ICS Environmental Handbook for Factories Version 3-January 2022

Table of content

Handbook for Factories
ICS Environmental Requirements

ICS Presentation

ICS Structure

The Initiative for Compliance and Sustainability (ICS) is a multi-sector initiative of social and environmental audits in the textile, clothing, bazar, leisure, furniture, fixtures, equipment, appliances and food sectors with the aim of improving social and environmental working conditions along global supply chains. ICS members join efforts by rolling out a shared audit framework in their supplying production plants and by exchanging information on their common factories within the ICS database. On this internal ICS database, ICS members share the results and all documents related to the audits (Audit questionnaire, Factory Profile, Corrective Action Plan, etc.) only with the members working with the audited factories. ICS enables its member companies to collaborate with common tools, to mutualize audits, contributing to the reduction of the 'audit fatigue' and share knowledge and best practices. ICS is not a sourcing platform as member retailers and brands can only access information on the factories they are already linked to.
The list of ICS member retailers and brands is available on ICS website www.ics-asso.org.

The objective of the present Handbook is to accompany the factory in its environmental compliance's knowledge and awareness. This Handbook can be sent to the factory either by the audit company mandated to perform an ICS environmental audit or by the ICS member prior to the audit. The present Handbook is a preparatory tool for the factory.

The ICS Environmental audit is structured in two levels. The core requirements will be assessed in all cases by the auditors and the advanced requirements will only be assessed if the factory demonstrates a high degree of environmental compliance.

The Environmental Handbook presents environmental requirements under these two categories: the core and the advanced requirements.

Enquiries and Recommendations relating to the ICS's scheme

Requests on interpretations, clarifications and recommendations should be addressed to the ICS team for ultimate share with the ICS members.

ICS Contact: ICS Office – 14, rue Bassano Paris FRANCE
Initiative for Compliance and Sustainability / Fédération des Entreprises du Commerce et de la Distribution
contact@ics-asso.org
www.ics-asso.org

ICS common methodology

Due diligence is the way toward advanced transparency and responsibility across global supply chains. A combined approach of social and environmental audits and close cooperation with factories on corrective action plans can contribute to enhanced sustainable supply chain management.

ICS actions are based on a common methodology applied by all ICS members and securing a complete control of the audit process by members.

- ICS audits are mandated and managed by member companies. Audit request is a member prerogative, which ensures a total control of the use of ICS. The aim is to ensure the impartiality of the audit process.
- ICS audits are performed only by third party ICS-authorized audit companies.
- ICS members share common monitoring rules when critical non-compliances are identified in the factories.
- **The ICS audit is neither a certificate nor a label.** The ICS audit's objective is to assess the environmental compliance of a factory and report observed non compliances and best practices at a given date.

Our partners on the ground

Audit quality is monitored by ICS through statistical indicators and comparative analysis as well as by ICS members' collaborative feedback and review.

The list of audit companies that are authorized to audit for ICS is available on our external website: https://ics-asso.org/audit-companies/

ICS Environmental Code of Conduct

Every ICS member requests its suppliers to comply with the ICS Environmental Code of Conduct that can be complemented by the member's own detailed Code of Conduct. By signing this Code, suppliers undertake to conform and commit to it as well as to have it respected by their own subcontractors and partners: shared responsibility is a key concept.

- The Environmental Code of Conduct covers the 8 chapters of the ICS Environmental audit questionnaire:
  - Chap. 1 – Environmental Management Systems
  - Chap. 2 – Energy Use, Transport and Greenhouse gases (GHGs)
  - Chap. 3 – Water Use
  - Chap. 4 – Wastewater and Effluent
  - Chap. 5 – Emission to Air
  - Chap. 6 – Waste Management
  - Chap. 7 – Pollution prevention, hazardous and potentially hazardous substances
  - Chap. 8 – Emergency Response Management

Information sharing process

Data sharing and confidentiality

ICS members linked to the same factory share the audit results and documents through the ICS database. ICS audit results are confidential and not accessible to ICS members not linked to the audited factory. ICS members must reference their supplying factories or factories under referencing process in the ICS database to be able to access the audits information and results. ICS members share a common methodology and tools that cannot be used for sourcing but only to monitor the environmental compliance of factories.

ICS audit documents shared with the supplier

The ICS audit report cannot be shared with the supplier in order to protect data confidentiality that workers might have shared with the auditors. The supplier will receive the following documents:

- The **Factory Profile** is sent to the factory either by the ICS member or the audit company before the audit. The factory must fill in the Factory Profile in English and send it back to the ICS member or audit company before the audit. The Factory Profile will be validated during the audit opening meeting by the facility management. Please note that the online Factory Profile is now the standard process.
- The **Corrective Action Plan (CAP)** is signed in local language during the audit closing meeting by the facility management. The CAP reports the non-compliances identified during the audit and their associated recommended corrective actions.
- The **Summary of Content (SOC)** indicating the rating of each chapter of the audit and the global rating (a letter and a percentage) is sent to the factory after the audit.

ICS audit

ICS audit planification

- The auditor's name should not be communicated to the factory or supplier before the audit takes place.
- Direct contact details (email, telephone) of the auditor should not be shared with factory or supplier before, during and after the audit.
- If the production rate is too low in the factory on a certain day included in the audit window period, the factory is responsible for informing the audit company and ICS member requesting the audit about it.
- The audit window period is defined by the member and should be a minimum of 2 weeks (the factory management can declare unavailable dates, including national and local public and bank holidays, but the window period must be a minimum of 2 full weeks when adding up the available dates for the factory).

ICS audit scope

The overall purpose of the ICS on-site audit is to evaluate the facility's compliance level with the ICS Environmental Code of Conduct, local regulations and international standards as well as to identify the necessary corrective actions and opportunities for continuous improvement. The ICS audit also reports the best practices observed by the auditors in the facility.

Physical areas covered under the scope of the ICS Environmental audit include:

- Production areas;
- Hazardous or potentially hazardous substances storage areas (sub-store, warehouse, dye store, oil and fuels storage areas, etc.);
- Effluent Treatment Plant (if any on-site, including laboratory, dedicated chemical store for treatment plant, dedicated power supply, sludge storage area, etc.);
- Waste storage area (non-hazardous and hazardous);
- Boilers and generators (heavy machines);
- Any area in the factory where chemicals might be/are used (spot removing room, etc.);
- Any area where water flow meters / energy meters are installed;
- Other storage areas, if applicable;
- Living and eating areas of workers, if applicable;
- All associated buildings near the site of production.

In case the Effluent Treatment Plant (ETP) is shared, the audited factory should grant the auditors access to the shared ETP, as it is part of the audit scope.

Audited factories must inform prior to the ICS audit the management and owners of the factories in the same buildings (if different than the audited factory's management) **about the need for auditors to visit the whole building and common areas and if required, also to visit the other factories present in the building as risks can originate from shared premises, for e.g., from a chemical products storage room located in a shared building and not properly managed.**

ICS audit process

The ICS audit process consists of six steps:

The auditors are the persons in charge of the audit process and the actual audit may or may not follow this order. However, all steps as described below will be completed during the audit. If further steps or documents are needed to support a complete understanding of the facility situation, the auditor may request additional information from the facility. The Audit Duration table provides the number of days required for an audit based on the size and specificities of the facility (please refer to the section on 'Methodology').

Identification of non-compliances:

- Most of the ICS questions are evaluated against local legal requirements.
- If the audit question and guideline do not refer to compliance with local legal requirements, the facility's practices are evaluated against ICS requirements.
- However, where local law is more stringent than standards set forth by questions based on the ICS requirements, the facility's practices are evaluated against local law.
- In the case of a non-compliance that is solved during the audit (e.g., a leak from a water tap immediately fixed), auditors will report the non-compliance in the report (and in the CAP for example, auditors can indicate that the non-compliance had been immediately closed).
- If the auditors are unable to confirm the full compliance, the observation will be reported as non-compliance.

Opening Meeting 

- **Attendees:** auditors, facility management and workers' organization representatives.
- **Purpose:** to introduce the auditors, to review the audit scope, to explain the audit procedures to be performed, to identify the parties to be involved as well as to estimate the audit duration. The facility representatives should grant auditors picture-taking permission. The pictures will be enclosed in the audit report documents and shared with ICS client members only. Pictures taken will be treated as confidential data.
- **Notification from the facility:** The facility should inform the auditors if any other visit or audit (social audit, environmental audit, inspection etc.) is performed in parallel of the current audit.

Documentation Review 

- **Purpose:** auditors will review facility's documents and records such as environmental certificate, water consumption monitoring records, waste contractor licenses, waste inventory to confirm compliance, identify non-compliances and report best practices if any.

