i>If yes, please list</i>	☐ Yes ☐ No
6.2	What are the main non-hazardous waste your site generates? <i>Please list</i>	
6.3	Does your site have systems or procedures in place that address waste management?	☐ Yes ☐ No ☐ N/A
6.4	Are site waste audits undertaken (to identify what wastes are generated where and to identify what opportunities there may be for reducing waste or improving the management of waste)? <i>If yes, how often are these undertaken and when was the most recent audit?</i>	☐ Yes ☐ No How often: Date of most recent audit:
6.5	Are waste materials recycled (either on-site or off-site)? <i>If yes, please provide details</i>	☐ Yes ☐ No
6.6	Is your site required to be registered as a waste producer with the regulatory authorities? <i>If yes, please provide details</i>	☐ Yes ☐ No
6.7	Are hazardous wastes separated from non-hazardous waste streams? <i>If yes, please describe</i>	☐ Yes ☐ No ☐ N/A
6.8	Does your site treat wastes on-site prior to off-site disposal? <i>If yes, are you required to have a licence or permit to undertake this activity?</i>	☐ Yes ☐ No ☐ Yes ☐ No ☐ N/A
6.9	Does your site burn wastes on-site?	☐ Yes ☐ No

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6. WASTE MANAGEMENT

6.10	Does your site bury or dispose of wastes on-site?	☐ Yes ☐ No
6.11	Does your site use external waste contractors?	☐ Yes ☐ No
	<i>If yes, is there a choice of which waste contractor company your site can use?</i>	☐ Yes ☐ No ☐ N/A
6.12	If external waste contractors are used, does your site undertake regular checks/audits of those contractors?	☐ Yes ☐ No ☐ N/A
6.13	Are waste contractors required to be licensed by a regulator or local authority?	☐ Yes ☐ No ☐ N/A
6.14	Does your site retain copies of waste contractor licences and permits on-site?	☐ Yes ☐ No ☐ N/A
6.15	Does your site retain records of off-site transfer, treatment and disposal of your wastes?	☐ Yes ☐ No ☐ N/A
	<i>If yes, how often are these retained for?</i>	Retention period:
	<i>If no, does your site know the final destination of its wastes?</i>	☐ Yes ☐ No ☐ N/A
6.16	Does your site provide training to relevant personnel in relation to waste management?	☐ Yes ☐ No ☐ N/A
6.17	Has your site set any targets in relation to reducing the volume of waste generated?	☐ Yes ☐ No ☐ N/A
6.18	Is your site free from any fines, prosecution or warning by the regulators in relation to waste issues?	☐ Yes ☐ No
	<i>If not, please provide details (including reason for fine/prosecution/warning, the date on which it occurred, the cost of any fine/details of any custodial sentence or restriction on site activities and whether the matter has been resolved or is ongoing)</i>	



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7. POLLUTION PREVENTION / HAZARDOUS AND POTENTIALLY HAZARDOUS SUBSTANCES

7.1	Does your site store, use or handle hazardous or potentially hazardous substances? <i>If yes, what are the main ones?</i>	☐ Yes ☐ No
	<i>If yes, does it maintain an inventory of those hazardous substances?</i>	☐ Yes ☐ No ☐ N/A
7.2	Does your site have systems or procedures in place that address pollution prevention and the management of hazardous and potentially hazardous substances? <i>If yes, please describe</i>	☐ Yes ☐ No ☐ N/A
7.3	Is your site required to hold a licence or permit for the hazardous substances present on-site? <i>If yes, does it hold the requisite licence or permit?</i>	☐ Yes ☐ No ☐ N/A
7.4	Has your site assessed whether any substances stored, used or handled on-site are prohibited by national or international laws or protocols?	☐ Yes ☐ No ☐ N/A
7.5	Does your site maintain up to date safety data sheets (or similar) for all hazardous substances used on-site?	☐ Yes ☐ No ☐ N/A
7.6	Does your site provide training to relevant personnel in relation to the management and use of hazardous substances?	☐ Yes ☐ No ☐ N/A
7.7	Has your site set any targets in relation to eliminating or reducing hazardous substances used on-site?	☐ Yes ☐ No ☐ N/A
7.8	Has your site assessed whether polychlorinated biphenyls (PCBs) are present in equipment on-site?	☐ Yes ☐ No ☐ N/A

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7. POLLUTION PREVENTION / HAZARDOUS AND POTENTIALLY HAZARDOUS SUBSTANCES

7.9	Has your site assessed whether asbestos-containing materials are present on-site?	☐ Yes ☐ No ☐ N/A
7.10	If asbestos containing materials are present, has the site compiled an asbestos register (or similar)? <i>If yes, please provide details</i>	☐ Yes ☐ No ☐ N/A
7.11	Are there any above ground or underground bulk storage tanks present on-site? <i>If yes, please describe number, size and substance stored</i>	☐ Yes ☐ No
7.12	If above ground tanks are present on-site, are they provided with secondary containment or equivalent?	☐ Yes ☐ No ☐ N/A
7.13	Does your site conduct integrity testing of bulk storage tanks? <i>If yes, please describe the frequency of testing and when the last testing was carried out</i>	☐ Yes ☐ No ☐ N/A
7.14	Does your site have emergency spill response (e.g. spill kits, spill response team etc.)? <i>If yes, please describe</i>	☐ Yes ☐ No ☐ N/A
7.15	Have there been any instances of incidents/spills of hazardous or potentially hazardous materials on-site (or of off-site incidents caused by your site's activities) in the past two years? <i>If yes, please provide details</i>	☐ Yes ☐ No
7.16	Is your site free from any fines, prosecution or warning by the regulators in relation to the storage or use of hazardous substances? <i>If not, please provide details (including reason for fine/prosecution/warning, the date on which it occurred, the cost of any fine/details of any custodial sentence or restriction on site activities and whether the matter has been resolved or is ongoing)</i>	☐ Yes ☐ No



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8. MAJOR INCIDENT MANAGEMENT

8.1	Have there been any major incidents at your site in the past 2 years? <i>If yes, please provide details</i>	☐ Yes ☐ No
8.2	Is your site required to hold a permit/licence or be notified to the authorities given the potential for a major incident?	☐ Yes ☐ No
8.3	Does your site have a site emergency response plan and/or procedure?	☐ Yes ☐ No ☐ N/A
8.4	Are people trained in what to do in an emergency?	☐ Yes ☐ No
8.5	Are local communities or emergency services involved in the development or review of the plan?	☐ Yes ☐ No ☐ N/A
8.6	Has your site communicated the emergency response plan to those parties that could be impacted? <i>If yes, please provide brief details</i>	☐ Yes ☐ No ☐ N/A
8.7	Are drills or major incident scenarios practised?	☐ Yes ☐ No ☐ N/A
8.8	Is your site free from any fines, prosecution or warning by the regulators in relation to any major incidents on-site or caused by the site? <i>If not, please provide details (including reason for fine/prosecution/warning, the date on which it occurred, the cost of any fine/details of any custodial sentence or restriction on site activities and whether the matter has been resolved or is ongoing)</i>	☐ Yes ☐ No



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9. CONTAMINATED LAND/SOIL AND GROUNDWATER POLLUTION PREVENTION

9.1	Has your site assessed the site sensitivity and potential pathways and receptors in the vicinity of the employment site? <i>If yes, please briefly describe the sensitivity of the site</i>	☐ Yes ☐ No
9.2	Has your site identified any known impact to soil and groundwater from current activities/operations (is there soil and/or groundwater contamination)?	☐ Yes ☐ No
9.3	Has your site undertaken any previous intrusive soil and groundwater investigations? <i>If yes, please provide brief details of the extent and nature of the investigations</i>	☐ Yes ☐ No ☐ Not required
9.4	If yes to 9.3 has any soil and groundwater contamination been identified?	☐ Yes ☐ No ☐ N/A
9.5	Is your site aware of any legal requirements in relation to contaminated land? <i>If yes, does this include an awareness of the requirements in relation to the assessment, investigation, remediation and soil and groundwater pollution prevention?</i>	☐ Yes ☐ No ☐ N/A
9.6	Does your site provide training to relevant personnel in relation to the prevention of soil and groundwater pollution?	☐ Yes ☐ No ☐ N/A
9.7	Is your site free from any fines, prosecution or warning by the regulators in relation to soil or groundwater contamination? <i>If not, please provide details (including reason for fine/prosecution/warning, the date on which it occurred, the cost of any fine/details of any custodial sentence or restriction on site activities and whether the matter has been resolved or is ongoing)</i>	☐ Yes ☐ No



■ APPENDIX 1: GSCP REFERENCE ENVIRONMENTAL SELF ASSESSMENT QUESTIONNAIRE

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

10. LAND USE AND BIODIVERSITY

10.1	Has your site assessed the potential impacts of the site operations on designated protected areas or the ecosystem (plants, animals and microorganisms)?	☐ Yes ☐ No
10.2	Is your site aware of the legal requirements in relation to land use and biodiversity that apply to the employment site?	☐ Yes ☐ No
10.3	Is the site required to hold a permit/licence in relation to land use or biodiversity issues?	☐ Yes ☐ No
10.4	Are there any identified protected habitats or species on the employment site or in the immediate surrounding areas? <i>If yes, please briefly describe</i>	☐ Yes ☐ No
10.5	Has your site implemented any control measures to minimise impacts to biodiversity? <i>If yes, please provide brief details</i>	☐ Yes ☐ No
10.6	Does your site provide training to relevant personnel on land use and biodiversity issues?	☐ Yes ☐ No
10.7	Does your site assess land use implications and legal requirements when planning major on-site projects or expansions?	☐ Yes ☐ No
10.8	Is your site free from any fines, prosecution or warning by the regulators in relation to land use or impacts on biodiversity? <i>If not, please provide details (including reason for fine/prosecution/warning, the date on which it occurred, the cost of any fine/details of any custodial sentence or restriction on site activities and whether the matter has been resolved or is ongoing)</i>	☐ Yes ☐ No



APPENDIX 1: GSCP REFERENCE ENVIRONMENTAL SELF ASSESSMENT QUESTIONNAIRE

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11. NUISANCE

- | | | |
|------|--|--|
| 11.1 | Has your site identified where there is the potential for nuisance could be caused by on-site operations? | ☐ Yes ☐ No |
| 11.2 | If yes to 11.1, what sources (e.g. noise, dust, odour, visual, litter) of potential nuisance has your site identified and assessed? | Types of nuisance: |
| 11.3 | Has your site assessed potential nuisance that might arise from non-routine or out of hours' operations/activities? | ☐ Yes ☐ No |
| 11.4 | Does your site have systems or procedures in place that manage/reduce the potential for the site to cause nuisance? | ☐ Yes ☐ No |
| 11.5 | Has your site received any instances of nuisance or complaints relating to on-site activities in the last 2 years?
<i>If yes, please provide details as to the nature and extent of these</i> | ☐ Yes ☐ No |
| | <i>If yes, does your site maintain a log of nuisance/complaints?</i> | ☐ Yes ☐ No |
| 11.6 | Does your site provide training to relevant personnel in how to reduce the potential for nuisance and complaints? | ☐ Yes ☐ No |
| 11.7 | Is your site free from any fines, prosecution or warning by the regulators in relation to nuisance or complaints?
<i>If not, please provide details (including reason for fine/prosecution/warning, the date on which it occurred, the cost of any fine/details of any custodial sentence or restriction on site activities and whether the matter has been resolved or is ongoing)</i> | ☐ Yes ☐ No |

END OF QUESTIONNAIRE

APPENDIX 2

GSCP Reference Environmental Pre-Audit Employment Site Profile

This tool forms part of the GSCP set of reference tools designed to provide a common interpretation of local and international environmental standards and requirements and environmental reference codes (if available and applicable). The Environmental Reference Requirements reflect a common understanding of good environmental practice and are applicable to all raw material processing, agricultural, manufacturing and logistics sites in the supply chain. The Environmental Reference Requirements provide a model for a site in the supply chain to demonstrate continuous improvement in its environmental performance from basic compliance to leading-edge performance (across three defined 'levels' for eleven different performance areas).

The reference tools on Environmental Audit Process and Methodology are based on the GSCP Environmental Reference Requirements but can be adopted and tailored to other codes of environmental practice.

When an audit request is made, the auditor should send the employment site a **PRE-AUDIT EMPLOYMENT SITE PROFILE** questionnaire asking for general information about location, size, production processes and activities and various environmental matters. This information allows auditors to:

- prepare relevant briefing materials (industry or country-specific);
- plan the assessment, for example the required number of audit days;
- focus the audit on priority or higher risk areas and topics.

The audit company should communicate the following to each employment site to be audited and any relevant parties, such as agents, in the supply chain:

- the importance of accuracy in completing in the pre-audit employment site profile;
- timeframe for completion of the pre-audit employment site profile;
- to whom to send the completed pre-audit employment site profile.

Recommended timeframe:

- the auditor should supply the pre-audit employment site profile questionnaire to the employment site within five working days of the audit being confirmed;
- the pre-audit employment site profile questionnaire should be completed and returned to the auditor two weeks from the date of the request being made;
- if an audit is requested and scheduled in less than two weeks, the auditor and employment site should work together to ensure the pre-audit employment site profile is returned as soon as possible and in any event before the audit is carried out.

Note on updates

It will be agreed between the buying company, the auditor and the site as to whether a full pre-audit profile would be required each time, or whether just an update of information that had changed would be needed.

A pre-audit employment site profile should have four main areas:

1. company Overview;
2. employment Site Details;
3. environmental Matters;
4. subcontractor Details.

Where the employment site itself is the audit requestor, the auditor should ensure that an agreement is in place with the employment site to allow the auditor to communicate audit findings and any alert notifications to any buyers, brands or retailers concerned.



1. COMPANY OVERVIEW

Where possible, the pre-audit employment site profile should detail the following overview of the company.

COMPANY OVERVIEW

Name of company which owns the employment site to be audited:

Registered head office address:

Mailing address of company
(if different to that of the employment site):

Telephone number:

Fax number:

Ownership type (e.g. joint venture, partnership, corporation, foreign investment, other):

Year company formed:

Business licence No. (if applicable)

Does the company own any other employment sites?

If yes, how many?



2. EMPLOYMENT SITE DETAILS

2.1 Employment Site Contact Details

The pre-audit employment site profile questionnaire should request the following contact information.

2.1 EMPLOYMENT SITE CONTACT DETAILS

Employment site name:	
Full address:	
Full address (in local language, if applicable):	
Country	
Is this site in an Export Processing Zone (EPZ)?	☐ Yes ☐ No
Employment site telephone number:	
Employment site fax number:	
Employment site email address:	
Reception opening hours', if applicable	
Employment site manager:	
Languages of the employment site management: <i>Please list the main languages spoken by employment site managers:</i>	
Key audit contact:	
Key contact job title:	
Key contact telephone number:	
Key contact email address	
Name of person completing this questionnaire (if different to key audit contact):	
Telephone number of person completing this questionnaire:	
Email address of person completing this questionnaire:	
Employment site website (if available):	
Closest airport/railway station:	
Distance from the above: please specify time and distance plus traffic conditions if relevant	



APPENDIX 2: GSCP REFERENCE ENVIRONMENTAL PRE-AUDIT EMPLOYMENT SITE PROFILE

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

2.2 Employment Site Environmental Management

The following information is requested to understand internal environmental management systems...

2.2 EMPLOYMENT SITE ENVIRONMENTAL MANAGEMENT

Name and job title of person responsible for environmental issues:

Name:

Job Title:

Does the site have an environmental policy?

☐ Yes ☐ No

Has the site developed an environmental management system?

☐ Yes ☐ No

If yes, is the site's environmental management system certified to a recognised standard, e.g. 14001, EMAS, etc.

☐ Yes ☐ No

If yes, please state which standard

Is there an environmental committee on-site?

☐ Yes ☐ No

Are internal environmental audits ever carried out?

☐ Yes ☐ No

If so, please state by whom and the date of the most recent audit

Are environmental audits ever carried out by external companies/third parties?

☐ Yes ☐ No

If so, please state by whom and the date of the most recent audit



■ APPENDIX 2: GSCP REFERENCE ENVIRONMENTAL PRE-AUDIT EMPLOYMENT SITE PROFILE

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

2.3 Employment Site Area, Location and Surrounding Land Uses

The pre-audit employment site profile questionnaire should detail the following information concerning the size of the employment site, its location and surrounding land uses.

Where relevant, the employment site should be asked to submit a site plan.

2.3 EMPLOYMENT SITE SIZE, LOCATION & SURROUNDING LAND USES

What is the employment site size?

acres/hectares/m² (please state units used)

Approximately, what area of the site is covered by buildings (%):

What age are the buildings on-site (if known)?

Is the site owned or leased?

☐ Owned ☐ Leased

If leased, who is the landlord?

