	<b>CRS</b> <b>Supply chain</b> <b>Assessment and Solutions</b>	Procedure : D-SAS-A-CHKLS-02 - Environmental Conformity Assessment Checklist
	<b>Environmental Conformity Assessment</b>	Date : 04.11.2016 Version : 3 Prepared by : Anne-Lise Legrand Approved by : Xavier Vital

## FACILITY INFORMATION

Audit number / reference	INT242880		
Factory name	Concept Management		
Audit date (dd/mm/yyyy)	17th August 2017		
Type of audit	<input checked="" type="checkbox"/> Initial <input type="checkbox"/> Follow up	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi announced <input type="checkbox"/> Unannounced	

## OVERALL EVALUATION:

<b>VERIFIED % OF CONFORMANCE</b>	<b>95.6%</b>	<b>A</b>	<b>Rating criteria:</b> A ≥ 95% B ≥ 85% C ≥ 60% D ≥ 40% E < 40%
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### Description of strengths and weaknesses of the factory for environmental issues :

*The company has good environmental management systems in place and complied with the ISO14001 standard for environmental. From the process, there is a very small amount of waste generated by the company; however the general waste was not segregated as it could have been done. A small amount of plastic and chemical mix cloths were noted in general waste.*

## CONTACT INFORMATION

Name of facility	Concept Management
Address	Royal House, Tennyson Street, Bolton, BL1 3HW
Country	United Kingdom
Name of representative	Mark Wilding / Director
Function of representative	Mark Wilding / Director
Tel / Fax	1204363184
E-mail	mark@conceptmanagementuk.com

## AUDITOR TEAM

Lead auditor	Roshini Wickramasinghe
Team member	/
Reviewer	

## FACILITY OPERATIONS

Products Manufactured	No Manufacturing (refurbishment and recycling)
Products per year	570 tonnes this year
Manufacturing Floors (m <sup>2</sup> )	2500
Peak season	Not specific
Brief description of production process	Concept Management are data security company that complete data erasing which includes the provisions of asset management, recycling, refurbishment and reclamation of end of life and excess inventory computer and electronic components and equipment
Equipment used	forklift, computer and other electronic testing equipments
Total number of employees	21 in total including the management
Any certification obtained	ISO 9001 for quality management, ISO 14001 environmental standard, IS)27001 for security systems (please see attached certification)

## INDUSTRY SECTOR ENVIRONMENTAL IMPACTS

<b>Answers to these questions is mandatory to weight critical sections</b>	Yes/No
Is the factory located nearby a humid area (pond, swamp, river)?	No
Is the factory located nearby a natural area (forest, bush)? Is there any other natural protected area at a close distance of the factory?	No
Is water used in process steps in big and significant quantities? (in process step or in cooling system (compressor, boiler))	No
Is water used for cleaning and maintenance of machineries in big and significant quantities? (by company itself or contractor)	No
Does the process use solvents? (e.g. for painting / fabric or paper printing / tenterframes / gluing / degreasing / varnishing processes)	No
Are there any dust emitting processes? (e.g. sand blasting, machining, incineration)	Yes
Is there any cooling system (AC unit containing refrigerant fluids) used in process (not domestic)? (for major cooling process, refrigeration of large warehouse, etc...)	No
Is there any use of hazardous chemicals in the process in big and significant quantities?	No
Is there any heat treatment process and/or combustion of fossil fuels on-site? (e.g. for quenching, annealing, metallurgy industry processes, but also in food industry, ceramic or glass furnace, and transportation / freight)	No
Is there any wastewater treatment plant on-site?	No
Are there any inflammable or explosive materials stored on-site? (e.g. plastic pellets, wood, powder)	Yes

## SPECIFIC DATA

Electricity consumption (kWh/year)	64271.0
Steam consumption (MJ/year)	n/a
Diesel oil consumption (m <sup>3</sup> /year)	32232lit
Water consumption (m <sup>3</sup> /year)	n/a
Wastewater discharge (m <sup>3</sup> /year)	n/a
Hazardous waste generated (kg/year)	526000.0
Solid waste generated (non hazardous) (kg/year)	1826000.0
Wastes sent to recycling (kg/year)	592000.0
Emissions to air - Equipments used	No (significant) emissions to air