- **List of documents to be prepared by the facility for the date of the audit:** please refer to Annex 1 of the present Handbook. The facility is required to be able to provide the auditors with the listed documents for at least the last 12 months.

Workers and Management Interviews

- **Attendees:** auditors conduct interviews with management personnel, e.g., Environmental compliance Manager, Chemical in charge/Manager and workers. Interviews with workers are to be conducted in private, without the presence of management staff, to assess if they were trained on environmental topics (workers handling chemicals, workers in charge of the waste collection and storage operations, etc.). Interviews will be conducted individually and/or in groups and should include workers holding different positions, such as workers in charge of waste handling, ETP maintenance and so on. For additional information on interviews sampling, please refer to the section on Methodology of the present Handbook.

Facility Tour

- **Attendees:** auditors and facility's representatives who accompany the auditors.
- **Purpose:** to evaluate the environmental management related practices, consider all potential environmental aspects and impacts, and observe other practices, the auditors conduct a walkthrough of any areas where workers may be present including, but not limited to: production floors, warehouses, chemical storage units, waste storage areas, effluent treatment plant (if any on-site), heavy machine rooms, areas where water and energy meters are installed, restrooms, clinic, canteen, and dormitories.
- **Audit review and checks:** auditors will review facility's documents (permits, licenses, etc.) but also ask for physical checks, which should be carried out by facility's workers.
- **Photos are taken** during the walkthrough of the outside (facility's gate, buildings and name etc.), of the inside (its work floors, etc.) and of any related building (warehouse etc.). The photos the auditor takes must not show faces of persons, to ensure data protection.

Pre-closing meeting

- **Attendees:** auditors only.
- **Purpose:** to prepare the closing meeting.

Closing meeting 

- **Attendees:** auditors, facility management and workers' organization representatives.
- **Purpose:** to present and discuss audit findings, to answer questions and provide clarifications, to reach an agreement on the facts observed or to provide an opportunity for facility's management to present counter-arguments to auditors, to ensure that facility's management understands the legal or Code basis for non-compliances.
- **Outcome:** the facility's management should commit to take action and solve non-compliances. The Corrective Action Plan (CAP) will contain a clear description of all non-compliances identified. A specific target date will be set for every non-compliance and the last CAP target date (i.e. the target date of the last action to be completed) will be clearly stated in the CAP. **The CAP should be issued on-site in the local language, signed and agreed to by the facility's management representative, the workers' organization representative and the lead auditor.** A copy of the CAP will be kept by the facility. An English version of the CAP will be issued later off-site by the auditors.
- **Notification from the facility:** The facility should indicate to the auditors if any other visit or audit has been performed in parallel of the current audit (if not mentioned during the opening meeting and in case the audit has been conducted during several days).

Methodology

ICS audit types

ICS members decide when to initialize a follow-up or a re-audit within the timeframes set by ICS and described below. **The ICS audit is neither a certificate nor a label.** The ICS audit's objective is to assess the environmental compliance of a factory and report observed non compliances and best practices at a given date.

There are 3 types of ICS audit:

- Initial audit: it is an audit carried out for the first time in the factory. The duration of the initial audit is defined according to the size and specificities of the factory.
- Follow-up audit: it is an audit carried out to monitor the effective closing of non-compliances underlined in a previous assessment (initial, follow-up or re-audit). It should

be initialized no later than 12 months after the completion of the previous ICS initial audit or re-audit. The duration of the follow-up audit is 1 man-day, regardless of the size of the assessed facility.
The organization of the follow-up audit must allow the audit team to review all the non-compliances that were previously identified, in order to assess whether the factory has improved its environmental performance and whether the said non-compliances have been closed. However, this should not prevent auditors to investigate other fields beyond the previously identified non-conformities, and all new findings should be duly reported.
All follow-up audits and any ICS audit should always include the triangulation pillars: observation, documents review and interviews according to the defined sampling methodology.

- Re-audit: it is an audit carried out to monitor the effective closing of non-compliances underlined in a previous assessment (initial, follow-up or re-audit). The duration of the re-audit is defined according to the size and specificities of the factory.

The ICS process allows ICS members to initialize a follow-up audit or a re-audit on the basis of an initial audit regardless of the ICS member who requested the previous audit. ICS members may choose a different audit firm for the follow-up audit than from the initial audit (only ICS-authorized audit firms can perform ICS audits).

ICS audit announcement types

ICS default process allows either **semi-announced audits** within a window of a minimum of two weeks or **fully unannounced** audits. In line with their due diligence process, ICS members select the audit announce type and the ICS-authorized audit firm. For specific reasons, the environmental audits may be organized by the ICS members as announced audits in all countries.

- In the case of semi-announced audits: the factory will be informed by one of the ICS-authorized audit firm that an ICS audit will be performed in the factory on behalf of an ICS member. The audit firm will indicate to the factory an audit window period of a minimum of two weeks (the window period is defined by the ICS member). The factory will not know the exact planned date prior to the audit. The factory will fill in the ICS Factory Profile before the audit and send it back to the audit firm.
- In the case of unannounced audits: the factory will not be informed about the ICS audit.
- **If the production rate is too low in the factory on a certain day included in the audit window period, the factory is responsible for informing the audit company and ICS member requesting the audit about it.**

Audit duration

The audit duration for initial and re-audit will be set between 1 to 2.5 man-days on site following the rules explained below. The duration will depend on two main criteria:

Criterion 1: Wastewater from production processes generated?

Scenarios	Questions to answer		
	Wastewater generated from production processes	Treatment on-site or off-site	Pre-treatment on-site
1	NO	NOT APPLICABLE	
2	YES	ON-SITE ETP[1]	NOT APPLICABLE
3	YES	OFF-SITE CETP[2]	PRE-TREATMENT[3] OR NO PRE-TREAMENT
4	YES	NO TREATMENT	

Criterion 2: What is the size of the factory?

For an environmental audit, the size of the factory depends on the total area of the factory in square meters (m²). There are three possible scenarios:

Factory size	Criteria (total area in square meters)
SMALL	< 5 000
MEDIUM	5 000 – 20 000
LARGE	> 20 000

Summary: Rules for the audit duration

Criterion 1			Criterion 2	Audit duration (Man day)
Wastewater generated from production processes	Treatment on-site or off-site	Pre-treatment on-site	Factory size	
YES	ON-SITE ETP		SMALL	2
			MEDIUM	2
			LARGE	2,5
	OFF-SITE CETP	PRE-TREATMENT OR NO PRE-TREATMENT	SMALL	1
			MEDIUM	2
			LARGE	2
	NO TREATMENT		SMALL	1
			MEDIUM	2
			LARGE	2
NO			SMALL	1
			MEDIUM	1
			LARGE	2

1 ETP: Effluent Treatment Plant
2 CETP: Common Effluent Treatment plant (not the municipal sewage plant)
3 A pre-treatment can be a physical treatment or a physical and chemical treatment. If the pre-treatment includes biological treatment, it will be considered as an ETP on-site

Workers' interview sampling size

Depending on the number of workers and staff at the audited facility, a varying number of workers representing different positions will be interviewed. Out of the interviewed workers, a portion will be interviewed in focus groups and the remaining portion will be interviewed individually. The confidentiality of the information obtained during these interviews will be ensured by the auditors and the ICS members. **Workers' data protection is the main reason why ICS audit reports are not fully shared with the factories.**

At least 50% of the workforce should be present onsite for the audit to be performed.

The auditor will select the below key workers and managers for interviews but might also select additional workers.

Topic	workers to interview
Environmental Management	1 worker & 1 manager For example: compliance manager or manager in charge of EMS and worker who attended the environmental training randomly chosen
Chemical Management	1 key worker & 1 manager For example: 1 worker in a production section handling chemicals or 1 worker working in the chemical warehouse and 1 manager/in charge of the chemical management (Chemical warehouse responsible)
Water, energy and emissions to air	1 key worker For example: maintenance manager or worker with responsibilities related to heavy machines, air treatment facilities and refrigerant equipment / operator with responsibilities related to pipelines, machines (using water) maintenance
Wastewater and Effluent	1 key worker ETP operator/manager
Waste management	1 key worker & 1 manager Example: 1 worker in charge of collecting the waste and segregating waste for temporary storage on-site and 1 manager/in charge to supervise the waste management
Emergency response management	2 workers (including 1 new worker) Any 2 new workers recently arrived in the factory

Documentation sampling size

Key documents/records, such as water and energy consumption records, environmental management procedures, environmental related training records, wastewater after treatment test reports, etc., must be reviewed and copies collected as appropriate.

In addition to the completion of the Factory Profile template, the facility should make available the requested documentation for at least the last 12 months.