Landlord:

Are there any other parties on site as tenants or sub-tenants?

☐ Yes ☐ No

If yes, please name them

Describe surrounding land use (residential, industrial, rural etc.) and identify neighbouring facilities and types:

North:

South:

East:

West:

...



APPENDIX 2: GSCP REFERENCE ENVIRONMENTAL PRE-AUDIT EMPLOYMENT SITE PROFILE

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

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2.3 EMPLOYMENT SITE SIZE, LOCATION & SURROUNDING LANDUSES

State the distance to, and size of the nearest residential community and sensitive sites (e.g. schools, hospitals, etc.)

Are there any sensitive habitats nearby, such as nature reserves, national parks, wetlands or sites of special scientific interest?

If yes, please describe

☐ Yes ☐ No

Briefly describe the geology beneath the site (if known)

What is the location of the nearest surface water courses?

Name of water course:
Distance and direction from site:
Use:
Official grade of water quality if applicable/known

Name of water course:
Distance and direction from site:
Use:
Official grade of water quality if applicable/known

Are there any boreholes/wells or natural springs either on-site or in the surrounding area?

If yes, please provide the following information:

☐ Yes ☐ No

Well, Borehole or Spring:
Location:
Use:

Well, Borehole or Spring:
Location:
Use:



■ APPENDIX 2: GSCP REFERENCE ENVIRONMENTAL PRE-AUDIT EMPLOYMENT SITE PROFILE

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

2.4 Employment Site Production and Processes Overview

The pre-audit employment site profile should detail the following information concerning the employment site's production systems and production processes. Some employment sites may not be willing to provide some of the information requested because of confidentiality agreements with other customers.

2.4 EMPLOYMENT SITE PRODUCTION SYSTEMS AND PROCESSES

Industry sector:

Principal products:

Main export markets:

Main production processes:

Main production equipment:

Main raw materials used:

Hazardous chemicals used on-site:

Does the site produce electrical or electronic products?

☐ Yes ☐ No ☐ N/A

If yes, please state which products

Does your site use any of the following materials in its products (or their components):

☐ Yes ☐ No ☐ N/A

- Lead
- Mercury
- Hexavalent chromium
- Cadmium
- Polybrominated biphenyls
- Polybrominated diphenyl ethers

If yes, please state which

...



APPENDIX 2: GSCP REFERENCE ENVIRONMENTAL PRE-AUDIT EMPLOYMENT SITE PROFILE

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

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2.4 EMPLOYMENT SITE PRODUCTION SYSTEMS AND PROCESSES

Are any of the following present on-site:

Boilers	☐ Yes	☐ No	☐ N/A
Air compressors	☐ Yes	☐ No	☐ N/A
Cooling towers or evaporative condensers	☐ Yes	☐ No	☐ N/A
Electrical substations/transformers/switch-gear	☐ Yes	☐ No	☐ N/A
Air conditioning equipment	☐ Yes	☐ No	☐ N/A
Automated gas fire suppression systems (e.g. halon systems)	☐ Yes	☐ No	☐ N/A
Operational Times	☐ Yes	☐ No	☐ N/A
Number of operational weeks per year:	☐ Yes	☐ No	☐ N/A
Number of operational days per week:	☐ Yes	☐ No	☐ N/A
Typical hours of operation:			
Scheduled site shut-downs:			



■ APPENDIX 2: GSCP REFERENCE ENVIRONMENTAL PRE-AUDIT EMPLOYMENT SITE PROFILE

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

2.5 Employment Site Workforce

The following information is an essential requirement, both to understand potential risks posed by the employment site's operations and to plan for the audit. Any missing details should be clarified with the employment site directly.

2.5 EMPLOYMENT SITE WORKFORCE

**Total number of workers
at the employment site:**

**Of which, how many are permanent
workers?**

**And how many are temporary
or agency workers?**

Language(s) spoken
*Please detail the different native
languages of the workforce*

Nationality of workers
*Please detail the different nationalities
of the workforce*

**Does the site use contractors
to perform any activities on-site?**
*If yes, please provide a brief overview
of contracted activities*

☐ Yes ☐ No ☐ N/A



3. ENVIRONMENTAL MATTERS

Where possible, the pre-audit employment site profile should detail the following information relation to environmental matters at the employment site.

3.1 ENVIRONMENTAL MATTERS

Environmental permitting

Is the facility subject to any integrated environmental operating permits?

☐ Yes ☐ No

If yes, what are the particular processes/activities or quantities of chemicals stored at the site which attract this permitting requirement?

When was the permit granted and on what date will it require renewal?

Are any changes planned in the next 5 years which will require a new permit or existing permit modification?

☐ Yes ☐ No

If yes, please describe

Energy

Which of the following sources of energy are used on-site:

Mains gas

☐ Yes ☐ No

Liquefied petroleum gas

☐ Yes ☐ No

Mains electricity

☐ Yes ☐ No

On-site generated electricity

☐ Yes ☐ No

Fuel oil (or gas oil)

☐ Yes ☐ No

Coal

☐ Yes ☐ No

Timber

☐ Yes ☐ No

Other

(please specify)

☐ Yes ☐ No

...



■ APPENDIX 2: GSCP REFERENCE ENVIRONMENTAL PRE-AUDIT EMPLOYMENT SITE PROFILE

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

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Water

Which of the following sources of water are used on-site:

Municipal mains water	☐ Yes ☐ No
Groundwater (from wells/boreholes)	☐ Yes ☐ No
Surface water (e.g. from river, lake, pond etc.)	☐ Yes ☐ No
Other (please specify)	☐ Yes ☐ No

Wastewater

Which of the following types and/or sources of wastewaters are generated at the facility?

Process wastewater (i.e. water that comes into contact with the process or product)	☐ Yes ☐ No
Non-contact water (i.e. heat exchanged cooling water)	☐ Yes ☐ No
Sanitary wastewater (i.e. domestic wastewater)	☐ Yes ☐ No
Surface water (i.e. storm water run-off/ rainwater run-off)	☐ Yes ☐ No
Are there any of the following on-site:	
Oil or petrol interceptors	☐ Yes ☐ No ☐ N/A
Septic tanks	☐ Yes ☐ No ☐ N/A
Wastewater lagoons	☐ Yes ☐ No ☐ N/A
Soakaways?	☐ Yes ☐ No ☐ N/A
Is there a wastewater treatment plant on-site? <i>If yes, which type of wastewater treatment (biological, chemical..)?</i>	☐ Yes ☐ No ☐ N/A
Are any discharges subject to permit/ consent by local or state authorities? <i>If yes, please provide details</i>	☐ Yes ☐ No ☐ N/A

...



APPENDIX 2: GSCP REFERENCE ENVIRONMENTAL PRE-AUDIT EMPLOYMENT SITE PROFILE

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

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Emissions to air

Does the employment site generate emissions to air? ☐ Yes ☐ No ☐ N/A

If yes, please describe

Is the facility subject to any licenses for atmospheric emissions? ☐ Yes ☐ No ☐ N/A

Are there abatement or pollution prevention devices (e.g. filters, scrubbers) on point source emissions to air? ☐ Yes ☐ No ☐ N/A

If so, please describe the abatement techniques employed at the site

Are any materials burnt or incinerated on site? ☐ Yes ☐ No ☐ N/A

Does the site use any ozone-depleting substances in equipment or processes on site? ☐ Yes ☐ No ☐ N/A

If yes, please describe

Waste management

Please list the main hazardous wastes generated on-site

Please list the main non-hazardous wastes generated on-site

Is the facility subject to any licences, permits or similar for waste handling, storage, treatment or disposal? ☐ Yes ☐ No

Are wastes treated in any way on site (e.g. incineration, burning, on-site lagoons)? ☐ Yes ☐ No

If yes, please describe

...



■ APPENDIX 2: GSCP REFERENCE ENVIRONMENTAL PRE-AUDIT EMPLOYMENT SITE PROFILE

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

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Have any of these activities been carried out in the past? <i>If yes, please describe</i>	☐ Yes ☐ No
Are wastes disposed to landfill on site and/or has on-site dumping taken place in the past? <i>If yes, please provide details</i>	☐ Yes ☐ No
Does the on-site disposal facility accept waste from other sources? <i>If yes, please provide details</i>	☐ Yes ☐ No
What wastes, if any, are recycled?	
Hazardous materials	
Are any radioactive materials used on-site?	☐ Yes ☐ No ☐ N/A
Are any wastes generated on-site which contain radioactive materials	☐ Yes ☐ No ☐ N/A
How are radioactive materials disposed of?	
Is asbestos present on-site?	☐ Yes ☐ No ☐ N/A
Has an asbestos survey ever been carried out?	☐ Yes ☐ No ☐ N/A
Have asbestos materials been removed from site historically?	☐ Yes ☐ No ☐ N/A
Is asbestos used in site products?	☐ Yes ☐ No ☐ N/A
Are any CMR materials (Carcinogenic, Mutagenic, Toxic to Reproduction) used?	☐ Yes ☐ No ☐ N/A
...	



APPENDIX 2: GSCP REFERENCE ENVIRONMENTAL PRE-AUDIT EMPLOYMENT SITE PROFILE

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

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Complaints and enforcement

Have neighbours or the public complained about nuisance/visual impact from any of the following:

Noise ☐ Yes ☐ No

Site aesthetics ☐ Yes ☐ No

Lighting at night ☐ Yes ☐ No

Litter ☐ Yes ☐ No

Waste materials storage ☐ Yes ☐ No

Dust ☐ Yes ☐ No

Vehicle movements ☐ Yes ☐ No

Other (describe) ☐ Yes ☐ No

If yes, please provide details

Are there any regulatory enforcement actions or prosecutions outstanding which relate to the above? ☐ Yes ☐ No

If yes, please provide details

...



■ APPENDIX 2: GSCP REFERENCE ENVIRONMENTAL PRE-AUDIT EMPLOYMENT SITE PROFILE

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

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Soil and groundwater contamination

Is there soil and/or groundwater contamination present on-site? ☐ Yes ☐ No
If yes, please provide details

Have any intrusive investigations been performed? ☐ Yes ☐ No
If yes, please provide details

Are there potential sources of soil and/or groundwater contamination from neighbouring properties? ☐ Yes ☐ No
If yes, please describe

Are regulatory authorities aware of any contamination on-site? ☐ Yes ☐ No
If yes, please provide details

Has the facility carried out (or are there plans to undertake) any site remediation or clean-up programme? ☐ Yes ☐ No
If yes, please provide details



3.2 Details of previous environmental audits and outcomes

This section provides the audit history of the employment site. This information helps determine the type of audit required and whether a current audit report can be shared.

3.2 EMPLOYMENT SITE PREVIOUS ENVIRONMENTAL AUDITS AND OUTCOMES

Has your employment site previously been audited in relation to environmental issues?

☐ Yes ☐ No

If yes, please provide details of previous audits:

Date of audit	Code or standard audited against	Auditing company/organisation

Would you be prepared to share previous audit reports and, improvement/action plans conducted for other customers?

☐ Yes ☐ No

Have any previous corrective actions been completed?

☐ Yes ☐ No

Please detail outstanding corrective actions and your expected completion date?

Issue found	Corrective action	Timescale	Person responsible



4. SUBCONTRACTING

4.1 Products/processes subcontracted overview

The pre-audit employment site profile should detail the following information on the products and/or processes that are subcontracted by the employment site:

4.1 PRODUCTS/PROCESSES SUBCONTRACTED

List any production or processes sub-contracted:

Subcontractor details: Please complete the table below for each process subcontracted. Add more tables as required.

Subcontracted Process 1	Process:	
	Products involved:	
	No. of subcontracting companies:	
	Is the concern for the environment part of the subcontractors selection criteria?	☐ Yes ☐ No
	Have you audited these contractors? <i>If yes, against which code of conduct/requirements?</i>	☐ Yes ☐ No
Subcontracted Process 2	Product:	
	Process:	
	No. of subcontracting companies:	
	Have you audited these contractors?	☐ Yes ☐ No
Subcontracted Process 3	Product:	
	Process:	
	No. of subcontracting companies:	
	Have you audited these contractors?	☐ Yes ☐ No

APPENDIX 3

GSCP Reference Environmental Audit Checks

This tool forms part of the GSCP set of reference tools designed to provide a common interpretation of local and international environmental standards and requirements and environmental reference codes (if available and applicable). The Environmental Reference Requirements reflect a common understanding of good environmental practice and are applicable to all raw material processing, agricultural, manufacturing and logistics sites in the supply chain. The Environmental Reference Requirements provide a model for a site in the supply chain to demonstrate continuous improvement in its environmental performance from basic compliance to leading-edge performance (across three defined 'levels' for eleven different performance areas).

The Reference tools on Environmental Audit Process and Methodology are based on the GSCP Environmental Reference Requirements but can be adopted and tailored to other codes of environmental practice.

The reference **AUDIT CHECKS** have been designed to provide auditors with the minimum requirements regarding audit methodology and evidence gathering. The audit checks are structured around the 11 Performance Areas and include guidance on:

- physical employment site inspection;
- employment site procedures and processes;
- interviews;
- document checks.

This document is **not intended as a checklist** but as a list of checks that should be used as guidance by auditors whilst not limiting audit activities.

For your reference, you can make a note when a particular point has been noted or question asked by ticking the box down the left hand side. Where a particular requirement is being met you can also make note of this. Also, you can modify its format and layout to better suit your working methodology, e.g. by adding dedicated pages for note-taking.

AUDIT CHECKS

■ APPENDIX 3: GSCP REFERENCE ENVIRONMENTAL AUDIT CHECKS

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010



1. Environmental management system

Employment site requirements at each performance level:

Level 1:

1. Understanding and awareness of significant environmental aspects and impacts (negative and positive)
2. Understanding and awareness of applicable legal requirements
3. Mechanism to remain up-to-date with applicable local legal requirements
4. Basic management controls in place
5. Member of management responsible for coordination of environmental management activities

Level 2:

6. Environmental Management System (EMS) is established, documented, implemented, maintained and continually reviewed/improved

7. The EMS includes:

- a. Environmental Policy
- b. Planning: environmental risk assessment, setting objectives and targets
- c. Implementation and operation: operational procedures; adequate training; documentation and its control
- d. Checking: monitoring and measurement, audit and inspections
- e. Management Review

8. Information on environmental performance is made available to appropriate internal and external stakeholders (please refer to the guidance section for detailed definition)

Level 3:

9. Forward looking environmental strategy to drive leading practice
10. Environmental management and environmental performance targets are designed to improve or sustain the environment and local ecosystem, or global when appropriate
11. Proactive engagement with relevant stakeholders to achieve significant performance improvement
12. Where relevant, commitment to voluntary standards

The following checks are intended as guidance and should not limit audit activities.

Is this performance area applicable to the employment site?

If yes, please complete the following table. If no, please proceed to the next Performance Area.

☐ Yes ☐ No

...



■ APPENDIX 3: GSCP REFERENCE ENVIRONMENTAL AUDIT CHECKS

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

...		
☐ Management provide the appropriate resources (including assigning a member of management responsible for coordination of environmental management activities) to ensure that compliance with applicable laws and regulations is maintained		
LEVEL 2		
☐ Management actively promotes or endorses environmental management		
☐ Information on environmental performance is made available to appropriate internal and external stakeholders		
☐ Management demonstrate, where appropriate, improvement in environmental performance		
LEVEL 3		
☐ Management promote a forward looking strategy to drive leading practice in environmental management		
☐ Management understand how environmental management and environmental performance targets are designed to improve or sustain the environment and local ecosystem, or global when appropriate		
☐ The site actively engages with appropriate stakeholders down the value chain to achieve significant performance improvement		
☐ Management promote a commitment to voluntary standards, where appropriate		
INTERVIEWS WITH KEY WORKERS/OTHER WORKERS USED TO CORROBORATE WORKER TESTIMONY WITH DOCUMENT CHECKS AND MANAGEMENT INTERVIEWS. THEY CONFIRM THE FOLLOWING:		
LEVEL 1		
☐ Workers understand how they, and their site's activities and operations, can impact the environment		
☐ Key workers are aware of environmental permit/licence requirements, where applicable		
☐ Workers receive training on environmental management issues at induction, where appropriate		
☐ Key workers with environmental management responsibilities receive specific training as required		
...		



