
ICS
ENVIRONMENTAL
HANDBOOK FOR
FACTORIES





Handbook for Factories

ICS Environmental Requirements

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ICS Presentation

ICS Structure

Initiative Clause Sociale (ICS) is a multi-sector initiative that conducts social audits in the textile, clothing, bazar, leisure, furniture, fixtures, equipment, appliances and food sectors with the aim of improving working conditions along global supply chains. ICS members join efforts by rolling out a shared audit framework in their production plants and by exchanging information on their common factories within the ICS database. On the internal ICS database, ICS members share the results and all documents related to the audits (Audit questionnaire, Factory Profile, CAP etc.) only with the members working with the audited factories. The ICS initiative enables brand to collaborate, mutualize audits and to contribute to the reduction of the audit 'fatigue'. The ICS is not a sourcing platform as member retailers can only access information on the factories they are linked to.

The list of ICS member companies 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.



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ICS common methodology

Due diligence is the way forward advanced transparency and responsibility across global supply chains. A combined approach of social and environmental audits and close cooperation with suppliers 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 brands.

- ICS audits can only be requested by an ICS member and not by a supplier, a factory or any intermediary. The aim is to ensure the impartiality of the audit process.
- ICS audits are performed only by third party audit companies accredited by ICS.
- ICS members share common monitoring rules when critical non-compliances are identified in the factories.

General Requirements - Factory Overview

- The factory should identify if there are any sensitive habitats nearby, such as nature reserves, national parks, wetlands or sites of special scientific interest.
- The factory should identify what the location of the nearest surface water course is (river, stream, canal, lake, reservoir, pond, etc.).
- The factory should identify if there are any boreholes/wells or natural springs either on-site or in the surrounding area.
- The factory should identify when the site was first developed from green field (if known).
- The factory should summarize the previous land-uses of the site (if known), e.g. type of operation, occupier of the site etc.

Chapter 1 - Requirements /Environmental Management Systems

Core requirements

- 1.1. The factory should identify if it is committed to any industry or governmental environmental protection codes or regulatory procedures.
- 1.2. The factory should identify if it holds the environmental-related documents requested by local law such as permits, licenses and certificates.
- 1.3. The factory should have a policy defining its approach to environmental management.
- 1.4. The factory should have specific written environmental procedures (e.g. for waste handling and disposal, spill prevention etc.).



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- 1.5. The factory should have a person of the management designated to coordinate environmental management activities. For small scale factories, the factory manager could be in charge of environmental issues.
- 1.6. The factory should have a system in place that will alert relevant workers of changes in any applicable environmental laws.
- 1.7. The factory should have a site environmental committee. The factory should include representatives from various business functions in the environmental committee. For small scale factories, the factory manager could be in charge of environmental issues.
- 1.8. The factory should have a system or process for assessing environmental aspects and impacts associated with the facility's activities including with the introduction of new (or changes to existing) materials, processes or activities.
- 1.9. The factory should ensure that all workers (including contractors, temporary and third party workers) are trained on relevant environmental matters, environmental procedures implemented on-site and on how they, as individuals, may impact the environment. Trainings should also be related to environmental risks assessed at the factory.
- 1.10. The factory should have a process for periodically reviewing its environmental performance (as per local law or at least every year).
- 1.11. The factory should ensure that trainings are repeated on a regular basis.

Enhanced requirements

- 1.12. The factory should have complete records of environmental trainings mentioning the names of all workers trained, the content of the trainings and the trainings dates.
- 1.13. The factory should have set environmental objectives and targets to improve environmental performance (e.g. reductions in water use, reductions in energy use, reductions in wastes generated).
- 1.14. The factory should have defined standards for suppliers (e.g. suppliers of services, contractors, raw material suppliers) that prescribe expected levels of environmental performance.
- 1.15. The factory should 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 above question 1.14.
- 1.16. The factory should ensure that visitors are provided with any instructions or information in relation to environmental matters and site rules.