ICS audit rating

ICS Environmental chapters levels

For each chapter in the ICS environmental audit, requirements are separated into two levels:

- Core requirements: environmental awareness and legal compliance and implemented practices;
- Advanced requirements: best practices for continual improvement (targets and action plans, analysis of performance, etc.).

 **The auditor should insist on the core requirements and encourage the factory to go beyond them. The objective is to push the factory to adopt a "continuous improvement" approach. ICS members will follow the facilities' level of compliance by first requesting the core requirements compliance then focusing on advanced ones.**

ICS double rating system

The ICS environmental audit is built on a double rating system composed of a percentage (0-100%) and a letter (A, B, C, D, E), for example: the global audit rating can be 90% B, 60% C etc. The percentage indicates the degree of compliance of the factory and the letter indicates the degree of criticality related to defined major non-compliances.

The ICS rating system is grounded on a thresholds' table coupled with the finding of critical non-compliances which require immediate attention and action. For instance, if an Alert Notification is raised, the facility rating can be 85% E: the facility is mostly environmentally compliant but one major issue has been identified and has raised an alert notification (i.e. the discharge of wastewater directly into the environment). The ICS audit system is designed to report the global level of the factory and at the same time clearly raise major non-compliances.

Each chapter of the audit is further subdivided as follows:

- **Unrated Informative questions** on applicable local laws and facility-specific information;
- **Rated compliance questions**: several questions are critical and therefore carry a higher weight in the overall result;

- **Critical questions triggering an Alert Notification** (please refer to the below sub-section on Alert Notifications);
- **Best Practices** are identified by the auditors when the facility's practices go beyond legal compliance. Best practices are reported in the audit questionnaire but do not influence the facility's overall rating.

All rated questions in the audit questionnaire are formulated using the same logic: 'Yes' indicates full compliance and 'No' reports non-compliance. The rating for each question is automatically calculated in the ICS environmental audit system.

Example of a summary of audit results by chapter

	Rating		Alert Notification	Advanced requirements (assessed if the global rating is equal or higher than 75%B)	Best Practices	Rating of Previous audit
	%	Code				
1. Environmental Management Systems	0%	#DIV/0!	NO		0	
2. Energy Use, Transport and Greenhouse Gases (GHGs)	0%	#DIV/0!	NO		0	
3. Water Use	0%	#DIV/0!	NO		0	
4. Wastewater and Effluent	0%	#DIV/0!	NO		0	
5. Emissions to Air	0%	#DIV/0!	NO		0	
6. Waste Management	0%	#DIV/0!	NO		0	
7. Pollution Prevention and Hazardous and Potentially Hazardous Substances	0%	#DIV/0!	NO		0	
8. Emergency Response Management	0%	#DIV/0!	NO		0	
AUDIT GLOBAL RATING	0%	E	NO	Not assessed	0	

Alert Notifications

Alert Notifications are triggered by the auditors when defined critical non-compliances requiring the immediate attention of ICS members are identified because they:

- Threaten the environment and the workers' safety or,
- Include cases of discharge of untreated wastewater directly into the environment, improper hazardous waste disposal practices (for chemical waste and sludge from wastewater treatment plants, in particular) and dangerous hazardous substances handling practices in the factory that can threaten the workers safety and environment.

Access denied to the facility

The facility should allow auditors into the facility's buildings to perform the ICS environmental audit. However, cases happen when the facility refuses to let the auditors into the premises or part of the premises. In such case, the following procedure applies:

- The team of auditors explains the purpose of the visit and the procedure of the audit to the facility's representative or the point of contact.
- Auditors take notes of all details of the situation to report to the ICS member.
- In case of refused access by the facility, the management of the facility can contact its vendor/client to verify the validity and importance of the ICS environmental audit.
- If the above fails and the facility refuses to let the auditors inside the premises, an Access denied notification is immediately sent by the auditors to the ICS member. Your signature and or company seal will be asked. The audit is therefore classified as being an "Access Denied".

- A copy of the Access denied notification will be sent to the facility.

Complaints raised by the factory

In case of complaints or appeals regarding the audit or the audit company, factories should contact the ICS member requesting the audit and if needed the ICS team at contact@ics-asso.org by detailing the issue.

Chapter 1 - Requirements /Environmental Management Systems

Core requirements

1.1. If the factory is committed to any industry or government environmental codes or is required to hold environmental-related documents such as permits, licenses, official contracts and certificates, the factory should have them.
1.2. The required permits, licenses, official contracts and certificates should be valid and consistent with the current situation.
1.3. The factory should have a policy defining its approach to environmental management.
1.4. The factory should set up a mechanism to remain up-to-date with applicable environmental legal requirements.
1.5. A person of the management should be designated to coordinate environmental management activities.
1.6. The factory should assess the significant environmental aspects and impacts associated with its activities.
1.7. The factory should document its objectives and action plans to address the main environmental impacts.
1.8. The factory should have a process to periodically review its environmental performance (as per local law or at least once per year).
1.9. The factory should have a site environmental committee.

Advanced requirements

1.10. The factory should have defined standards for suppliers (e.g., suppliers of services, contractors, raw material suppliers) that prescribe expected levels of environmental performance.
1.11. The factory should provide trainings in relation to environmental matters and factory's environmental procedures that are repeated on a regular basis.

Chapter 2 – Requirements / Energy Use, Transport and Greenhouse Gases (GHGs)

Core requirements

2.1. If the factory produces energy (steam, electricity, heat…) and is required to hold permits, licenses or official authorizations for this activity, the factory should have them.

2.2. These permits, licenses or official authorizations need to be valid.
2.3. The factory should be aware of the applicable legal requirements to monitor and track energy consumption.
2.4. The factory should have power consumption meters in place or any other means to measure the entire factory power consumption.
2.5. The factory should monitor its overall energy consumption on a regular basis (every month).
2.6. The factory should be free from any steam/compressed-air leaks.
2.7. The factory should estimate its energy consumption at a department, section, and process level.
2.8. The factory should conduct internal inspections to identify and avoid common situations where energy is wasted in the production (e.g., poor steam lines insulation, useless lighting, etc.). Inspections should be documented and conducted on a regular basis (every 6 months at least).
2.9. The factory should provide trainings to relevant workers in relation to energy use, transport, and greenhouse gases generation (GHGs).

Advanced requirements

2.10. The factory should put in place power consumption meters or any other means to measure and analyze the energy consumption at a department, section and process level.
2.11. The factory should be able to analyze and measure its energy consumption by energy source.
2.12. The factory should monitor or routinely assess emissions of GHGs associated with the site's processes/activities, fuel use for on-site or off-site transportation, agricultural activities etc.
2.13. The factory should have targets and action plans that seek to reduce its environmental impact related to energy use and increase efficiency from: energy, transport, greenhouse gases (GHGs).

Chapter 3 – Requirements / Water Use

Core requirements

3.1. If the factory uses water abstracted from on-site boreholes or from rivers, streams, lakes etc., it should identify if the site requires a permit, license, or official contract for this activity. If so, the factory should identify what the limits and conditions associated with this permit/license are and comply with them.
3.2. These permits, licenses, or official contracts need to be valid.
3.3. The factory should identify what the legal requirements to monitor and track water consumption are.
3.4. The factory should put in place a water flow meter at the raw or fresh water extraction/source point.

3.5. The factory should monitor and track its overall water consumption. The monthly overall water consumption should be documented.

3.6. The factory should be free from any significant water leaks from the machines and pipelines for the water supply in the production.

3.7. The factory should be free from any significant water leaks from the toilets, offices, canteen, etc.

3.8. The factory needs to be free from any discharge point for domestic wastewater directly into the environment.

3.9. The factory should estimate its water consumption at a department, section and process level.

3.10. The factory should conduct internal inspections to identify and avoid common situations where water is wasted in the production (e.g. water leaks, useless excessive water consumption for a given operation, etc.). Inspections should be documented and conducted on a regular basis (every 6 months at least).

3.11. The factory should provide trainings to relevant workers in relation to water use.

Advanced requirements

3.12. The factory should put in place water consumption meters or any other means to measure and analyze the water consumption at a department, section and process level.

3.13. The factory should have set targets aiming at reducing water consumption.

Chapter 4 – Requirements / Wastewater and Effluent

Core requirements

4.1. The factory should identify if the site requires a permit, license or official contract for discharging wastewater/effluent via the drainage system in accordance with local law.

4.2. The factory should ensure that the required permit, license or official contract is valid.

4.3. The factory should be in compliance with the law regarding the installation of an on-site ETP or a pre-treatment plant if required by the permits, licenses or contracts.

