

# Environmental and Social Management System

## Toolkit

**GENERAL**

Although the environmental and social management system described in this publication is based on IFC Performance Standard 1, the process outlined herein may not provide for meeting all the requirements of IFC Performance Standard 1, or any other IFC Performance Standard. The purpose of this publication is to demonstrate a technical means of integrating environmental and social concerns into company management, so that a business can become more effective in reducing its impact on the environment, its workers and its neighboring communities. The publication is provided "AS IS" and is provided without warranty of any kind, either express or implied, including, but not limited to, implied warranties of merchantability, fitness for a particular purpose or non-infringement. Development of an environmental and social management system based on this publication does not imply any type of certification or compliance with any IFC Performance Standards, including but not limited to IFC Performance Standard 1, nor does it imply endorsement by or affiliation or sponsorship with IFC.

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# Table of Contents

Welcome & How to Use This ESMS Toolkit.....	5
<b>Policies</b> .....	7
Introduction.....	7
Checklist for Developing a Company Policy Statement.....	8
Sample CEO Letter announcing the ESMS - Internal .....	11
<b>Identification of Risks and Impacts</b> .....	12
Introduction.....	12
Risk Identification Worksheet .....	13
Process Mapping Tool .....	18
Physical Mapping Tool .....	20
Risk Assessment Tool.....	22
<b>Management Programs</b> .....	24
Introduction.....	24
Root Cause Analysis.....	25
Action Plan Chart .....	27
Outline of Procedure .....	29
Supply Chain and Contractors Management .....	30
<b>Organizational Capacity</b> .....	31
Introduction.....	31
Training Plan Worksheet.....	32
Roadmap and Time Estimate for Developing and Implementing an ESMS.....	33
<b>Emergency Preparedness and Response</b> .....	37
Introduction.....	37
Emergency Scenario Mapping.....	38
Sample Fire Response Procedure .....	39
Flooding Preparedness and Response Procedure .....	48
<b>Stakeholder Engagement</b> .....	53
Introduction.....	53
Stakeholder Mapping Tool – Identification and analysis .....	54
Impact Zoning Tool for Identifying Affected Communities.....	56
Stakeholder Engagement Plan Worksheet.....	57
<b>External Communication and Grievance Mechanism</b> .....	58
Introduction.....	58

Checklist for Effective Grievance Mechanism .....	59
Grievances Log.....	60
<b>Reporting Back to Affected Communities .....</b>	<b>62</b>
Introduction.....	62
Format and Venues for Ongoing Reporting .....	63
<b>Monitoring and Management Review .....</b>	<b>64</b>
Introduction.....	64
Monitoring Plan.....	65
Auditing Guidance .....	66

# Welcome & How to Use This ESMS Toolkit

Environmental and social responsibility is becoming more and more important in today's global economy. There are thousands of environmental and social codes and standards in the world today. The codes and standards define the rules and the objectives. But the challenge is in the implementation. An environmental and social management system helps companies to integrate the rules and objectives into core business operations through a set of clearly defined, repeatable processes.

In the following pages, we provide tools to build or enhance your company's environmental and social management system (ESMS), such as sample documents, blank forms, flowcharts, checklists and templates. There are tools for each of the nine elements in your ESMS.

As you go through the Toolkit, you may want to refer back to the companion publication, the *ESMS Implementation Handbook*, which gives more background on each of the nine ESMS elements.

It is important to remember that simply creating a book of policies and procedures is not the end – it is just the beginning. Policies and procedures need to be implemented and turned into consistent processes. Continual improvement requires people who are committed to the effort. It requires trained people who have the right attitude, skills and knowledge. It requires leadership. Our hope is that, with this in mind, your company can use our ESMS tools to help accelerate the journey of continual improvement, for the benefit of the company, as well as your employees and stakeholders.

Quick Reference for Using the ESMS Toolkit	
<b>ESMS General Toolkit</b>	This toolkit provides tools, including forms, templates, checklists and other useful documents, to help you develop and implement an ESMS.
<b>ESMS General Implementation Handbook</b>	This companion publication provides background on environmental and social management systems and offers step-by-step instructions on how to develop and implement an ESMS.
<b>ESMS Self-Assessment and Improvement Guide</b>	This companion publication contains a questionnaire, maturity matrix and improvement tips to help you measure the maturity of your ESMS and develop a plan for improvement.

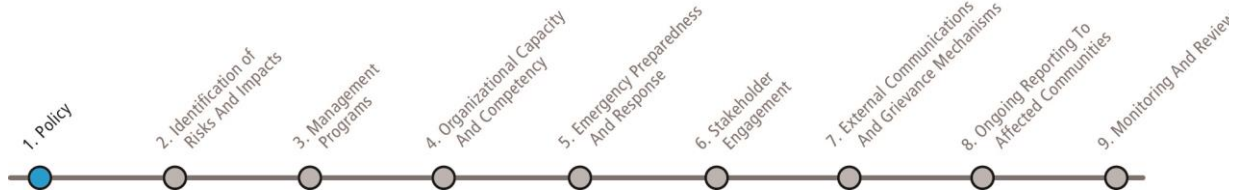
## Acknowledgments

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# 1. Policy



## Policy

### Introduction

Policies are the foundation of your Environmental and Social Management System (ESMS). They are the rules that you expect your people to follow and the public statement you make about what your company believes in and how you strive to conduct your business.

The process of adopting environmental and social policies provides a company with an opportunity to think about and discuss what is important. Ultimately, it also enables you to gain the commitment and support of senior management as they approve and communicate the policies.

We present two tools related to this element:

- Checklist for Developing a Company Policy Statement
- Sample CEO Letter announcing the ESMS



# 1. Policy

## Checklist for Developing a Company Policy Statement

### Instructions:

Use this checklist to make sure that you are considering the relevant issues in your environmental and social policy.

### Environment

- *Environmental laws and regulations*
- *Resource utilization efficiency (energy, water, important input materials, etc.)*
- *Greenhouse gas (GHG) emissions*
- *Release of pollutants into air, water, and land*
- *Handling, storage, and disposal of hazardous chemicals*
- *Hazardous and non-hazardous wastes*
- *Recover, reuse, treatment, and proper disposal of waste*
- *Consideration of non-chemical means to control economically significant pests and vectors*
- *Conversion of forest lands or wetlands*

### Labor and Working Conditions

#### Human resources policies and procedures

- *Documented labor policies and procedures*
- *Clear communications throughout the company*

#### Working conditions and terms of employment

- *Respect of collective bargaining agreement, if applicable*
- *Reasonable working conditions and terms of employment (e.g. compensation, benefits)*
- *Protection for migrant, contract or temporary workers*
- *Clean and appropriate accommodations, if applicable*

#### Workers' organizations

- *Workers' rights to form and to join workers' organizations*
- *No discrimination against those who organize*

#### Non-discrimination and equal opportunity

- *Non-discrimination in hiring, promotion and compensation practices*
- *Training, tools and opportunities for advancement*
- *Freedom from harassment by management or other workers*
- *Remedy for past discrimination*

#### Retrenchment

- *Consideration of alternatives and mitigation in case of retrenchment*





# 1. Policy

- *Payments and benefits in compliance with national law*
- Grievance mechanism
  - *Transparent process for receiving and resolving worker complaints*
  - *No retaliation or discrimination*
- Child labor
  - *Minimum age for employment*
  - *Conditions for engagement of young workers*
- Forced labor
  - *Freedom of movement, freedom to resign*
  - *No retention of identification papers or money to detain workers*
- Occupational health and safety
  - *Safe work environment and dormitories, if applicable*
  - *Emergency prevention and response system*
  - *Personal protective equipment and appropriate training*
  - *Documentation and reporting of accidents, near misses, and illnesses*
  - *Appropriate use of potentially hazardous chemicals in accordance to Material Safety Data Sheets (MSDS) and International Chemical Safety Cards (ICSC).*
- Workers engaged by third parties
  - *Extension of labor policies to labor contractors, recruiting agencies and other third parties*
  - *Grievance mechanism for contracted workers*
- Supply chain
  - *Extension of policies and monitoring of supply chain with respect to child labor, forced labor and worker safety to supply chain*

## Community Health, Safety and Security

- Community Health and Safety
  - *Consumer product safety*
  - *Health and safety of the public related to company activities*
  - *Health and safety of the public related to the construction, operation, and decommissioning of equipment and infrastructure*
  - *Downstream impacts related to wastewater disposal*
  - *Potential community exposure to hazardous materials and substances*
  - *Transportation and disposal of hazardous wastes*
  - *Impact on ecosystem services on which communities rely*
  - *Impact on land ownership through acquisition and resettlement*



## 1. Policy

- *Community exposure to water-borne, vector-borne and communicable diseases associated with company activities*
- *Communicable diseases associated with the influx of temporary or permanent project labor*
- *Emergency situations caused by company activities, equipment and infrastructure*
- *Excessive or unregulated vehicle traffic near the facility and through communities*

### Security personnel

- *Appropriate screening, training, equipping and monitoring of direct or contracted workers providing security services*
- *Grievance mechanism for workers and the community to express concerns about the security system and personnel*
- *Investigation of allegations of past abuse*



### Sample CEO Letter announcing the ESMS - Internal

To all employees of our company:

Our vision is to become one of the most respected and admired companies in our area. We aspire to conduct ourselves in an ethical and responsible manner. Corporate social responsibility, which includes environmental, labor rights, and community issues, is a growing concern to investors, consumers and to all of us as people.

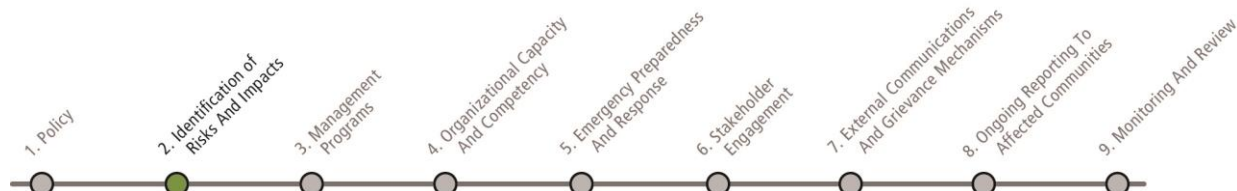
To integrate corporate social responsibility into our day-to-day business activities, we are developing and implementing an environmental and social management system (ESMS). A management system consists of trained, committed people routinely following procedures and continually improving.

I ask for your full cooperation in this important initiative. We believe that corporate social responsibility must be a foundation of our long-term growth and profitability. Not only is it an integral part of our overall business strategy, but it is also the right thing to do. It is the right thing for our customers, our suppliers, our shareholders, our communities and for you, as a core part of this company.

As we strive to successfully implement our ESMS, we will train and involve you throughout the process. **[Person's name and title]** is in charge of this corporate social responsibility initiative and I will personally ensure that the system is effective. Each of you has a direct line of communication with **[person]** for any suggestions or concerns. I thank you for your efforts and your continued dedication to our success.



## 2. Identification of Risks and Impacts



# Identification of Risks and Impacts

## Introduction

Identifying your risks can seem like a daunting task, but don't be overwhelmed. You can scale your program to be appropriate for the size and complexity of your company. But remember, small companies can have the same risks and potentially severe environmental and social impacts as large companies.

Think of your risk identification and assessment as a value-added activity, an opportunity to gather information that will help you effectively improve your operations. Risk identification and assessment is an ongoing process; situations change over time, so the assessment should be repeated at regular intervals.

As you identify the risks for your company, consider the different risks that women and men may encounter. You should also consider the risks to people outside your company – your external stakeholders.

We present four tools related to this element:

- Risk Identification Worksheet
- Process Mapping Tool
- Physical Mapping Tool
- Risk Assessment Form



## 2. Identification of Risks and Impacts

### Risk Identification Worksheet

#### Instructions:

This worksheet can help you identify the key risk areas for your company so that you can focus your efforts on the most important issues. It will not tell you whether or not the risk has led to a negative impact for your company; rather, it will call attention to the specific risk areas that are most likely to become problems. You can then use that information to focus your attention on those risks and decide what further actions are necessary to prevent or respond to any potential negative impacts. You should consult with people inside and outside of your company who are knowledgeable about these issues as you complete the worksheet. For each box, circle the appropriate answer.

LABOR AND WORKING CONDITIONS RISKS		
RISK FACTORS	My company has the following conditions (circle the appropriate answer)	Potential negative impact (A “yes” response means that there is a potential negative impact)
There is a difference in nationality, race or religion between workers and managers.	Yes/No	Discrimination. Disciplinary abuse and harassment. Human trafficking and/or forced labor.
Our managers and supervisors are not aware of the workers’ rights under the national labor law or collective agreements.	Yes/No	Inadequate wages, benefits and contracts. Excessive overtime. Discrimination. Disciplinary abuse and harassment.
We have an apprentice program that provides young workers with training and work experience.	Yes/No	Forced labor. Child labor.
Children accompany their parents during work or leisure time.	Yes/No	Child labor. Exposure of children to workplace hazards.
Female workers make up the majority of the workforce, while most managers and/or security staff are male workers.	Yes/No	Discrimination. Disciplinary abuse and (sexual) harassment.
We do not have a system for recording the “in” and “out” time for workers.	Yes/No	Excessive working hours. Lack of overtime payment.
Some workers are paid based upon the tasks performed (quota) rather than hours worked.	Yes/No	Health and safety risks. Inadequate wage payment. Excessive working hours.
Wages paid do not always meet the legal minimum wage or a level to meet the basic needs of a family.	Yes/No	Malnutrition. Child labor. Excessive overtime. Exhaustion.
We routinely use recruiting agencies and contract workers.	Yes/No	Inadequate wages, benefits and contracts. Forced labor.
We routinely use homeworkers or contractors that use homeworkers.	Yes/No	Inadequate wages, benefits and contracts. Forced labor. Child labor.
We routinely use seasonal or temporary workers.	Yes/No	Inadequate wages, benefits and contracts. Excessive overtime.
Some of the workers are migrants from another area.	Yes/No	Forced labor. Discrimination.
Migrant workers or seasonal workers are employed in more hazardous jobs.	Yes/No	Discrimination.
We provide a dormitory for some or all of our workers.	Yes/No	Lack of freedom of movement. Lack of clean adequate space. Excessive charges for the use of the dormitory.
The dormitories are not regularly inspected for their cleanliness, hygienic conditions, adequate space availability, or safe drinking	Yes/No	Lack of clean adequate space. Illness or health hazards due to lack of sanitation or access to a clean drinking water supply.