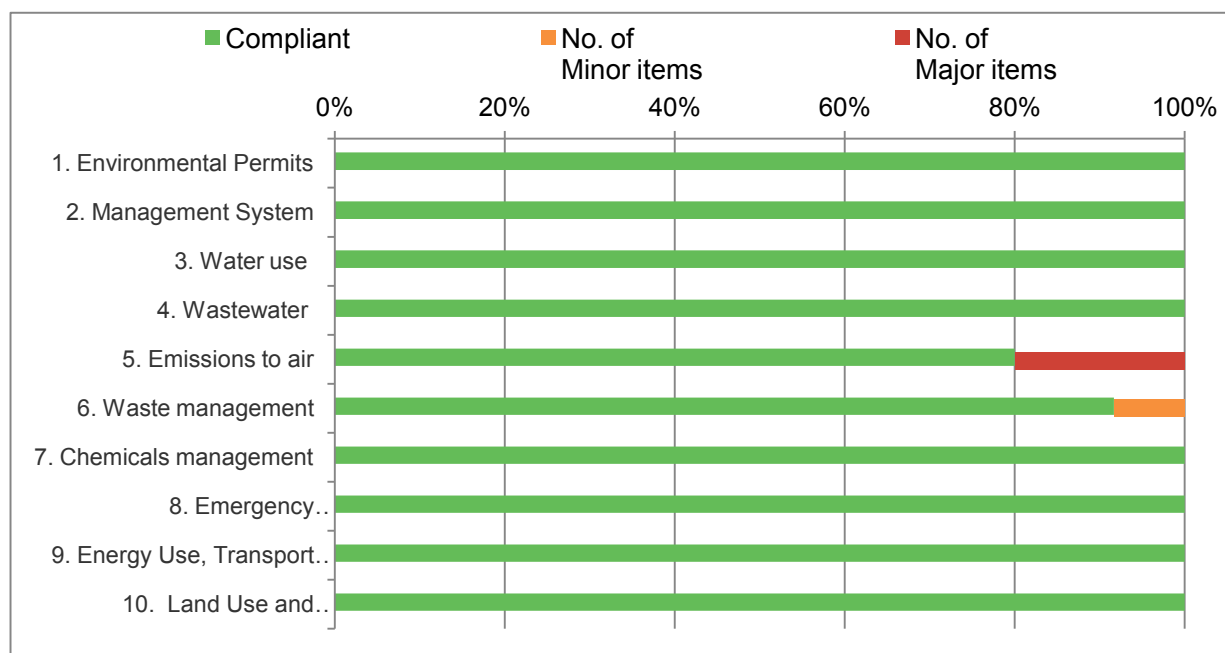
Hazardous waste produced (list) :	<i>N/A - no waste produce from the process- site is a recycling unit having computers, laptops, cables and other gaming consoles and controllers for repair and recycling.</i>
Main chemicals used (list) :	<i>Domestic cleaning products + white spirit</i>

## OPENING AND CLOSING MEETING

Did a senior manager with authority to put in place an action plan attend the closing meeting? If not, please give details.	Yes
Was CAP accepted and signed by senior manager?	Yes

## OVERALL CONFORMANCE

Conformance area	Section Rating	Compliant	No. of Major items	No. of Minor items
1. Environmental Permits	100.0%	3	0	0
2. Management System	100.0%	8	0	0
3. Water use	100.0%	3	0	0
4. Wastewater	100.0%	2	0	0
5. Emissions to air	77.8%	4	1	0
6. Waste management	94.7%	11	0	1
7. Chemicals management	100.0%	12	0	0
8. Emergency Preparedness and Response	100.0%	1	0	0
9. Energy Use, Transport and Greenhouse Gases (GHGs)	100.0%	4	0	0
10. Land Use and Biodiversity, Nuisances	100.0%	6	0	0
<b>Weighted Total</b>	<b>95.6%</b>	<b>54</b>	<b>1</b>	<b>1</b>