4.4. The treatment plant processes (of ETP or pre-treatment plant) need to be effective.

4.5. The factory should have a drainage plan to identify all the industrial wastewater flows and discharge points.

4.6. The factory needs to be free from any discharge point for industrial wastewater directly into the environment.

4.7. The required wastewater parameters after treatment should be controlled by a third party or external laboratory on a regular basis (as per law or as per the frequency defined in the agreement with the CETP or at least every 6 months).

4.8. The wastewater parameters after treatment should be within the limits as per legal standard or as per the CETP standard according to the last test report issued by a third party or external laboratory. The test report must be dated within the last 6 months.

4.9. The factory should have an internal procedure to control and monitor the wastewater parameters after treatment (including testing instruments, maintenance of instruments, list of required tests).
4.10. The ETP operator or the person in charge of the pre-treatment should understand and know the factory's testing procedures.
4.11. The factory should conduct internal tests and maintain records regularly.
4.12. The wastewater parameters should be within the limits as per legal standard or as per the CETP standard according to the last test report issued internally by the factory after treatment.
4.13. The water flow meters should be installed at the on-site pre-treatment or on-site ETP inlet and outlet points.
4.14. Based on the water consumption data for the production processes and readings from the ETP inlet and outlet meters, the entire wastewater should be treated.
4.15. The factory should take measures to avoid the risk of overflow (spare pumps available and security distance between the surface of the water and the top of the tank).
4.16. The ETP capacity should be suitable and sufficient for the volume of wastewater to be treated.
4.17. The tanks should be in good condition.
4.18. The maintenance operations for the ETP should be undertaken, documented and registered.
4.19. The factory should conduct trainings for relevant workers in relation to ETP management.

Advanced requirements

4.20. The factory should have set targets aiming at reducing the volume of wastewater generated or reducing the level of water pollution or improving the wastewater treatment processes.

4.21. If the factory is planning an increase in the production, the factory should ensure the current ETP capacity is sufficient to treat the additional volume of wastewater that will be generated.

4.22. If it is not sufficient, the factory should have a plan to ensure this additional volume of wastewater will be treated.

Chapter 5 – Requirements / Emissions to Air

Core requirements

5.1. The factory should identify if the site requires a permit, official contract or license for emissions to air in accordance with local law.

5.2. The factory should ensure that the required permit, official contract or license is valid.

5.3. The factory should be aware of the applicable legal requirements to monitor and track emissions to air.

5.4. The factory should ensure the heavy machines such as boilers and generators are properly inspected and maintained.

5.5. If the site releases toxic substances into the air from stack or diffuse emission, the factory should have filters and / or systems to control the air emissions in accordance with local law limits.

5.6. The stack air emissions tests should be conducted on a regular basis (as per law or at least every year).

5.7. The stack air emissions should be within the limits as per law or as per international standard based on the last third-party test report.

5.8. The factory should identify and document all its potential sources of emissions to air (point and fugitive sources emissions to air).

5.9. The factory should have measures in place to detect ODS/ F Gases leaks and maintain ODS/ F Gas containing equipment?

5.10. If any industrial gas treatment process is installed, it should be properly monitored and controlled.

5.11. The factory should conduct trainings for relevant workers in relation to emissions to air and ODSs.

5.12. The air quality should be monitored by a third-party.

5.13. The air quality should be monitored on a regular basis (as per law or at least once a year during high season).

5.14. The air quality test results should be within the limits as per law or as per international standard.

5.15. The factory should provide respiratory, or any other adequate masks to the workers when the MSDS of substances used or the factory's activities and processes require them.

Advanced requirements

5.16. The factory should have set targets aiming at reducing emissions to air and quantity of ODSs used on-site.

Chapter 6 – Requirements / Waste Management

Core requirements

6.1. The factory should identify if the site is required to be registered as a waste producer with the regulatory authorities.

6.2. The factory should ensure that the required permit, official contract or license is valid.

6.3. The factory should be aware of the applicable legal requirements to monitor and track waste generated.

6.4. The factory should collect and store all the waste generated in separated dedicated areas.

6.5. The factory should keep an inventory of waste including types and quantities (including sludge).

6.6. The inventory should be updated on a regular basis (according to the waste collection frequency for example).

6.7. The factory should separate hazardous wastes from non-hazardous waste streams.
6.8. The hazardous wastes storage area(s)' access should be restricted to only authorized workers.
6.9. If there is an ETP on-site, the sludge or generally other types of hazardous waste/substances should be temporarily stored on-site in a dedicated area, on hard-surfaced floor (or in a secondary containment) and without possible contact with the rain.
6.10. Agreements/contracts with entities handling waste should be signed for all hazardous wastes generated on-site.
6.11. Agreements/contracts with entities handling waste should be signed for all non-hazardous wastes generated on-site.
6.12. If entities handling waste are required to be licensed by a regulator or local authority, the factory should hold copies of its waste contractors' licenses and permits.
6.13. The factory should take actions to prevent the potential environmental and health negative impacts from its hazardous wastes when disposed of (empty drums washed on-site, sludge fully dried, etc.).
6.14. The factory should be free from any on-site waste burning and/or uncontrolled landfilling.
6.15. A manager in charge of the waste management should be appointed.
6.16. The factory should have a complete and compliant waste management procedure in place for waste collection and temporary storage.
6.17. The agreements/contracts with the contractors handling hazardous wastes should include the waste disposal method (incineration, landfill, recycling) of all hazardous wastes.
6.18. The agreements/contracts with the contractors handling non-hazardous wastes should include the waste disposal method (incineration, landfill, recycling) of all non-hazardous wastes.
6.19. The factory should conduct trainings for all relevant workers on waste management.

Advanced requirements

6.20. If external waste contractors are used, the factory should identify if regular checks/audits of those contractors are undertaken.
6.21. The factory should have set targets to reduce the volume of waste generated.
6.22. The factory should identify if waste materials are recycled (either on-site or off-site).

Chapter 7 – Requirements / Pollution Prevention and Hazardous and Potentially Hazardous Substances

Core requirements

7.1. The factory should be aware if it is required to hold licenses, permits or official contracts for the hazardous substances present on-site in accordance with local law.
7.2. These permits, licenses or official contracts should be valid in accordance with local law.
7.3. An experienced/qualified manager should be designated to be in charge of the chemical management in the factory.

7.4. The factory should maintain a reliable and complete chemical inventory with the following basic information: area of use, chemical name, CAS Numbers of the chemical components, chemical supplier, MSDS availability and quantities stored.
7.5. The inventory should be updated on a regular basis.
7.6. The MSDS should be available in local language and accessible to all workers close to the areas where chemicals are used and stored.
7.7. The facility should keep the complete (16 sections) original version of the MSDS of all chemicals used and stored on-site.
7.8. All the chemical containers should be labelled with the name in local language and the corresponding hazard symbol (for hazardous chemicals).
7.9. The facility should keep the original label compliant with the GHS requirements in all chemical containers stored on-site.
7.10. The hazardous substances should be stored in separated dedicated storage room(s), safe, sheltered, clean and well ventilated with an appropriate temperature maintained.
7.11. Incompatible chemicals should be properly segregated.
7.12. The access to the chemical storage area(s) should be restricted to only authorized workers.
7.13. The factory should prevent the risk of chemical spill or leakage with appropriate measures in the storage areas and production areas.
7.14. The eye wash and shower stations should be connected to running water, installed close to the chemical storage area and using area.
7.15. The factory should have chemical handling and storing procedures documented and implemented for a proper chemical management.
7.16. The factory should conduct trainings for relevant workers in relation to the management and use of hazardous substances.
7.17. The trainings should be conducted regularly according to local law.

Advanced requirements

7.18. The factory should have targets and action plans in relation to eliminating or reducing hazardous substances used on-site.
7.19. The factory should have a process to request its chemical suppliers to comply with the MRSL.
7.20. The factory should have a system to monitor, for each chemical product/formulation received on-site, the compliance with the MRSL.

Chapter 8 –Requirements / Emergency Response Management

Core requirements

8.1. The factory should be aware if it is required to hold permits, licenses or official contracts to notify the authorities of any major incident.
8.2. The required permits, licenses or official contracts should be valid in accordance with local law.
8.3. The factory should identify and document all the potential causes of emergency situations related to environment and assess the levels of risks.

8.4. The factory should have an emergency response plan or procedure in case of chemical spill incidents.
8.5. The factory should conduct chemical spill incident mock drills.
8.6. The chemical spill incident mock drills should be conducted on a regular basis (if not defined by law, at least once a year).
8.7. The chemical spill incident mock drills should be documented with, at minimum: date, number of participants, description of the actions taken and time it took to clean-up the spill.
8.8. The facility should provide appropriate emergency response equipment and materials everywhere where chemicals are used and stored.
8.9. The factory should have an emergency response plan or procedure in case of fire incidents available.
8.10. The factory should have an emergency procedure for the ETP.
8.11. The factory should keep records of workplace accidents, injuries and diseases.