## 2. Identification of Risks and Impacts

<b>water and sanitation.</b>		
<b>Workers are not free to move out of their dormitories</b>	Yes/No	Lack of freedom of movement. Forced labor.
<b>There are security guards at our company.</b>	Yes/No	Lack of freedom of movement. Harassment.
<b>We are located in a free-trade zone.</b>	Yes/No	Inadequate wages, benefits and contracts.
<b>There are large fluctuations in working hours based on work demand.</b>	Yes/No	Excessive overtime. No payment of overtime due to hour averaging. Layoffs.
<b>There is a labor shortage in the area.</b>	Yes/No	Child labor.
<b>Our region does not have a strongly established union structure.</b>	Yes/No	Discrimination. Restriction on freedom of association and collective bargaining.
<b>There is no history of collective bargaining, unions or other forms of worker representation at our company.</b>	Yes/No	Lack of freedom of association.
<b>The union members and worker representatives do not enjoy the same benefits as the other workers.</b>	Yes/No	Lack of freedom of association. Discrimination.
<b>The hiring, compensation and promotion of workers is not based on the job requirements and workers' skills.</b>	Yes/No	Discrimination.
<b>There is no procedure for workers to express their complaints (grievance mechanism).</b>	Yes/No	Discrimination. Disciplinary abuse and harassment. Worker injuries and chronic conditions.
<b>The organization has done a collective dismissal in the past or it may be vulnerable to collective dismissal due to poor financial conditions or technical reasons.</b>	Yes/No	Discrimination.
<b>We do not verify the age of workers at the time of hiring.</b>	Yes/No	Child labor. Hiring of young workers. Exposure of young workers to hazardous jobs.
<b>Workers are required to deposit money or their original documents (e.g. certificates, landing documents, passports, etc.) as a condition of their employment.</b>	Yes/No	Forced labor. Harassment.
<b>We withhold one-month salary from workers as security deposit.</b>	Yes/No	Forced labor.
<b>Our workers don't have access to separate and clean areas for eating and changing clothes.</b>	Yes/No	Worker illnesses.
<b>Sanitation and washing facilities are not inspected regularly.</b>	Yes/No	Worker illnesses due to infectious diseases.
<b>Our production activities include significant lifting, carrying or repetitive motions.</b>	Yes/No	Worker injuries and chronic conditions.
<b>Large equipment is used in our operations.</b>	Yes/No	Worker injuries and chronic conditions.
<b>Equipment, machinery and tools are not regularly inspected and maintained.</b>	Yes/No	Worker injuries such as lacerations, loss of limbs or digits.
<b>Our production activities involve workers routinely interacting with machinery.</b>	Yes/No	Worker injuries and chronic conditions.
<b>There are dust emissions/high noise levels due to certain activities.</b>	Yes/No	Respiratory hazards. Noise induced hearing loss.
<b>Our workers work long hours in areas with exposure to sunlight, ultraviolet radiation and/or excessive heat.</b>	Yes/No	Heat and sun-induced dermatitis. Melanoma. Lip cancer. Dehydration.
<b>Workers are required to work at precarious levels and high elevations.</b>	Yes/No	Fall injuries. Head injuries from falling objects.
<b>Our tools are not well maintained or ill</b>	Yes/No	Fatigue. Physical injury such as cuts and



## 2. Identification of Risks and Impacts

designed for the job.		lacerations.
Roadways and paths are narrow, restricting vehicular or personnel movements.	Yes/No	Worker injury or death due to hazards related to head-on crashes between vehicles or overturns off the side of the road.
Electrical equipment used is not regularly inspected and maintained.	Yes/No	Workers exposure to severe shocks, burns or electrocution.
Confined spaces are not yet identified and workers are not fully trained on safe operating practices.	Yes/No	Worker's exposure to toxic gases (hydrogen sulfide, methane, ammonia, carbon monoxide, carbon dioxide). Oxygen deficiency and asphyxiation.
We use open trucks to transport workers from location to another.	Yes/No	Physical injury. Fatalities due to vehicle-worker collisions or other accidents.
Our production activities involve hazardous materials or processes that could cause fires or explosions.	Yes/No	Worker injuries or fatalities.
Some hazardous materials are not identified or labeled and some of the workers may not be trained in safe handling of chemicals or other hazardous substances.	Yes/No	Worker illnesses. Exposure to hazardous chemicals
We have not identified all operations where personal protective equipment (PPEs) is required.	Yes/No	Worker injuries. Exposure to hazardous material and chronic conditions.
Not all workers are aware of the work place hazards and how to use the appropriate PPEs.	Yes/No	Worker injuries. Exposure to hazardous material and chronic conditions.
Our workers are not aware of what to do in case of an emergency. Emergency routes and exits are often blocked and locked.	Yes/No	Injuries and loss of life.
The companies in our supply chain would probably answer "Yes" to most of the questions above.	Yes/No	All of the above

ENVIRONMENTAL RISKS		
RISK FACTORS	My company has the following conditions (circle the appropriate answer)	Potential negative impact (A "yes" response means that there is a potential negative impact)
Our operations require large quantities of fresh water.	Yes/No	Water resources depletion in the region. Contamination of ground or surface water sources in the region due to discharge of surface runoffs.
Our operations have high requirements for power supply.	Yes/No	High energy consumption.
We require large quantities of fuel (gas/diesel/etc.) for our operations.	Yes/No	Air emissions.
We have various processes and utility equipment, which may generate air emissions (e.g. boiler, diesel generator set, incinerator, grinder, etc.).	Yes/No	Air emissions. Solid waste (e.g. waste from equipment maintenance, fly and bottom ash from coal-based boilers). Hazardous waste (e.g. waste oil, oil-soaked filters and rags). Liquid waste (e.g. boiler blow-down, waste oil). Noise generation.
We generate large (or significant) quantities of solid or liquid waste from our	Yes/No	Solid waste. Liquid waste. Contamination of land, groundwater



## 2. Identification of Risks and Impacts

manufacturing or production processes.		and/or surface water due to improper disposal of solid and liquid waste.
We dispose of our solid waste in our landfill or city's landfill facility.	Yes/No	Contamination of land, groundwater (due to leachate) and/or surface water (due to run-off).
We generate hazardous or toxic solid or liquid waste such as chemical residues and sludge from wastewater treatment plants.	Yes/No	Contamination of land, groundwater and/or surface water (due to run-off) if disposed improperly.
We discharge our wastewater (process effluent) in a nearby river, lake or any other water body.	Yes/No	Contamination of receiving water body and aquatic life. Eutrophication due to high BOD <sub>5</sub> or COD.
We treat our wastewater and sewage (from toilets, washrooms, etc.) before it is discharged.	Yes/No	Energy consumption. Solid waste generation (e.g. sludge from treatment process, treatment chemicals). Land and/or water contamination due to improper disposal of solid waste (e.g. sludge).
We do not re-use (part of) our treated wastewater (process effluent) for processing purposes.	Yes/No	Water consumption.
We use some banned or restricted chemicals/materials in our processes.	Yes/No	Non-fulfillment of regulatory requirements. Air, land or water pollution depending on current usage. Exposure of workers or consumers to banned chemicals.
We face problems related to pests/vectors.	Yes/No	Use of chemicals. Chemical exposure to workers. Land or water contamination due to disposal of infested material.
We require large extensions of land.	Yes/No	Loss of biodiversity. Soil degradation. GHG emissions.

### COMMUNITY HEALTH, SAFETY AND SECURITY RISKS

RISK FACTORS	My company has the following conditions (circle the appropriate answer)	Potential negative impact (A "yes" response means that there is a potential negative impact)
Our operations involve air emissions, water discharge, solid waste disposal, leakage of chemicals or gases, etc., that may pass on to the surrounding community	Yes/No	Air, water or land contamination, which can affect the health and livelihood of local communities.
We use certain banned or restricted chemicals, pesticides or herbicides in our operations.	Yes/No	Exposure of community to banned chemicals/hazardous substances directly or through contaminated water and soil. Impact on wildlife.
We plan to develop new infrastructure, buildings, equipment and other facilities.	Yes/No	Exposure of communities to air emissions, noise, and accidents due to equipment and vehicular movement. Impact on wildlife, biodiversity and local livelihoods due to natural habitat conversion.
We plan to decommission and dispose of old infrastructure, buildings, equipment and other facilities.	Yes/No	Health risks to communities as a result of exposure to toxic substances (e.g. from chemicals, heavy metals, asbestos, etc.), and air emissions and noise due to equipment and vehicular movement.





## 2. Identification of Risks and Impacts

<b>There is significant movement of vehicles in and around our facilities due to our operations.</b>	Yes/No	Exposure of communities to air emissions, noise, and accidents due to vehicular movement.
<b>We store hazardous chemicals or hazardous waste in our facility.</b>	Yes/No	Health risks to communities and negative impacts on wildlife and biodiversity due to the intentional or unintentional (spills) release of hazardous or toxic substances contaminating air, land, or water.
<b>We discharge water from our operations, which may have an impact on surrounding water bodies (e.g. wastewater from workers' residential facilities, other production facilities, etc.).</b>	Yes/No	Negative impacts on local food security and income generation due to contamination of aquatic life. Diseases/illness among local communities due to the use of contaminated water.
<b>We hire temporary and migrant workers.</b>	Yes/No	Communicable diseases brought or spread by the influx of workers.
<b>We hire private security personnel.</b>	Yes/No	Conflicts with communities.
<b>We sometimes have complaints from the local community.</b>	Yes/No	Conflicts with communities.
<b>Our operations use large quantities of fresh water.</b>	Yes/No	Potential negative effects for fisheries. Lack of water for irrigation for nearby farmers, negative effect on availability of drinking water.
<b>Our operations involve a high risk of fires and explosions. Our building is not fit or does not have a permit for the operations taking place.</b>	Yes/No	Collapse of building. Fires and explosions may affect nearby buildings. Injuries and loss of life.



## 2. Identification of Risks and Impacts

### Process Mapping Tool

#### Instructions:

A process map is a flowchart that visually illustrates the flow of activities of any given process from beginning to end. Below is an example of a blank process map. In order to develop a process map, you first identify all your company's processes. Then, you identify the inputs (what is needed to carry out that activity - e.g. water, energy, raw materials or chemicals) and outputs (what is left from that activity – e.g. waste, emissions or by-products) for each process step.

Process maps are particularly useful in identifying environmental risks, occupational health and safety hazards, and areas of process improvement. They can help you pinpoint inefficiencies within your workflow so that you can streamline processes and maximize productivity, which can benefit your business and your workers.

After you complete the process map, consider each activity and identify the following:

- Occupational health and safety hazards;
- Risks to the environment and communities; and
- Opportunities for waste reduction and resource efficiency

It is essential to include people from all levels of your company in this process. Supervisors and workers, especially, can offer valuable insight into the way things are actually done in your facility since they are doing the day-to-day work. If you can't bring everyone together to complete the process map, you should ask supervisors to consult with the workers they oversee in order to obtain their input, and then incorporate that information into the process map.

After you have identified the risks, you should start thinking about possible solutions. There are many different types of solutions that you may consider; you may want to revise your production practices completely or simply increase the use of personal protective equipment by your workers. The solutions that you choose will form the basis of the Action Plans you will prepare as part of your Management Program (Chapter 3).



## 2. Identification of Risks and Impacts

Inputs	Process steps	Outputs	OHS hazards and potential negative impacts on workers	Risks and potential negative impacts on the environment and community	Opportunity For Waste Reduction/Energy & Water Savings
Water, energy, raw materials, chemicals, labor etc.	Operational activity	Waste, emissions, byproducts	Injuries, long-term illnesses	Environmental pollution, shortage of resources	Improved process, reuse and recycling
<i>What inputs are needed to carry out the activity?</i>	<i>What is the activity? (This should be <b>one</b> step in an operational process.)</i>	<i>What waste does the activity produce?</i>	<i>What type of negative impact could this activity have on workers?</i>	<i>What type of negative impact could this activity have on the environment and the surrounding community?</i>	<i>How can the activity be improved to prevent those negative impacts from occurring?</i>

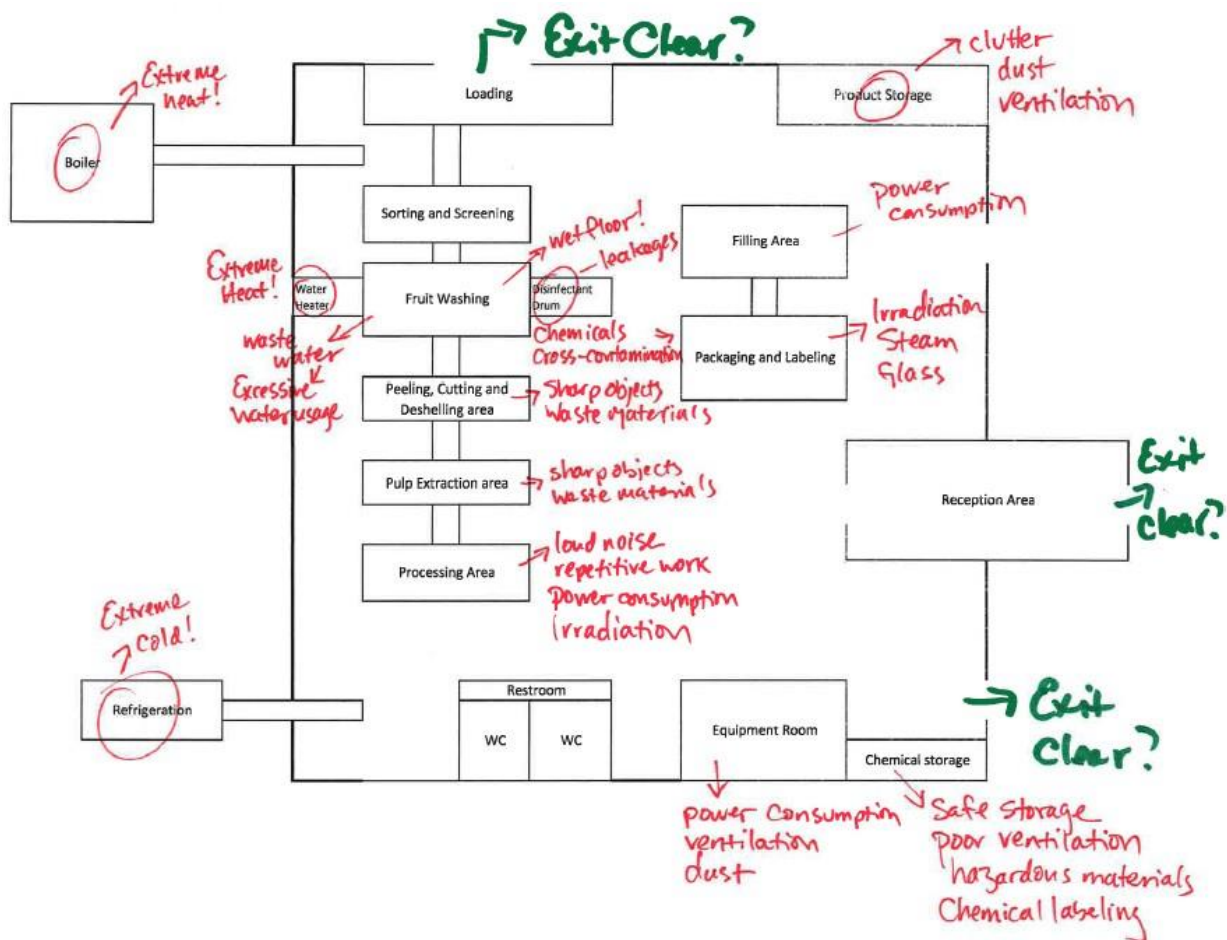


## 2. Identification of Risks and Impacts

### Physical Mapping Tool

#### Instruction

A physical map is another helpful tool to identify risks in your company. First, prepare a map of the layout of your facility (below is an example for a fruit processing facility). The map should include all the areas where production activities and various business operations take place, and illustrate how they are connected to one another. You can also use this map when you develop your emergency preparedness plan. Once you have the physical map, you should do a walk-through of the facility to identify existing or potential problems. You should conduct the walk-through during working hours with a team that includes supervisors and workers, since they often know what the problems are and have ideas about necessary improvements. Whenever you observe a problem or potential problem, write it down and mark it on the map.