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

Core requirements

- 2.1. The factory should identify if the site is required to monitor or calculate energy and/or GHG emissions to demonstrate compliance with applicable permits.
- 2.2. The factory should identify what the energy sources used on the site are (e.g. main electricity, locally generated electricity, coal, oil, gas etc.). The factory should be able to explain what they are and what they are used for.
- 2.3. The factory should monitor and track its overall energy consumption.
- 2.4. The factory should put in place power consumption meters or any other means to measure the entire factory power consumption. The factory should assess both energy inputs and outputs.
- 2.5. The factory should ensure that there is no leak on-site (chemical, gaz, steam etc.). The factory should calculate steam generation and consumption and install steam flow meters if relevant.
- 2.6. The factory should conduct internal inspections to control the status of the steam lines and repair steam leaks. Inspections should be documented and conducted on a regular basis (every 3 months on average).
- 2.7. The factory should analyze its energy consumption at a department, section and process level.
- 2.8. The factory should identify if it produces or consumes any energy from renewable sources (e.g. solar, wind etc.).
- 2.9. The factory should provide trainings to relevant workers in relation to energy use, transport and greenhouse gases generation (GHGs).

Enhanced requirements

- 2.10. The factory should put in place power consumption meters or any other means to measure the energy consumption at a department, section and process level.
- 2.11. The factory should be able to analyze and document every month its energy consumption for 1 kg of product processed (e.g. energy consumption per kg of textile produced).
- 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 monitor or routinely assess emissions of fluorinated-gases (F-gases).
- 2.14. The factory should have systems or procedures in place that aim at reducing the site's environmental impact and increase efficiency from energy consumption, transport and greenhouse gases generation (GHGs).



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- 2.15. The factory should identify if it is part of a recognized compliance scheme for greenhouse gas (GHG) emissions trading. If so, the factory should provide details of the scheme (e.g. who runs it and the employment site's membership reference).
- 2.16. The factory should conduct site energy audits and describe how often they are undertaken and when the most recent audit was done.

Chapter 3 – Requirements / Water Use

Core requirements

- 3.1. The factory should identify what sources of water are used (e.g. mains drinking water, main process water, borehole abstraction, surface water abstraction etc.). The factory should explain what they are and what they are used for.
- 3.2. 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 or license for this activity. If so, the factory should identify what the limits and conditions associated with this permit/license are and comply with them.
- 3.3. The factory should identify what the legal requirements to monitor and track water consumption are.
- 3.4. The factory should monitor and track its overall monthly water consumption.
- 3.5. The factory should put in place a water flow meter at the raw or fresh water extraction/source point. The factory should assess both water inputs and outputs.
- 3.6. The factory should analyze its water consumption at a department, section and process level.
- 3.7. The factory should provide trainings to relevant workers in relation to water use.

Enhanced requirements

- 3.8. The factory should put in place water consumption meters or any other means to measure the water consumption at a department, section and process level.
- 3.9. The factory should be able analyze and document every month its water consumption for 1 kg of product processed (e.g. water consumption per kg of textile produced).
- 3.10. The factory should have set targets aiming at reducing water consumption.
- 3.11. The factory should identify if there is any re-use of '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).
- 3.12. The factory should 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. The factory should identify how often these audits are undertaken and when the most recent audit was done.



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- 3.13. The factory should identify if it is free from fines, prosecution or warnings by the regulators in relation to water use. If not, the factory should 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 still ongoing).

Chapter 4 – Requirements / Wastewater and Effluent

Core requirements

- 4.1. The factory should identify if the site is required to sample/test wastewater discharges. The factory should provide details including frequency of testing and whether this is undertaken on-site or outsourced to an external contractor.
- 4.2. The factory should identify if the site requires a permit or license for discharging wastewater/effluent via the drainage system in accordance with local law.
- 4.3. The factory should ensure that the required permit or license is valid.
- 4.4. The factory should identify what wastewater/effluent streams are generated.
- 4.5. The factory should have a dedicated drainage system on-site. The factory should describe the drainage systems present and identify potential leakages.
- 4.6. The factory should identify and describe where wastewater/effluent from the site is discharged to (municipal sewer, river, lake, sea etc.).
- 4.7. The factory should treat wastewater/effluent prior to off-site discharge and have a dedicated onsite wastewater/effluent treatment plant (ETP) in accordance with local law.
- 4.8. If there is an ETP on-site and managed internally, the factory shall ensure the ETP is functional, well operated and well maintained to ensure an effective treatment of the wastewater.
- 4.9. 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, or the factory has a plan to ensure this additional volume of wastewater will be treated (in a new ETP or in an external ETP).
- 4.10. The factory should have systems or procedures in place that cover wastewater generation and management.
- 4.11. The factory should provide trainings to relevant workers in relation to wastewater management including ETP handling.