Advanced requirements

8.12. The factory should communicate the emergency response plan to those parties that could be impacted.

Annex 1- Documentation review

Please find below the list of documents that the employment site will need to make available to the audit team on the audit day if the document is applicable and required by local legislation (two or more below requirements could be included in one single document in a given country):

Type	Document
GENERAL	Site Layout
	Production flow chart
	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, odor and noise).
	Environmental certificate / permit
	Approval to operate
EMS	Core requirements level
	Company environmental policy
	System to remain up-to-date with changes in laws and regulations
	Organization chart
	Job description of manager in charge of coordinating environmental management activities
	Identification of the environmental aspects and impacts
	Environmental objectives, targets and action plan
	Environmental management committee records (clearly mentioning the list of workers part of the committee, topics addressed, etc.)
	Environmental awareness training records
	Advanced level
	Environmental standard used by the factory to evaluate its suppliers and evidences of the assessment conducted
ENERGY USE, TRANSPORT AND GREENHOUSE GASES (GHGs)	Core requirements level
	Energy consumption records: total energy consumption for different types of energy sources: electricity, natural gas, oil, coal, etc.
	Energy consumption breakdown records for different department/ process/ sections/ use in the factory

	Steam lines internal inspection report (steam leaks inspection) and general inspection of the factory to identify easy opportunities to save energy
	Advanced level
	Calculation of direct Greenhouse Gas Emissions SCOPE 1 (scope 2 and scope 3 if available)
	Objectives, targets and action plan related to energy, transport and GHG emissions reduction
	Training for relevant workers in relation to: energy, transport and greenhouse gases (GHGs)
WATER USE	Core requirements level
	Water consumption records: overall water consumption for all the different water sources
	Water consumption breakdown records: for different department/ process/ sections in the factory
	Reports of internal inspections undertaken in the factory to identify water leaks, control the maintenance of machines using water, water pipelines, etc. and general inspection of the factory to identify easy opportunities to save water
	Advanced level
	Documentation on water savings: targets and action plan
	Training for relevant workers in relation to: water use and savings
WASTEWATER AND EFFLUENT	Core requirements level
	Agreement with the Common ETP (CETP) if the factory is connected to a CETP for the wastewater treatment or authorization to discharge the wastewater in the sewage system
	Drainage Plan or Pipeline Layout
	Wastewater after treatment quality test reports (from third party)
	Water flow measurements at ETP inlet and outlet points records
	Wastewater parameters internal test records
	Procedures for testing the wastewater parameters internally
	ETP capacity documented
	ETP operational & maintenance manual
	Training records or evidence of training (internal or external) of the ETP operator (Evidence the ETP operator has a consistent background to operate the ETP)
	Advanced level

	ETP emergency procedure
	Objectives, Targets and action plan to reduce the pollution of water, reduce the wastewater volume or improve the treatment process
	In case of increase of the production planned, evidence that the on-site ETP capacity is sufficient to treat the additional volume of wastewater to be generated
EMISSIONS TO AIR	Core requirements level
	Identification of main point sources emissions to air (Informative question)
	All equipments maintenance / inspection records (e.g. boilers and generators)
	Stack air emissions test reports
	Inventory of air emissions sources (point source and fugitive emissions, including potential sources of ODS and F-gases emissions)
	Air treatment equipment maintenance records
	Advanced level
	Objectives, Targets and action plan to reduce the air pollution and/or the quantity of ODS / F-gases emissions generated
	Ambient air quality test report
	Training for relevant workers in relation to emissions to air and ODSs (ex: Maintenance operator)
WASTE MANAGEMENT	Core requirements level
	Waste inventory
	Register of sludge quantities generated by the ETP (can be included in the inventory)
	Agreements with waste contractors (for all types of waste)
	Waste management procedure/policy
	Agreements with waste contractors mentioning the final disposal/treatment methods (for all types of waste, except sludge)
	Agreement with contractor for sludge collection mentioning what is the final disposal/treatment of the sludge
	Training for all relevant workers about waste management (ex: for workers in charge of collecting the waste)
	Advanced level
	Evidences the factory audits the waste contractors
	Objectives, Targets and action plan to reduce the waste generation and improve the waste final treatment/disposal

	Evidences of waste recycling
POLLUTION PREVENTION, HAZARDOUS AND POTENTIALLY HAZARDOUS SUBSTANCES	Core requirements level
	Bulk tanks inventory (including contents, capacity etc.), if any bulk tank onsite
	Bulk tank inspection logs/reports and bulk tank integrity testing logs/reports, if any bulk tank onsite
	Chemical inventory
	MSDS original versions with 16 sections
	Trainings for relevant workers in relation to the management and use of hazardous substances (ex: workers handling chemicals,...)
	System of the factory to monitor the compliance with the MRSL
	Chemical handling and storing procedure
	Advanced level
	Objectives, Targets and action plan for chemical use reduction and hazardous chemical substitution & elimination.
EMERGENCY RESPONSE MANAGEMENT	Core requirements level
	Identification of emergency situations / Emergency response plan
	Chemical spill emergency response procedure
	Chemical spill clean-up mock drill report
	Fire emergency response procedure
	Fire emergency mock drills report
	Evidence of a designated team of emergency response workers
	Health and safety training for new workers
	Health and safety training for existing workers
	Spill/incident log and remedial steps taken including correspondence with authorities regarding e.g. spills, leaks, odor, noise, etc.
	Advanced level
	Process to review the Emergency Response Plan

Annex 2- Glossary

Apprenticeship / traineeship program	Refers to hiring and employment terms of apprentices, namely, if the apprenticeship scheme is legal, working hours, contracts, type of work, teacher supervision, etc. Apprentices / trainees can be above 18 years of age.
Back-up subcontractor	As per ICS definitions and for ICS tools' implementation: ▪ "Contractors" are workers whose primary working location is the audited site. Contractors are therefore defined independently of their job positions. ▪ "Sub-contractors" are workers who are only present temporarily on-site or are not present on-site. Company(ies) appointed by the audited factory to take over fully or partly either production process(es) or purchase orders that must to be handled onsite within the factory's premise. Company(ies) appointed by the audited factory to take over fully or partly either production process(es) or purchase orders declared in the factory profile to be handled within the factory's premises. Back-up subcontractors are divided in two categories: - Process subcontractors: subcontractors that are involved to take in charge part(s) of the production process(es). For example in the textile industry: spinning, dyeing, printing, embroidery, packaging, etc. - Capacity subcontractors: subcontractors used by the audited factory to allocate surplus of production or purchase orders (that were allocated to the audited factory at first). Components producers will be considered as suppliers of the factory. For example, company(ies) appointed by a factory to provide such kind of components have to be identified as suppliers (non-exhaustive list): yarn, cartons, tags, labels, fabric, zipper, buttons, lining, polybags, lining… Unless specified differently by the ICS member, factory' suppliers should not be included in the scope of questions related to subcontracting matter.
Best practice	A best practice is an issue which the auditor feels is over and above the sectorial standards and applicable law against which the site was audited. The report should also highlight any best practice observed. Best practice refers to areas where the site is exceeding requirements by providing additional benefits or managing issues in a particularly effective way.
Bulk storage tank	This term covers the large size containers that hold liquids in the factory. Pictures to be added.
Child care factory	Any room in factory designated for non-working children.
Child	According to ILO Convention 182, the term shall apply to all persons under the age of 18. Young workers are still children but may be authorized to work from 15 to 18, according to local law.
Child Labor	Child labor consists of work by children that is economically exploitative or likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development.
Classification	Status of the worker as per legal definition. Examples of classification are salaried, hourly, overtime exempt, trainee, apprentice, temporary, part-time, and intern.