## CHECKPOINTS

1. Environmental Permits			
No.	Criteria	Y/N/NA	Comments and evidence observed
1.1 Major	Has the facility obtained environmental permits and licenses required by local laws or regulations?	Yes	Permits and licenses were available where required.
1.2 Major	Are all permits/licenses valid?	Yes	Verified during the audit
1.3 Major	Are site operations in compliance with permit conditions?	Yes	Verified during the audit
2. Management System			
No.	Criteria	Y/N/NA	Comments and evidence observed
2.1 Minor	Has the facility established environmental policy or use client's environmental policy?	Yes	The site has a well detailed environmental policy (signed by the director in January 2017). There is an environmental manual too. These were been
2.2 Minor	Are one or more members of management specifically responsible for coordinating facility's environmental management activities?	Yes	Mark Wilding/ The Director is the responsible person
2.3 Minor	Does the responsible person have a good understanding of applicable laws?	Yes	The management were well aware about the relevant regulations. Further there is a legal register available which explain all applicable regulations for this kind of facilities.
2.4 Minor	Has the facility adequately identify facility's environmental impacts through an environmental analysis?	Yes	Impacts have been identifying via the analysis.
2.5 Minor	Has the facility established a system to identify applicable legal requirements?	Yes	A well detailed legal register was available
2.6 Minor	Is there any basic environmental management control in place?	Yes	Well organised environmental management systems are in place
2.7 Minor	Are workers aware of environmental policy, objectives, and procedures relevant to their job and how the site activities impact the environment?	Yes	verified via the interviews
2.8 Minor	If there ecolabeled goods are produced in the factory, is there a sufficient organisation in place to prevent any contamination of the batches of labeled products by other non-labeled products?	Yes	verified via the interviews and the observations
3. Water Use			
No.	Criteria	Y/N/NA	Comments and evidence observed
3.1 Major	Are there water consumption meters in place?	Yes	As per the management there is a water meter available.
3.2 Minor	Is water consumption tracked?	Yes	Water only been used for general usage of the employees
3.3 Minor	Are water tanks and pipes free of leaks?	Yes	observations from the site tour
3.4 Minor	Are procedures in relation to water use management written and implemented? (even basic display, e.g. requested flow for process using	NA	No water use for manufacturing
3.5 Major	If factory is subject to a water abstraction permit, does it hold it and apply its requirements?	NA	No water use for manufacturing

3.6 Minor	Do key workers with water use/consumption management responsibilities receive specific training as required?	NA	No water use for manufacturing
<b>4. Wastewater</b>			
No.	Criteria	Y/N/NA	Comments and evidence observed
4.1 Minor	Is there any drainage plan in place with a general understanding of wastewater flow direction and discharge points?	NA	No water use for manufacturing
4.2 Major	Is management aware of polluted wastewater risks associated to factory's process? Does management know all concerned contaminants and discharge points?	NA	No water use for manufacturing
4.3 Major	If required by law, is there any wastewater treatment plant installed on-site or nearby and under factory's control?	NA	No water use for manufacturing
4.4 Major	Is the on-site wastewater treatment process known, monitored and controlled?	NA	No water use for manufacturing
4.5 Major	Is wastewater discharge quality and quantity properly controlled and monitored?	NA	No water use for manufacturing
4.6 Major	Based on existing laboratory report, does discharged wastewater meet limits for regulated pollutants?	NA	No water use for manufacturing
4.7 Major	Is wastewater and rainwater discharged in separated sewage?	Yes	Verified via the management interviews
4.8 Major	Is there no visible wastewater discharge into rain drain or to unprotected ground that directly goes to environment?	NA	No water use for manufacturing
4.9 Major	Based on observation, are sumps/pits receiving wastewater in good condition and of sound integrity?	Yes	No issues were noted from the site tour
4.10 Minor	Have procedure in relation to wastewater management been implemented?	NA	No water use for manufacturing
4.11 Major	Are wastewater treatment operators aware of the key operating parameters of the treatment plant?	NA	No water use for manufacturing
4.12 Major	Is any maintenance undertaken on wastewater pipe system and treatment plant ?	NA	No water use for manufacturing
4.13 Major	If factory releases industrial wastewater into central (public or industrial area) wastewater treatment plant, does the supplier have the relevant and up-to-date wastewater discharge licence/permits into central (public or industrial area) wastewater treatment plant?	NA	No water use for manufacturing
4.14 Major	If factory releases industrial wastewater into central (public or industrial area) wastewater treatment plant, does industrial wastewater comply with central (public or industrial area) wastewater treatment plant limits for incoming wastewater?	NA	No water use for manufacturing
<b>5. Emissions to air</b>			
No.	Criteria	Y/N/NA	Comments and evidence observed
5.1 Minor	Is an inventory of main point sources emissions to air maintained? Has the site also considered the potential for fugitive emissions?	NA	No gas or air emissions on site