## 2. Identification of Risks and Impacts

HERE ARE SOME THINGS TO LOOK FOR DURING THE WALK-THROUGH:

- *Where are people most likely to become injured? Identify trip, slip and fall hazards (from falling objects or a fall from an elevated area), as well as areas where someone could become injured by vehicles.*
- *Are equipment, tools, and machinery designed and maintained efficiently to reduce worker strain? Can they be operated safely?*
- *Where are workers exposed to hazardous chemicals, pathogens, excessive dust, noise, sun, and extreme temperatures? Do workers have appropriate personal protective equipment (PPE)? Is it being used correctly?*
- *Is the work area lighting sufficient?*
- *Are chemicals labeled and safely stored with compatible materials? Are there any existing or potential leakages from containers?*
- *Where could fires, explosions, or the accidental release of hazardous materials occur? Is there adequate and appropriate response equipment close to those areas?*
- *Are exit doors unobstructed and well-marked? Are they unchained and equipped with panic bars?*
- *Are any passages blocked due to the layout of the facility or improperly stored materials?*
- *Which areas have high levels of water consumption or discharge? Identify all potential water consumption and discharge sources.*
- *Are input materials being used efficiently? Is material wasted at any point?*
- *Where is most of the waste produced in the facility? How is the waste managed?*
- *Has your company's use of land negatively affected nearby residents (e.g. through emission of pollutants or land encroachment)?*
- *In general, are there places or work processes with clear bad habits?*

After the walk-through, meet with the team and discuss your observations. You can also discuss previous incidents or accidents and their consequences, so that you can take steps to prevent similar situations in the future.

The information you collect in the walk-through will form the basis of the Action Plans you will prepare as part of your Management Program in Chapter 3.



## 2. Identification of Risks and Impacts

### Risk Assessment Tool

#### Instructions

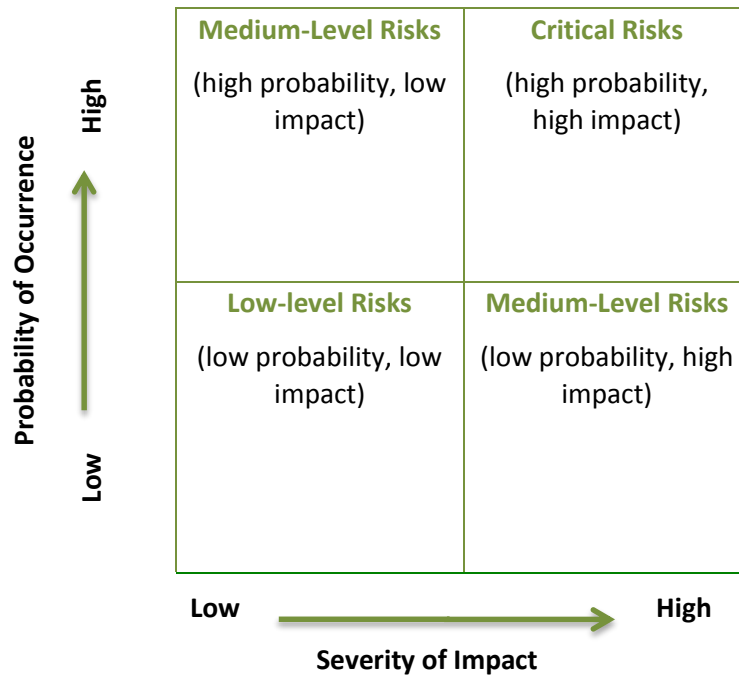
Once you have identified the risks in your company, the number of issues may seem daunting. But don't get overwhelmed. This risk assessment form will help you assess the significance of each risk so that you can prioritize the risks that most need your attention, and devote the necessary resources to addressing them. You should prioritize the risks that have the **highest probability** of occurring and those that would have most **severe impacts** if they occurred. Once you have prioritized certain risks, you can develop an Action Plan. You should first seek to *avoid* the risks altogether, and prevent the risk from becoming a problem. If that is not possible, you can take steps to *minimize* any potential negative impacts of the risks.

Complete the risk assessment form below by first filling in the risks that you identified using the tools above. Then, assess the probability (low, medium, high, extreme) that each risk will occur, and assess the potential severity (low, medium, high, extreme) of the impacts. For example, a major flood or earthquake may be unlikely to occur (low probability), but the damage to your staff and to your facility could be extremely high (high impact).

- As you **assess the probability of each risk**, you should consider the circumstances of your facility and its local context. You may ask yourself questions such as:
  - (1) How many times has this risk led to a negative impact in the recent past? For example, if you typically have one chemical spill each year, it is likely that this trend will continue.
  - (2) Is your location particularly risky for any reason? For example, are you located on a fault line or within the typical path of tropical storms?
  - (3) Have there been any recent changes in your situation that may increase your vulnerability to risk? For example, have you had an influx of new workers who have not been fully trained in safety procedures and may be more likely to make mistakes?
- In order to **assess the severity of the possible negative impacts** of each risk, you should consider the possible scope of the impact. How many people would be impacted if the risk were to occur? Would it result in extreme injuries or the deaths of workers? Would it destroy your infrastructure? Would it impact the local community and environment as well? Would you lose your operating permits? For example, a fire could negatively impact all of your workers, destroy your facility, and even spread to the local community and environment.
- As you prioritize the risks to address, you should also consider opportunities to increase efficiency and save money by reducing water and energy consumption, waste generation, and other similar considerations.



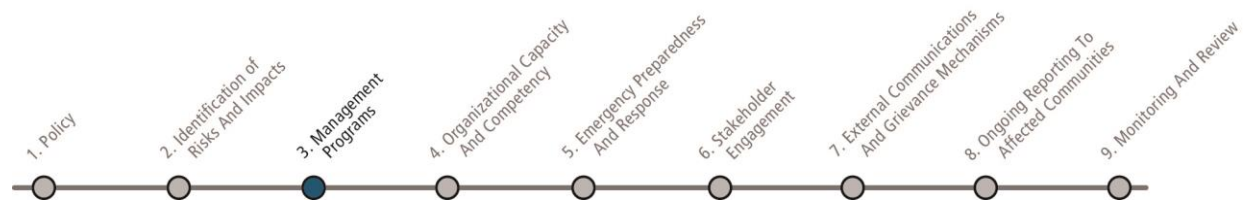
## 2. Identification of Risks and Impacts



RISK	PROBABILITY OF OCCURRING (low=1, medium=2, high=3, extreme=4)	SEVERITY IF OCCURRED (low=1, medium=2, high=3, extreme=4)	RISK PRIORITIZATION (low, medium, critical)	NOTES
<i>What is the risk that has been identified? (Use previous tools to identify risks.)</i>	<i>What is the likelihood that this risk will occur and create negative impacts?</i>	<i>How severe would the potential impacts be, if the risk should occur?</i>	<i>What are the highest priority risks based on the likelihood of occurring and the severity of the impact?</i>	<i>Any additional notes.</i>



## 3. Management Programs



# Management Programs

## Introduction

Your Management Program should include Action Plans and procedures to help you address the risks that you identified and prioritized through the tools in Chapter 2. You should first seek to *avoid* any potential negative impacts of the risks; if that is not possible, you should take steps to *minimize* the impact of the risks; finally, if you are unsuccessful in those efforts, you can *offset or compensate* for negative impacts after they have occurred.

We present five tools related to this element:

- Root Cause Analysis
- Action Plan Chart
- Outline of Procedure
- Supply Chain Management Tool





## 3. Management Programs

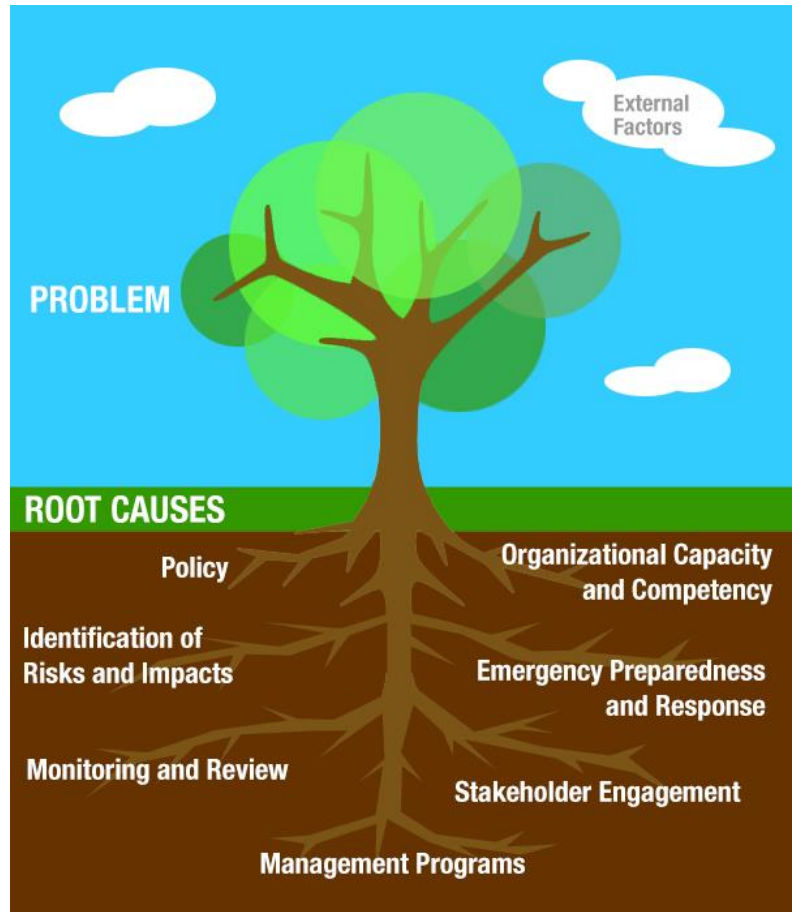
### Root Cause Analysis

Once you have identified and prioritized your risks, you should try to identify their underlying root causes. The root causes are often deficiencies in your management system, such as inadequate procedures or improper training.

You can use this root cause tree diagram to brainstorm and map the underlying factors that can lead to negative impacts for each prioritized risk.

#### Instructions:

- The risk or problem that you prioritized through your risk assessment is the *treetop*.
- The root causes are the *roots* of the tree. Root causes are gaps in the implementation of your management system. Group similar root causes into the appropriate ESMS element: Policy, Identification of Risks and Impacts, Management Programs, Organizational Capacity and Competency, Stakeholder Engagement, and Monitoring and Review.
- In the area outside of the tree, you can include information about external factors that may influence your business but are beyond the direct control of your company. These may include your external environment, such as the weather or a natural disaster, and other factors, such as government policies, economic trends or market forces.
- As with the other exercises, you should conduct this activity with a diverse group of employees to ensure that you capture different perspectives within the company.



The root cause tree diagram is a useful tool to help you move beyond the surface-level challenges, and dig deeper to identify root causes.



## 3. Management Programs

You can also use the "**5 Whys**" technique to facilitate a robust conversation about root causes.

Example: There is a chemical spill in your facility. (The Problem)

1. *Why?* – The container holding the chemical leaked. (First why)
2. *Why?* – There was a hole in the container. (Second why)
3. *Why?* – The container is old and has not been replaced. (Third why)
4. *Why?* – The workers did not know that it had to be replaced. (Fourth why)
5. *Why?* – The worker was not trained in the chemical handling procedures. (Fifth why - identified root cause is a gap in Organizational Capacity and Competency.)

These tools will enable you to build a management system that addresses underlying issues that contribute to problems to create more systematic and lasting preventive solutions.



### 3. Management Programs

#### Action Plan Chart

##### Instructions

Use this chart to identify the actions you will take to address the prioritized risks, and to determine how you will manage those actions.

In the chart below, list the risks that you identified and prioritized in the previous section. Then, determine which actions you will take to avoid, minimize, or compensate/offset the negative impacts of each risk. Assign a responsible staff member to each action and set a deadline to ensure that he or she will implement the action. You should also identify the resources required to complete the action, and the operational procedures you need to adopt to ensure the long-term sustainability of the action.

**Risk:** Insert the risks that you prioritized here. For example, worker exposure to high concentrations of dust.

**Objective:** What do you want to achieve broadly? What are your performance targets?  
For example, reduce workers' exposure to dust.

MITIGATION HIERARCHY	ACTION	PERFORMANCE INDICATORS	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
<b>Avoid the risk</b>	<i>What will you do to avoid this risk?</i>  For example, install a dust collection system.	<i>What parameters will you monitor to determine your success?</i>	<i>When will this be accomplished?</i>	<i>Who is responsible for ensuring that this occurs?</i>  (This should include all levels of management, including supervisors and first-line managers.)	<i>What human and financial resources will you need?</i>	<i>What procedures will you put in place to ensure that this action becomes part of your daily processes?</i>  For example, a procedure for the operation and maintenance of the dust collection system.
<b>Minimize the risk</b>	<i>What will you do to minimize this risk?</i>  For example, provide workers with respiratory personal protective equipment (PPE).					For example, a procedure for the assignment, maintenance, and replacement of respiratory PPE.



### 3. Management Programs

<b>Compensate/ Offset negative impacts of the risk</b>	<i>What will you do to make up for any negative impacts from this risk?</i>  For example, establish a remediation policy to compensate and relocate workers whose health is affected by the dust exposure.					For example, a procedure for regularly conducting physical examinations of workers exposed to dust.
--	--	--	--	--	--	--



## 3. Management Programs

### Outline of Procedure

As you implement your action plan, you should define the procedures that you will follow. Procedures clearly systematize actions so that they become routine, daily processes and practices. Procedures and work instructions can be communicated in different formats, such as text, flowcharts, or pictograms. You should use the format that is most effective for your company staff. The outline below includes the important components of a well-defined written procedure.