Enhanced requirements

- 4.12. The factory should have set targets aiming at reducing the volume of wastewater generated.



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- 4.13. The factory should identify if the factory is free from fines, prosecution or warning by the regulators in relation to wastewater management. If not, the factory should 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).

Chapter 5 – Requirements / Emissions to Air

Core requirements

- 5.1. The factory should identify if the site requires a permit or license for emissions to air in accordance with local law.
- 5.2. The factory should ensure that the required permit or license is valid.
- 5.3. The factory should identify what the main points of source emissions to air are (point source emissions are those which discharge via a chimney, stack, extraction system or vent).
- 5.4. The factory should identify what the main fugitive emissions to air are. 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.).
- 5.5. The factory should have an inventory of on-site equipment that contains ozone depleting substances (ODSs) (e.g. air conditioning equipment that contains refrigerants). The factory should describe the types and quantities of refrigerants/ODSs present on-site.
- 5.6. The factory should have systems or procedures in place that manage emissions to air and ODSs.
- 5.7. The factory should sample or test emissions to air in accordance with local law. The factory should provide details including frequency of testing and whether this is undertaken by site workers or outsourced to an external contractor.
- 5.8. The factory should ensure a routine or periodic maintenance/inspection programme is in place to test for leaks of ODSs. The factory should detail if it has been conducted by a specialized external contractor.
- 5.9. The factory should provide trainings to relevant workers in relation to emissions to air and ODSs.

Enhanced requirements

- 5.10. The factory should have set targets aiming at reducing emissions to air and quantity of ODSs used on-site.
- 5.11. The factory should identify if the phase-out is legally required for the site. The factory should provide details of this phasing out.
- 5.12. The factory should identify if the site phases out the use of ODSs.



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- 5.13. The factory should identify if there are abatement or pollution prevention devices (e.g. filters, scrubbers) on point source emissions to air. The factory should describe the abatement techniques employed on the site.
- 5.14. The factory should identify if the site is free from any fines, prosecution or warning by the regulators in relation to emissions to air or ODSs. If not, the factory should 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).

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 or license is valid.
- 6.3. The factory should identify what the main non-hazardous wastes generated are.
- 6.4. The factory should identify if the site generates 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).
- 6.5. The factory should separate hazardous waste from non-hazardous waste streams.
- 6.6. The factory should store hazardous wastes in good conditions (secondary containment/hard-surface floor, roof) to prevent spillage or leaking of waste materials.
- 6.7. The factory should have systems or procedures in place concerning waste management.
- 6.8. The factory should identify if the site burns waste on-site.
- 6.9. The factory should identify if the site buries or disposes waste on-site.
- 6.10. The factory should identify if wastes are treated on-site prior to off-site disposal.
- 6.11. If yes, the factory should identify if it is required to have a license or permit to undertake this activity.
- 6.12. The factory should identify if it uses external waste contractors. If so, the factory should identify the reason why these contractors have been chosen.
- 6.13. The factory should identify if waste contractors are required to be licensed by a regulator or local authority.
- 6.14. The factory should identify if the site retains copies of waste contractor licenses and permits on-site.
- 6.15. The factory should keep the record of hazardous waste transferred to contractor.



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6.16. The factory should identify if the site retains records of off-site transfer, treatment and disposal of the wastes.

6.17. The factory should provide trainings to relevant workers in relation to waste management.

Enhanced requirements

6.18. If external waste contractors are used, the factory should identify if regular checks/audits of those contractors are undertaken.

6.19. The factory should identify if waste materials are recycled (either on-site or off-site).

6.20. The factory should pay special attention to the sludge from the ETP as this is one of the most toxic wastes generated by the factory with an ETP on-site. The sludge final disposal must be known by the factory and the best choice in terms of environmental protection of sludge disposal available in the country should be selected by the factory.