■ APPENDIX 3: GSCP REFERENCE ENVIRONMENTAL AUDIT CHECKS

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

LEVEL 3	☐ The employment site has identified environmental management and environmental performance targets designed to improve or sustain the environment and local ecosystem, or global when appropriate
	☐ The employment site has investigated and used, if relevant, alternative water sources with lower ecosystem impact
	☐ The employment site has established a forward looking strategy to drive leading practice
	☐ The employment site has committed to voluntary standards
	☐ Communications with appropriate stakeholders through the value chain show that achieving significant performance improvement has been discussed



2. Energy use, transport and Greenhouse Gases (GHGs)

Employment site requirements at each performance level:

Level 1:

- 1. Meet legal requirements
- 2. Relevant, up-to-date permits are held and compliance maintained
- 3. Tracking of energy consumption/calculation of GHG emissions including fuel use for on-site transport

Level 2:

- 4. Formal systems and processes in place to manage and audit energy use and GHG emissions as per the site EMS
- 5. Energy consumption and greenhouse gas emissions (including on-site vehicle emissions) are made available to appropriate internal and external stakeholders
- 6. Renewable energy use targets and GHG emission reduction targets (normalised) are established/reviewed at least on an annual basis to drive continuous improvement
- 7. Demonstrable reduction in energy (normalised; please refer to the guidance section for further definition)
- 8. Targets include on-site vehicle emissions reduction, which are reviewed on an annual basis to drive continuous improvement

Level 3:

- 9. Leading practice mechanisms in place to reduce greenhouse gas (GHG) intensity (for further definition please refer to the guidance section)
- 10. Use of energy sources with lower GHG intensity
 - a. Energy consumption level is sustainable within availability of local energy resources
 - b. Demonstrable achievement of stretching energy and fuel efficiency and GHG emission targets beyond recognised international standard practice
- 11. Engagement with appropriate stakeholders down the value chain identifying ways to reduce GHG emissions
- 12. Carbon accounting in business system
- 13. Specification of the most environmentally efficient combinations of vehicle types, fuels and technologies for distribution fleet
- 14. Fuel consumption and vehicle emission reduction targets are reviewed on an annual basis to drive continuous improvement for the entire fleet

The following checks are intended as guidance and should not limit audit activities.

Is this performance area applicable to the employment site?

If yes, please complete the following table. If no, please proceed to the next Performance Area.

☐ Yes ☐ No



■ APPENDIX 3: GSCP REFERENCE ENVIRONMENTAL AUDIT CHECKS

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EVIDENCE GATHERING ON ENERGY USE, TRANSPORT AND GREENHOUSE GASES (GHGS)	NOTES
2.1 Physical employment site inspection	
LEVEL 1	
☐ Based on observations, the site has established procedures to manage energy use, transport and greenhouse gases are being followed (e.g. management of substances, activities etc.)	
2.2 Employment site procedures and processes	
LEVEL 1	
☐ Policies and procedures in relation to energy use, transport and GHG emissions management have been established and implemented (e.g. written policies and procedures, employee handbook, induction training, etc.)	
☐ Formal systems and processes in place to manage and audit energy use and GHG emissions as per the site EMS	
2.3 Interviews	
INTERVIEWS WITH MANAGEMENT CONFIRM THE FOLLOWING:	
LEVEL 1	
☐ Management is aware of laws and regulations concerning energy use, transport and GHG emissions and compliance	
☐ Policies and processes regarding energy use, transport and GHG emissions are effectively communicated to workers	
☐ Management is aware of how energy consumption and how the calculation of GHG emissions is tracked	
☐ Management provide the appropriate resources to ensure that compliance with applicable laws and regulations is maintained	
...	



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ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

...	
LEVEL 2 Management actively promotes or endorses proactive energy conservation The management are driving continuous improvement and reviewing the on-site transport reduction emission target on an annual basis Management are proactively driving continuous improvement through reviewing renewable energy use and GHG emission reduction targets on an annual basis The employment site ensures energy consumption and greenhouse gas emissions (including on-site vehicle emissions) data is made available to relevant internal and external stakeholders The employment site demonstrates, where appropriate, improvement in energy use performance and that it is achieving renewable energy use and GHG emission reduction targets	
LEVEL 3 For energy sources with lower GHG intensity, management understands the concept of sustainable energy consumption within availability of local energy resources Management understand what recognised international standard practice is in relation to energy and fuel efficiency and GHG emission targets for their sector/geography and have set site targets that exceed those practices Management are proactively driving continuous improvement in the entire transport fleet through reviewing fuel consumption and vehicle emission reduction targets on an annual basis The site actively engages with appropriate stakeholders down the value chain to identify ways to reduce GHG emissions Management actively promotes the implementation of leading practice greenhouse gas intensity mechanisms INTERVIEWS WITH KEY WORKERS/OTHER WORKERS USED TO CORROBORATE WORKER TESTIMONY WITH DOCUMENT CHECKS AND MANAGEMENT INTERVIEWS. THEY CONFIRM THE FOLLOWING:	
LEVEL 1 Workers have a general understanding of how they, and their site’s activities and operations, can impact energy use and greenhouse gas emissions Key workers are aware of energy use and greenhouse gas emissions permit/licence requirements, where applicable ...	



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...	
☐ Workers receive training on energy use and greenhouse gas emission issues at induction, where appropriate	
☐ Key workers with energy use, transport and greenhouse gas emissions management responsibilities receive specific training as required	
☐ Workers have access to, and understand, energy use, transport and greenhouse gas emissions procedures, where appropriate	
2.4 Document checks	
LEVEL 1	
☐ Relevant employment site permits and licences that relate to energy use, transport and GHGs are available and up to date	
☐ Where the employment site is legally required to hold and/or maintain documentation in relation to energy use, transport and GHGs, these are held on file for the required period of time	
☐ Procedures that address energy use, transport and GHGs at the site are made available to relevant employment site personnel	
☐ Energy consumption/calculation of GHG emissions including fuel use for on-site transport data is recorded, tracked and documented	
☐ An inventory of main point sources emissions to air is maintained. The site has also considered the potential for fugitive emissions	
☐ Training materials (e.g. induction records, training matrix etc.) indicate: • workers receive training on energy use, transport and GHG issues; and • key workers receive training applicable to their energy use, transport and GHGs roles and responsibilities	
...	



...

LEVEL 2	
☐ Reviews of on-site vehicle emissions reduction targets undertaken and available	
☐ Reviews of renewable energy use targets and GHG emission reduction targets (normalised) undertaken and available	
☐ Targets in place to phase-out use of specific types of ODS, such as CFCs, halons, TCE, CCl4 in line with recognised international standard practice	
☐ Provide a short summary as to how the employment site has made demonstrable achievement of reducing energy	
☐ Provide a short summary as to how the employment site has made demonstrable achievement of meeting or exceeding air quality improvement targets (normalised)	
LEVEL 3	
☐ Reviews of fuel consumption and vehicle emission reduction targets are undertaken and are available	
☐ The employment site has confirmed that energy consumption levels are sustainable (in relation to the availability of local energy sources)	
☐ The employment site has implemented leading practice mechanisms to reduce GHG intensity	
☐ Air quality improvement targets are stretching and are being achieved	
☐ Communications with appropriate stakeholders through the value chain show that identifying ways to reduce GHG emissions have been discussed	
☐ Energy and fuel efficiency and GHG emission targets are stretching and are being achieved	
☐ The employment site has documented the specifications of the most environmentally efficient combinations of vehicle types, fuels and technologies for distribution fleet	



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3. Water use

Employment site requirements at each performance level:

Level 1:

1. Meet legal requirements
2. Relevant, up-to-date permits are held and compliance maintained
3. Measurement of water consumption is undertaken

Level 2:

4. Formal systems and processes in place to manage and audit water consumption as per the site EMS
5. Water consumption data are made available to relevant internal and external stakeholders
6. Water consumption efficiency targets are reviewed on an annual basis to drive continuous improvement
7. Demonstrable achievement of water efficiency targets (normalised)

Level 3:

8. Where relevant, water consumption level is sustainable within local ecosystem limits and water catchment area
9. Investigation of and use, if relevant, of alternative water sources with lower ecosystem impact
10. Demonstrable achievement of stretching water efficiency targets beyond recognised international standard practice
11. Leading practice water efficiency mechanisms in place, including re-use, recovery and recycling
12. Engagement with appropriate stakeholders down the value chain to improve water efficiency

The following checks are intended as guidance and should not limit audit activities.

Is this performance area applicable to the employment site?

If yes, please complete the following table. If no, please proceed to the next Performance Area.

☐ Yes ☐ No

...



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...	
☐ Management are proactively driving continuous improvement through reviewing water consumption efficiency targets on an annual basis	
☐ The employment site ensures water consumption data is made available to relevant internal and external stakeholders	
☐ The employment site demonstrates, where appropriate, improvement in water use and performance and that it is achieving water efficiency targets	
LEVEL 3	
☐ Management understands the concept of sustainable water consumption within the local ecosystem limits and water catchment area	
☐ Management actively investigate and uses, if appropriate, alternative water sources with lower ecosystem impact	
☐ Management understand what recognised international standard practice is in relation to setting water efficiency targets for their sector/geography and have set site targets that exceed those practices	
☐ The site actively engages with appropriate stakeholders down the value chain to improve water efficiency	
☐ Management actively promotes the implementation of leading practice water efficiency mechanisms including, e.g. re-use, recovery and recycling	
INTERVIEWS WITH KEY WORKERS/OTHER WORKERS USED TO CORROBORATE WORKER TESTIMONY WITH DOCUMENT CHECKS AND MANAGEMENT INTERVIEWS. THEY CONFIRM THE FOLLOWING:	
LEVEL 1	
☐ Workers understand how they, and their site's activities and operations, can impact water use	
☐ Key workers are aware of water use/consumption permit/licence requirements, where applicable	
☐ Workers receive training on water use issues at induction, where appropriate	
☐ Key workers with water use/consumption management responsibilities receive specific training as required	
☐ Workers have access to, and understand, water use procedures, where appropriate	
...	

...



3.4 Document checks	
LEVEL 1	
☐ Relevant employment site permits and licences that relate to water use are available and up to date	
☐ Where the employment site is legally required to hold and/or maintain documentation in relation to water use/ consumption, the documentation is retained on file for the required period of time	
☐ Monitoring results for water consumption are available and maintained	
☐ Procedures that address water use issues at the site are made available to relevant employment site personnel	
☐ Training materials (e.g. induction records, training matrix etc.) indicate: - workers receive training on water use issues; and - key workers receive training applicable to their water use management roles and responsibilities	
LEVEL 2	
☐ Reviews of water consumption efficiency targets are undertaken and are available	
☐ The employment site has made demonstrable achievement of meeting or exceeding water efficiency targets (normalised)	
LEVEL 3	
☐ Site has identified whether water use/consumption is sustainable (in relation to the local ecosystem limits and water catchment area)	
☐ Site has investigated and used, if relevant, alternative water sources with lower ecosystem impact	
☐ Site has implemented leading practice mechanisms to promote reducing water use/consumption	
☐ Water efficiency targets are stretching and are being achieved	
☐ Communications with appropriate stakeholders through the value chain show that water efficiency has been discussed	



4. Wastewater/effluent

Employment site requirements at each performance level:

Level 1:

1. Meet legal requirements
2. Relevant, up-to-date permits are held and compliance maintained
3. Drainage plan in place with a general understanding of wastewater flow direction and discharge points
4. Identification of the contaminants, their flow direction and potential impact

Level 2:

5. Formal systems and processes in place to manage wastewater effluent as per the site EMS
6. Basic on-site wastewater treatment in place to achieve improvements in wastewater quality or connection to off-site wastewater treatment system
7. Regular wastewater quality testing/ monitoring is undertaken to ensure ongoing compliance with permitted effluent limits and as per the site's EMS
8. Wastewater quality data are made available to relevant internal and external stakeholders
9. Wastewater quality and volume improvement targets are reviewed on an annual basis to drive continuous improvement
10. Demonstrable improvement in wastewater quality

Level 3:

11. Wastewater effluent quality and discharge volume are sustainable in the context of local receptors and ecosystem limits
12. Leading practice wastewater treatment in place
13. Leading practice mechanisms in place to improve quality of wastewater discharged to local environment, including reuse of grey water
14. Demonstrable achievement of stretching wastewater effluent quality improvement and volume reduction targets (normalised) beyond recognised international standard practice
15. Engagement with appropriate stakeholders down the value chain to improve wastewater effluent quality

The following checks are intended as guidance and should not limit audit activities.

Is this performance area applicable to the employment site?

If yes, please complete the following table. If no, please proceed to the next Performance Area.

☐ Yes ☐ No

...

...

EVIDENCE GATHERING ON WASTEWATER / EFFLUENT		NOTES
4.1 Physical employment site inspection		
LEVEL 1		
☐	Based on observations, sources of wastewater generated across the employment site have been identified	
☐	Based on observation, confirmed that wastewaters are not discharging direct to unprotected ground and are directed to a drainage system	
☐	Based on observation, sumps/pits receiving wastewater are in good condition and of sound integrity	
☐	Is wastewater/effluent directed to a wastewater/effluent treatment plant or undergoes treatment prior to discharge	
☐	Surface water/stormwater drains are free from contamination and blockages	
☐	Procedures established to manage wastewater/wastewater discharges are being followed (e.g. management of wastewater, activities etc.)	
☐	No spills or leaks to the environment observed	
LEVEL 2		
☐	Check whether basic on-site wastewater treatment is in place to achieve improvements in wastewater quality or connection to off-site wastewater treatment system	
4.2 Employment site procedures and processes		
LEVEL 1		
☐	Policies and procedures in relation to wastewater/effluent management have been established and implemented (e.g. written policies and procedures, employee handbook, induction training, etc.)	
☐	Regular wastewater quality testing/monitoring is undertaken to ensure ongoing compliance with permitted effluent limits and as per the site's EMS	
...		



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...	
4.3 Interviews	
INTERVIEWS WITH MANAGEMENT CONFIRM THE FOLLOWING:	
LEVEL 1	
☐ Management is aware of laws and regulations concerning wastewater/effluent discharge compliance	
☐ Policies and processes regarding wastewater/effluent are effectively communicated to workers	
☐ Management describe how the employment site identifies the contaminants, their flow direction and potential impact in relation to wastewater/effluent discharges from the employment site	
☐ Management provide the appropriate resources to ensure that compliance with applicable laws and regulations is maintained	
LEVEL 2	
☐ Management actively promotes or endorses proactive wastewater quality and management	
☐ Management are proactively driving continuous improvement through reviewing wastewater quality and volume improvement targets on an annual basis	
☐ The employment site ensures wastewater quality data is made available to relevant internal and external stakeholders	
☐ The employment site demonstrates, where appropriate, improvement in wastewater quality and performance and that it is achieving wastewater quality targets	
LEVEL 3	
☐ Management understands the concept of sustainable wastewater effluent quality and discharge within the local ecosystem limits and local receptors	
☐ Management understand what recognised international standard practice is in relation to setting wastewater effluent quality improvement targets and volume reduction targets (normalised) for their sector/geography and have set site targets that exceed those practices	
☐ Management understand leading practice wastewater treatment and this has been implemented at the site	
☐ The site actively engages with appropriate stakeholders down the value chain to improve wastewater effluent quality	
☐ Management actively promotes the implementation of leading practice mechanisms to improve the quality of wastewater discharged to local environment, including reuse of grey water	
...	



...

INTERVIEWS WITH KEY WORKERS/OTHER WORKERS USED TO CORROBORATE WORKER TESTIMONY WITH DOCUMENT CHECKS AND MANAGEMENT INTERVIEWS. THEY CONFIRM THE FOLLOWING:

LEVEL 1	
☐ Workers understand how they, and their site’s activities and operations, can impact wastewater/effluent quality and discharge volumes	
☐ Key workers are aware of wastewater/effluent permit/licence requirements, where applicable	
☐ Workers receive training on wastewater/effluent issues at induction, where appropriate	
☐ Key workers with wastewater/effluent management responsibilities receive specific training as required	
☐ Workers have access to, and understand, wastewater/effluent procedures, where appropriate	
4.4 Document checks	
LEVEL 1	
☐ Relevant employment site permits and licences that relate to wastewater/effluent discharge are available and up to date	
☐ Where the employment site is legally required to hold and/or maintain documentation in relation to wastewater/effluent, the documentation is retained on file for the required period of time	
☐ Procedures that address wastewater/effluent issues at the site are made available to relevant employment site personnel	
☐ The employment site has identified and documented the contaminants, their flow direction and potential impact associated with wastewater/effluent discharges leaving the site	
☐ An up-to-date drainage plan of the employment site is available and confirms a general understanding of wastewater flow direction and discharge points	
☐ Training materials (e.g. induction records, training matrix etc.) indicate: - Workers receive training on wastewater/effluent issues; and - Key workers receive training applicable to their wastewater/effluent management roles and responsibilities	
...	