**Title:** Procedure X

**Procedure identification number:**

**Number of pages:**

**1.0 Purpose:** *What is the objective of the procedure?*

For example: This procedure is intended to address risk X identified during the risk assessment process.

**2.0 Scope:** *What is the reach of this procedure for the company? What/who is included in the procedure and what/who is not?*

For example: This procedure encompasses all of our company's operations and business processes, as well as our contractors.

**3.0 Definitions:** *How does the company understand the terms used in this procedure?*

**4.0 Responsibilities:** *Who will regularly review and update this procedure? Who will inform and train personnel on their responsibilities under this procedure? Who is responsible for following the work instructions described in this procedure?*

**5.0 Work instructions:** *What are the specific steps to take in order to implement this procedure?*

**6.0 Reference documents:** *What documents support this procedure? What is this procedure based on? Where can you learn more?*

For example: This may include related company policies, relevant national or local laws, and industry standards.

**7.0 Records:** *Where are the outcomes of the procedures documented?*

For example: Worker injuries may be recorded in an accidents log and worker issues may be recorded in personnel files.

**8.0 Approving authority:** *Who is responsible for approving these procedures?*

For example: The General Manager is responsible for approving this procedure.

**9.0 Issue date:** *When was the procedure issued?*

**10.0 Revision date:** *When was the procedure reviewed and revised? (Procedures should be continually updated and improved).*



## 3. Management Programs

### Supply Chain and Contractors Management

In addition to managing risks within your company, your management system should extend to your primary suppliers and contractors. The table below can help you make sure that you are incorporating them into your ESMS appropriately. As you go through the table, think of critical ways you can manage risks.

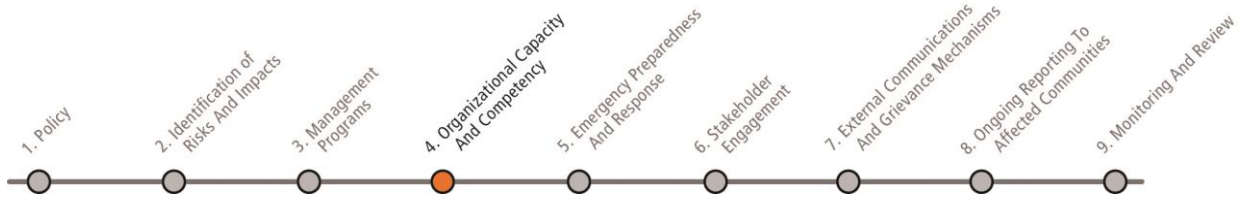
Suppliers and contractors should have ownership and accountability for their own management system, but you can help them build their internal capacity to do so. You can help them adapt the concepts and tools provided in the ESMS Handbook and Toolkit to develop their own ESMS.

ESMS ELEMENT	SUPPLY CHAIN AND CONTRACTORS MANAGEMENT
<b>Policy</b>	<ul style="list-style-type: none"> <li>• Make sure your environmental and social policy statement includes your expectations with regards to suppliers and contractors.</li> </ul>
<b>Identification of Risks and Impacts</b>	<ul style="list-style-type: none"> <li>• Make sure your risk assessment identifies risks in your supply chain and your contractors.</li> <li>• Create a checklist/rating system to evaluate the social and environmental performance of new and existing suppliers and contractors.</li> </ul>
<b>Management Program</b>	<ul style="list-style-type: none"> <li>• Define action plans to address the identified risks within your supply chain. If you don't have the ability or leverage to influence environmental and social performance improvements among your suppliers and contractors, you may want to consider gradually replacing them.</li> <li>• Incorporate supplier and contractor ratings into business planning.</li> </ul>
<b>Organizational Capacity and Competency</b>	<ul style="list-style-type: none"> <li>• Train relevant staff (including procurement, sourcing, and compliance departments) to identify environmental and social risks among your suppliers and contractors.</li> </ul>
<b>Emergency Preparedness and Response</b>	<ul style="list-style-type: none"> <li>• Assess emergency preparedness among your suppliers and contractors and help them develop the capacity to plan for emergencies.</li> </ul>
<b>Stakeholder Engagement</b>	<ul style="list-style-type: none"> <li>• Engage with external stakeholders to identify risks in your supply chain or risks caused by your suppliers and contractors.</li> </ul>
<b>External Communications and Grievance Mechanisms</b>	<ul style="list-style-type: none"> <li>• Implement accessible grievance mechanisms so you can receive and address complaints about your suppliers and contractors.</li> </ul>
<b>Ongoing Reporting to Affected Communities</b>	<ul style="list-style-type: none"> <li>• Report back to communities affected by activities performed by your primary suppliers or contractors on your behalf.</li> <li>• Inform these communities about results of actions taken.</li> </ul>
<b>Monitoring and Review</b>	<ul style="list-style-type: none"> <li>• Review your suppliers and contractors' management systems on a periodic basis and mandate changes as needed.</li> </ul>

*For more information, you can consult the IFC Performance Standard 2 Handbook for Labor and Working Conditions: "Measure and Improve your Labor Standards Performance", and the IFC Good Practice Handbook "Assessing and Managing Environmental and Social Risks in an Agro-Commodity Supply Chain."*



## 4. Organizational Capacity



# Organizational Capacity

## Introduction

Your ESMS extends beyond documented policies and procedures. You need trained, committed people at all levels in your company to effectively implement your ESMS. This does not mean that ESMS implementation should become everyone's full-time job, rather, the new responsibilities should be incorporated into the relevant job descriptions and performance should be evaluated based on the consistent implementation of assigned duties as defined in procedures.

In order to develop your organizational capacity, you have to train your staff appropriately. You should utilize progressive training techniques: initially, the training should raise participants' awareness about the ESMS; next, training should develop participants' commitment to the ESMS; and finally, it should teach participants how to implement the ESMS. Each training module should have a specific goal related to this progression: (1) raise awareness; (2) gain commitment; and (3) teach people the knowledge and skills they need to implement the ESMS.

We present two tools related to this element:

- Training Plan Worksheet
- Roadmap and Time Estimate for Developing and Implementing an ESMS



## 4. Organizational Capacity

### Training Plan Worksheet

#### Instructions

Identify the type of training that your managers and workers need in order to effectively implement your action plans and improved procedures. You should also distinguish between those who only need basic ESMS training and those who need more advanced ESMS training to carry out their responsibilities.

#### Sample Training Plan Worksheet

DEPARTMENT	MODULE 1	MODULE 2	MODULE 3	MODULE 4

A sample list of some of the relevant topics for specific groups is presented in the table below. You should select the specific training modules for each of the target groups based on the relevant risks and potential improvement opportunities.

DEPARTMENT	RELEVANT TOPICS FOR TRAINING
<b>Senior management</b>	Introduction to IFC Performance Standards and ESMS; Sectorial best practices.
<b>ESMS team</b>	Introduction to IFC Performance Standards and the nine ESMS elements; Environmental legal requirements; Identification and evaluation of environmental and social risks and impacts; Root cause analysis; Stakeholder engagement; Monitoring of performance indicators; Internal auditing; Environmental and social reporting.
<b>HR Department</b>	Introduction to ESMS and IFC Performance Standard 2 – Labor and Working Conditions; Hiring, non-discrimination, anti- harassment, remuneration and other labor policies; Effective complaint management and resolution procedures for workers; Worker-management interaction.
<b>Workers and Managers</b>	Introduction to ESMS; ESMS policies; Instructions on new or modified operational procedures relevant to the tasks performed (e.g. waste management procedure; storage and handling of hazardous chemicals; use and maintenance of PPE); Emergency response procedures; Instruction on complaint management system; Worker-management interaction.
<b>Procurement</b>	Supply chain assessment based on environment and social requirements; Supply chain audits.





## 4. Organizational Capacity

### Roadmap and Time Estimate for Developing and Implementing an ESMS

**Instructions** The roadmap below lists the activities that a company commonly needs to put in place to set up an ESMS. This table will help you develop a timeline for action and estimate the staff time required to develop and implement your ESMS.

For more detailed guidance on how to develop and implement an ESMS, refer to the IFC ESMS Handbook and the ESMS Self-Assessment and Improvement Guide.

ACTIVITY		TIME SPENT				MONTH															
						1	2	3	4	5	6										
DEV	What will you do to <b>develop</b> this ESMS element? What types of documents, records or procedures do you need?	Who is responsible for these activities?				When will they occur and how long will it take to complete each activity?															
IMP	How will you <b>implement</b> this ESMS element in practice? What actions and processes will you put in place to ensure that your intended actions are being carried out?																				
1. Policy		Senior mgt time	Mid-mgt time	Supervisors time	Workers time																
DEV	Hold kick-off meeting at senior management level to discuss ESMS implementation																				
	Formulate organization's environmental & social policy, or review existing one																				
IMP	Design, printing and display of ESMS policy in key areas																				
	Communicate ESMS policy to workers and key external stakeholders																				

ACTIVITY		TIME SPENT				MONTH															
						1	2	3	4	5	6										
2. Risk and Impact Identification		Senior mgt time	Mid-mgt time	Supervisors time	Workers time																
DEV	Map processes and key stakeholders, including suppliers and contractors																				
	Compile regulatory and other requirements, including stakeholder expectations																				
	Identify and prioritize environmental and social risks (including supply chain and contractors)																				



## 4. Organizational Capacity

3. Management Programs		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTH																											
						1				2				3				4				5				6							
DEV	Formulate environmental and social performance targets																																
	Formulate environmental and social action plans																																
	Formulate ESMS manual (document procedures)																																
IMP	Communicate environmental and social performance targets to employees.																																
	Implement environmental and social action plans (assign responsibilities and resources)																																

4. Organizational Capacity and Competency		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTH																											
						1				2				3				4				5				6							
DEV	Select ESMS team and team leader																																
	Define competency program for ESMS core team																																
	Define training program to ensure implementation of new/improved procedures																																
IMP	Conduct awareness and training programs on environmental, OHS, and labor issues.																																
	Conduct internal auditor training for the organization's ESMS assessors/auditors																																





## 4. Organizational Capacity

8. Ongoing Reporting to Affected Communities		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS																																		
						1				2				3				4				5				6														
DEV	Develop/upgrade system for reporting and disclosing information to affected communities																																							
IMP	Communicate and disclose information to affected communities as per the stakeholder engagement plan																																							

9. Monitoring and Review		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS																																		
						1				2				3				4				5				6														
DEV	Define ESMS monitoring plan and establish benchmarks to evaluate environmental and social performance																																							
	Define procedure and evaluation criteria for ESMS internal audit																																							
IMP	Collect and analyze monitoring data																																							
	Carry out internal audits																																							
	Hold senior review meetings to evaluate company's performance																																							
	Communicate outcomes of review of the ESMS performance by senior management and key decisions taken																																							
	<b>TOTAL</b>																																							



## 5. Emergency Preparedness and Response



# Emergency Preparedness and Response

## Introduction

Even with good systems in place, emergencies can and do happen. Therefore, it is essential to plan in advance. You should try to prevent emergencies from occurring, but you also need to train your employees so they know what to do in case something does happen. You don't need to plan for every single possible accident or emergency. Use your risk assessment to focus on the emergencies that are most likely to happen or would cause the most harm. Then you can develop and implement a suitable emergency preparedness and management plan for each prioritized emergency situation.

As part of the plan, you should create detailed procedures that outline the steps you will take to prepare for and respond to an emergency. We provide samples of response procedures for some common emergencies: fires, flooding, and chemical spillages.

We present four tools related to this element:

- Emergency Scenario Mapping
- Sample Fire Response Procedure
- Sample Chemical Spill Response Procedure
- Sample Emergency Flooding Response and Preparedness Procedure



## 5. Emergency Preparedness and Response

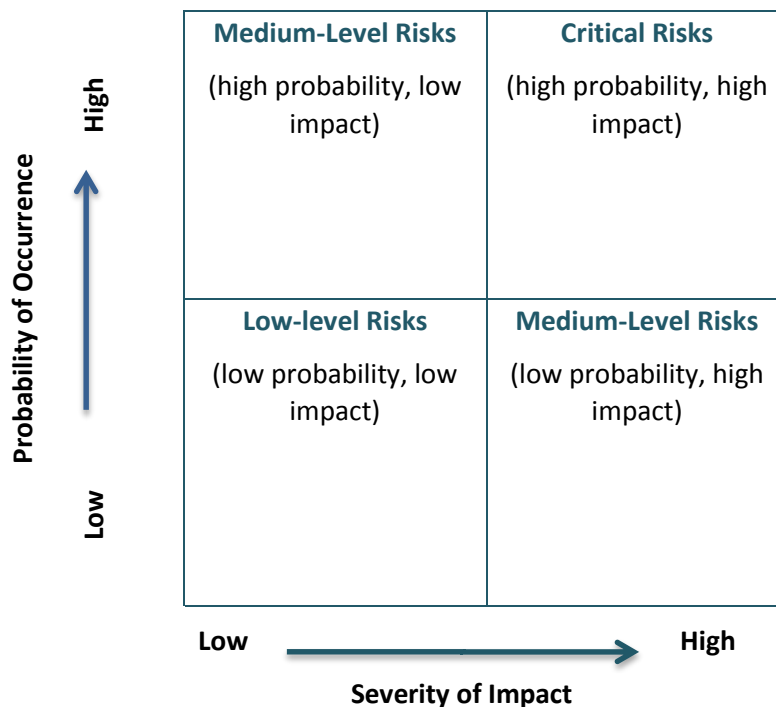
### Emergency Scenario Mapping

Through your risk assessment, you will assess and prioritize the emergency scenarios that are most likely to occur in your area or would have the most severe impacts, and then create a comprehensive emergency preparedness plan so you can minimize the damage to your company and workers in case of emergency. This sample list includes the most common types of emergencies, all of which can result in significant worker injury or death, as well as disruption of operations and destruction of property.

Possible manmade or natural emergency situations include:

- *Storms, including tornados, typhoons, and hurricanes (many can result in flooding)*
- *Other natural disasters, such as flooding, earthquakes and associated tsunamis, and volcanic eruptions*
- *Fire*
- *Explosion (manmade or accidental)*
- *Civil unrest*
- *Chemical spill or release of hazardous substances*

You can use the risk assessment graph to map the probability and severity of these possible emergency situations.





## 5. Emergency Preparedness and Response

### Sample Fire Response Procedure

#### **Title: Fire Response Procedure**

Procedure number: EM001

Number of pages: 5 pages

#### **1.0 Purpose and Scope:**

- 1.1. **Purpose:** Set out responsibilities and activities in order to respond to emergency resulting from fire. Identify the roles, responsibilities and authorities to effectively facilitate the site's emergency preparedness and response.
- 1.2. **Scope:** This procedure applies to all activities and processes of at **[Name of Company]**.