5.2 Major	If required by law, or if there are processes with a significant air discharge, is there any air emissions abatement equipment installed?	NA	No gas or air emissions on site
5.3 Major	Is abatement equipment maintained and in appropriate working order ?	NA	No gas or air emissions on site
5.4 Major	As per legal requirement, or if there are processes with a significant air discharge, are air emissions followed and monitored?	NA	No gas or air emissions on site
5.5 Major	Does the air emissions meet emission limits for regulated pollutants?	NA	No gas or air emissions on site
5.6 Minor	If the factory has a freight activity (transportation with own vehicules), do vehicules respect the local applicable limits for exhaust emissions (ex: EURO standard in Europe)?	Yes	Verified via the interviews with the management / workers.
5.7 Major	Has the facility identified equipment containing ozone-depleting substances (ODS) e.g., chillers, air conditioning units, etc? Is an inventory kept?	Yes	There is a air conditioning unit available
5.8 Major	Does the company use a specialist contractor to do maintenance on such equipment? (to avoid leak of ODS and recover waste susbtances)	Yes	As per the management a 3rd party contractor available to inspect this.
5.9 Major	Are ODS-containing equipements maintained? Are maintenance records available? (e.g. replacement of refrigerant fluid in A/C unit)	No	No maintenance records available at the time of the audit
5.10 Major	Can factory show evidence that banned refrigerant fluids are not used? (reminder: CFC and HCFC are totally banned)	Yes	No banned chemicals used by the company.
5.11 Minor	Are air treatment operators aware of the key operating parameter of the treatment facility and do they receive related training?	NA	No gas or air emissions on site

**6. Waste Management**

No.	Criteria	Y/N/NA	Comments and evidence observed
6.1 Major	Are wastes being segregated according to hazardous and non-hazardous characteristics?	Yes	It was noted all process wastes are segregated on site and all items received are being segregated into separate containers and including hazardous (i.e. ...)
6.2 Major	Are wastes being stored in containers applicable to their contents?	Yes	observations from the site tour
6.3 Major	Are waste containers in good condition?	Yes	Observations from the site tour
6.4 Major	Are containers and storage areas located outside and covered to prevent rain water flow?	Yes	all preocess waste are kept inhouse therefore rain does not effect.
6.5 Major	Are waste containers labeled with name and potential hazard characteristics (pictograms)?	Yes	observations from the site tour
6.6 Major	Are surfaces of waste storage areas in good condition to prevent spillage or leaking of waste materials?	Yes	observations from the site tour
6.7 Major	Is there no burning or uncontrolled landfilling activities undertaken on-site?	Yes	observations from the site tour

6.8 Minor	Is there a record of waste production, disposal and treatment?	Yes	<i>all done online via a system computer system</i>
6.9 Minor	Are waste materials reported as being recyclable being identified and separated for recycling?	Yes	<i>Seen though the online system</i>
6.10 Minor	Are procedures regarding waste management in place?	Yes	<i>observations from the site tour</i>
6.11 Minor	Are regular checks undertaken on waste contractor licences?	No	<i>General waste collector's licence / records were not available</i>
6.12 Minor	Do key workers with waste management responsibilities receive appropriate training?	Yes	<i>training records were seen and verified via the interviews</i>
<b>7. Chemicals management</b>			
No.	Criteria	Y/N//NA	Comments and evidence observed
7.1 Major	Does the factory have documented business practices on how to select and purchase chemicals?	Yes	<i>only domestic cleaning products are used by the company in a very small scale.</i>
7.2 Major	Does the factory have a process to verify that all chemicals in use and products manufactured meet regulatory compliance requirements in all legal jurisdictions where product is sold? (e.g. REACH regulation, RoHS regulation, ecolabel products, etc)	Yes	<i>COSHH assessments are kept on site.</i>
7.3 Minor	Does management review all the chemicals used at facility to determine requirements for proper storage, labelling, handling? Is is documented?	Yes	<i>Observation from site tour, records review process and interviews with the management / employees.</i>
7.4 Major	Are chemicals properly labeled and segregated per dangerousness?	Yes	<i>Only domestic cleaning products are used by the company in a very small scale. All were kept labeled</i>
7.5 Major	Does the factory have a inventory of all chemicals used in the facility?	Yes	<i>Inventory was available</i>
7.6 Major	Is MSDS available in local language at chemical storage area?	Yes	<i>observations from the site tour</i>
7.7 Minor	Is a check for up-to-date MSDS undertaken by qualified management representative?	Yes	<i>verified via the documents review process</i>
7.8 Major	Does the factory have an employee training program that for chemicals handling and disposal?	Yes	<i>training records were seen. Only domestic cleaning products used by the company.</i>