Collective bargaining	Collective bargaining refers to a voluntary process or activity through which employees and workers discuss and negotiate their relations, in particular terms and conditions of work and the regulation of relations between employers, workers and their organizations. Participants in collective bargaining include employers themselves or their organizations, and trade unions or, in their absence, representatives freely designated by the workers.
Common Effluent Treatment Plant (CETP)	See definition of ETP. "Common" ETP indicates that the ETP is used to collect and treat wastewater flows from different industrial units. The point is to treat effluents by means of a collective effort mainly for a cluster of small scale industrial units.
Confidential Grievance Process	Grievance cannot be directly associated with the person bringing the grievance as the method of communication does not permit identification of the person, e.g., third party hotline, drop box without surveillance, trusted person who is responsible for maintaining secrecy. The response to anonymous grievances should be posted at locations that can be seen by all workers.
Contractor	As per ICS definitions and for ICS tools' implementation: ▪ "Contractors" are workers whose primary working location is the audited site. Contractors are therefore defined independently of their job positions. ▪ "Sub-contractors" are workers who are only present temporarily on-site or are not present on-site. An entity (e.g., person, company) that a facility hires without establishing a direct employment relationship in order to complete a service or job. A contractor is not a direct employee of the facility. Examples of contractors are contracted electricians, maintenance, canteen, cleaning and security personnel, who can be contracted as individuals or through a company. Contractors may include temporary agency employment where a worker is employed by the temporary work agency, and then hired out to perform his/her work at (and under the supervision of) the factory. There is considered to be no direct employment relationship between the temporary agency worker and the factory, although there are legal obligations of the factory towards the temporary agency worker, especially with respect to health and safety. The relevant labour contract is of limited or unspecified duration with no guarantee of continuation.
Deductions	Values subtracted from the wage, the difference between the gross amount of worker earnings and the net amount they actually receive.
Discrimination in employment	Treating people differently or less favorably because of characteristics that are not related to their merit or the inherent requirements of the job.
Effluent (see also wastewater)	Liquid waste flowing out of a factory, farm, commercial establishment, or a household into a water body such as a river, lake, or lagoon, or a sewer system or reservoir.
Effluent Treatment Plant (ETP)	It describes the processes used for treating industrial wastewater from wet processes that is produced by industries as an undesirable by-product. After treatment, the treated industrial wastewater (or effluent) may be reused or released to a sanitary sewer or to surface water in the environment.
Equal pay for equal work	The principle of equal pay for work of equal value means that rates and types of remuneration should be based not on any discrimination base –see list above- but on an objective evaluation of the work performed. Disparities in remuneration that reflect differences in years of education and work experience are acceptable.
Emergency exit	Exit door or window identified as emergency exit in evacuation plan.

Emergency exit pathway	A continuous and unobstructed way of travel from any point in a building or structure to a public way (i.e. assembly point).
Emergency exit stairs	Stairs used for evacuation from building, according to the evacuation plot plan.
Emergency exit window	Windows identified as emergency exit in evacuation plan.
Emissions to air	There are three main sources of emissions to air: 1) Point source emissions: emissions from stationary and identifiable sources such as the emissions from the stack of a generator (emitted through a single point source into the atmosphere – vent or stack); 2) Fugitive emissions: fugitive source air emissions refer to emissions that are distributed spatially over a wide area and not confined to a specific discharge point. They originate in operations where exhausts are not captured and passed through a stack. 3) Mobile source emissions: emissions from vehicles; similar to other combustion processes, emissions from vehicles include CO, NOx, SO2, PM and VOCs.
Employment terms	The conditions that an employer and worker agree upon for a job. Terms of employment include wage, benefits, working hours, job responsibilities, and probation periods.
Environment	Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans and their interrelationships. Note 1: Surroundings can extend from within an organization to the local, regional and global system. Note 2: Surroundings can be described in terms of biodiversity, ecosystems, climate or other characteristics. (ISO 14001:2015 definition)
Environmental aspect	Element of an organization's activities or products or services that interacts or can interact with the environment. Note 1: An environmental aspect can cause (an) environmental impact(s). A significant environmental aspect is one that has or can have one or more significant environmental impact(s). Note 2: Significant environmental aspects are determined by the organization applying one or more criteria. (ISO 14001:2015 definition)
Environmental committee	A group of responsible workers who are chosen or elected to make decisions about the environmental values, activities and strategies of the organization. The workers can be from different levels of the hierarchy (managers, key workers and workers).
Environmental impact	Change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects (ISO 14001:2015 definition).
Environmental Management System (EMS)	An EMS is a set of practices and processes helping organizations to manage their environmental impacts and improve environmental performance caused by their products, services and activities. An environmental management system provides structure to environmental management and covers areas such as training, record management, inspections, objectives and policies.
Environmental manager	A member of the management appointed to hold the overall responsibility of the implementation of the environmental management system (EMS). It doesn't mean this person is in charge of every single task related to the environmental issues but he or she needs to make sure the system works and in particular, this

	person has two important responsibilities: 1) Communicate and report to the top management the status of implementation of the EMS; 2) Coordinate with other members of the management and subordinates the implementation of the EMS.
Environmental objective	Result to be achieved set by the organization and consistent with its environmental policy (ISO 14001:2015 definition).
Environmental policy	Intentions and direction of an organization related to environmental performance, as formally expressed by its top management (ISO 14001:2015 definition).
Factory Profile	Questionnaire completed by the factory prior to the audit with data needed by the audit company in order to prepare for the audit. Factory profile includes such data as workforce profile, factory size, production processes, etc.
Falsification	Process of making, adapting, or imitating documents with the intent to deceive in order to appear in compliance with local laws, international standards or client's Code of Conduct. E.g. Falsified business license.
Freedom of association	Freedom of association implies respect for the right of employers and workers to freely and voluntarily establish and join organizations of their own choice, free from outside interference or monitoring.
GHS (Global harmonized system for the identification and labeling of chemicals)	The Globally Harmonized System of Classification and Labelling of Chemicals (GHS) is a system developed by the United Nations for standardizing and harmonizing the classification and labelling of chemicals globally.
Greenhouse Gases (GHGs)	Greenhouse gases (GHGs) are gases in the Earth's atmosphere that absorb/trap some of the earth's outgoing radiation, causing the atmosphere to warm up (called the 'greenhouse effect'). This process is the main cause of the change in the earth's weather, called 'climate change'. The main GHGs are carbon dioxide (CO2) from burning of fuels, methane (CH4) from agriculture, landfill sites), nitrogen dioxide (N2O) associated with fertilizer production and use and fluorinated (F) gases, e.g. refrigerants. The most significant environmental impact of energy use is the generation of GHGs. (Source: GSCP Environmental Implementation Guidelines)
Grievance	A statement of a complaint over something believed to be wrong or unfair.
Grievance Process	Formalized way to accept, assess and resolve complaints.
Hazardous substance/material	Hazardous materials: are those materials that represent an excessive risk to property, the environment or human health because of their physical and/or chemical characteristics. Materials (including mixtures and solutions) can be classified according to the hazard they present, as follows: flammable, corrosive, toxic, explosive, etc. (source: IFC Hazardous Materials Management Guidelines).
Homeworker	A homeworker is a person who for a fixed rate of remuneration (can be by piece) carries out work at his or her home for the factory and the factory is not the final consumer of the product or service provided.
Indoor air quality	Refers to the air quality within and around buildings and structures, especially as it relates to the health and comfort of building occupants. The indoor air quality includes fugitive emissions, particulate maters, VOCS, gas...

Industrial waste gas treatment	All techniques employed to reduce or eliminate particulates (such as dust) and/or gases from industrial exhaust streams. The aim is to decrease the emission into the atmosphere of substances that can harm the environment or human health. Example: Wet scrubber, cyclone and multicyclone, bag filters...
Integrity test (for bulk storage tank)	The integrity testing is a process to verify the integrity of a bulk container for storing liquid products. The objective is to check if the container is in good conditions, strong enough, resistant to shocks, not rusted, etc.
Language understood by concerned workers	Local language or reported language(s) spoken by workers.
Language understood by majority of workers	Local language or reported language(s) spoken by more than 50% of workers.
Legal register	The legal register is a tool to help the factory to remain up to date with the legal obligations and to accurately track its compliance performance and status for each legal requirement.
Manipulation	Modification of data in the documentation using unfair means to serve one's purpose. E.g. Manipulation of time records to hide excessive working hours.
Migrant workers	Include both internal and foreign workers who have moved from their original home (in country or foreign) to a new home at the workplace.
MSDS (Material Safety Data Sheet)	A Material Safety Data Sheet (MSDS) is a document that contains information on the potential hazards (health, fire, reactivity and environmental) and how to work safely with the chemical product. It is an essential starting point for the development of a complete health and safety program. The MSDS should be translated in local language (at least the sections 1 - Identification (substance & supplier) 2- Hazard identification 3- Composition/information on ingredients 4- First-aid measures 5- Fire-fighting measures 6- Accidental release measures 7- Handling and storage 8- Exposure controls/personal protection, should be translated). For chemicals used in the production, the MSDS must be located nearby. The worker must be able to know where to find the MSDS and to reach it in few minutes.
MRSL (Manufacturer Restricted Substances List)	The MRSL is a list of hazardous chemicals that are restricted below a certain threshold in textile, apparel and footwear manufacturing. The MRSL establishes concentration limits for substances in chemical formulations used within manufacturing facilities. The MRSL addresses ANY chemical used within the four walls of a manufacturing factory (cleaners, detergents, dyes, solvents, textile preservatives, sizing agents, etc.). See the definition of RSL in the glossary to avoid the confusion between those two lists. **IMPORTANT: See definition of RSL to understand the difference between these two lists.**
Non-working children	Persons under the age of 18 that are present at the factory but not employed by the factory to perform work.
ODSs (Ozone depleting substances) and F-gases	ODS (Ozone Depleting Substances) are responsible for the ozone layer depletion. Widely used ODS are gases such as chlorofluorocarbons (CFCs) and hydrofluorocarbons (HCFCs) used as refrigerants in air conditioning, chillers, etc. and halons used in firefighting equipment, for example. Note that other refrigerant gases used in refrigerant systems called F-gases such as HFCs are also damaging the environment (powerful greenhouse gases) so they should be controlled as well.