#### **2.0 Definitions:**

- 2.1. **EMERGENCY:** Situation that poses immediate threat of:
  - a. Injuries and damage to health
  - b. Fatalities
  - c. Damage to property
  - d. Damage to environment
- 2.2. **FIRE EMERGENCY:** Situation that poses or signals immediate threat in the form of:
  - a. Uncontrolled fire or imminent threat of uncontrolled fire
  - b. Smoke or burning
  - c. Uncontrolled release or spillage of flammable or combustible substance
  - d. Sounding of fire alarm

3.0 **Responsibility and Authority:** This procedure is the responsibility of the operations manager or designate. The operations manager shall report to the president in matters related to emergency preparedness, and shall have total authority during emergency situations. The operations manager shall have the authority to declare a state of emergency. In the absence of the operations manager, these authorities shall revert to the president.

- 3.1. The EHS Manager shall:
  - a. Review and revise this procedure at least once a year;
  - b. Ensure that everyone is aware of their responsibilities as defined in this procedure;
  - c. Ensure that required fire detection, alarm and response equipment is present in all designated areas;
  - d. Assemble fire brigades in each work area in accordance with the work area supervisors;
  - e. Regularly schedule and deliver training to fire brigades;



## 5. Emergency Preparedness and Response

- f. Regularly schedule and organize evacuation drills in all work areas;
- g. Analyze the results of drills (e.g. evacuation time) and take appropriate action.

### 3.2. The HR Manager shall:

- a. Ensure that responsibilities as defined in this procedure are included in job descriptions.

### 3.3. The Maintenance Manager shall:

- a. Regularly test all emergency equipment to ensure it is in working condition;
- b. Schedule maintenance of emergency equipment by an approved contractor;
- c. Take immediate action when equipment needs to be repaired or replaced.

### 3.4. The Work Area Supervisors shall:

- a. Ensure that fire brigades participate in training;
- b. Regularly remind workers of their responsibilities in the event of a fire;
- c. Conduct a head count of workers gathered at muster points.

### 3.5. Fire brigades shall:

- a. Participate in trainings organized by the EHS Manager;
- b. Respond to the fire and provide medical aid as explained in the work instructions of this procedure and in trainings.

### 3.6. All workers shall:

- a. Participate in evacuation drills;
- b. Immediately inform a member of the fire brigade or work area supervisor in the event of a fire;
- c. Evacuate the building through the nearest exit when the fire alarm sounds;
- d. Gather at the designated muster points.

### 3.7. Other responsibilities as defined in the work instructions.

## 4.0 Work Instructions:

### 4.1. **FIREFIGHTING INSTRUCTIONS**

- a. The cardinal rule in firefighting is to preserve life, and then property.
- b. The **person who discovers the fire** shall call for in-house assistance immediately after discovering the fire. Do not enter a burning room or building without another qualified person to assist. Alert other employees immediately.
- c. Determine if the fire can be extinguished within an appropriate time limit with the portable equipment in the building. If the equipment is sufficient, use it to extinguish the fire. If not, call the fire department, activate an alarm and evacuate the building.
- d. The **person who discovers the fire** should notify the telephone operator and provide the exact location and nature of fire.
- e. The **telephone operator** will notify the following individuals in turn:





## 5. Emergency Preparedness and Response

- i. Engineering control room;
  - ii. Time office;
  - iii. Operations manager;
  - iv. Maintenance department;
  - v. EHS manager;
  - vi. All other heads of departments; and
  - vii. House doctor.
- f. The **telephone operator** will remain on duty and serve as the information and control center unless instructions or conditions dictate otherwise.
- g. As soon as the **electrical department** is notified, the electrician shall cut off the power supply of the affected area, bring the elevators (if available) down to the ground level and provide an adequate lighting arrangement (with emergency lighting if extra light is required) for firefighting or evacuation.
- h. The **maintenance department** shall reach the fire hydrant pump room (if safe) for smooth pump operation.
- i. The **work area supervisor** (or the shift in-charge) will make appropriate decisions regarding building evacuation and firefighting with the help of an internal trained team and/or notifying the city's fire department.
- 4.2. **BUILDING EVACUATION:** It is essential to make decisions quickly and evacuate the premises in order to prevent the loss of lives. The evacuation procedure should be handled with expertise and without delay. When evacuation from the building is necessary, everyone must leave through the nearest exit or as advised. In labor-intensive industries, many people will have to be evacuated in a very short time. In the past, many workers in the textile industry, for example, have lost their lives due to blocked or locked exits, or an insufficient number of exits. Make sure exit routes can be used in case of an emergency.
- a. Close but do not lock doors behind you as you leave the building.
  - b. Employees and visitors should gather near the designated muster point in a safe area that is upwind from smoke or toxic gases and will not hamper emergency vehicles or services when they arrive.
  - c. In order to ensure that everyone is accounted for, conduct a head count of all employees and visitors.
  - d. Employees are not to re-enter the evacuated building until they are so advised by the designated officer (operations manager or safety manager).



## 5. Emergency Preparedness and Response

- e. Only trained and competent personnel equipped with suitable PPEs can perform any required rescue operations (for a trapped employee/visitor, for example).

4.3. **MEDICAL AID:** Treat all minor injuries with first aid, but remember that first aid is only temporary. First aid provides the immediate treatment that is needed before a doctor can reach the victim onsite, or before the victim can be transported to a doctor. What you do in the critical moments after an injury occurs could save a life, so it is important to know the basic first aid procedures. Review them often so you will be prepared if you suddenly find yourself in an emergency situation. The most important thing to do when someone is injured is to survey the scene to determine if the situation is safe, or if the victim must be moved from a dangerous location to a safe place. Call for emergency medical help immediately for all life-threatening situations and send people to guide the emergency team to the victim.

### 4.4. FIRST AID FOR FIRE INJURIES AND BURNS

- a. Move patient to fresh air.
- b. Move the patient from the heat of fire.
- c. Do not allow crowding around the patient.
- d. Remove or cut away clothes from affected parts of the body.
- e. Open buttons and loosen clothing.
- f. Pour chilled water on the affected parts.
- g. Apply any antiseptic cream.
- h. Get a doctor.

4.5. **ASPHYXIA:** If the patient has difficulty breathing or there are symptoms of collapse:

- a. Give artificial respiration with respirator or mouth-to-mouth respiration.
- b. Supply oxygen.
- c. Take the patient to the hospital or to receive medical help.

4.6. **SHOCK:** If the patient perspires, has a low pulse and the body is cold:

- a. Cover the victim with a blanket. (Do not touch burned parts.)
- b. Make sure the victim remains lying down.
- c. Elevate feet if you do not suspect head or neck injury or leg fracture.
- d. Get medical help.
- e. Monitor vital signs.
- f. Prevent loss of body temperature.
- g. Take the patient to a hospital immediately.



## 5. Emergency Preparedness and Response

5.0 **Emergency Response Team:** The purpose of the Emergency Response Team is to deal with catastrophic accidents within the company. The team's responsibilities are to immediately meet when an emergency situation is reported and to determine the course of action.

### Emergency Response Team members

NAME	TITLE	HOME PHONE	CELL PHONE
	General Manager		
	Operations Manager		
	Shift-in-charge		
	EHS Manager		
	Firefighting team member 1		
	Firefighting team member 2		

***Emergency Response Team members may be called upon on short notice***

6.0 **Reference Documents:** Evacuation plan, plant map with locations of emergency exits, firefighting equipment and first aid stations.

7.0 **Records:** Training logs, drill logs, firefighting and medical equipment maintenance and inspection logs; water gauge and pressure inspections logs

8.0 **Approving Authority:** General Manager

9.0 **Issue/Revision Date:** November 27, 2013



## 5. Emergency Preparedness and Response

### Sample Chemical Spill Response Procedure

#### **Title: Chemical Spill Response Procedure**

Procedure number: EM002

Number of pages: 4 pages

#### **1.0 Purpose and Scope:**

- 1.1. **Purpose:** This procedure outlines the steps to manage a chemical spill in order to minimize the potential for injury and damage to the environment.
- 1.2. **Scope:** The procedure applies to any event resulting in the uncontained spill of a hazardous substance within the activities and processes of **[Name of Company]**.

#### **2.0 Definitions:**

- 2.1. **Nature of the Spill:** Determined by the level of risk from the hazardous substance and the level of containment of the spill. One can distinguish between minor and major spills
- 2.2. **Minor Spill:** Limited risk to workers and environment. An example of a minor spill is a spill of 5 ml of concentrated Sulfuric Acid, which is a small volume that can easily be neutralized and removed.
- 2.3. **Major Spill:** Large risk to workers and environment. An example of a major spill is the uncontrolled release of ammonia in an unventilated enclosed area. If the volume is large it may represent a high risk to persons in the area.

3.0 **Responsibility and Authority:** This procedure is the responsibility of the operations manager or designate. The operations manager shall report to the president in matters related to emergency preparedness, and shall have total authority during emergency situations. The operations manager shall have the authority to declare a state of emergency. In the absence of the operations manager, these authorities shall revert to the president.

3.1. The EHS Manager shall:

- a. Review and revise this procedure at least once a year;
- b. Ensure that everyone is aware of their responsibilities as defined in this procedure;
- c. Ensure that equipment for the containment and cleanup of leaks and spills, and appropriate PPE, is present in all designated areas;
- d. Ensure that MSDS and ICSC are available in all locations where hazardous chemicals are stored or in use;
- e. Identify workers responsible for handling or storing hazardous chemicals in accordance with the work area supervisors;
- f. Assemble Emergency Response Team;



## 5. Emergency Preparedness and Response

- g. Regularly schedule and deliver training (i) on the response to minor spills/leaks to workers responsible of handling and storing hazardous chemicals, and (ii) on the response to major spills/leaks to the Emergency Response Team;
- h. Regularly schedule and organize evacuation drills in all work areas;
- i. Analyze the results of drills (e.g. evacuation time) and take appropriate action.

### 3.2. The HR Manager shall:

- a. Ensure that responsibilities as defined in this procedure are included in job descriptions.

### 3.3. The Operations Manager shall:

- a. Ensure that workers responsible for handling and storing hazardous chemicals and the Emergency Response Team participate in training;

### 3.4. Workers responsible for handling and storing hazardous chemicals shall:

- a. Participate in trainings organized by the EHS Manager;
- b. Respond to minor spills/leaks and provide medical aid as explained in the work instructions of this procedure and in trainings.
- c. Immediately contact the Emergency Response Team in case of a major spill/leak.

### 3.5. The Emergency Response Team shall:

- a. Participate in trainings organized by the EHS Manager;
- b. Respond to major spills/leaks and provide medical aid as explained in the work instructions of this procedure and in trainings.

### 3.6. All workers shall:

- a. Participate in evacuation drills;
- b. Evacuate the building through the nearest exit when they hear the alarm;
- c. Gather in the designated muster points, conduct a head count, and inform their supervisor if someone is missing.

### 3.7. Other responsibilities as defined in the work instructions.

## 4.0 **Work Instructions:**

### 4.1. **MINOR SPILL**

- a. Spills must be cleaned up promptly and thoroughly.
- b. Approach with care - many harmful chemicals lack colour or offensive odours. Never assume that spilled chemicals are harmless.
- c. Identify the chemical/s and hazards involved – check Material Safety Data sheet (MSDS) or International Chemical Safety Card (ICSC).
- d. Use the information on the physical and chemical properties of the material to judge response and/or evacuation procedures.



## 5. Emergency Preparedness and Response

- e. Decontaminate equipment, clothing and personnel, including any victims, on site if necessary.
- f. Dispose of contaminated equipment and materials only after receiving specialist advice.
- g. Ensure emergency procedures are in place and practiced.

### 4.2. MAJOR SPILL:

- a. Contact the **Emergency Response Team**.
- b. Notify the **telephone operator**, who will remain on duty as information and control center unless instructions or condition dictate otherwise.
- c. The **telephone operator** will contact public authorities when appropriate. Provide the following information:
  - i. State that this is an emergency.
  - ii. Provide your name, telephone number and location.
  - iii. Provide the location of the incident.
  - iv. Provide the time and type of incident.
  - v. Provide the name and quantity of material involved.
  - vi. Note the extent of injuries, if any.
- d. Evacuate personnel from the spill area.
- e. Shut off equipment as you leave the area.
- f. Direct personnel to the nearest fire exit. Do not use elevators.
- g. Do not touch any harmful substance. Take precautions to protect yourself if necessary.
- h. DO NOT go back in to an area where a chemical spill has occurred! Untrained rescuers who do not wear proper protective equipment can be overcome by toxic or asphyxiating fumes. Contact Operations manager and Lab Manager.
- i. Close doors to prevent further contamination. Secure the area to keep non-emergency response personnel away from danger.
- j. **The Emergency Response Team** will isolate contaminated individuals and treat as per MSDS or ICSC.
- k. In conjunction with expert assistance, the **Emergency Response Team** will minimise the spread of contamination and commence decontamination/clean up procedures.

- ### 4.3. MEDICAL AID:
- Treat all minor injuries with first aid, but remember that first aid is only temporary. First aid provides the immediate treatment that is needed before a doctor can reach the victim onsite, or before the victim can be transported to a doctor. What you do in the critical moments after an injury occurs could save a life, so it is important to know the basic first aid procedures. Review them often so you will be prepared if you suddenly find yourself in an emergency situation. Follow the instruction on MSDS or ICSC.



## 5. Emergency Preparedness and Response

- a. Remove victims from spill area to fresh air (but do not endanger your own life by entering areas with toxic gases).
- b. Immediately remove contaminated clothing.
- c. Flush skin or eyes with running water for 15 minutes.
- d. Get medical attention for victims.

5.0 **Emergency Response Team:** The purpose of the Emergency Response Team is to deal with catastrophic accidents within the company. The team's responsibilities are to immediately meet when an emergency situation is reported and to determine the course of action.

### Emergency Response Team members

NAME	TITLE	HOME PHONE	CELL PHONE
	General Manager		
	Operations manager		
	EHS Manager		
	Emergency Response Team member 1		
	Emergency Response Team member 2		

***Emergency Response Team members may be called upon on short notice***

6.0 **Reference Documents:** Evacuation plan, plant map with locations of emergency exits, MSDS, ICSC, and first aid stations.

7.0 **Records:** Training logs, drill logs, MSDS, ICSC, spillage containment and medical equipment maintenance and inspection logs.

8.0 **Approving Authority:** Operations manager

9.0 **Issue/Revision Date:** December 5, 2013



## 5. Emergency Preparedness and Response

### Flooding Preparedness and Response Procedure

#### **Title: Flooding Response Procedure**

Procedure number: EM001

Number of pages: 5 pages

#### **1.0 Purpose and Scope:**

- 1.1. **Purpose:** Set out responsibilities and activities in order to respond to emergency resulting from flooding. Identify the roles, responsibilities and authorities to effectively facilitate the company's emergency preparedness and response.
- 1.2. **Scope:** This procedure applies to all activities at **[Name of Company]**.