6.21. The factory should identify if site waste audits are undertaken (to identify which waste is generated, where it is generated and what can be implemented in order to reduce waste or to improve waste management). If so, the factory should detail how often these are undertaken and when the most recent audit was done. The factory should have set targets aiming at reducing the volume of waste generated.

6.22. The factory should identify if the site is free from any fines, prosecution or warning by the regulators in relation to waste issues. If not, the factory should 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 still ongoing).

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

Core requirements

7.1. The factory should identify if the site is required to hold a license or permit for the hazardous substances present on-site in accordance with local law.

7.2. The factory should ensure that the required permit or license is valid.

7.3. The factory should assess whether any substances stored, used or handled on-site are prohibited by national or international laws or protocols.

7.4. The factory should identify if hazardous or potentially hazardous substances are stored, used or handled and what the main ones are.

7.5. The factory should maintain an inventory of those hazardous substances.

7.6. The factory should have assessed whether polychlorinated biphenyls (PCBs) are present in equipment on-site or not.



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- 7.7. The factory should have assessed whether asbestos-containing materials are present on-site or not.
- 7.8. If asbestos containing materials are present, the factory should have compiled an asbestos register (or similar).
- 7.9. The factory should maintain up-to-date safety data sheets (or similar) for all hazardous substances used on-site.
- 7.10. The factory should have systems or procedures in place concerning pollution prevention and the management of hazardous and potentially hazardous substances.
- 7.11. The factory should provide trainings to relevant workers in relation to the management and use of hazardous substances. The supplier should ensure a member of the management has the skills and knowledge to supervise the activities related to the chemical management.

Enhanced requirements

- 7.13. The factory should have set targets aiming at eliminating or reducing hazardous substances used on-site.
- 7.14. The factory should identify if any above ground or underground bulk storage tanks is present on-site. The factory should describe number, size and what the substance stored is.
- 7.15. If above ground tanks are present on-site, the factory should provide secondary containment or equivalent.
- 7.16. The factory should identify if integrity testing of bulk storage tank is conducted. The factory should describe the frequency of testing and when the last testing was carried out.
- 7.17. The factory should be free from any fines, prosecution or warning by the regulators in relation to the storage or use of hazardous substances. If not, the factory should 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 still ongoing).

Chapter 8 –Requirements / Major Incident Management

Core requirements

- 8.1. The factory should identify if the site is required to hold a permit/license or to be notified to the authorities given the probability that a major incident occurs.
- 8.2. The factory should ensure that the required permit or license is valid.
- 8.3. The factory should have a site emergency response plan and/or procedure (notably in case of fire and in case of chemical spill).
- 8.4. The factory should have emergency spill response (e.g. spill kits, spill response team etc.).



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- 8.5. The factory should conduct drills or practice major incident scenarios (including fire and chemical spill).
- 8.6. The factory should document fire drills and chemical spill incident mock drills with at minimum: date, announced/unannounced, number of participants, and time it took to evacuate.
- 8.7. The factory should have instances of incidents/spills of hazardous or potentially hazardous materials on-site (or of off-site incidents caused by the site's activities) in the past two years.
- 8.8. The factory should keep records of workplace accidents, injuries and diseases.
- 8.9. The factory should provide training to all workers in case of emergency, at minimum on: notification of employees in event of fire, spill or any emergency, reporting fire or emergency to local authority, use of fire extinguishers, evacuation procedures, and first aid.

Enhanced requirements

- 8.10. The factory should communicate the emergency response plan to those parties that could be impacted.
- 8.11. The factory should involve local communities or emergency services in the development or review of the emergency response plan.
- 8.12. The factory should identify if the site is free from any fines, prosecution or warning by the regulators in relation to any major incidents on-site or caused by the site. If not, the factory should 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 still ongoing).

Annex - List of documents to make available for the audit

Please find below the list of documents (where applicable) that the employment site will need to make available to the audit team on the audit day:

- / 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;*



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- / 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 licenses (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 licenses;*
- / 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 licenses and permits etc.;*
- / site audits of waste contractors;*
- / Bulk tank inventory (including contents, capacity etc.);*



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- / 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).*