Overtime waiver	Document issued by local authorities allowing the factory to work in excess of legal limit of working hours within a set period of time (e.g. per month) as long as the hours worked are equal to or below the average allowable work hours for the entire period of the waiver (e.g. 6 months, 1 year etc.).
Permanent Obstruction	Access is obstructed by immovable machinery, items stuck to ground, etc.
Policy	A set of principles of action or rules and standards in writing that the factory and/or its workers must abide by.
Possibility to recover	The worker should have free access to these documents and does not have to go through a second party to access documents. The worker has personal access to documents at all times (e.g., a lock box that the worker has the key to and can access 24/7).
PPE (Personal Protective Equipment)	PPE is equipment that will protect the user against health or safety risks at work. It can include items such as safety helmets, gloves, eye protection, high-visibility clothing, safety footwear and safety harnesses. It also includes respiratory protective equipment (RPE). (source: http://www.hse.gov.uk)
Prison employment	Prisoners used as part of the work force. Under prison labour arrangements, prisoners may be brought to the factory, or the production may occur in the prison facilities.
Procedure	A series of actions conducted in a certain order or manner.
Quota	A fixed amount of work (e.g., pieces of goods) that a worker or several workers are required to manufacture, produce, assemble, and/or work on during a specific time frame.
Renewable energy sources	Renewable energy sources are, unlike fossil fuels, energy sources that regenerate such as biomass (wood, landfill gas and biogas, ethanol, etc.), hydropower, geothermal, wind, solar, etc. (source: www.eia.gov)
RSL (Restricted Substances List)	A RSL is a list of hazardous chemicals that are restricted below a certain threshold in finished textile products.
Significant environmental aspect or impact	A significant environmental aspect or impact is an aspect or impact which is considered as a more important one for the factory as per the criteria of significance chosen by the factory. The significant environmental aspects and impacts are considered as priorities and should be addressed with major attention. The factory has to be able to explain what are the criteria for the identification of significant aspects and impacts (e.g. if legal requirement related or not, if the potential impact can affect a sensitive area or not, etc.).
Significant water leak	Meaning of "a significant water leak" is: continual flow of water or a drop every second. "Non-significant" is, for example, only few drops per minute. See the pictures of examples of significant water leaks in the guidance of chapter 3.
Skilled worker	A skilled worker has special abilities, experience or/and training to do a particular job. It can includes semi-skilled and highly skilled workers
Sludge (from Effluent treatment plant)	Sludge is a residual, semi-solid material left from industrial and municipal wastewater and sewage treatment processes. It looks like a thick, soft or wet mud or a similar viscous mixture of liquid and solid components produced from a wastewater treatment process. Sludge can be highly hazardous.
Supplier	An entity who supply goods or services to the factory.
Temporary Obstruction	Access is obstructed by movable items, storage boxes, etc.

Triangulation	Triangulation techniques are observation, documentation review, interviews.
Unskilled worker	Unskilled workers are people who have no particular work skills
Volatile organic compound (VOCs)	The most common sources of fugitive VOC emissions are associated with industrial activities that produce, store, and use VOC-containing liquids or gases where the material is under pressure, exposed to a lower vapor pressure, or displaced from an enclosed space. Typical sources include equipment leaks, open vats and mixing tanks, storage tanks, unit operations in wastewater treatment systems, and accidental releases.
Waste management	It encompasses the management of all processes and resources for proper handling of waste materials; the actions and activities to manage all types of wastes from its generation to its final disposal. It includes the collection, the handling, the storage, the transportation and the final disposal method.
Wastewater	Wastewater (or waste water) is any type of water that has been affected by human use. Wastewater is "used water from any combination of domestic, industrial, commercial or agricultural activities, surface runoff or storm water, and any sewer inflow or sewer infiltration".
Workers	Workers include employees and employers, as well as persons working for a business enterprise independently of their function. **Workers covered by the scope of the audit are all workers holding a job on the factory's site whatever is their employment contract (permanent worker, temporary, contractors, apprentices…).** Employers are workers who, working on their own account or with one or a few partners, in a self-employment job have engaged one or more persons to work for them in their business as employee(s) or workers more generally as described above.
Workers' organization	Any organization of workers for the purpose of furthering and defending the interests of workers with regard to working conditions and terms of employment.
Young workers	Workers below 18 years old with a minimum age that should not be inferior to 15 years old. If however, the local legal minimum age is set at 14 years of age in accordance with ILO Convention 138 developing country exceptions, this lower age may apply.
ZDHC (Zero discharge of hazardous chemicals)	"Zero discharge of hazardous chemicals" is a brands initiative, with a dedicated team based in Amsterdam, willing to assist brands, their supply chains and the broader industry to adopt a harmonized approach to the control and gradual elimination of 11 hazardous substances classes used to process textile and trim materials in apparel and footwear.

Annex 3- ICS Environmental audit questionnaire

ICS questions do not all have the same rating and the rating is automatically calculated by the ICS system.

Chapter 1: Environmental Management Systems
Is the factory required to hold environmental-related documents such as permits, licenses, official contracts and certificates?
Have the required permits, licenses, official contracts and certificates been found valid and consistent with the current situation?
Does the factory have a policy defining its approach to environmental management?
Has the factory set up a mechanism to remain up to date with applicable environmental legal requirements?
Is a person of the management designated to coordinate environmental management activities?
Does the factory assess the significant environmental aspects and impacts associated with its activities?
Has the factory documented its objectives and action plans to address the main environmental impacts?
Does the factory have a process to periodically review its environmental performance (as per local law or at least every year)?
Is there a site environmental committee?
Does the factory evaluate defined standards for suppliers (e.g., suppliers of services, subcontractors, raw material suppliers) that prescribe expected levels of environmental performance?
Are the trainings in relation to environmental matters and factory's environmental procedures repeated on a regular basis?

Chapter 2: Energy Use, Transport and Greenhouse Gases (GHGs)
If the factory produces energy (steam, electricity, heat…) does the factory require permits, licenses or official authorizations for this activity?
If yes, have the permits, licenses or official authorizations been found valid?
Is the factory aware of the applicable legal requirements to monitor and track energy consumption?
Does the factory have power consumption meters in place or any other means to measure the entire factory power consumption?
Does the factory monitor on a regular basis (every month) its overall energy consumption?
Based on observation, is the factory free from any steam/compressed-air leak?
Does the factory estimate its energy consumption at a department, section and/or process level?
Does the factory conduct internal inspections, at least every 6 months, to identify and avoid common situations where energy is wasted in the production (e.g., steam leaks, useless lighting, etc.)?
Does the factory conduct trainings for relevant workers in relation to energy, transport and greenhouse gases (GHGs)?
Does the factory have power consumption meters in place to measure and analyse the energy consumption at a department, section and/or process level?
Does the factory measure and analyse its energy consumption by energy source?
Does the factory monitor or routinely assess emissions of GHGs associated with factory's processes/activities, fuel use for on-site or off-site transportation, agricultural activities etc.?
Does the factory have targets and action plans that seek to reduce its environmental impact and increase efficiency from: energy, transport, greenhouse gases (GHGs)?

Chapter 3: Water Use
If the factory uses water abstracted from on-site boreholes or from rivers, streams, lakes etc., does the factory require permits, licenses or official contracts for this activity?
If yes, have the permits, licenses or official contracts been found valid?
Is the factory aware of the applicable legal requirements to monitor and track water consumption?
Does the factory have water flow meters in place at the raw or freshwater extraction/source point to measure the entire water consumption?
Does the factory monitor every month its overall water consumption?
Based on observation, is the factory free from any significant water leak from the machines and pipelines for the water supply in the production?
Based on observation, is the factory free from any significant water leak from the toilets, offices, canteen, water taps?
Is the factory free from any discharge point for domestic wastewater directly into the environment?
Does the factory estimate its water consumption at a department, section and/or process level?
Does the factory conduct internal inspections to identify and avoid common situations where water is wasted in the production (e.g., water leaks, useless excessive water consumption for a given operation, etc.)?
Does the factory conduct trainings for relevant workers in relation to water use?
Does the factory have water flow meters in place to measure and analyse the water consumption at a department, section and/or process level?
Does the factory have targets and an action plan to achieve water savings?