#### **2.0 Definitions:**

- 2.1. **Emergency:** Situation that poses immediate threat of:
  - a. Injuries and damage to health
  - b. Fatalities
  - c. Damage to property
  - d. Damage to environment

#### **3.0 Responsibility and Authority**

- 3.1. The Emergency Response Team Coordinator shall:
  - a. Review and revise this procedure at least once a year.
  - b. Ensure that everyone is aware of his or her responsibilities as defined in this procedure.
  - c. Ensure that necessary equipment (e.g., real-time warning systems, radio, shelters) and supplies (drinkable water, non-perishable food, flashlights) are present in all designated areas.
  - d. Assemble the Emergency Response Team.
  - e. Regularly schedule and deliver training to the Emergency Response Team on their responsibilities under this procedure.
  - f. Regularly schedule and organize drills in all work areas.
  - g. Analyze the results of drills and take appropriate action.
- 3.2. The HR Manager shall:
  - a. Ensure that responsibilities as defined in this procedure are included in job descriptions.
- 3.3. The Operations Manager shall:
  - a. Ensure that the Emergency Response Team members participate in training.
- 3.4. The Emergency Response Team shall:
  - a. Participate in trainings organized by the ERT Coordinator.





## 5. Emergency Preparedness and Response

- b. Respond to emergencies as explained in the work instructions of this procedure and in trainings.

3.5. All workers shall:

- a. Participate in drills;

3.6. Other responsibilities as defined in the work instructions.

4.0 **Work Instructions:** The Emergency Response Centre (ERC) shall monitor the weather conditions for potential flooding. The ERC shall keep track of weather conditions that may cause flooding (e.g. approach of a typhoon or other natural storm) and alert the ERT members when necessary. The ERC shall make a public announcement via the P/A system when a flood-warning signal has been confirmed (both during and after office hours). Upon notification of a flood warning, all personnel shall be advised to return indoors as soon as possible.

### 4.1. Flood Response Procedure

- a. Pre-Flood Planning

- i. Staff and train an **emergency response team (ERT)**, whose members are willing to stay on site during flooding (if safe to do so). Ask for volunteers. Arrange for support/assistance during flooding for families of those who will remain at the facility. Also, notify local emergency preparedness authorities about your plans to have personnel on site.
- ii. Designate a **weather monitor**, who will report weather conditions and keep the ERT Coordinator up to date on conditions before, during and after a flood. Involve local government and liaise with other businesses.
- iii. Give the **ERT Coordinator** the authority to implement the plan, based on predetermined checkpoints (e.g. when the approaching water is within a certain distance from the facility). This responsibility includes shutting down operations and sending personnel home.
- iv. The **ERT Coordinator** shall ensure that the **manager(s)** carry out predetermined tasks at each warning stage of a storm. To guarantee this, task checklists should be distributed to all those involved, completed and returned to the ERT Coordinator.
- v. Assess levels of insurance coverage for flood damage.
- vi. Install appropriate system to warn employees in real-time.
- vii. Provide safe shelters or structures that can protect employees and designate a safe evacuation route to them.
- viii. Provide radio and communication systems and appropriate PPE.

- b. Advance preparedness steps



## 5. Emergency Preparedness and Response

- i. Identify all critical areas of a facility, and make sure someone on all shifts knows the proper shutdown procedures and is authorized to implement them.
  - ii. Maintain an updated list of telephone numbers and contacts for local emergency response agencies and the industrial property insurance company. Contact local authorities to plan and coordinate activities before the need for emergency action. That way, both you and they will be better prepared.
  - iii. Arrange backup communications, such as two-way radios or cellular phones, and have spare batteries and a diesel-driven emergency generator on site.
  - iv. Arrange an off-site emergency communications control center, such as a hotel meeting room, in case it becomes too dangerous to remain on site.
  - v. Determine which company records are vital, and make plans to protect/relocate them.
  - vi. Identify a hot site (an off-site data processing location where you can continue business immediately).
  - vii. Maintain ongoing agreements with contractors for supplies and repairs that may be needed after a flood. If possible, use contractors who are from outside potential flooded areas. Local contractors may be over-committed.
  - viii. Order emergency supplies and maintain them throughout potential flooding season.
  - ix. Have straps or other means on hand to brace/anchor yard storage, signs, plantation vehicles, and roof-mounted equipment from the flood.
  - x. Protect/relocate vital records.
  - xi. Inspect all fire protection equipment, such as sprinkler control valves and fire pumps.
  - xii. Ensure that the ERT members who volunteer to stay on site have proper supplies and equipment (drinkable water, nonperishable food, medical, flashlights, and walkie-talkies).
  - xiii. Have cash on hand for post-flood needs, such as buying food and supplies, or paying employees and contractors.
  - xiv. Repair and fill aboveground tanks with water.
  - xv. Fill fuel tanks of generators, fire pumps and all company-owned vehicles.
  - xvi. Protect computer and machinery with tarpaulins and waterproof covers.
  - xvii. Isolate, neutralize or remove from the site any chemicals that can react violently with each other.
  - xviii. Shut off gas to minimize fire loss.
  - xix. Shut down all noncritical and nonessential electrical equipment.
- c. During the Flood: Emergency response personnel should stay at the facility only if safe to do so.



## 5. Emergency Preparedness and Response

- i. Patrol the property continuously and watch for roof leaks, pipe breakage, fire or structural damage.
  - ii. Personnel should remain in a place that has been identified as safe the flooding.
  - iii. During power failure, turn off electrical switches to prevent reactivation before necessary checks are completed.
- d. After the Flood
- i. Secure the site.
  - ii. Survey for damage.
  - iii. Survey for safety hazards such as live wires, leaking gas or flammable liquids, and damage to foundations or underground piping.
  - iv. Call in key personnel and notify contractors to start repairs. Make sure safety systems are fully implemented before work is allowed to begin.
  - v. Begin salvage processes as soon as possible to prevent further damage: cover broken windows and torn roof coverings, clear fallen trees.
  - vi. Clean roof drains and remove debris from roof to prevent drainage problems.
  - vii. Visually check any conductors and exposed insulators before restarting main electrical distribution systems.

### 5.0 **First Aid and Rescue Operations**

- a. In case of an injury, call the ERC. Call for local Government Emergency Services directly if the situation is urgent or serious and inform ERC subsequently as soon as practicable.
- b. Do not conduct rescue operations unless you are trained to perform a proper rescue or the situation is safe for conducting a rescue operation.
- c. Do not move an injured person, especially when there are signs of spinal injury or bone fracture, unless it is absolutely necessary to do so for safety reasons.
- d. Keep the injured person comfortable, warm, and lying down.
- e. First aid treatment should be administered, preferably by trained persons.

6.0 **Emergency Response Team:** The purpose of the Emergency Response Team is to deal with any catastrophic accidents. The team should meet immediately when an emergency situation is reported to determine the course of action.



## 5. Emergency Preparedness and Response

### Emergency Response Team members

NAME	TITLE	HOME PHONE	CELL PHONE
	General Manager		
	Operations Manager		
	Shift-in-charge		
	EHS Manager		
	Doctor/Site Medical Superintendent		
	Emergency Response Team Coordinator		
	ERT member 1		
	ERT member 2		
	ERT member 3		
	Neighbors		
	Fire Safety Officer		
	Transportation resources		
	Local volunteer organizations		

***Emergency Response Team members may be called upon on short notice***

- 7.0 **Reference Documents:** Evacuation, search and rescue plan, facility layout plan with locations of emergency facilities.
- 8.0 **Records:** Training logs, drill logs, firefighting, rescue operations, and medical equipment maintenance and inspection logs.
- 9.0 **Approving Authority:** Operations manager
- 10.0 **Issue/Revision Date:** October 9, 2013



## 6. Stakeholder Engagement



# Stakeholder Engagement

## Introduction

Many different groups of stakeholders interact with your company as you conduct your business. A stakeholder is any person or organization that has an interest in, is affected by, or perceives that is affected by your company.

You should engage with your stakeholders to understand the impacts that your business has on them and reduce reputational risks from anti-company sentiments or negative campaigns. Regular and systematic interactions with stakeholders can earn their trust and create a positive image for your company. In addition, stakeholders can provide valuable feedback to help you avoid or minimize possible negative impacts from your operations.

We present three tools related to this element:

- Stakeholder Mapping Tool
- Impact Zoning Tool for Identifying Affected Communities
- Stakeholder Engagement Plan Worksheet



## 6. Stakeholder Engagement

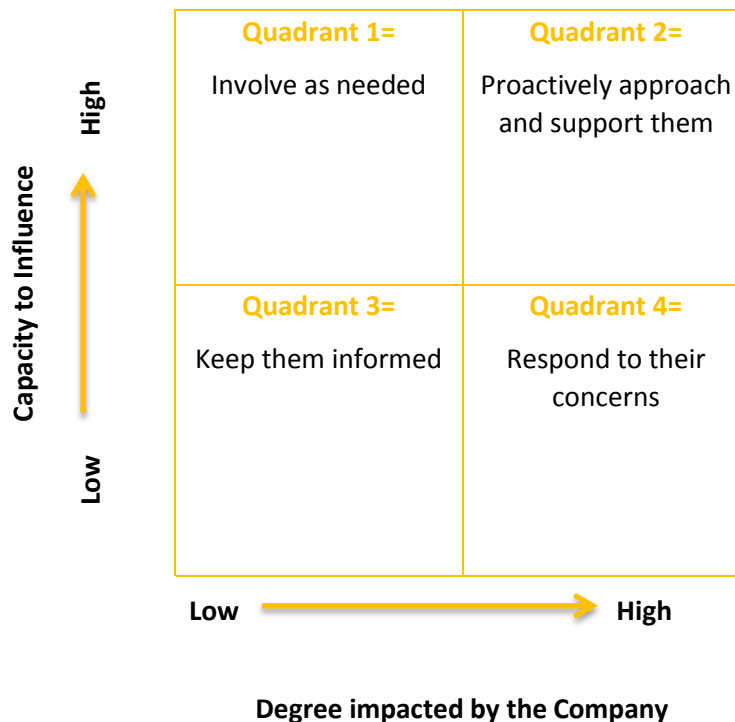
### Stakeholder Mapping Tool – Identification and analysis

#### Instructions

1. Conduct this exercise with a cross-functional/departmental team.
2. Create a list of all the relevant stakeholders for your company. Relevant stakeholders include: stakeholders who are directly and indirectly **affected** by your company; stakeholders who have an interest in your company operations; stakeholders who may have complaints or concerns related to your operations; stakeholders who have an ongoing relationship with the company; and stakeholders who can influence your company operations. You should be as specific as possible in your list. For example, you should list each of your main clients and suppliers independently, and disaggregate communities by identifying legitimate local leaders or other relevant actors.
3. Discuss each stakeholder group and record each one's key concerns, issues and interests related to your company.

STAKEHOLDER	ISSUES/CONCERNS/INTERESTS

4. Place these stakeholders on the stakeholder map according to the degree to which they are impacted by your operations and their capacity to influence your company operations.



5. Categorize the stakeholders according to their current relationship with your company: **supportive**,



## 6. Stakeholder Engagement

**supportive with conditions, neutral, negative.** Stakeholder engagement should serve to maintain positive relationships with supportive stakeholders and help you address the concerns of less-supportive stakeholders. Remember, stakeholders' relationships with the company can change over time. We recommend that you conduct this type of analysis periodically to ensure that you are engaging with your stakeholders appropriately.

6. Prioritize your stakeholders for engagement.
7. Create strategies to engage with the prioritized stakeholders. As you determine your engagement strategies, keep current initiatives of the company in mind. You should also create tiered engagement strategies for stakeholders in each of the four quadrants on the stakeholder map.
  - *Quadrant 1: Involve as needed*
  - *Quadrant 2: Proactively approach and support*
  - *Quadrant 3: Keep informed*
  - *Quadrant 4: Respond to concerns*
8. Review the stakeholder map at regular intervals and when there are major changes in your company or the local context. You should also review the stakeholder map with external groups to obtain their feedback.



## 6. Stakeholder Engagement

### Impact Zoning Tool for Identifying Affected Communities

#### Instructions

The term “affected communities” includes any individuals or communities that are located in proximity to the company’s facilities and are directly exposed to actual or potential adverse impacts on their environment, health and livelihood due to company activities.

*A quick and practical technique for identifying affected communities is through an “Impact Zoning Map” (see box below). By mapping your company’s sphere of influence for different types of environmental and social impacts, you can begin to identify distinct groups by impact area. You can then use that information to prioritize the key stakeholders for consultation.*

*You should assign priority to individuals and groups who are directly adversely affected by your company’s activities; however, it can be challenging to distinguish between who is directly affected and who is not. Communities that live just outside of your designated impact area can still feel that they are impacted by your company, and may feel they have been arbitrarily excluded from the engagement process.*

#### HOW TO IDENTIFY STAKEHOLDERS THROUGH IMPACT ZONING

1. Draw a sketch map of the key design components of the project, both on- and off-site, that may give rise to local environmental and social impacts (e.g. land area used/affected; air and water pollution receptors, etc.). This may be performed more efficiently by using aerial photographs or satellite images.
2. Identify the broad impact zones for each of these components (e.g. the area of land take, air and water pollution receptors, etc.).
3. After identifying and mapping broad stakeholder groups, overlay those groups with the impact zones.
4. Through consultation with legitimate stakeholder representatives, verify which groups are potentially affected by which impacts.

*Source: Doing Better Business Through Effective Consultation and Disclosure. IFC (1998).*





## 6. Stakeholder Engagement

### Stakeholder Engagement Plan Worksheet

#### Instructions

After identifying your most important stakeholders, you should develop a plan to engage them. You should have a higher level of engagement with the most affected groups and with groups that have the most influence on (or potential to influence) your business.

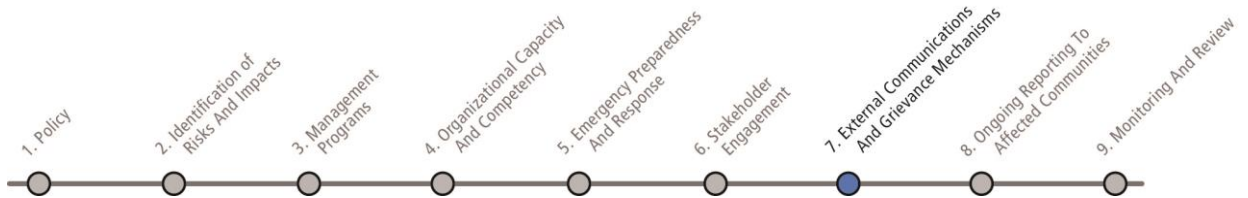
At a minimum, you should always implement an **external communication** procedure to receive communications from the public and adjust your management program accordingly. In the case of adversely affected stakeholders, you should also implement a **grievance mechanism** so that you can address complaints that may arise. You should also actively engage adversely affected stakeholders in **consultations** to regularly provide them with clear and meaningful information. These two methods of engagement will enable these communities to express their concerns and suggestions on an ongoing basis. Finally, you should **report back** to your stakeholders and explain the results of actions that your company may have taken to address the issues identified during the consultation process.