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...	
LEVEL 2	☐ Reviews of wastewater quality and volume improvement targets are undertaken and are available ☐ Regular wastewater quality testing/monitoring results are available ☐ The employment site has made demonstrable achievement of meeting or exceeding wastewater quality and volume improvement targets (normalised)
LEVEL 3	☐ The employment site has identified whether wastewater effluent quality and discharge volume is sustainable (in relation to the local ecosystem and local receptors limits) ☐ The site has implemented leading practice mechanisms to promote reducing water use/consumption ☐ Wastewater effluent quality improvement and volume reduction targets are stretching and are being achieved ☐ Communications with appropriate stakeholders through the value chain show that wastewater effluent quality has been discussed



5. Emissions to air

Employment site requirements at each performance level:

Level 1:

- General: Meet legal requirements (including monitoring)
- General: Relevant, up-to-date permits are held and compliance maintained
- General: An inventory of main point source emissions to air is maintained and site has considered potential for fugitive emissions
- Ozone Depleting Substances: Meet legal requirements
- Ozone Depleting Substances: Relevant, up-to-date permits are held and compliance maintained
- Ozone Depleting Substances: An inventory of ozone-depleting substances (ODS) is maintained
- Ozone Depleting Substances: Regular maintenance of ODS containing equipment

Level 2:

- General: Formal systems and processes in place to manage emissions to air as per the site EMS
- General: Regular air emissions quality testing/monitoring is undertaken to ensure ongoing compliance with permitted limits
- General: Air emissions quality data are made available to relevant internal and external stakeholders
- General: Air quality improvement targets are reviewed on an annual basis to drive continuous improvement
- General: Demonstrable reduction in emissions to air (normalised)
- Ozone Depleting Substances: Proactive ODS leak detection and maintenance of ODS-containing equipment
- Ozone Depleting Substances: Targets in place to phase-out use of specific types of ODS, such as CFCs, halons, TCE, CCl4 in line with recognised international standard practice
- Ozone Depleting Substances: Demonstrable reduction, control and substitution of ODS

Level 3:

- General: Emissions to air are sustainable within local ecosystem limits
- General: Leading practice abatement technologies in place to minimise emissions to air or efforts to reduce emissions at source
- General: Demonstrable achievement of stretching air quality improvement targets beyond recognised international standard practice
- General: Engagement with appropriate stakeholders down the value chain to reduce emissions to air
- General: Additional and proactive emissions monitoring performed
- Ozone Depleting Substances: Complete phase-out of all ODS (beyond legal requirements)

The following checks are intended as guidance and should not limit audit activities.

Is this performance area applicable to the employment site?

If yes, please complete the following table. If no, please proceed to the next Performance Area.

Yes

No



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EVIDENCE GATHERING ON EMISSIONS TO AIR		NOTES
5.1 Physical employment site inspection		
LEVEL 1		
☐	Based on observation, site has identified point and fugitive sources of emissions to air	
☐	Based on observation, no abnormal emissions to air are discernible across the site and at the site perimeter	
☐	Based on observation, site has identified that equipment present on-site that has the potential to contain ozone-depleting substances (e.g. chillers, air conditioning units, etc.)	
☐	Procedures established to manage emissions to air and ozone-depleting substances are being followed (e.g. management of emission sources, equipment, activities etc.)	
☐	Emissions to air abatement equipment has been checked to ensure that it is in appropriate working order	
☐	Equipment likely to contain ozone-depleting substances has been checked to ensure that it is in appropriate working order	
5.2 Employment site procedures and processes		
LEVEL 1		
☐	Policies and procedures in relation to emissions to air and ozone-depleting substances have been established and implemented (e.g. written policies and procedures, employee handbook, induction training, etc.)	
☐	Formal systems and processes in place to manage emissions to air as per the site EMS	
...		



5.3 Interviews	
INTERVIEWS WITH MANAGEMENT CONFIRM THE FOLLOWING:	
LEVEL 1	
☐ Management is aware of laws and regulations (including monitoring requirements) concerning emissions to air compliance	
☐ Management is aware of laws and regulations (including monitoring requirements) concerning ozone-depleting substances compliance	
☐ Policies and processes regarding emissions to air and ozone-depleting substances are effectively communicated to workers	
☐ Management provide the appropriate resources to ensure that compliance with applicable laws and regulations is maintained	
LEVEL 2	
☐ Management actively promotes or endorses proactive emissions to air management	
☐ Management actively promotes or endorses proactive ODS management (including leak detection and maintenance)	
☐ Management are proactively driving continuous improvement through reviewing air quality improvement targets on an annual basis	
☐ The employment site ensures air emissions quality data is made available to relevant internal and external stakeholders	
☐ The employment site demonstrates, where appropriate, a reduction in emissions to air	
☐ The employment site demonstrates, where appropriate, reduction, control and substitution of ODS targets	
LEVEL 3	
☐ Management understands the concept of sustainable emissions to air within the local ecosystem limits	
☐ Management understand what recognised international standard practice is in relation to setting air quality improvement targets for their sector/geography and have set site targets that exceed those practices	
☐ Management understand leading practice abatement technologies to minimise emissions to air or efforts to reduce emissions at source and this has been implemented at the site	
☐ The site actively engages with appropriate stakeholders down the value chain to reduce emissions to air	
...	...



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...	INTERVIEWS WITH KEY WORKERS/OTHER WORKERS USED TO CORROBORATE WORKER TESTIMONY WITH DOCUMENT CHECKS AND MANAGEMENT INTERVIEWS. THEY CONFIRM THE FOLLOWING:
LEVEL 1	
☐ Workers understand how they, and their site's activities and operations, can impact emissions to air	
☐ Key workers are aware of emissions to air and ozone-depleting substances permit/licence requirements, where applicable	
☐ Workers receive training on emissions to air and ozone-depleting substances issues at induction, where appropriate	
☐ Key workers with emissions to air and ozone-depleting substances management responsibilities receive specific training as required	
☐ Workers have access to, and understand, emissions to air and ozone-depleting substances procedures, where appropriate	
5.4 Document checks	
LEVEL 1	
☐ Relevant employment site permits and licences that relate to emissions to air are available and up to date	
☐ Relevant employment site permits and licences that relate to ozone-depleting substances are available and up to date	
☐ Where the employment site is legally required to hold and/or maintain documentation in relation to emissions to air and ozone-depleting substances, these are held on file for the required period of time	
☐ Procedures that address emissions to air and ozone-depleting substances at the site are made available to relevant employment site personnel	
☐ An inventory of main point sources emissions to air is maintained. The site has also considered the potential for fugitive emissions	
☐ An inventory of ozone-depleting substances (ODS) is maintained	
☐ Regular maintenance records are available for the regular maintenance of ODS containing equipment	
☐ Competency records of external ODS servicing contractors are held on file, where required	
☐ Training materials (e.g. induction records, training matrix etc.) indicate: • workers receive training on emissions to air and ODS issues; and • key workers receive training applicable to their emissions to air and ODS roles and responsibilities	...



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LEVEL 2	
☐ Reviews of air quality improvement targets are undertaken and are available	
☐ Regular air emissions and quality testing/monitoring results are available	
☐ The employment site has demonstrated proactive ODS leak detection and maintenance of ODS-containing equipment, above legal requirements	
☐ Targets are in place to phase-out use of specific types of ODS, such as CFCs, halons, TCE, CCl4 in line with recognised international standard practice	
☐ The employment site has made demonstrable achievement of reducing, controlling and substituting ODSs	
☐ The employment site has made demonstrable achievement of meeting or exceeding air quality improvement targets (normalised)	
LEVEL 3	
☐ The employment site has identified whether emissions to air are sustainable (in relation to the local ecosystem limits)	
☐ The employment site has implemented leading practice abatement technologies to minimise emissions to air or efforts to reduce emissions at source	
☐ Air quality improvement targets are stretching and are being achieved	
☐ Communications with appropriate stakeholders through the value chain show that reducing emissions to air has been discussed	
☐ The employment site has performed additional and proactive emissions monitoring beyond legal requirements	
☐ The employment site has documented the complete phase-out of all ODS (beyond legal requirements)	



6. Waste management

Employment site requirements at each performance level:

Level 1:

1. Meet legal requirements
2. Relevant, up-to-date permits are held and compliance maintained
3. Regular checks that waste contractors have appropriate permits are undertaken
4. Hazardous and non-hazardous waste is segregated and employee awareness and training provided on handling and segregation of wastes
5. Inventory/management/storage/transportation procedures for hazardous waste streams are in place
6. Records of on-site and off-site waste disposal/treatment maintained
7. No on-site waste burning/or uncontrolled waste landfilling is undertaken

Level 2:

8. Formal systems and processes in place to manage waste generation, storage, transportation and disposal as per the site EMS including waste minimisation audit and consideration of waste hierarchy principles

9. Evaluation of waste management contractors (suitability, disposal/treatment methods)

10. Engagement with suppliers to identify waste avoidance/reduction/recycling/reuse opportunities

11. Segregation of waste streams in line with recognised international standard practice

12. Monitoring and measurement of waste generated and recycled with data available to relevant internal and external stakeholders

13. Waste reduction and recycling targets are reviewed at least on an annual basis to drive continuous improvement

14. Demonstrable waste reduction (normalised)

Level 3:

15. Waste disposal method and volume is sustainable within local operating environment and availability of waste treatment and disposal facilities

16. Leading practices in place to minimise resource/virgin material use and achieve waste reduction/recycling/energy from waste

17. Demonstrable achievement of stretching waste reduction/recycling targets beyond recognised international standard practice

18. Engagement with appropriate stakeholders down the value chain to identify waste avoidance/reduction/recycling/reuse/energy from waste measures

The following checks are intended as guidance and should not limit audit activities.

Is this performance area applicable to the employment site?

If yes, please complete the following table. If no, please proceed to the next Performance Area.

☐ Yes ☐ No

...

EVIDENCE GATHERING ON WASTE MANAGEMENT	NOTES
6.1 Physical employment site inspection	
LEVEL 1	

- ☐ Segregation and storage practices are in line with legal requirements

☐ Wastes are being segregated according to hazardous and non-hazardous characteristics

☐ Wastes are being stored in containers applicable to their contents

☐ Waste containers are in good condition

☐ Containers and/or storage areas located externally are covered to prevent rain water ingress

☐ All containers of waste are labelled with their contents

☐ Containers of hazardous waste are labelled with their contents and hazard characteristics

☐ Surfaces of waste storage areas are in good condition to prevent spillage or leaking of waste materials

☐ Uncontrolled burning or uncontrolled landfilling activities not undertaken on-site

☐ Waste materials reported as being recycled are being identified and separated for on-site or off-site recycling

☐ Spill response materials/equipment (e.g. granules etc.) are available in close proximity to containers of liquid wastes

☐ Review a number of waste management activities to check whether site waste management procedures are being implemented

☐ Try to identify the physical location where waste documentation is being stored

☐ Check for evidence of:
 - communications/meeting minutes regarding the management of waste are displayed for all workers to see (e.g. on notice boards)
 - waste minimisation programmes
- ...



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...	
6.2 Employment site procedures and processes	
LEVEL 1	
☐ Policies and procedures regarding waste management is in place (e.g. written policies and procedures, employee handbook, induction training, etc.)	
☐ Formal systems and processes are in place to manage waste generation, storage, transportation, and disposal as per the site EMS	
6.3 Interviews	
INTERVIEWS WITH MANAGEMENT CONFIRM THE FOLLOWING:	
LEVEL 1	
☐ Management is aware of laws and regulations concerning waste management and compliance	
☐ Policies and procedures regarding waste management is effectively communicated to workers	
☐ Management provide the appropriate resources to ensure compliance with applicable laws and regulations is maintained	
☐ Management have nominated key workers to undertake regular checks on waste contractor permits/licences	
LEVEL 2	
☐ A nominated person has evaluated the suitability and disposal/treatment methods of waste management contractors	
☐ The employment site engages with suppliers to identify waste avoidance/recycling/reuse opportunities	
☐ Management facilitate annual reviews of waste reduction and recycling targets	
...	



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•••			☐ Training materials (e.g. induction records, training matrix etc.) indicate: • workers receive training on waste handling, segregation and storage requirements; and • key workers receive training applicable to their waste management roles and responsibilities	
	LEVEL 2			
		☐ Waste minimisation audits have been undertaken		
		☐ The employment site has considered and, where practical, applied the waste hierarchy principles		
		☐ Audits of waste contractors have been undertaken to determine the suitability and disposal/treatment methods of waste contractors		
		☐ Communications with suppliers show that waste avoidance/reduction/recycling/reuse opportunities have been discussed		
		☐ Monitoring/measurement data of wastes generated and recycling targets are available		
		☐ Waste reduction/recycling targets have been documented and are reviewed at least annually		
	LEVEL 3			
		☐ Reviews are undertaken to assess the future waste capacity of receiving treatment/disposal facilities to identify waste reduction priorities and drive sustainability		
		☐ The employment site has identified whether the disposal methods and volumes of its wastes are sustainable (in relation to the local operating environment and availability of waste treatment and disposal facilities)		
		☐ Employment site has implemented leading practice measures to minimise virgin material use and waste generated		
		☐ The employment site has implemented leading practices in relation to recycling and/or the generation of energy from waste		
		☐ Waste reduction/recycling targets are stretching and are being achieved		
		☐ Communications with stakeholders show that waste avoidance/reduction/recycling/reuse opportunities down the value chain have been discussed		



7. Pollution prevention/hazardous and potentially hazardous substances

Employment site requirements at each performance level:

Level 1:

1. Meet legal requirements
2. Compliance with prohibited chemicals list (e.g. for agrichemicals from World Health Organisation, WHO)
3. Relevant, up-to-date permits are held and compliance maintained
4. An inventory of hazardous substances used and stored is maintained together with relevant up-to-date Material Safety Data Sheets (MSDS)
5. Specific procedures/controls in place for the management/storage/transportation of all hazardous substances, minimising potential for air, water, soil and groundwater impacts
6. Pollution prevention and response training is delivered to all relevant employees
7. Incidents are notified to the authorities as required by applicable permits/legislation

Level 2:

8. Formal systems and processes in place for pollution prevention and to reduce the potential for pollution incidents as per the site EMS
9. Dedicated site emergency response team in place to deal with pollution incidents
10. Regular practice drills are carried out for pollution incidents
11. Targets are reviewed on an annual basis to reduce the use of hazardous substances, minimise associated risks and substitute with non-hazardous alternatives where possible
12. Where relevant, specific pollution prevention mechanisms are considered in agricultural production, including optimisation of agrichemicals input
13. Demonstrable reduction in hazardous substances use (normalised) and minimisation of associated risks, as appropriate

Level 3:

14. 'Zero pollution incident' target and policy in place
15. Detailed pollution prevention inspections are conducted
16. Promote the use of non-hazardous and non-toxic alternative substances
17. Demonstrable achievement of stretching hazardous substance reduction / substitution targets beyond recognised international standard practice
18. Engagement with appropriate stakeholders down the value chain to improve hazardous substance use

The following checks are intended as guidance and should not limit audit activities.

Is this performance area applicable to the employment site?

If yes, please complete the following table. If no, please proceed to the next Performance Area.

☐ Yes ☐ No



■ APPENDIX 3: GSCP REFERENCE ENVIRONMENTAL AUDIT CHECKS

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

EVIDENCE GATHERING ON POLLUTION PREVENTION/HAZARDOUS AND POTENTIALLY HAZARDOUS SUBSTANCES		NOTES
7.1 Physical employment site inspection		
LEVEL 1		
☐ Hazardous and potentially hazardous substance storage, use, handling, processing and/or disposal are in line with legal requirements		
☐ Bulk containers (including tanks) and pipework containing hazardous and potentially hazardous substances with the potential to cause pollution are in good condition and of sound integrity		
☐ Bulk containers (including tanks) and pipework containing hazardous and potentially hazardous substances with the potential to cause pollution are labelled, where appropriate		
☐ Check, through observation, for the presence and use of prohibited chemicals at the employment site		
☐ Relevant up-to-date Material Safety Data Sheets (MSDS) are available in areas where chemicals are being stored/used		
☐ Procedures/control established to prevent/reduce the potential for pollution are being followed (e.g. management of substances, storage, transportation etc.)		
☐ Emergency response and pollution prevention equipment (e.g. spill kits) is available and has been checked to ensure that it is in appropriate working order		
☐ No spills or leaks to the environment are observed		
☐ Secondary containment/bunds are in good condition and are of sound integrity		
7.2 Employment site procedures and processes		
LEVEL 1		
☐ Policies and procedures in relation to pollution prevention/hazardous and potentially hazardous substances management have been established and implemented (e.g. written policies and procedures, employee handbook, induction training, etc.)		
☐ Formal systems and processes in place for pollution prevention and to reduce the potential for pollution incidents as per the site EMS		
...		