Chapter 4: Wastewater and Effluent
Does the factory require permits, licenses or official contracts for discharging wastewater/effluent in accordance with local law?
If yes, have the required permits, licenses or official contracts been found valid?
Is the factory in compliance with the law regarding the installation of an on-site ETP or a pre-treatment if required by the permits, licenses or contracts?
Based on observation, is there satisfactory evidence the treatment plant processes (of ETP or pre-treatment plant) are effective?
Does the factory have a drainage plan to identify all the industrial wastewater flows and discharge points?
Is the factory free from any discharge point for industrial wastewater directly into the environment?
Are the required wastewater parameters after treatment controlled by a third party or external laboratory on a regular basis (as per law or as per the frequency defined in the agreement with the CETP or at least every 6 months)?
Are wastewater parameters after treatment within the limits as per legal standard or as per the CETP standard according to the last test report issued by a third party or external laboratory?
Does the factory have an internal procedure to control and monitor the wastewater parameters after treatment (including testing instruments, maintenance of instruments, list of required tests)?
Does the ETP operator or the person in charge of the pre-treatment understand and know the factory's testing procedures?
Does the factory regularly conduct internal tests and maintain records?
Are wastewater parameters after treatment within the limits as per legal standard or as per the CETP standard according to the last test report issued internally by the factory?
Are water flow meters installed at the on-site pre-treatment or on-site ETP inlet and outlet points?
Based on the water consumption data for the production processes and readings from the ETP inlet and outlet meters, is the entire wastewater treated?
Does the factory take measures to avoid the risk of overflow (spare pumps available and security distance between the surface of the water and the top of the tank)?
Is the ETP capacity suitable and sufficient for the volume of wastewater to be treated?
Are the tanks in good condition?
Are maintenance operations for the ETP undertaken, documented and registered?
Does the factory conduct trainings for relevant workers in relation to ETP management?
Does the factory have targets and an action plan in relation to reducing the volume of wastewater generated or reducing level of water pollution or improving the wastewater treatment process?
If the factory is planning to increase the production, is the current ETP capacity sufficient to treat the additional amount of wastewater that will be generated?
If not, is the factory able to explain how the additional amount of wastewater will be treated?

Chapter 5: Emissions to Air
Does the factory require permits, licenses or official contracts for emissions to air in accordance with local law?
If yes, have the required permits, licenses or official contracts been found valid?
Is the factory aware of the applicable legal requirements to monitor and track emissions to air?
Are all the heavy machines (boilers/generators) properly inspected and maintained?
If the site releases toxic substances into the air from stack or diffuse emission, does the factory have filters and / or systems to control the air emissions in accordance with local law limits?
Are the stack air emissions tests conducted on a regular basis (as per law or at least every year)?
Are the stack air emissions within the limits as per law or as per international standard based on the last third-party test report?
Has the factory identified and documented all its potential sources of emissions to air (point and fugitive sources emissions to air)?
Does the factory have in place measures to detect ODS/ F Gases leaks and maintain ODS/ F Gas containing equipment?
If any industrial gas treatment process is installed, is it properly monitored and controlled?
Does the factory conduct trainings for relevant workers in relation to emissions to air and ODSs?
Is the air quality monitored by a third-party?
Is the air quality monitored on a regular basis (as per law or at least once a year during high season)?
Are the air quality test results within the limits as per law or as per international standard?
Does the factory provide respiratory, or any other adequate masks to the workers when the MSDS of substances used or the factory's activities and processes require them?
Does the factory have targets and action plans in relation to reducing emissions to air or the quantity of ODSs used on-site?

Chapter 6: Waste Management
Is the factory required to be registered as a waste producer with the regulatory authorities?
If yes, have the required registration permits, licenses or official contracts been found valid?
Is the factory aware of the applicable legal requirements to monitor and track waste generated?
Does the factory collect and store all the waste generated in separated dedicated areas?
Does the factory keep an inventory of waste including types and quantities (including sludge)?
Is the inventory updated on a regular basis (according to the waste collection frequency for example)?
Does the factory separate hazardous wastes from non-hazardous waste streams?
Is the hazardous wastes storage area(s) access restricted to only authorized workers?
Is the sludge or generally other types of hazardous waste/substances temporarily stored on-site in a dedicated area (on hard-surfaced floor, in a secondary containment, with a roof) and without possible contact with the rain or soil?
Are agreements/contracts with entities handling hazardous/non-hazardous wastes signed for all hazardous wastes generated on-site?
Are agreements/contracts with the entities handling wastes signed for all non-hazardous wastes generated on-site?
If entities handling hazardous/non-hazardous wastes are required to be licensed by a regulator or local authority, does the factory hold copies of these entities' licenses and permits?
Are actions taken by the factory to prevent the potential environmental and health negative impacts from its hazardous wastes when disposed of (empty drums washed on-site, sludge fully dried, etc.)?
Is the factory free from any on-site waste burning and/or uncontrolled landfilling?
Did the factory appoint a manager to be in charge of the waste management?
Does the factory have a waste management procedure in place for waste collection and temporary storage that is complete and compliant?
Do the agreements/contracts with the entities handling hazardous wastes include the waste disposal method (incineration, landfill, recycling) of all hazardous wastes?
Do the agreements/contracts with the entities handling non-hazardous wastes include the waste disposal method (incineration, landfill, recycling) of all non-hazardous wastes?
Does the factory conduct trainings for all relevant workers on waste management?
If external entities for waste management/disposal are used, does the factory undertake regular checks/audits of those entities?
Does the factory have any targets and action plans in relation to reducing the volume of waste generated?
Are waste materials recycled (either on-site or off-site depending on the local waste sub-contractor)?

Chapter 7: Pollution Prevention, Hazardous and Potentially Hazardous Substances
Is the factory required to hold licenses, permits or official contracts for the hazardous substances present on-site in accordance with local law?
If yes, have the permits, licenses or official contracts been found valid in accordance with local law?
Is an experienced/qualified manager designated to be in charge of the chemical management in the factory?
Does the factory maintain a reliable and complete chemical inventory with the following basic information: area of use, chemical name, CAS Numbers of the chemical components, chemical supplier, MSDS availability and quantities stored?
Is the inventory updated on a regular basis?
Are MSDS in local language available and accessible to all workers close to the areas where chemicals are used and stored?
Does the factory keep the complete (16 sections) original version of the MSDS of all chemical used and stored on-site?
Are all the chemical containers labelled with the name in local language and the corresponding hazard symbol (for hazardous chemicals)?
Does the factory keep the original label compliant with the GHS requirements in all chemical containers stored on-site?
Are the hazardous substances stored in separated dedicated storage closed off area(s), safe, sheltered, clean and well ventilated with an appropriate temperature maintained?
Are incompatible chemicals properly segregated?
Is the chemical storage area(s) access restricted to only authorized workers?
Does the factory prevent the risk of chemical spill or leakage with appropriate measures in the storage areas and production areas?
Are eye wash and shower stations connected to running water, installed close to the chemical storage area and using area?
Does the factory have chemical handling and storing procedures documented and implemented for a proper chemical management?
Does the factory conduct trainings for relevant workers in relation to the management and use of hazardous substances?
Are the trainings conducted regularly according to local law?
Does the factory have targets and action plans in relation to eliminating or reducing hazardous substances used on-site?
Does the factory have a process to request its chemical suppliers to comply with the MRSL?
Does the factory have a system to monitor, for each chemical product/formulation received on-site, the compliance with the MRSL?

Chapter 8: Emergency Response Management
Is the factory required to hold permits, licenses or official contracts to notify the authorities of any major incident?
If yes, have the required permits, licenses or official contracts been found valid?
Has the factory identified and documented all the potential causes of emergency situations related to environment and assessed the levels of risks?
Does the factory have an emergency response plan or procedure in case of chemical spill incidents available?
Does the factory conduct chemical spill incident mock drills?
Are chemical spill incident mock drills conducted on a regular basis (if not defined by law, at least once a year)?
Are chemical spill incident mock drills documented with, at minimum: date, number of participants, description of the actions taken and time it took to clean-up the spill?
Does the factory provide appropriate emergency response equipment and materials everywhere chemicals are used and stored?
Does the factory have an emergency response plan or procedure in case of fire incidents available?
Does the factory have an emergency procedure for the ETP?
Does the factory keep records of workplace accidents, injuries and diseases?
Has the factory communicated the emergency response plan to those parties that could be impacted as per law?

14, rue de Bassano - 75016 Paris

Tél. : 01 40 76 17 21 / 22

http://www.ics-asso.org