The table below provides examples of stakeholders that may be impacted by, or may influence, your operations. Once you have created a stakeholder map and identified the concerns, you can create an engagement plan and determine the engagement method, the necessary information to be disclosed or reported back to your stakeholders, and the key information you would like to obtain from your stakeholders.

STAKEHOLDER ENGAGEMENT PLAN				
Stakeholder	Concerns	Engagement method	Information to disclose and report back	Most valuable info to obtain
	What is this stakeholder concerned about regarding your company? What keeps them awake at night?	How can your company engage this stakeholder?  What is the most effective method of two-way communication?  How frequently do you need to engage with this group?	What does this stakeholder need to know?	What does your company need to know about or from this stakeholder?
Employees				
Contract workers				
Local community				
Consumers				
Suppliers				
Contractors				
Regulators				
NGOs				
Media organizations				
Etc.				



## 7. External Communication and Grievance Mechanism



# External Communication and Grievance Mechanisms

## Introduction

### Grievance Mechanism

A grievance mechanism establishes a channel for affected community members to contact you – openly, confidentially or anonymously – with inquiries, concerns or formal complaints. It creates an alternative way for community members to communicate with your company as part of your formal stakeholder engagement process.

### External Communication

Even if your company has not identified any affected communities during your stakeholder engagement process, you must establish and maintain a publicly available and easily accessible channel for members of the public to contact you (e.g. through a phone number, website, or email address). External stakeholders can provide you with valuable information through this channel, such as: suggestions on product improvement; feedback on customers' interaction with your employees; and comments from regulators, NGOs and individuals regarding your company's environmental and social performance.

We present two tools related to this element:

- Checklist for Effective Grievance Mechanism
- Grievances Log



## 7. External Communication and Grievance Mechanism

### Checklist for Effective Grievance Mechanism

#### Instructions

The following checklist will guide you through the key aspects of an effective grievance mechanism. This list includes some illustrative examples; consider adapting these to your company's size, complexity and local context.

KEY ASPECTS OF EFFECTIVE GRIEVANCE MECHANISMS	COMPANY'S METHOD
<b>Provide ease of access to confidentially communicate or file complaints, including anonymous ones</b>	<ul style="list-style-type: none"> <li>• Form and instructions on website that people can fill in and submit online.</li> <li>• Email address.</li> <li>• Telephone hotline.</li> <li>• Suggestion boxes located outside the company gate and in strategic places (e.g. in churches, municipality, and civic centers).</li> <li>• Weekly visits by a designated community liaison to affected villages or other stakeholders to record complaints or concerns.</li> </ul>
<b>Publicize the system so that stakeholders know it exists and how to access it</b>	<ul style="list-style-type: none"> <li>• Distribute brochures at churches, schools and civic centers, highlighting the company's profile and operations. The brochures should include instructions for external stakeholders to communicate or file complaints, and explain your company's procedures for handling complaints.</li> <li>• Hold a meeting with community leaders and other stakeholders for the general manager/designated community liaison to explain your written procedures.</li> </ul>
<b>Foster sense of legitimacy and trust; encourage dialogue and shared responsibility for outcomes</b>	<ul style="list-style-type: none"> <li>• Major cases reviewed by a formal multi-stakeholder oversight body (that includes, for example, the company, representatives from the affected communities, NGOs, academics and/or a municipality representative).</li> <li>• Provide transparent funding for expert research, so that any collection of evidence is independent and unbiased.</li> <li>• Resolve the most serious claims through independent mediation.</li> </ul>
<b>Be transparent about the process and outcomes</b>	<ul style="list-style-type: none"> <li>• Summarize all cases in detail – include information about whether the complaint was accepted, and provide information about the process and timeline for investigation and resolution of the case.</li> <li>• Post case summaries on the company website and/or report back to the complainant through a letter/email/community liaison.</li> </ul>
<b>Implement a predictable and defined process that includes assignment of responsibility, time limits and monitoring of outcomes</b>	<ul style="list-style-type: none"> <li>• Assign an employee or team to record complaints and work with the relevant staff and external stakeholders to investigate complaints, determine the necessary actions in response, and report back on the outcomes.</li> </ul>
<b>Make the system a source of continual learning</b>	<ul style="list-style-type: none"> <li>• Management team periodically reviews complaints and the complaint system to monitor the effectiveness of the system and integrate results into the company's systems.</li> <li>• Company conducts perception surveys among affected stakeholders to learn about their awareness of the mechanism, and to assess the perceived trustworthiness of and ease of access to the grievance mechanism and its outcomes.</li> </ul>



## 7. External Communication and Grievance Mechanism

### Grievances Log

#### Instructions:

You should keep a logbook or database of grievances in order to monitor their progress towards resolution. This tool will also enable you to analyze the grievance information and use it to improve your operations and proactively prevent future concerns. This log illustrates the type of information that is useful to record about each grievance.

<b>1. GRIEVANCE IDENTIFICATION NUMBER</b>		
<b>2. DETAILS OF COMPLAINT</b>		
2.1 When it occurred		
2.2 Where it occurred		
2.3 How it occurred and who was involved		
2.4 Complainant(s)'s story and expectation		
2.5 Date grievance was recorded		
2.5 Place/method grievance was received		
<b>3. PROFILE OF COMPLAINANT(S)</b>		
3.1 Gender		
3.2 Age		
<b>4. CONTACT INFORMATION OF COMPLAINANT(S)</b>		
4.1 Anonymous (Y/N)		
4.2 Phone		
4.3 Email		
4.4 Address		
<b>5. COMPLAINT ACCEPTED (Y/N)</b>		
<b>5.1 COMPLAINT NOT ACCEPTED</b>		
5.1.1 Action taken	Clearly not related to the operations of the organization – rejected <input type="checkbox"/>	
	Labor-related grievances – transfer to Human Resources <input type="checkbox"/>	
	Commercial disputes – transfer to commercial dispute resolution mechanisms or civil court <input type="checkbox"/>	
	Related to governmental policy and institutions – transfer to authorities <input type="checkbox"/>	
	Other <input type="checkbox"/>	
5.1.2 Complainant notified (Y/N)		
5.1.3 Method of notification		
5.1.4 Date of closure		

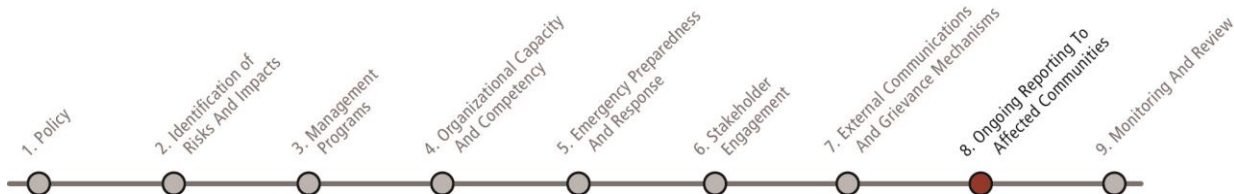


## 7. External Communication and Grievance Mechanism

5.2 COMPLAINT ACCEPTED	
5.2.1 Category of complaint	Particulate emissions to air <input type="checkbox"/>
	Odor <input type="checkbox"/>
	Noise <input type="checkbox"/>
	Effluents <input type="checkbox"/>
	Company vehicles <input type="checkbox"/>
	Influx of migrant workers <input type="checkbox"/>
	Security personnel <input type="checkbox"/>
	Other <input type="checkbox"/>
5.2.2 Photos and documentary evidence of legitimacy	
5.2.3 Resolution	First: Internal <input type="checkbox"/> - Responsible people/division:
	Second: Multi-stakeholder oversight body <input type="checkbox"/>
	Third: Independent mediation <input type="checkbox"/>
5.2.4 Resolution/corrective action taken	
5.2.5 Complainant notified (Y/N)	
5.2.6 Method of notification	
5.2.7 Complainant(s) satisfied or appealed	
5.2.8 Photos and documentary evidence of closure	
5.2.9 Resources spent	
5.2.10 Date of closure	
5.2.11 Number of days from complaint to closure	
6. POST CLOSURE MONITORING REQUIRED (Y/N)	
6.1 Method and frequency of monitoring required	
7. PREVENTIVE MEASURES TO AVOID REOCCURRENCE OF SIMILAR GRIEVANCES	
7.1 Suggested preventive actions	



## 8. Reporting Back to Affected Communities



# Reporting Back to Affected Communities

## Introduction

The final, critical step towards building and maintaining a good relationship with your stakeholders is to keep them informed about your company's response to their concerns or complaints. Therefore, you should **report back** to affected communities and explain the actions that your company has taken to address the issues that were identified during the engagement process, and the outcomes of those actions.

We present one tool related to this element:

- Formats and Venues for Ongoing Reporting



## 8. Reporting Back to Affected Communities

### Format and Venues for Ongoing Reporting

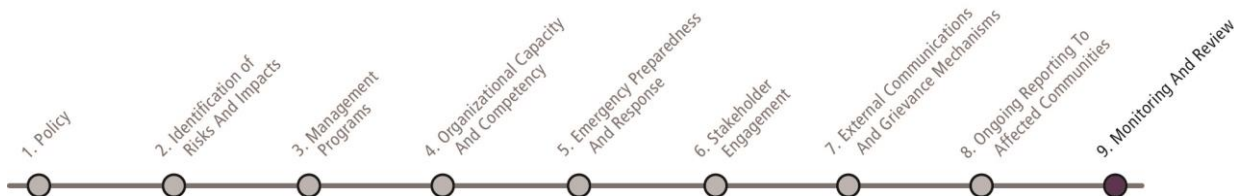
#### Instructions

This list can help you brainstorm different ways that you can report back to affected stakeholders about actions you have taken, and the ways that you are monitoring results in their areas of interest.

- Open houses
- Banners outside the company gate
- Brochures distributed in churches, schools, civic centers
- Website
- Town hall meetings at the local municipality or civic center
- Meetings with representatives of the affected stakeholders
- Letters to representatives of the affected stakeholders and complainants
- Emails
- Phone calls
- Sustainability reporting (e.g. GRI)



## 9. Monitoring and Management Review



# Monitoring and Management Review

## Introduction

Monitoring and review are critical components of the ESMS because these two activities enable you to check and adjust your system. You need to monitor your action plans to ensure that they are implemented and that your procedures are being followed. You also want to make sure that your ESMS is addressing the most relevant risks and promoting lasting improvements in your company. The goal of the ESMS is to inspire a fundamental shift within your company; the ESMS can help you transition from a reactive approach to a preventive approach. Instead of addressing problems after they have already occurred (corrective actions), the ESMS enables you to prevent issues from becoming problems in the first place (preventive actions). Monitoring and management review provide you with the necessary information to make that transition.

We present two tools for this element:

- Monitoring Plan
- Auditing Guidance





## 9. Monitoring and Review

### Monitoring Plan

#### Instructions

Your monitoring plan will help you determine if your action plans and improved procedures are achieving your established objectives. A sample template for developing a monitoring plan is presented below.

PERFORMANCE INDICATORS		
Performance Indicators	Monitoring Protocol	Monitoring records
<ul style="list-style-type: none"> <li>What parameters will you monitor to determine your success?</li> </ul> <p>For example, cholinesterase levels for workers exposed to pesticides.</p>	<ul style="list-style-type: none"> <li>How frequently will you collect samples?</li> <li>What methods, tools, and equipment will you use to collect and analyze samples?</li> <li>What standards or benchmarks will you use to establish acceptable values?</li> <li>Who will be responsible to collect, analyze, and act upon the data?</li> </ul>	<ul style="list-style-type: none"> <li>How will you know if you are working towards that indicator?</li> <li>What records will you maintain and review?</li> </ul>

PROCESS INDICATORS	
Processes Indicators	Monitoring records
<ul style="list-style-type: none"> <li>What will you monitor to evaluate progress against your action plan?</li> </ul> <p>For example, the percentage of pesticide applicators that can explain the work instructions for handling pesticides.</p>	<ul style="list-style-type: none"> <li>How will you know if you are working towards that indicator?</li> <li>What records will you maintain and review?</li> </ul>



## 9. Monitoring and Review

### Auditing Guidance

#### Instructions

*This auditing guidance provides a comprehensive overview of the steps that an auditor would take to assess various aspects of your business. You should review this auditing guidance to gain insight into the types of issues and questions that auditors consider. This will broaden your view of potential risk areas and elements of the ESMS beyond those that you may have targeted in your initial risk assessment.*

✓	A. PREPARATION
	Collect audit and inspection reports on the company's environmental and labor performance for the previous two years.
	Collect corrective action plans generated from previous audits or inspections and review the status of each action item that was agreed upon. Are they all closed out? Focus your review on open items and the underlying factors that prevent you from completing the corrective action plan.
	Ascertain the general level of PPE use on the organization. Ensure that auditors wear the same PPE as employees are required to wear: head, hearing, eye, skin protection, protective boots, clothing, etc. Do not allow any auditor to enter work areas without the clothing/gear required for the operations activity and that employees are required to wear.
	Obtain site plans for all the relevant operational areas. Ensure auditing team has a working knowledge of the operations to be evaluated.
	Research and refer to current local environmental and labor laws and regulations. Basic labor code issues: (i) regular weekly work hours, (ii) labor contract provisions, (iii) rest periods, lunch, etc., (iv) overtime requirements, limits and exceptions, (v) hour averaging and banking hours, (vi) minimum wage, (vii) social system payment liability, (viii) annual leave, (ix) laws to protect disadvantaged workers, (x) severance pay. Basic environmental code issues: (i) wastewater, (ii) storm water, (iii) spill prevention and response, (iv) construction/demolition/remodeling, (v) hazardous materials, (vi) hazardous waste, (vii) toxic chemical release, (viii) air emissions, (ix) solid waste.
	Review regulatory permit(s) conditions and specific requirements along with most recent review and corrective action reports.
	Review certification(s) audit reports (e.g. ISO 14001, OSHAS 18001, BSCI or SA8000) for nonconformance, mandatory remedial actions, recommendations, etc. Summarize status of items (open or closed).
	Review any government inspection reports, third-party audit reports, etc.
	Review the stakeholder engagement plan and records of grievances by external stakeholders. Pay attention to: emergency preparedness and response capability to include the community if necessary; use of chemicals and accidental releases of hazardous materials affecting community, e.g. dyes and chlorine; discharges of wastewater or other wastes to areas affecting local communities; exacerbation of flooding; limits of water availability use and physical access; diminution of quality of life due to the operation.
	Pay special attention in observation/document review/interviews to issues identified in previous reports.
	Research and understand the national and local context of labor union rights and activity, local environmental groups and community activist organizations.
	Schedule sufficient time to conduct the scope of the audit. Announce the availability of confidential meeting schedules with employees; schedule, arrange and conduct while protecting employee confidentiality.