7.3 Interviews	
INTERVIEWS WITH MANAGEMENT CONFIRM THE FOLLOWING:	
LEVEL 1	
☐ Where there is the potential for pollution to occur, the employment site has identified this potential	
☐ Management is aware of laws and regulations concerning pollution prevention/hazardous and potentially hazardous substances management and compliance	
☐ Management is aware of the prohibited chemicals list (e.g. for agrichemicals from World Health Organisation, WHO) and compliance with this requirement	
☐ Policies and processes regarding pollution prevention/hazardous and potentially hazardous substances management is effectively communicated to relevant workers	
☐ Management provide the appropriate resources to ensure compliance with applicable laws and regulations is maintained	
LEVEL 2	
☐ Measures have been implemented to reduce the potential for pollution to occur at the employment site	
☐ Management is actively promoting the implementation of specific pollution prevention mechanisms in agricultural production, including optimisation of agrichemicals input	
☐ Management is actively engaged in promoting and achieving a reduction in hazardous substances use (normalised) and minimisation of associated risks, as appropriate	
LEVEL 3	
☐ Management is actively promoting the use of non-hazardous and non-toxic alternative substances	
INTERVIEWS WITH KEY WORKERS/OTHER WORKERS USED TO CORROBORATE WORKER TESTIMONY WITH DOCUMENT CHECKS AND MANAGEMENT INTERVIEWS. THEY CONFIRM THE FOLLOWING:	
LEVEL 1	
☐ Workers understand how they, and their site's activities and operations, can cause pollution	
☐ Key workers are aware of pollution prevention/hazardous and potentially hazardous substances permit/licence requirements, where applicable	
☐ Workers receive training on pollution prevention/hazardous and potentially hazardous substances at induction	
...	...



■ APPENDIX 3: GSCP REFERENCE ENVIRONMENTAL AUDIT CHECKS

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

...	
☐ Relevant workers with responsibilities for the prevention of pollution receive specific training on its prevention and relevant response in the event of a release	
☐ Workers have access to, and understand, pollution prevention/hazardous and potentially hazardous substances procedures	
LEVEL 2	
☐ Regular practice drills are carried out for pollution incidents	
☐ A dedicated site emergency response team is in place to deal with pollution incidents	
7.4 Document checks	
LEVEL 1	
☐ Relevant employment site permits and licences that relate to pollution prevention/hazardous and potentially hazardous substances are available and up to date	
☐ Where the employment site is legally required to hold and/or maintain documentation in relation to pollution prevention/hazardous and potentially hazardous substances, the documentation is retained on file for the required period of time	
☐ Pollution incidents have been notified to the authorities as required by applicable permits/legislation	
☐ The employment site has considered and documented all potential pollution scenarios related to the site's activities and operations	
☐ Specific procedures/controls for the management/storage/transportation of all hazardous substances, minimising potential for air, water, soil and groundwater impacts are made available to relevant employment site personnel	
☐ The employment site maintains an inventory of hazardous substances used and stored on-site	
☐ The employment site maintains relevant up-to-date Material Safety Data Sheets (MSDS) and these are made available to employees in the language(s) understood by the majority of employees.	
☐ The employment site has considered and documented chemicals used on-site and whether they are on the prohibited chemicals list	
☐ Training materials (e.g. induction records, training matrix etc.) indicate: • workers receive training on pollution prevention and response; and • pollution response team members have received appropriate training	...



APPENDIX 3: GSCP REFERENCE ENVIRONMENTAL AUDIT CHECKS

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

LEVEL 2	
☐ Documented evidence that regular practice drills are carried out for pollution incidents	
☐ Improvement actions identified from practice drills have been implemented and closed out	
☐ The employment demonstrates a reduction in hazardous substances use (normalised) and minimisation of associated risks, as appropriate	
☐ Hazardous substance use and non-hazardous alternative use performance targets are reviewed annually and reviews have been documented	
☐ The employment site has implemented pollution prevention mechanisms to reduce the potential for pollution in agricultural production this includes optimisation of agrichemicals input	
LEVEL 3	
☐ A 'Zero pollution incident' target and policy is in place and has been documented	
☐ Detailed pollution prevention inspections are documented and maintained. Inspections consider all areas of the employment site where the potential for pollution exists.	
☐ The employment site has documented non-hazardous and non-toxic alternative substances that are available	
☐ Hazardous substance reduction/substitution performance targets are stretching and are being achieved	
☐ Communications show the employment site engages with appropriate stakeholders down the value chain to improve hazardous substance use	
☐ The employment site has implemented leading practice mechanisms to reduce the potential for major incidents (e.g. process changes etc.)	



8. Major incident management

Employment site requirements at each performance level:

Level 1:

- 1. Meet legal requirements
- 2. Relevant, up-to-date permits are held and compliance maintained
- 3. Site emergency plan in place with detailed guidelines/training for major incident response, as needed and reflecting the risks of activities undertaken on-site
- 4. Emergency response plan communicated to local authorities, emergency services and local communities, as required

Level 2:

- 5. Formal systems and processes in place to manage emergency response as per the site EMS
- 6. Reduction in potential occurrence and impacts of major incidents (e.g. explosions, fires, major spills etc.)
- 7. Regular Quantitative Risk Assessment (QRA) reviews
- 8. Major incidents reported to relevant stakeholders
- 9. Dedicated site emergency response team in place
- 10. Regular practice drills are carried out for all emergency scenarios

Level 3:

- 11. 'Zero major incident' target and policy in place
- 12. Proactive engagement with local community to ensure awareness of risks of major incidents and emergency response procedures
- 13. Local community is involved in site's emergency response drill and has been contacted by the emergency response team, as relevant
- 14. Leading practice mechanisms in place to reduce risk of major incidents e.g. process changes

The following checks are intended as guidance and should not limit audit activities.

Is this performance area applicable to the employment site?

If yes, please complete the following table. If no, please proceed to the next Performance Area.

☐ Yes ☐ No

...



EVIDENCE GATHERING ON MAJOR INCIDENT MANAGEMENT		NOTES
8.1 Physical employment site inspection		
LEVEL 1		
☐	Confirm, through observation, whether substances used and/or activities undertaken at site have the potential to cause major incidents	
☐	Hazardous substance storage, use, handling, processing and/or disposal are in line with legal requirements	
☐	Ensure hazardous substances are being segregated to prevent potential major incidents from occurring	
☐	Bulk containers (including tanks) and pipework containing substances with the potential to cause a major incident are in good condition and of sound integrity	
☐	Bulk containers (including tanks) and pipework containing substances with the potential to cause a major incident are labelled, where appropriate	
☐	Check whether procedures established to prevent/reduce the potential for a major incident are being followed (e.g. management of substances, activities etc.)	
☐	Emergency response equipment is available and has been checked to ensure that it is in appropriate working order	
☐	Emergency response plan and arrangements (including site/emergency service contact details) are displayed or are available throughout the employment site	
☐	No spills or leaks to the environment are observed	
☐	Review neighbouring properties/operations and confirm whether there is the potential for a major incident that could impact the employment site (this would be an observation rather than a compliance finding)	
8.2 Employment site procedures and processes		
LEVEL 1		
☐	Policies and procedures to prevent/reduce the potential for a major incident have been established and implemented (e.g. written policies and procedures, employee handbook, induction training etc.)	
☐	Policies and procedures for emergency response have been established and implemented (e.g. written policies and procedures, employee handbook, induction training etc.)	
...		



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...	
LEVEL 2	☐ Formal systems and processes are in place to prevent/reduce the potential for major incidents as per the site EMS
	☐ Formal systems and processes are in place for emergency response as per the site EMS
8.3 Interviews	
INTERVIEWS WITH MANAGEMENT CONFIRM THE FOLLOWING:	
LEVEL 1	☐ Where there is the potential for a major incident to occur, confirm whether the employment site has identified this potential
	☐ Management is aware of laws and regulations concerning major incident management and compliance
	☐ Policies and processes regarding major incident management is effectively communicated to workers
	☐ Management provide the appropriate resources to ensure compliance with applicable laws and regulations is maintained
LEVEL 2	☐ Measures have been implemented to reduce the potential occurrence and severity of major incidents at the employment site
	☐ Management is actively engaged in promoting and achieving a reduction in the potential occurrence and impacts of major incidents
LEVEL 3	☐ Management is actively promoting the implementation of leading practice mechanisms in relation to reducing risk of major incidents
...	



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...	☐ Training materials (e.g. induction records, training matrix etc.) indicate: • workers receive training on major incident prevention and emergency response; and • emergency response team members have received appropriate training
LEVEL 2	☐ Major incidents have been reported to relevant stakeholders ☐ Documented evidence that regular practice drills are carried out for all emergency scenarios ☐ Improvement actions identified from practice drills have been implemented and closed out ☐ Regular Quantitative Risk Assessment (QRA) reviews are undertaken and documented
LEVEL 3	☐ A 'Zero major incident' target and policy is in place and has been documented ☐ Communications with the local community show that the risks of major incidents and the associated emergency response procedures, where applicable, have been discussed ☐ The local community is involved in site emergency response drills and has been contacted by the site emergency response team ☐ The employment site has implemented leading practice mechanisms to reduce the potential for major incidents (e.g. process changes etc.)



9. Contaminated land/soil and groundwater pollution prevention

Employment site requirements at each performance level:

Level 1:

1. Meet legal requirements
2. Relevant, up-to-date permits are held and compliance maintained
3. Understanding and awareness of site setting/sensitive receptors in site’s vicinity
4. Not causing or knowingly permitting contamination of soil and groundwater

Level 2:

5. Formal systems and processes in place to manage contaminated soil and groundwater as per the site EMS
6. Qualitative, desk-based (as appropriate) soil and groundwater risk assessment completed including:
 - a. All potential current and historical on-site sources of potential soil and groundwater impact
 - b. All potential current and historical off-site sources of potential soil and groundwater impact
 - c. Mapping of all receptors and pathways
 - d. Assessment of risk of soil and groundwater impact

Level 3:

7. All actions completed following results for soil and groundwater risk assessment, e.g. and as required:
 - a. Focused Phase II investigation
 - b. Appropriate and efficient remediation of soil and/or groundwater contamination performed
8. Any soil and groundwater contamination is communicated to relevant stakeholders, as required
9. Zero contamination’ target and policy in place
10. Proactive management of soil and groundwater quality
11. Leading practice techniques in place to prevent further/future soil and/or groundwater contamination and in relation to remediation
12. Proactive engagement with stakeholders in the local community to ensure awareness of potential soil and/or groundwater contamination
13. Engagement with appropriate stakeholders down the value chain in relation to the prevention and management of soil and groundwater contamination

The following checks are intended as guidance and should not limit audit activities.

Is this performance area applicable to the employment site?

If yes, please complete the following table. If no, please proceed to the next Performance Area.

☐ Yes
 ☐ No



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NOTES	EVIDENCE GATHERING ON CONTAMINATED LAND/SOIL AND GROUNDWATER POLLUTION PREVENTION
	9.1 Physical employment site inspection
	LEVEL 1
	☐ Confirm, through observation, whether substances used, wastes stored and/or activities undertaken at site have the potential to impact underlying soil and groundwater
	☐ Bulk containers (including tanks), pipework containing substances with the potential to cause impact to the environment are in good condition and of sound integrity
	☐ Secondary containment/bunds are in good condition and are of sound integrity
	☐ Procedures established to prevent/reduce the potential for impact to soil and groundwater are being followed (e.g. management of substances, activities etc.)
	☐ Emergency response equipment is available and has been checked to ensure that it is in appropriate working order
	☐ No spills or leaks to the environment are observed
	☐ There is no staining of unprotected ground
	☐ No areas of the employment site have been subject to burning or burying of waste activities
	☐ Review neighbouring properties/operations and confirm whether there is the potential for off-site activities impacting soil and groundwater migrating onto the employment site (this would be an observation rather than a compliance finding)
	6.2 Employment site procedures and processes
	LEVEL 1
	☐ Policies and procedures in relation to contaminated land/soil and groundwater pollution prevention have been established and implemented (e.g. written policies and procedures, employee handbook, induction training, etc.)
	☐ Formal systems and processes are in place in relation to contaminated land/soil and groundwater pollution prevention as per the site EMS
...	



■ APPENDIX 3: GSCP REFERENCE ENVIRONMENTAL AUDIT CHECKS

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...	
☐ The employment site ensures any soil and groundwater contamination is communicated to relevant internal and external stakeholders	
LEVEL 3	
☐ Management have implemented and promote a 'Zero contamination' target and policy	
☐ Management are proactive in maintaining and improving soil and groundwater quality	
☐ Management actively promotes the implementation of leading practice techniques to prevent further/future soil and/or groundwater contamination and in relation to remediation	
☐ Management are proactive in engaging with stakeholders in the local community to ensure awareness of potential soil and/or groundwater contamination	
☐ Management engage with appropriate stakeholders down the value chain in relation to the prevention and management of soil and groundwater contamination	
INTERVIEWS WITH KEY WORKERS/OTHER WORKERS USED TO CORROBORATE WORKER TESTIMONY WITH DOCUMENT CHECKS AND MANAGEMENT INTERVIEWS. THEY CONFIRM THE FOLLOWING:	
LEVEL 1	
☐ Workers understand how they, and their site's activities and operations, can impact soil and groundwater	
☐ Key workers are aware of contaminated land/soil and groundwater pollution prevention permit/licence requirements, where applicable	
☐ Workers receive training on soil and groundwater issues at induction, where appropriate	
☐ Key workers with contaminated land/soil and groundwater pollution prevention management responsibilities receive specific training as required	
☐ Workers have access to, and understand, contaminated land/soil and groundwater pollution prevention procedures, where appropriate	
☐ Workers confirm that waste materials are not buried on-site currently	
☐ Workers confirm that waste materials have not been buried on-site historically	
...	



9.4 Document checks	
LEVEL 1	
Relevant employment site permits and licences that relate to contaminated land/soil and groundwater pollution prevention are available and up to date	
A 'Zero contamination' target and policy is maintained on-site and is available	
Where the employment site is legally required to hold and/or maintain documentation in relation to contaminated land/soil and groundwater pollution prevention, the documentation is retained on file for the required period of time	
The employment site has documented the site setting/sensitive receptors in the site's vicinity	
Records of inspections of secondary containment/bunds are available	
Records of spills or releases to the environment are documented	
Any known soil and groundwater impacts arising from off-site sources have been documented	
Procedures that address soil and groundwater impacts at the site are made available to relevant employment site personnel	
Training materials (e.g. induction records, training matrix etc.) indicate: workers receive training on soil and groundwater issues and pollution prevention; and key workers receive training applicable to their contaminated land/soil and groundwater pollution prevention management roles and responsibilities	
LEVEL 2	
The employment site maintains documentation relating to soil and groundwater risk assessments including, where appropriate, focussed Phase II investigations, monitoring results and remediation activities	
LEVEL 3	
The employment site has implemented leading practice techniques to prevent further/future soil and/or groundwater contamination and in relation to remediation	
Communications with appropriate stakeholders and the local community through the value chain show that the prevention and management of soil and groundwater contamination have been discussed	



10. Land use and biodiversity

Employment site requirements at each performance level:

Level 1:

1. Meet legal requirements relating to planning and development
2. Relevant, up-to-date permits are held and compliance maintained
3. No negative impact on designated protection areas or species

Level 2:

4. Formal systems and processes in place to manage land use and biodiversity as per the site EMS
5. In agricultural production, proactive management to maintain soil fertility, avoid soil erosion and promote soil and biodiversity recovery
6. Where appropriate, demonstrable improvement in land use and biodiversity performance including deforestation, rehabilitation and conservation activities

Level 3:

7. Land use is sustainable within local ecosystem context
8. Leadership role in biodiversity conservation, for example partnership with relevant local organisations
9. Leading practice mechanisms in place to promote biodiversity and leading practice land management
10. Engagement with appropriate stakeholders down the value chain to improve land use and biodiversity performance, within and beyond site boundaries
11. Demonstrable achievement of stretching targets beyond recognised international standard practice

The following checks are intended as guidance and should not limit audit activities.

Is this performance area applicable to the employment site?

If yes, please complete the following table. If no, please proceed to the next Performance Area.

☐ Yes ☐ No

...



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...	☐ Policies and processes regarding land use and biodiversity are effectively communicated to workers
	☐ Management provide the appropriate resources to ensure that compliance with applicable laws and regulations is maintained
LEVEL 2	☐ In agriculture production management actively promotes or endorses proactive management in agricultural production to maintain soil fertility, avoid soil erosion and promote soil and biodiversity recovery
	☐ The employment site demonstrates, where appropriate, improvement in land use and biodiversity performance including deforestation, rehabilitation and conservation activities
LEVEL 3	☐ Management understands the concept of sustainable land use within the local ecosystem context
	☐ The employment site demonstrates a leadership role in biodiversity conservation (e.g. by partnering with local organisations)
	☐ Management actively promotes the implementation of leading practice mechanisms in relation to biodiversity and land management
	☐ Management understands what recognised international standard practice is in relation to land use and biodiversity for their sector/geography and have set targets that exceed those practices
INTERVIEWS WITH KEY WORKERS/OTHER WORKERS USED TO CORROBORATE WORKER TESTIMONY WITH DOCUMENT CHECKS AND MANAGEMENT INTERVIEWS. THEY CONFIRM THE FOLLOWING:	
LEVEL 1	☐ Workers understand how they, and their site's activities and operations, can impact land use and biodiversity
	☐ Key workers are aware of land use and biodiversity permit/licence requirements (including planning permission requirements), where applicable
	☐ Workers receive training on land use and biodiversity issues at induction, where appropriate
	☐ Key workers with land use and biodiversity management responsibilities receive specific training as required
	☐ Workers have access to, and understand, land use and biodiversity procedures, where appropriate
...	



10.4 Document checks	
LEVEL 1	
Relevant employment site permits and licences that relate to land use and biodiversity (including planning permission/consent and development requirements) are available and up to date	
Where the employment site is legally required to hold and/or maintain documentation in relation to land use and biodiversity, the documentation is retained on file for the required period of time	
Procedures that address land use and biodiversity issues at the site (including planning of new developments, construction, changing processes etc.) are made available to relevant employment site personnel	
If there have been recent changes on site (e.g. building extensions, process changes, new buildings etc.), check to ensure that potential impacts on land use and biodiversity have been considered and documented	
Training materials (e.g. induction records, training matrix etc.) indicate: - workers receive training on land use and biodiversity issues; and - key workers receive training applicable to their land use and biodiversity management roles and responsibilities	
There is documented evidence that demonstrates that the employment site does not negatively impact designated protection areas or species	
LEVEL 2	
The employment site has made demonstrable improvement in land use and biodiversity performance	
LEVEL 3	
Communications with local organisations show that the employment site is taking a leading role in biodiversity conservation	
The employment site has identified whether land use is sustainable (in relation to the local ecosystem context)	
The employment site has implemented leading practice mechanisms to promote biodiversity and land management	
Land use and biodiversity performance targets are stretching and are being achieved	
Communications with appropriate stakeholders through the value chain show that land and biodiversity performance have been discussed	



11. Nuisance

Employment site requirements at each performance level:

Level 1:

1. Meet legal requirements
2. Relevant, up-to-date permits are held and compliance maintained
3. Understanding and awareness of nuisance levels from site activities and associated impacts (including odour, noise, visual and general housekeeping)

Level 2:

4. Formal systems and processes in place to manage nuisances (including odour, noise, visual and general housekeeping) and complaints as per the site EMS
5. Impacts and complaints data are made available to relevant internal and external stakeholders
6. Impacts and complaints reduction targets are reviewed on an annual basis to drive continuous improvement
7. Demonstrable reduction in nuisance impacts and complaints

Level 3:

8. 'Zero complaints' target and policy in place
9. Proactive engagement with local community/stakeholders to reduce impacts
10. Leading practice mechanisms in place to ensure reduction of impacts e.g. process changes
11. Demonstrable achievement of stretching performance targets beyond recognised international standard practice

The following checks are intended as guidance and should not limit audit activities.

Is this performance area applicable to the employment site?

If yes, please complete the following table. If no, please proceed to the next Performance Area.

☐ Yes ☐ No

...

...



EVIDENCE GATHERING ON NUISANCE			NOTES
11.1 Physical employment site inspection			
LEVEL 1			
☐ Confirm, through observation, whether activities undertaken at site, and resulting normal emissions) have the potential to cause nuisance to surrounding neighbours			
☐ There are no emissions to air, water or land that have the potential to cause nuisance			
☐ Confirm, through observation, whether there are any sensitive off-site receptors adjacent to the employment site (e.g. schools, housing, etc.)			
☐ Emissions from the employment site are not noted at the site perimeter			
☐ Procedures established to prevent/reduce the potential for impacts to surrounding areas are being followed (e.g. management of waste, activities etc.)			
☐ Emergency response equipment is available and has been checked to ensure that it is in appropriate working order			
☐ General housekeeping across the employment site is of an acceptable standard			
☐ No spills or leaks to the environment are observed			
11.2 Employment site procedures and processes			
LEVEL 1			
☐ Policies and procedures in relation to nuisance management have been established and implemented (e.g. written policies and procedures, employee handbook, induction training, etc.)			
☐ Formal systems and processes are in place to manage nuisances (including odour, noise, visual and general housekeeping) as per the site EMS			
☐ Formal systems and processes are in place to manage complaints arising from on-site nuisances as per the site EMS			
11.3 Interviews			
INTERVIEWS WITH MANAGEMENT CONFIRM THE FOLLOWING:			
LEVEL 1			
☐ Management understand and are aware of potential nuisance levels from site activities and associated impacts (including odour, noise, visual and general housekeeping)			
...			



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...	
☐ Management is aware of laws and regulations concerning nuisance and compliance	
☐ Policies and processes regarding nuisance are effectively communicated to workers	
☐ Management is aware of complaints that are received by the employment site	
☐ Management provide the appropriate resources to ensure that compliance with applicable laws and regulations is maintained	
LEVEL 2	
☐ Management are proactively driving continuous improvement through reviewing complaints targets on an annual basis	
☐ The employment site ensures impacts and complaints data is made available to relevant internal and external stakeholders and local communities	
☐ The employment site demonstrates, where appropriate, improvement in nuisance impacts and complaints	
LEVEL 3	
☐ Management have implemented and promote a 'Zero complaints' target and policy	
☐ Management actively promotes the implementation of leading practice mechanisms in relation to reducing impacts (e.g. through process changes)	
☐ Management understands what recognised international standard practice is in relation to nuisance management for their sector/geography and have set targets that exceed those practices	
INTERVIEWS WITH KEY WORKERS/OTHER WORKERS USED TO CORROBORATE WORKER TESTIMONY WITH DOCUMENT CHECKS AND MANAGEMENT INTERVIEWS. THEY CONFIRM THE FOLLOWING:	
LEVEL 1	
☐ Workers understand how they, and their site's activities and operations, can impact surrounding neighbours	
☐ Key workers are aware of nuisance permit/licence requirements, where applicable	
☐ Workers receive training on nuisance issues at induction, where appropriate	
☐ Key workers with nuisance and complaints management responsibilities receive specific training as required	
☐ Workers have access to, and understand, nuisance procedures, where appropriate	
...	

APPENDIX 4

GSCP Reference Environmental Alert Notification

WHERE A 'CRITICAL' NON-COMPLIANCE IS IDENTIFIED:

Where a 'critical' non-compliance is identified, the auditor should follow the escalation policies of the audit requestor. Wherever possible, the auditor should inform the audit requestor as soon as a 'critical' non-compliance is identified. If the audit requestor is on site, the auditor should communicate the critical non-compliance immediately. This will enable the audit requestor and the employment site to work together to plan an appropriate and timely resolution to the issue.

Please note that if an auditor believes they might be at risk as a result of communicating a critical non-compliance, the audit team should wait until it is removed from that situation before issuing the alert notification.

Auditors should prioritise the welfare of workers when deciding how to inform employment site management of any critical non-compliance. Auditors should follow the escalation policies of the audit requestor to minimise any risk to workers.

Examples of critical non-compliances include

- An environmental aspect which represents imminent risk of serious or significant impact to the environment (e.g. major damage to a local ecosystem, closure of a potable water abstraction point, known on-site or off-site impact to soil, groundwater or surface water).
- Relevant inventory/register not established in relation to a particular Performance Area, which has the potential to result in non-compliance with permit/licence/consent requirements or which results in mis-management of environmental matters with the potential for significant impact to the environment.
- Site currently under threat of prosecution, fine and/or enforcement in relation to an environmental issue, e.g. the site has identified that permit/licence/consent/exemption is required, but not obtained it.
- An attempt to pervert the course of the audit through fraud, coercion, deception or interference.
- A systemic violation of a legal requirement that has attracted (or could likely attract) regulator intervention (e.g. continued illegal disposal of waste materials, either on-site or off-site).
- Auditors denied access or obstructed from conducted from conducting a proper audit
- Non-operation of critical abatement equipment e.g. air emission scrubber, incineration unit etc.
- Evidence of the deliberate provision of false information to auditors or regulators so as to disguise non-compliances with permit/licence/consent requirements.
- Performance or monitoring data manipulated or misreported to intentionally mislead regulators.
- A major non-compliance from a previous audit that has not been addressed or in relation to which no significant improvement has been made by the time of a follow up audit and which has increased the level of environmental risk, e.g. of causing incidents.
- Site knowingly utilises illegal/unlicensed external third parties in relation to environmental matters (e.g. waste removal/disposal).



REFERENCE ALERT NOTIFICATION

1. Key information

EMPLOYMENT SITE AND AUDIT INFORMATION

Name of the audited company:

Supplier name:

Employment site name:

Country:

Audit date:

Date of alert:

Lead auditor:

Issue area(s):

2. Details of critical non-compliance(s)

Critical non-compliances should be presented in a consistent format, with sufficient detail concerning the issue(s) and its context to enable useful remediation discussions to begin. A table should be completed for each issue found.

CRITICAL NON-COMPLIANCE

Legislation or environmental topic:

Description of critical non-compliance:

Auditor findings (description, extent of issue, direct consequences of the issue, etc):

Documentary, interview and other evidence found:

Management response:

Proposed corrective actions:

APPENDIX 5

GSCP Reference Environmental Audit Report

This tool forms part of the GSCP set of reference tools designed to provide a common interpretation of local and international environmental standards and requirements and environmental reference codes (if available and applicable). The Environmental Reference Requirements reflect a common understanding of good environmental practice and are applicable to all raw material processing, agricultural, manufacturing and logistics sites in the supply chain. The Environmental Reference Requirements provide a model

for a site in the supply chain to demonstrate continuous improvement in its environmental performance from basic compliance to leading-edge performance (across three defined 'levels' for eleven different performance areas).

The reference tools on Environmental Audit Process and Methodology are based on the GSCP Environmental Reference Requirements but can be adopted and tailored to other codes of environmental practice.

THE CONTEXT, FINDINGS, ISSUES AND ACTIONS AGAINST EACH AREA OF THE AUDIT STANDARD USED SHOULD BE REPORTED TO THE AUDIT REQUESTOR

The report should include:

- a summary of the auditors' evaluation of the employment site's performance against each of the 11 Performance Areas;
- identified non-compliances which indicate that the employment site is not meeting Level 1 of the GSCP Environmental Reference Requirements;
- observations and good practices.

For each environmental Performance Area, the report should:

- describe the current situation including which of the GSCP Environmental Reference Requirements the site is currently meeting;
- provide evidence and information to substantiate the findings;
- for each non-compliance or observation, provide a:
 - / description of the non-compliance or observation and its frequency;
 - / evidence found to substantiate it;
 - / classification to applicable law, code of conduct, etc;
 - / if required by the audit requestor, recommended corrective action with a timeframe for completion and responsibility.



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ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

The report should include photos of the employment site such as*:

- outside general overview;
- inside general overview
- key activities and processes that have potential environmental impact;
- waste handling and storage areas;
- hazardous substance storage areas;
- areas of potential impact to soil and groundwater including staining and distressed vegetation;
- bulk storage tanks and secondary containment;
- wastewater treatment areas;
- abatement equipment;
- good practices where these can be photographed;
- non-compliances where these can be photographed.

Unless agreed by all parties in writing, the audit organisation will not distribute the report to any entities except the audit requestor. However, the audit requestor should share the report with the employment site/customer/supplier as soon as possible in order to facilitate co-operation on continuous improvement.

Auditors may feel the need to separately report to the audit requestor in the event that, for example, the auditor has:

- information that is too sensitive for the audit report itself;
- concerns which cannot be substantiated through evidence and/or interviews;
- commentary/insight on the attitude of management towards the non-compliances or where management was obstructive to the audit process;
- concerns about the possibility of falsified records.

The process for reporting such information should be agreed between the audit requestor and the auditor in advance of the audit.

This type of reporting may not be appropriate where the audit requestor is the employment site itself.

*Photographs should only be taken with the permission of the employment site as they may contain or reveal confidential information.

1. EXECUTIVE SUMMARY

This Audit Report summarises the key findings from an audit undertaken at the <<site>> against applicable legal requirements and the GSCP Environmental Reference Requirements. Further information on the GSCP Environmental Reference Requirements can be found in the main body of this report.

The audit was undertaken by <<auditor(s) name(s)>> on <<date>>, on behalf of <<audit requestor>>.

<<Please include a brief summary of overall environmental performance identified during the site visit, highlighting key strengths and also areas for improvement>>.

The following table records the key findings from the audit against the three performance levels for each of the 11 Environmental Performance Areas outlined in the GSCP Environmental Reference Requirements.

ENVIRONMENTAL PERFORMANCE AREA	GSCP ENVIRONMENTAL REFERENCE REQUIREMENTS LEVEL RATING (Not achieved Level 1, Level 1, Level 2, Level 3)	NUMBER OF NON-COMPLIANCES PLEASE INDICATE IF ZERO (Please indicate in brackets the number of legal compliances identified)			NUMBER OF OBSERVATIONS
		Critical	Major	Minor	
Example Performance Area	Not achieved Level 1	1 (0)	5 (2)	5 (4)	3
Environmental management systems					
Energy use, transport GHGs					
Water use					
Wastewater/effluent					
Emissions to air					
Waste management					
Pollution prevention/hazardous and potentially hazardous substances					
Major incident management					
Contaminated land/soil and groundwater pollution prevention					
Land use and biodiversity					
Nuisance					





2. REFERENCE AUDIT REPORT

2.1 General information

1.0	Employment site contact details:	Name: _____ Address: _____ Country: _____ Telephone: _____ Fax/email: _____ GPS coordinates: _____ Is this site in an Export Processing Zone (EPZ)*? Yes ☐ No ☐		
1.1	Audit date(s):	_____		
1.2	Report issue date:	_____		
1.3	Audit type:	☐ Initial ☐ Follow-up	☐ Full Audit ☐ Partial Audit	☐ Announced ☐ Semi-announced ☐ Unannounced
1.4	Audit conducted by:	☐ Auditing Company (please provide name below) ☐ Retailer ☐ Brand Owner ☐ Purchaser ☐ NGO ☐ Union ☐ Multiple parties. If yes, please list.		
1.5	Audit personnel <i>(please specify the names and titles of the auditors and worker interviewers who conducted the audit)</i>	Name: _____ Title: _____	Name: _____ Title: _____	
1.6	Time in and time out:	In: _____	Out: _____	
1.7	Previous audit details (if any):	• Audited conducted by: _____ • Audit date: _____ • Audit type: _____		

...

* "Industrial zones with special incentives set up to attract foreign investors, in which imported materials undergo some degree of processing before being re-exported" (ILO, 2007)



■ APPENDIX 5: GSCP REFERENCE ENVIRONMENTAL AUDIT REPORT

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

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		• Audited conducted by:
		• Audit date:
		• Audit type:
		• Audited conducted by:
		• Audit date:
		• Audit type:
1.8	Supplier name:	
1.9	Main employment site contact:	Name: Position: Telephone:
1.10	Name and job title of employment site representative who signed the summary of findings and corrective actions	Name: Title:
1.11	Audits results reviewed by employment site management?	☐ Yes ☐ No
1.12	Audit report author:	
1.13	Audit report reviewer:	
1.14	General remarks:	



2.2 Employment site information

2.2.1 Production systems and processes

2.1.1	Industry sector:	
2.1.2	Principal products:	
2.1.3	Main export markets:	
2.1.4	Main production processes (e.g. Stitching, labelling, injection, moulding, baking, harvesting, dyeing etc.):	
2.1.5	Main production equipment:	
2.1.6	Main raw materials used:	
2.1.7	List of hazardous chemicals used employment site:	

2.2.2 Audit overview and history

2.2.1	Applicable environment-related code of conduct, if appropriate	
2.2.2	Was a perimeter survey undertaken? <i>If Yes, please detail the results</i>	☐ Yes ☐ No
2.2.3	Were any alert notifications issued as part of this audit? <i>If yes, how many?</i>	☐ Yes ☐ No



2.3 Reporting template

The audit report includes 'Findings' and 'Evidence' columns as per the example below for each of the 11 Performance Areas against which the audit was conducted. For follow-up audits, the report issued should be an updated version of the original report, with all new issues and updates to previous issues clearly highlighted. An example of how to include follow-up information in the audit report template is shown below.

FINDING (Summary of requirement, plus description of the finding, details of the management position, any management involvement and element of the law that has been violated)	EVIDENCE (A description of the evidence observed and related to the audit check guidelines. Please indicate the type of evidence listed e.g. worker interview, documentary, observational)
e.g. Waste Management Site was not in possession of appropriate waste permit.	Documentary No permit available. Management Interview Site management not aware of requirement.
Follow up 01/06/09 – Site obtained relevant permit from local authority.	Follow-up 01/06/09 – Documentary Copy of permit sent to auditor.
Follow up 01/06/09 – New Issue Waste management Site management has not communicated requirements of permit to relevant site personnel.	Follow up 01/06/09 – New issue Management Interviews Management reported that it has scheduled a half day awareness raising session on requirements of the new waste permit.