## 9. Monitoring and Review

✓ B. INTRODUCTORY MEETING WITH MANAGEMENT	
	Meet with the senior management and department managers before conducting audit activities to review ESMS issues and the purpose of the audit.
	Share an agenda and itinerary for the meeting with senior management and local supervisors.
	With department managers, review the prior audit reports and performance to date in meeting corrective actions.
	Discuss non-retaliation against cooperating workers; inform management that future audits will include reviews of the continued employment of workers interviewed.

✓ C. OPERATIONAL WALK-THROUGH	
	Conduct operational walk-through following production processes. Refer to previous relevant physical walk-through assessments of the facility; determine if all previous nonconformance/action items are closed out - if not, why not?
	Minimize the number of managers and supervisors that accompany you on the walk-through. One or two escorts of non-supervisory staff based on knowledge/responsibilities are usually sufficient.
	During the walk-through, be aware of your body language and the message this sends to workers; ensure that you are equipped with/wearing the same PPE required of employees.
	<p>Take note of all things observed that require attention:</p> <ol style="list-style-type: none"> <li>1. Water used indiscriminately for watering as well as washing and cleaning</li> <li>2. Water wastages/inefficiencies</li> <li>3. Energy wastage</li> <li>4. Evidence of spillages</li> <li>5. Dry cleanup and collection of organic solids</li> <li>6. Harborage or other unorganized storage of materials</li> <li>7. Wastes and discards</li> <li>8. Workplace availability of data on hazards or banned or restricted chemicals in use (MSDS/ICSC)</li> <li>9. Movement of materials: hand trucks, forklifts, etc. Are the passageways and transit routes clearly marked; is color-coding used for non-pedestrian movement?</li> <li>10. Obvious hazards for heads, hearing, sight, life and limb: workplace hazards attenuated; employee awareness?</li> <li>11. PPE used as prescribed, available, replaced at no cost; employee awareness</li> <li>12. Are employees able to explain jobs and responsibilities?</li> <li>13. Evidence of QA team activity</li> </ol>
	Verify that fire exits in buildings (e.g. storage or maintenance areas, administrative buildings, etc.) exist and open on demand; no means to prevent exit; panic bars in good working order; clear egress once exit opened; emergency exits clearly marked; nearest exits clearly marked; hose cabinets equipped with hoses, nozzles, etc.; prohibited areas clearly marked; electrical cabinets closed and sealed; lockout/tag-out procedures and tools (tags, locks, warning labels and signs) clearly available near electrical cabinets; first aid cabinets and equipment; emergency lighting; emergency preparedness and evacuation plans in place; and that employees are trained on using these.
	Indoor working conditions should be verified for adequacy if there is potential for risks such as heat, light, noise and dust. Use measuring devices to determine air quality, noise level, and temperature.
	Following the walk around, conduct a walk-through of the dormitory facilities, canteens, washrooms and changing rooms (if relevant). Note the condition and adequacy of these areas.
	Suggest best practice to supervisors and managers during the walk-through; ensure that the suggestion is filtered by processes/operations practicalities.



## 9. Monitoring and Review

	Give sufficient attention to all ESMS elements during the operation/dormitory walk-through. Knowledge of procedures, training using the procedures, awareness of complaints management and resolution procedure, employment rights, HR policy and provisions, etc.
	Pay special attention to areas identified in previous corrective action requests. Focus on open non-conformances from previous audits: why did they occur? Elucidate the underlying cause and make an effort to diagnose and prescribe preventive and ameliorative measures. The individual who is responsible for the item is not as important as why it occurred and how the company can prevent non-conformances and unplanned events in the future.

✓ <b>D. INTERVIEWING WORKERS</b>	
	Select at least 5 percent of workers, max. 100 workers. Conduct individual and group interviews for balanced response.
	Select workers who are representative of the workforce population (gender, race, age, religion, functional departments, etc.).
	If the factory has contracted or migrant workers, make sure to include them as well.
	Do not allow supervisors or managers to influence selection of workers for interviews or the interviews.
	Conduct on-site interviews in areas that protect worker confidentiality and where the worker would feel comfortable. Make sure supervisors or managers are not in or near the space where the interviews are conducted. Keep them away from the selection and interview process.
	Conduct interviews early in the audit to allow for follow-up.
	Make sure to tell the workers that everything they say is confidential and that management has been warned against retaliation.
	Be sensitive to cultural and gender issues.
	Plan for an average of fifteen minutes per interview; however, use common sense in terminating interviews that are becoming nonproductive and extending interviews with people who are candid or openly addressing critical issues.
	Formulate questions prior to the interviews to make sure you cover all specific areas of the ESMS review through the aggregated interviews. Always ask employees how processes may be improved, water use reduced, energy saved, waste reduced, etc.
	If you plan to take notes, ask the workers if it is OK and clearly explain reason for taking notes. Try to minimize note taking as much as possible during the interview. Finish writing your notes immediately after the interview, so you have accurate documentation.
	Have your worker representatives recommend a preferred approach to building rapport with workers.
	Ask workers specifically about follow up on previous corrective action plans. What non-conformances remain open; what issues presented through the complaints management and resolution mechanism remain open?



## 9. Monitoring and Review

Make sure your questions address the following:

### LABOR ISSUES

- Do workers know about and understand company's policies related to labor and working conditions?
- Do workers understand their rights under the law related to freedom of association and collective bargaining?
- Do workers understand how their wages are calculated for base time, performance and overtime?
- Are workers aware of any dismissal, transfer, demotion or other punitive action against workers due to their exercising their rights under either their contracts or local or national law?
- Ask workers about the status of trade unions, worker committees or other worker groups and whether there is management interference.
- Ask questions to determine conformance to discrimination and sexual harassment policies.
- Do workers understand the company's grievance mechanism, and do they feel it is operational and free from retaliation?

### OCCUPATIONAL HEALTH AND SAFETY ISSUES

- Do workers feel safe and protected in their jobs? For example, are they provided with PPE that is appropriate and works? Is their physical environment free of hazards? Are they expected to reduce physical hazards or are engineering controls in place? Are there job hazards assessments done routinely and when the processes or materials change? Have issues submitted through the complaints management and resolution mechanism been addressed?
- Do they feel there is adequate safety equipment, such as extinguishers/hydrants and first aid kits? Are there sufficient safety drills if an emergency, such as a fire, typhoon, flood or windstorm, were to occur and necessitate an evacuation from buildings? Witness the emergency mock drills and make note of shortcomings; ask an employee to pretend he/she has just been injured and explain what to do next.
- Are they instructed and trained on these risks at regular intervals?
- Have any workers been involved in accidents at the facility and, if so, what happened afterwards?
- Is the environment comfortable to work in, in terms of temperature, exposure to heat and sun?
- Do they feel that chemicals, waste and other substances are stored or disposed of safely and appropriately at the facility? Is there sufficient access to Material Safety Data Sheets (MSDSs) and/or International Chemical Safety Cards (ICSCs) and appropriate training in their use? What is the management's response to any expressed issues through the complaint management and resolution mechanism?

If the organization employs contract workers, make sure to ask questions that address possible violations and areas of abuse. Do you feel different from a permanent employee? Why?

Conduct some worker interviews off-site if possible.



## 9. Monitoring and Review

✓ E. INTERVIEWING AFFECTED COMMUNITIES AND OTHER STAKEHOLDERS	
	The stakeholder mapping exercises and stakeholder consultation meetings should help identify the relevant population that is affected by the facility and its activities.
	Select a sample of individuals that represent the views of this affected community. This group may include members of the public as well as NGOs, campaign groups, trade unions, local businesses and government authorities. If possible, target NGOs that are industry-specific. Seek out former employees if possible, but filter out disgruntled former employees or those with a personal agenda against the company.
	Gauge awareness of the grievance mechanism. Has it been tested? Does it work? Does the company utilize it in practice or ignore it? Is it taken seriously?
	Be sure to include representatives from indigenous or marginalized groups in these interviews.
	<p>Make sure your questions address the following:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> How have the facility's operations affected the physical environment (air, water, land) near them?</li> <li><input type="checkbox"/> Has this resulted in either air, land or water contamination?</li> <li><input type="checkbox"/> Has wildlife been affected by the facility's activities?</li> <li><input type="checkbox"/> Has the facility's business impacted local livelihoods or access to traditional hunting/fishing/breeding/religious/other grounds due to natural habitat conversion?</li> <li><input type="checkbox"/> Have any health risks or deterioration to well-being been associated with the facility from exposure to toxic chemicals, from air emissions or noise pollution? Note any neighbors or employees who have become ill or have ill children.</li> <li><input type="checkbox"/> Have any contagious or vector-borne diseases been on the rise due to an influx of workers in the area or increase in local vectors (e.g. mosquitos, flies)? Is the community aware of an increase in the rat/mouse or other vermin population?</li> <li><input type="checkbox"/> Have these affected groups had any clashes with security hired at the facility?</li> <li><input type="checkbox"/> Have any of these groups been approached or invited by the company running the facility to discuss their concerns at meetings? Have any of their grievances been addressed or investigated? Has the company followed up on questions?</li> </ul>

✓ F. ON-SITE DOCUMENT REVIEW	
	<b>LABOR ISSUES:</b>
	<p>Make sure you review the relevant documents for the following areas:</p> <ol style="list-style-type: none"> <li>1. Human resources: Management-worker committee meeting minutes, memos and letters, budgets related to implementing labor policy, training material, logs and curricula or written communications to workers that address all issues, training records and instructor qualifications.</li> <li>2. Working conditions: Contracts for all workers; policies and procedures related to wages, benefits, hours and leave; evidence of communication and training on wage calculation; personnel files; time cards; payroll records and pay stubs (selected without management interference); criteria used to set performance pay bonuses; and employment and termination records.</li> <li>3. Are employees' payment methods secured? Can employees opt to have payments deposited into an account? Are employees paid in cash at the facility (which can lead to significant risks during their commute)?</li> <li>4. Collective bargaining: Collective bargaining policy, agreement and documentation (such as minutes and records of collective bargaining sessions).</li> <li>5. Discrimination: Discrimination policy; related procedures; documentation handling discrimination issues; diversity training and attendance log; hiring, promotion and termination records; gender demographics in facility at worker and manager levels.</li> <li>6. Retrenchment: Policies and procedures for workforce reduction, severance and transition; documentation of prior workforce reductions; minutes of management meetings and communications to workers on this issue.</li> <li>7. Complaint management and resolution mechanism: Documented procedure, communications, records and logs of grievance handling.</li> <li>8. Child labor: Procedure for age verification, documentation of apprentice program, birth and medical records and school records of workers.</li> </ol>



## 9. Monitoring and Review

	<p>9. Forced labor: Employment contracts (as well as for those workers hired through recruitment agencies), payroll records, timesheets and wage deduction, worker passports and IDs.</p> <p>10. Health and safety: Accident and medical treatment logs, equipment safety logs, logs of fire and safety drills, health and safety risk analyses, government health inspection reports, safety certificates and training curriculum and logs, and evidence of changes to all of this when company processes, methods, chemicals, materials are changed, reordered, etc.</p>
	<p>Select files and/or records at random to generate a representative sample of the workforce population and functional distribution in the factory. Seek some files to corroborate interviews conducted earlier.</p>
	<p>Balance your time and effort investigating all areas of labor standards at work. Document review is particularly critical for wages, working hours, health and safety, use of sub-contractors, hiring and termination.</p>
	<p>If the operation employs contract workers, address potential areas of abuse in the document review. Specifically review the contract with the workers.</p>
	<p>Identify all significant incidences of non-conformance in preparation for your management meeting.</p>
<b>ENVIRONMENTAL AND OHS ISSUES:</b>	
	<p>Make sure you review the relevant documents for the following areas:</p> <ol style="list-style-type: none"> <li>1. Emergency response and preparedness: Examine the facility's emergency response procedures and accident reports, as well as documents indicating that workers have been trained on these issues.</li> <li>2. Ask the employee to show you how to get out, assuming that there is now a fire; follow the employee; ask another to tell/show you what happens if he/she was just injured.</li> <li>3. Environmental management: Examine any company environmental policies and environmental management system policies and reports, including sustainability reports, energy consumption records, guidelines and monitoring, resource use and waste generation. Note the status of previously identified non-conformances.</li> <li>4. Insurance: Identify documents that indicate legal permits have been obtained, insurance policies are in place and the relevant legal authorities notified of the facility's activities.</li> <li>5. Technical: Documents on production processes, and storage, purchase and maintenance of facility equipment. Availability of MSDS/ICSCs and employee training and orientation to the specific risk posed by materials in use; response to submissions through the complaint management and resolution mechanism.</li> <li>6. Waste disposal: Policies, procedures and guidelines on elimination and recycling of waste emissions and effluents to air, water and land, including monitoring of the quantity and quality, treatment and disposal of all waste, including wastewater and solid waste; are employees/area supervisors queried for opinions on improvements?</li> <li>7. Hazardous material: The storage of chemicals and toxicology sheets (MSDS/ICSCs from ILO/WHO/EU/UNEP, etc.). Avoid total reliance upon manufacturer's statements. Does procurement mandate furnishing such materials?</li> <li>8. Health and safety: Check for the existence of logs of accident and fatality rates, health and safety guidelines or handbooks for workers and monitoring of these statistics, including the job hazard analyses and engineering corrections to eliminate hazards at the source, as opposed to requiring employees to mitigate environmental hazards; provision of appropriate PPE that cover actual, defined technical, physical, biological and chemical hazards in the workplace; Tool Box safety meetings records.</li> <li>9. Work environment: Look for guidelines, reports, logs and "ecomaps" of the facility work environment that monitor emissions of dust, odors, sources of noise and vibrations and worker exposure to heat and cold. LEL meters and audible and visual alarms are mandatory wherever there may be accumulations of dust or ambient dust.</li> </ol>



## 9. Monitoring and Review

✓ G. CLOSING MEETING WITH MANAGEMENT	
	Conduct a closing meeting with senior management and department managers.
	Present your preliminary findings with particular emphasis on the positives as well as areas for improvement and why. All new and previously existing non-conformances must be addressed. Seek clarification on any findings or issues raised during the audit.
	Work with the department managers and supervisors on a corrective action plan that details specific actions to be taken and timelines for their completion.
	Go over any outstanding corrective action requests from previous audit reports.
	Make sure senior management signs off on the corrective action plan.





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