The tables below present the findings of the audit against each of the GSCP Environmental Reference Requirement. At Level 1 non-compliances are categorised into Critical, Major and Minor non-compliances, together with an indication as to where these represent non-compliances with legal requirements. In case legal requirements do not exist in the site's country of operations, these reference requirements can be used as reference and also as parameters against which non-compliances can be identified.

For Level 2 and Level 3, the tables state whether a particular requirement has been 'met' or 'not met'. There is then a summary of good practices identified. Each section is completed with an overall summary statement in relation to which Level the auditor believes the site has achieved.

Definitions and examples of non-compliances:

A non-compliance is a specific breach of the standard or code against which the employment site was audited.

In relation to Level 1 Requirements, a non-compliance is categorised as a:

- minor non-compliance;
- major non-compliance; or
- critical non-compliance.

The Audit Report records whether the non-compliance identified is a non-compliance with specific legal requirements.

Minor

- basic environmental management structure and defined management responsibilities are in place, however, this is not documented;
- site has identified and is managing its potentially significant aspects and impacts but has not documented this process/ the results;
- relevant inventory/register established in relation to a particular Performance Area, but not actively maintained;
- an occasional or isolated compliance issue e.g. missing records/documentation in relation to permit/consent/licence requirements;
- the site has a mechanism to remain up to date with applicable local legal requirements, but has not documented this process;
- an issue which presents a risk to the environment (low risk) (either on-site or the surrounding areas);
- site has a procedure to ensure that external third parties utilised by the site for environmental matters (e.g. waste removal/disposal) are appropriately licensed, but has not documented this process;



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- occasional or isolated instances of missing monitoring/performance data (that is not a legal requirement).

Major

- basic management structure/defined management responsibilities not in place, either in relation to overall environmental management or particular Performance Area;
- site has identified that it has potentially significant environmental aspects/impacts, but has not acted on this information;
- site is not aware of its legal requirements in relation to a particular performance area;
- site has no mechanism for remaining up to date with applicable legal requirements;
- site not aware of relevant permit/licence/consent/exemption requirements;
- breaches of legislation or permit/licence/consent requirements which represents risk of moderate harm to the environment e.g. exceedance of wastewater discharge limits, exceedance of air emission limit concentration, etc;
- a systemic breach or violation of a legal requirement;
- a breach of a legal requirement or environmental permit/licence/consent which is considered likely to attract regulator intervention;
- site has not confirmed that all external third parties utilised by the site for environmental matters (e.g. waste removal/disposal) are appropriately licensed;
- relevant inventory/register not established in relation to a particular Performance Area;
- consumption/generation data not collected in relation to a particular Performance Area that is relevant to the site;
- site has not provided identified and/or provided training to employees on environmental matters which represent a serious or significant impact to the environment.

Critical

- an environmental aspect which represents imminent risk of serious or significant impact to the environment (e.g. major damage to a local ecosystem, closure of a potable water abstraction point, known on-site or off-site impact to soil, groundwater or surface water);
- site has identified that a permit/licence/consent/exemption is required, but has not obtained it;
- relevant inventory/register not established in relation to a particular Performance Area, which has the potential to result in non-compliance with permit/licence/consent requirements or which results in mis-management of environmental matters with the potential for significant impact to the environment;

- site currently under threat of prosecution, fine and/or enforcement in relation to an environmental issue;
- an attempt to pervert the course of the audit through fraud, coercion, deception or interference;
- a systemic violation of a legal requirement that has attracted (or could likely attract) regulator intervention (e.g. continued illegal disposal of waste materials, either on-site or off-site);
- auditors denied access or obstructed from conducting a proper audit;
- non-operation of critical abatement equipment e.g. air emission scrubber, incineration unit, etc;
- evidence of the deliberate provision of false information to auditors or regulators so as to disguise non-compliances with permit/licence/consent requirements;
- performance or monitoring data manipulated or misreported to intentionally mislead regulators;
- a major non-compliance from a previous audit that has not been addressed or for which no significant improvement has been made by the time of a follow up audit, and which has increased the level of environmental risk, e.g. of causing incidents;
- site knowingly utilises illegal/unlicensed external third parties in relation to environmental matters (e.g. waste removal/disposal).

Critical non-compliances should trigger an alert notification [\[see Section 4.5\]](#).

- An Observation
 - / a possible issue which could develop into a non-compliance if action is not taken by the Employment Site (i.e. a potential non-compliance).
 - / an issue, on which the auditor has some evidence to indicate that it may be present, but is not confirmed by more than one data point.
 - / an opportunity for improvement e.g. how the employment site can meet the requirements of the next performance level.
- Good Practice
 - / an innovative or novel approach to managing environmental issues in relation to a particular Performance Area.

Level 2 and Level 3 findings

The GSCP Environmental Reference Requirements at levels 2 and 3 are intended to drive performance improvement. As such, the auditor should record only whether the Employment Site has met or not met a particular Requirement, as well as observations and examples of good practice. Where the auditor identifies that a Requirement is not met, they should provide a short description as to why.

3. REFERENCE AUDIT REPORT BY PERFORMANCE AREAS

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ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010



1.0 ENVIRONMENTAL MANAGEMENT SYSTEMS						
Report						
LEVEL 1						
Non-Compliance Type Please tick one column and also note if it is a legal issue?				Observation?	Finding Summary of requirement, plus description of the finding and element of the law that has been violated	Evidence (A description of the evidence observed and related to the audit check guidelines. Please indicate the type of evidence listed e.g. worker interview, documentary, observational)
Critical	Major	Minor	Legal Issue?			
☐	☐	☐	☐	☐		



LEVEL 2				
Requirement	Met	Not Met	Observation?	Evidence (A description of the evidence observed and related to the audit check guidelines)
Environmental Management System (EMS) is established, documented, implemented, maintained and continually reviewed/improved The EMS includes: - environmental Policy; - planning: environmental risk assessment, setting objectives and targets; - implementation and operation: operational procedures; adequate training; documentation and its control; - checking: monitoring and measurement, audit and inspections; - management Review.				
Information on environmental performance is made available to appropriate internal and external stakeholders <i>(please refer to the guidance section for detailed definition)</i>				
LEVEL 3				
Forward looking environmental strategy to drive leading practice	☐	☐		
Environmental management and environmental performance targets are designed to improve or sustain the environment and local ecosystem, or global when appropriate	☐	☐		
Proactive engagement with relevant stakeholders to achieve significant performance improvement	☐	☐		
Where relevant, commitment to voluntary standards	☐	☐		
...				

Examples of good practice identified
(please provide a short description of the good practice measure identified)

Summary: overall level achieved for environmental management systems: ☐ Level 1 not achieved ☐ Level 1 ☐ Level 2 ☐ Level 3

Note to auditor: If this report relates to a follow-up audit, then please copy the tables from above and replicate here with the findings presented as per the template on page 5.

■ APPENDIX 5: GSCP REFERENCE ENVIRONMENTAL AUDIT REPORT





2.0 ENERGY USE, TRANSPORT AND GREENHOUSE GASES (GHGS)									
Report									
LEVEL 1									
Non-Compliance Type Please tick one column and also note if it is a legal issue?				Observation?		Finding		Evidence	
Critical	Major	Minor	Legal Issue?			Summary of requirement, plus description of the finding and element of the law that has been violated)		(A description of the evidence observed and related to the audit check guidelines. Please indicate the type of evidence listed e.g. worker interview, documentary, observational)	
☐	☐	☐	☐	☐					
LEVEL 2									
Requirement				Met		Not Met		Observation?	
								(A description of the evidence observed and related to the audit check guidelines)	
Formal systems and processes in place to manage and audit energy use and GHG emissions as per the site EMS				☐		☐			
Energy consumption and greenhouse gas emissions (including on-site vehicle emissions) are made available to appropriate internal and external stakeholders				☐		☐			
Renewable energy use targets and GHG emission reduction targets (normalised) are established/reviewed at least on an annual basis to drive continuous improvement				☐		☐			
Demonstrable reduction in energy (normalised; please refer to the guidance section for further definition)				☐		☐			
Targets include on-site vehicle emissions reduction, which are reviewed on an annual basis to drive continuous improvement				☐		☐			



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LEVEL 3

Leading practice mechanisms in place to reduce greenhouse gas (GHG) intensity (for further definition please refer to the guidance section)



Use of energy sources with lower GHG intensity



- Energy consumption level is sustainable within availability of local energy resources
- Demonstrable achievement of stretching energy and fuel efficiency and GHG emission targets beyond recognised international standard practice



Engagement with appropriate stakeholders down the value chain identifying ways to reduce GHG emissions



Carbon accounting in business system



Specification of the most environmentally efficient combinations of vehicle types, fuels and technologies for distribution fleet



Fuel consumption and vehicle emission reduction targets are reviewed on an annual basis to drive continuous improvement for the entire fleet



Examples of good practice identified
(please provide a short description of the good practice measure identified)

Summary: overall level achieved for energy use, transport and Greenhouse Gases (GHG): ☐ Level 1 not achieved ☐ Level 1 ☐ Level 2 ☐ Level 3



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3.0 WATER USE

Report

LEVEL 1

Non-Compliance Type

Please tick one column and also note if it is a legal issue?

Critical

Major

Minor

Legal Issue?

Observation?

Summary of requirement, plus description of the finding and element of the law that has been violated)

Finding

Evidence

(A description of the evidence observed and related to the audit check guidelines. Please indicate the type of evidence listed e.g. worker interview, documentary, observational)

LEVEL 2

Requirement

Met

Not Met

Observation?

Evidence

(A description of the evidence observed and related to the audit check guidelines)

Formal systems and processes in place to manage and audit water consumption as per the site EMS

Water consumption data are made available to relevant internal and external stakeholders

Water consumption efficiency targets are reviewed on an annual basis to drive continuous improvement

Demonstrable achievement of water efficiency targets (normalised)

...



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LEVEL 3				
Where relevant, water consumption level is sustainable within local ecosystem limits and water catchment area	☐	☐		
Investigation of and use, if relevant, of alternative water sources with lower ecosystem impact	☐	☐		
Demonstrable achievement of stretching water efficiency targets beyond recognised international standard practice	☐	☐		
Leading practice water efficiency mechanisms in place, including re-use, recovery and recycling	☐	☐		
Engagement with appropriate stakeholders down the value chain to improve water efficiency	☐	☐		
Examples of good practice identified (please provide a short description of the good practice measure identified)				
Summary: overall level achieved for water use: ☐ Level 1 not achieved ☐ Level 1 ☐ Level 2 ☐ Level 3				



4.0 WASTEWATER / EFFLUENT									
Report									
LEVEL 1									
Non-Compliance Type Please tick one column and also note if it is a legal issue?				Observation?	Finding Summary of requirement, plus description of the finding and element of the law that has been violated)	Evidence (A description of the evidence observed and related to the audit check guidelines. Please indicate the type of evidence listed e.g. worker interview, documentary, observational)			
Critical	Major	Minor	Legal Issue?						
☐	☐	☐	☐	☐					
LEVEL 2									
Requirement						Met	Not Met	Observation?	Evidence (A description of the evidence observed and related to the audit check guidelines)
Formal systems and processes in place to manage wastewater effluent as per the site EMS						☐	☐		
Basic on-site wastewater treatment in place to achieve improvements in wastewater quality or connection to off-site wastewater treatment system						☐	☐		
Regular wastewater quality testing/ monitoring is undertaken to ensure ongoing compliance with permitted effluent limits and as per the site's EMS						☐	☐		
Wastewater quality data are made available to relevant internal and external stakeholders						☐	☐		
Wastewater quality and volume improvement targets are reviewed on an annual basis to drive continuous improvement						☐	☐		
Demonstrable improvement in wastewater quality						☐	☐		
									...



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...

LEVEL 3					
Wastewater effluent quality and discharge volume are sustainable in the context of local receptors and ecosystem limits	☐	☐			
	☐	☐			
	☐	☐			
	☐	☐			
	☐	☐			
Leading practice wastewater treatment in place	☐	☐			
Leading practice mechanisms in place to improve quality of wastewater discharged to local environment, including reuse of grey water	☐	☐			
Demonstrable achievement of stretching wastewater effluent quality improvement and volume reduction targets (normalised) beyond recognised international standard practice	☐	☐			
Engagement with appropriate stakeholders down the value chain to improve wastewater effluent quality	☐	☐			
Examples of good practice identified <i>(please provide a short description of the good practice measure identified)</i>					
Summary: overall level achieved for wastewater/effluent: ☐ Level 1 not achieved ☐ Level 1 ☐ Level 2 ☐ Level 3					



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5.0 EMISSIONS TO AIR

5.1 General

Report

LEVEL 1

Non-Compliance Type

Please tick one column and also note if it is a legal issue?

Critical

Major

Minor

Legal Issue?

Observation?

Finding

Summary of requirement, plus description of the finding and element of the law that has been violated

Evidence

(A description of the evidence observed and related to the audit check guidelines. Please indicate the type of evidence listed e.g. worker interview, documentary, observational)

LEVEL 2

Requirement

Formal systems and processes in place to manage emissions to air as per the site EMS

Regular air emissions quality testing/monitoring is undertaken to ensure ongoing compliance with permitted limits

Air emissions quality data are made available to relevant internal and external stakeholders

Air quality improvement targets are reviewed on an annual basis to drive continuous improvement

Demonstrable reduction in emissions to air (normalised)

...

Met

Not Met

Observation?

Evidence

(A description of the evidence observed and related to the audit check guidelines)



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LEVEL 3				
Emissions to air are sustainable within local ecosystem limits	☐	☐		
Leading practice abatement technologies in place to minimise emissions to air or efforts to reduce emissions at source	☐	☐		
Demonstrable achievement of stretching air quality improvement targets beyond recognised international standard practice	☐	☐		
Engagement with appropriate stakeholders down the value chain to reduce emissions to air	☐	☐		
Additional and proactive emissions monitoring performed	☐	☐		
Examples of good practice identified (please provide a short description of the good practice measure identified)				
Summary: overall level achieved for emissions to air, general: ☐ Level 1 not achieved ☐ Level 1 ☐ Level 2 ☐ Level 3				



5.0 EMISSIONS TO AIR

5.2 Ozone Depleting Substances (ODS)

Report

LEVEL 1

Non-Compliance Type

Please tick one column and also note if it is a legal issue?

Critical

Major

Minor

Legal Issue?

Observation?

Summary of requirement, plus description of the finding and element of the law that has been violated

Finding

Evidence

(A description of the evidence observed and related to the audit check guidelines. Please indicate the type of evidence listed e.g. worker interview, documentary, observational)

LEVEL 2

Requirement

Met

Not Met

Observation?

Evidence

(A description of the evidence observed and related to the audit check guidelines)

Proactive ODS leak detection and maintenance of ODS-containing equipment

Targets in place to phase-out use of specific types of ODS, such as CFCs, halons, TCE, CCl4 in line with recognised international standard practice

Demonstrable reduction, control and substitution of ODS

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...

LEVEL 3

Complete phase-out of all ODS (beyond legal requirements)

☐☐

Examples of good practice identified
(please provide a short description of the good practice measure identified)

Summary: overall level achieved for Ozone Depleting Substances (ODS): ☐ Level 1 not achieved ☐ Level 1 ☐ Level 2 ☐ Level 3



6.0 WASTE MANAGEMENT

Report

LEVEL 1

Non-Compliance Type

Please tick one column and also note if it is a legal issue?

Critical	Major	Minor	Legal Issue?	Observation?	Finding	Evidence
☐	☐	☐	☐	☐	Summary of requirement, plus description of the finding and element of the law that has been violated)	(A description of the evidence observed and related to the audit check guidelines. Please indicate the type of evidence listed e.g. worker interview, documentary, observational)

LEVEL 2

Requirement

Requirement	Met	Not Met	Observation?	Evidence
Formal systems and processes in place to manage waste generation, storage, transportation, and disposal as per the site EMS, including waste minimisation audit and consideration of waste hierarchy principles	☐	☐		(A description of the evidence observed and related to the audit check guidelines)
Evaluation of waste management contractors (suitability, disposal/ treatment methods)	☐	☐		
Engagement with suppliers to identify waste avoidance/ reduction/ recycling/ reuse opportunities	☐	☐		
Segregation of waste streams in line with recognised international standard practice	☐	☐		
Monitoring and measurement of waste generated and recycled, with data available to relevant internal and external stakeholders	☐	☐		



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...						
Waste reduction and recycling targets are reviewed at least on an annual basis to drive continuous improvement.	☐	☐				
Demonstrable waste reduction (normalised)	☐	☐				
LEVEL 3						
Waste disposal method and volume is sustainable within local operating environment and availability of waste treatment and disposal facilities	☐	☐				
Leading practices in place to minimise resource/virgin material use and achieve waste reduction/recycling/energy from waste	☐	☐				
Demonstrable achievement of stretching waste reduction/recycling targets beyond recognised international standard practice	☐	☐				
Engagement with appropriate stakeholders down the value chain to identify waste avoidance/reduction/recycling/reuse/energy from waste measures	☐	☐				
Examples of good practice identified <i>(please provide a short description of the good practice measure identified)</i>						
Summary: overall level achieved for waste management:	☐ Level 1 not achieved	☐ Level 1	☐ Level 2	☐ Level 3		



7.0 POLLUTION PREVENTION / HAZARDOUS AND POTENTIALLY HAZARDOUS SUBSTANCES

Report

LEVEL 1

Non-Compliance Type

Please tick one column and also note if it is a legal issue?

Critical

Major

Minor

Legal Issue?

Observation?

Finding

Summary of requirement, plus description of the finding and element of the law that has been violated)

Evidence

(A description of the evidence observed and related to the audit check guidelines. Please indicate the type of evidence listed e.g. worker interview, documentary, observational)

LEVEL 2

Requirement

Met

Not Met

Observation?

Evidence

(A description of the evidence observed and related to the audit check guidelines)

Formal systems and processes in place for pollution prevention and to reduce the potential for pollution incidents as per the site EMS

Dedicated site emergency response team in place to deal with pollution incidents

Regular practice drills are carried out for pollution incidents

Targets are reviewed on an annual basis to reduce the use of hazardous substances, minimise associated risks and substitute with non-hazardous alternatives where possible

Where relevant, specific pollution prevention mechanisms are considered in agricultural production, including optimisation of agrichemicals input

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GLOBAL SOCIAL COMPLIANCE PROGRAMME_25

LEVEL 3		
Demonstrable reduction in hazardous substances use (normalised) and minimisation of associated risks, as appropriate	☐	☐
‘Zero pollution incident’ target and policy in place	☐	☐
Detailed pollution prevention inspections are conducted	☐	☐
Promote the use of non-hazardous and non-toxic alternative substances	☐	☐
Demonstrable achievement of stretching hazardous substance reduction/substitution targets beyond recognised international standard practice	☐	☐
Engagement with appropriate stakeholders down the value chain to improve hazardous substance use	☐	☐
Examples of good practice identified (please provide a short description of the good practice measure identified)		
Summary: overall level achieved for pollution prevention/hazardous and potentially hazardous substances: ☐ Level 1 not achieved ☐ Level 1 ☐ Level 2 ☐ Level 3		



8.0 MAJOR INCIDENT MANAGEMENT

Report

LEVEL 1

Non-Compliance Type Please tick one column and also note if it is a legal issue?				Observation?	Finding Summary of requirement, plus description of the finding and element of the law that has been violated)	Evidence (A description of the evidence observed and related to the audit check guidelines. Please indicate the type of evidence listed e.g. worker interview, documentary, observational)
Critical	Major	Minor	Legal Issue?			
☐	☐	☐	☐	☐		

LEVEL 2

Requirement	Met	Not Met	Observation?	Evidence (A description of the evidence observed and related to the audit check guidelines)
Formal systems and processes in place to manage emergency response as per the site EMS	☐	☐		
Reduction in potential occurrence and impacts of major incidents (e.g. explosions, fires, major spills etc.)	☐	☐		
Regular Quantitative Risk Assessment (QRA) reviews	☐	☐		
Major incidents reported to relevant stakeholders	☐	☐		
Dedicated site emergency response team in place	☐	☐		
Regular practice drills are carried out for all emergency scenarios	☐	☐		

...



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...

LEVEL 3	
Zero major incident' target and policy in place	☐ ☐
Proactive engagement with local community to ensure awareness of risks of major incidents and emergency response procedures	☐ ☐
Local community is involved in site's emergency response drill and has been contacted by the emergency response team, as relevant	☐ ☐
Leading practice mechanisms in place to reduce risk of major incidents e.g. process changes	☐ ☐
Examples of good practice identified (please provide a short description of the good practice measure identified)	
Summary: overall level achieved for major incident management: ☐ Level 1 not achieved ☐ Level 1 ☐ Level 2 ☐ Level 3	

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...				
All actions completed following results for soil and groundwater risk assessment, e.g. and as required:				
☐				
☐				
a. Focused Phase II investigation				
☐				
☐				
b. Appropriate and efficient remediation of soil and/or groundwater contamination performed				
☐				
☐				
Any soil and groundwater contamination is communicated to relevant stakeholders, as required				
☐				
☐				
LEVEL 3				
'Zero contamination' target and policy in place				
☐				
☐				
Proactive management of soil and groundwater quality				
☐				
☐				
Leading practice techniques in place to prevent further/future soil and/or groundwater contamination and in relation to remediation				
☐				
☐				
Proactive engagement with stakeholders in the local community to ensure awareness of potential soil and/or groundwater contamination				
☐				
☐				
Engagement with appropriate stakeholders down the value chain in relation to the prevention and management of soil and groundwater contamination				
☐				
☐				
Examples of good practice identified (please provide a short description of the good practice measure identified)				
Summary: overall level achieved for contaminated land/soil and groundwater pollution prevention:				
☐ Level 1 not achieved ☐ Level 1 ☐ Level 2 ☐ Level 3				



10.0 LAND USE AND BIODIVERSITY

Report

LEVEL 1

Non-Compliance Type

Please tick one column and also note if it is a legal issue?

Critical

Major

Minor

Legal Issue?

Observation?

Summary of requirement, plus description of the finding and element of the law that has been violated)

Finding

Evidence

(A description of the evidence observed and related to the audit check guidelines. Please indicate the type of evidence listed e.g. worker interview, documentary, observational)

LEVEL 2

Requirement

Met

Not Met

Observation?

Evidence

(A description of the evidence observed and related to the audit check guidelines)

Formal systems and processes in place to manage land use and biodiversity as per the site EMS

☐
☐

In agricultural production, proactive management to maintain soil fertility, avoid soil erosion and promote soil and biodiversity recovery

☐
☐

Where appropriate, demonstrable improvement in land use and biodiversity performance including deforestation, rehabilitation and conservation activities

☐
☐

...



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LEVEL 3	
Land use is sustainable within local ecosystem context	☐ ☐
Leadership role in biodiversity conservation, for example partnership with relevant local organisations	☐ ☐
Leading practice mechanisms in place to promote biodiversity and leading practice land management	☐ ☐
Engagement with appropriate stakeholders down the value chain to improve land use and biodiversity performance, within and beyond site boundaries	☐ ☐
Demonstrable achievement of stretching targets beyond recognised international standard practice	☐ ☐
Examples of good practice identified (please provide a short description of the good practice measure identified)	
Summary: overall level achieved for land use and biodiversity: ☐ Level 1 not achieved ☐ Level 1 ☐ Level 2 ☐ Level 3	



APPENDIX 5: GSCP REFERENCE ENVIRONMENTAL AUDIT REPORT

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11.0 NUISANCES

Report

LEVEL 1

Non-Compliance Type

Please tick one column and also note if it is a legal issue?

Critical

Major

Minor

Legal Issue?

Observation?

Finding

Evidence

LEVEL 2

Requirement

Observation?

Evidence

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4. ON-SITE PICTURES

Auditors should include relevant photos that were taken as part of the audit in this section of the audit report. Relevant photos may include general pictures of the employment site – such as pictures of the employment site or pictures of the production floor, or they may be specific to the details of the audit report – such as a picture of a non-compliance, observation or best practice.

The suggested photos below are examples, and the auditor should include **all** relevant photos.

<i>Photo</i>	<i>Photo</i>	<i>Photo</i>
Outside view of employment site buildings	Employment site entrance	Processes
<i>Photo</i>	<i>Photo</i>	<i>Photo</i>
Waste skips	Chemical storage cupboard	Above ground storage tank
<i>Photo</i>	<i>Photo</i>	<i>Photo</i>
Non-compliance 1	Observation 1	Best Practice 1
<i>Photo</i>	<i>Photo</i>	<i>Photo</i>

APPENDIX 6

GSCP Reference Environmental Supplementary Audit Information

This tool forms part of the GSCP set of reference tools designed to provide a common interpretation of local and international environmental standards and requirements and environmental reference codes (if available and applicable). The Environmental Reference Requirements reflect a common understanding of good environmental practice and are applicable to all raw material processing, agricultural, manufacturing and logistics sites in the supply chain. The Environmental Reference Requirements provide a model for a site in the supply chain to demonstrate

continuous improvement in its environmental performance from basic compliance to leading-edge performance (across three defined 'levels' for eleven different performance areas).

The reference tools on Environmental Audit Process and Methodology are based on the GSCP Environmental Reference Requirements but can be adopted and tailored to other codes of environmental practice.

SUPPLEMENTARY AUDIT REPORT

Auditors may feel the need to produce a separate, supplementary report for the audit requestor containing:

- information too sensitive for the audit report;
- concerns which cannot be substantiated through evidence and/or interviews;
- attitude of management towards the non-compliances or the audit process as a whole.

Supplementary reports may be appropriate:

- if workers appear to be under undue pressure from management on the day of audit;
- if management was obstructive or reluctant to accept findings and the need for remediation;
- where the auditor has concerns about the possibility of falsified records;
- where sensitive issues could not be discussed during the closing meeting because of a potential risk to workers' wellbeing.



Reference environmental supplementary audit information

AREA OF CONCERN (Description of the issue, who was involved or effected and its potential consequences)	EVIDENCE / OBSERVATIONS (a description of the evidence observed)	RELATED ENVIRONMENTAL STANDARD OR LEGAL REQUIREMENT

APPENDIX 7

GSCP Reference Summary of Environmental Findings and Corrective Actions

This tool forms part of the GSCP set of reference tools designed to provide a common interpretation of local and international environmental standards and requirements and environmental reference codes (if available and applicable). The Environmental Reference Requirements reflect a common understanding of good environmental practice and are applicable to all raw material processing, agricultural, manufacturing and logistics sites in the supply chain. The Environmental Reference Requirements provide a model for a site in the supply chain to demonstrate continuous improvement in its environmental performance from basic compliance to leading-edge performance (across three defined ‘levels’ for eleven different performance areas).

The reference tools on Environmental Audit Process and Methodology are based on the GSCP Environmental Reference Requirements but can be adopted and tailored to other codes of environmental practice.

The reference **Summary of Environmental Findings and Corrective Actions** has been designed to provide a structure to the audit team’s findings and help the audit team develop a corrective action plan and structure a closing meeting.

A NOTE ON CORRECTIVE ACTIONS

Audit requestors (companies and/or individuals) may take a number of different approaches with respect to corrective actions, for example:

- require auditors solely to identify corrective actions and require the employment site to develop the corrective action plan following the audit; or
- require auditors to identify evidence-based findings and work with the employment site to develop a corrective action plan; or
- require auditors to identify evidence-based findings, develop the appropriate corrective action and agree with the employment site on their follow-up.

However, reference is made here to both ‘findings and corrective actions’ on the understanding that the identification of corrective actions may be required.

The Summary of Findings and Corrective Actions template includes:

- audit findings: Summary of non compliances, good practice, and evidence found;
- classification of non compliances;
- reference to the applicable code of conduct and/or law which has been contravened;
- recommended corrective actions: Auditors suggestion on how the audit findings can be resolved;
- person/party responsible for corrective action;



APPENDIX 7: GSCP REFERENCE ENVIRONMENTAL SUMMARY OF FINDINGS AND CORRECTIVE ACTIONS ■

ENVIRONMENTAL AUDIT PROCESS & METHODOLOGY REFERENCE TOOLS - NOVEMBER 2010

- verification method:

/ a desk-based follow up may be used to verify corrective actions for minor non-compliances but provide less assurance than a follow-up audit. Desk-based verification should check corrective actions through photos, copies of certificates, invoices, etc. submitted by the employment site. Desk-based follow-up cannot be used where actions need to be verified through worker testimony;

/ follow-up audits are recommended for critical or major non-compliances or when corrective actions can be evaluated only through interviews and extensive documentation reviews (see section 5.4 of the reference audit process);

- timescale for completion: The amount of time required for the issue to be closed. The time allocated for corrective actions to be completed should be appropriate, realistic and timely.

The Summary of Findings and Corrective Actions should:

- be clearly described and written in both English and the language spoken by the employment site management;
- be distributed as follows:
 - / a signed copy for the employment site manager;
 - / a signed copy retained by the auditor together with other audit documentation;
 - / a hard or soft copy to the audit requestor.

NB: Where employment site representatives are unwilling to sign an English language copy of the Summary of Findings and Corrective Actions, the auditor should still sign their English language copy and should indicate that they have witnessed the representative's signature on the copy signed by management.



REFERENCE SUMMARY OF ENVIRONMENTAL FINDINGS AND CORRECTIVE ACTIONS

1. Employment site and auditor details

Employment site name:	Audit requestor:
Employment site address:	Auditor name and organisation:
Employment site representative (name and position):	Audit date:
	Time in:
	Time out:



2. Details of non-compliances and corrective actions

The audit findings are based upon on-site observation, interviews with employees and management, and document review:

Audit Findings (non compliance)	Classification of non- compliance (Critical, Major, Minor)	Performance area (in GSCP Environmental Reference Requirements)	Suggested corrective actions	Person / party responsible	Verification method	Timescale for completion

3. Details of observations

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APPENDIX 7: GSCP REFERENCE ENVIRONMENTAL SUMMARY OF FINDINGS AND CORRECTIVE ACTIONS

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4. Employment site comments or dispute of findings

Where an agreement cannot be reached between employment site management and auditors regarding findings and/or corrective actions, employment sites can outline the disagreements in the box below:

Comments	Employment site representative signature	Date



5. Acceptance of findings and corrective actions

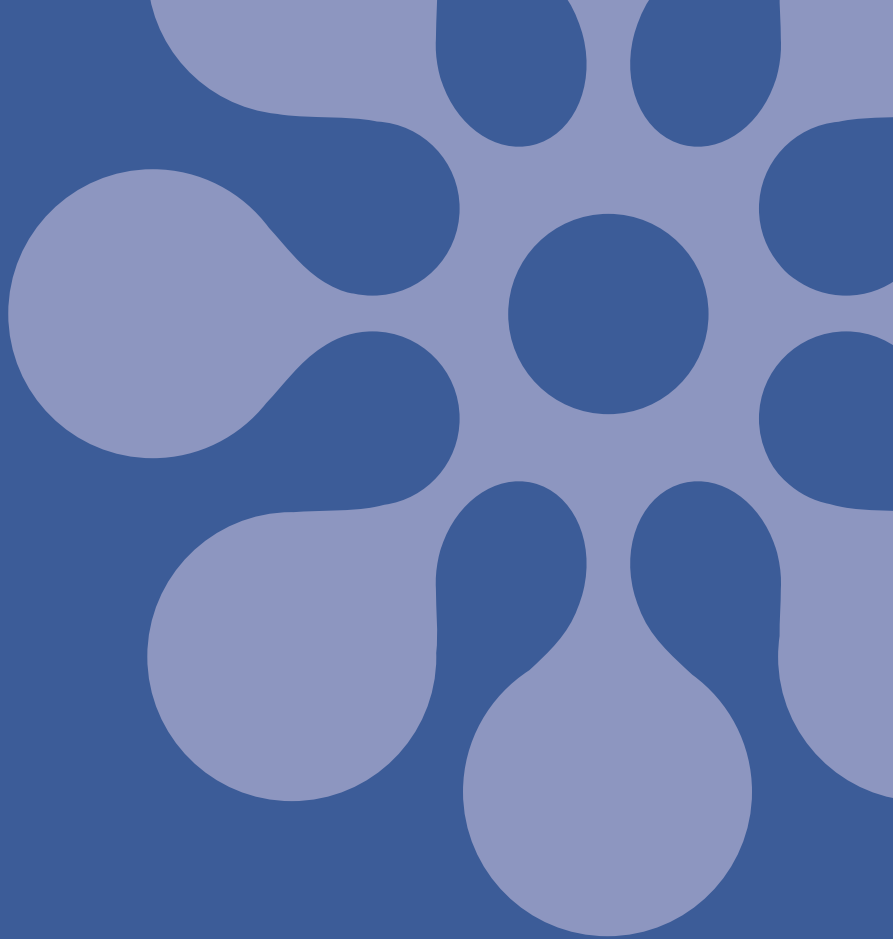
A closing meeting has been undertaken and the above findings and corrective actions were discussed and agreed:

Signature – auditor	Date	Employment site representative name and position	Signature - employment site representative	Date

Does the employment site Representative above have the authority to complete all actions listed?

☐ No
☐ Yes

*If No, who would have the necessary authority to take decisions on these points?
(Please provide names, positions and contact details of additional managers):*



The GSCP is facilitated by
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