7.9 Major	Does the factory have well marked, designated chemical storage areas with restricted access?	Yes	observations from the site tour
7.10 Major	Does the factory have chemical hazard signage and safe handling equipment available in the areas of the facility where chemicals are used?	Yes	observations from the site tour
7.11 Major	Are PPE adapted to handling of the hazardous chemicals used in the processes? (e.g. dust mask for solvents handling is not adapted)	Yes	A very small scale of white spirit used for cleaning purposes but not regular.
7.12 Major	Are all temporary chemical storages (for localized use and application of chemicals) clearly marked with their contents, and placed on solid surface?	Yes	observations from the site tour
<b>8. Emergency Preparedness and Response</b>			
No.	Criteria	Y/N//NA	Comments and evidence observed
8.1 Major	Does the factory have a chemical emergency response plan in place and tested on a periodic basis?	NA	Does not require as a very small of cleaning products been use by the site.
8.2 Major	Does the factory conduct fire evacuation drill on a periodic basis?	Yes	annual fire drill has been conducted. Records were seen.
8.3 Major	Does the factory identify large bulk chemical storage tanks that have a high risk potential to leak and cause significant environmental damage?	NA	No large bulk chemicals use at this site.
8.4 Major	Is anti-explosion device installed in warehouse where explosive substances are stored?	NA	No large bulk chemicals use at this site.
8.5 Minor	Are records of spills or releases to the environment recorded, documented and notified to authorities?	NA	No spills or chemicals release to the environment
<b>9. Energy Use, Transport and Greenhouse Gases (GHGs)</b>			
No.	Criteria	Y/N//NA	Comments and evidence observed
9.1 Major	Does the factory track and measure site electricity consumption?	Yes	Records kept on site
9.2 Major	Does the factory track and measure site and transportation fossil fuels (gasoline, diesel) consumption?	Yes	Records kept on site
9.3 Minor	Does the factory track and measure process consumption records separately from the rest of the facility (offices, etc)?	NA	small facility - The site tacks energy consumption from a site perspective, not separately.
9.4 Minor	Does the factory calculate and track its greenhouse gas emissions (GHG)?	NA	Give name of the GHG accounting framework GHG emissions are tracked and calculated against
9.5 Minor	Is management aware of applicable laws and regulations concerning energy use, transport and GHG emissions?	Yes	verified via the interviews
9.6 Major	Is the facility compliant with local requirements regarding energy consumption and records?	Yes	verified via the interviews
9.7 Minor	If facility is buying renewable energy, does it hold related certificates to prove the claim of "renewable" ?	NA	No renewable energy
<b>10. Land Use and Biodiversity, Nuisances</b>			
No.	Criteria	Y/N//NA	Comments and evidence observed

10.1 Minor	Is management aware of sensitive receptors in site's vicinity, when applicable? (e.g. known endangered specie)	Yes	<i>verified via the interview with the site management</i>
10.2 Major	Are site operations in line with legal requirements relating to land use (including planning permission and development requirements)?	Yes	<i>Lease building but relevant licence / permits were kept on site</i>
10.3 Major	If there is a humid area nearby the site, is there any contamination observed?	NA	<i>none noted</i>
10.4 Major	If there is a natural area nearby the site, is there any contamination observed?	NA	<i>none noted</i>
10.5 Minor	Is management aware of nuisances from site activities and associated impacts (including odour, noise, visual and general housekeeping) ?	Yes	<i>verified via the interview with the site management</i>
10.6 Minor	Is general housekeeping across the site of an acceptable standard?	Yes	<i>observations from the site tour</i>
10.7 Major	Where the employment site is legally required to hold and/or maintain documentation in relation to nuisance and complaints, is the documentation	Yes	<i>No issues noted</i>
10.8 Minor	Do workers receive training on nuisance issues at induction, when appropriate?	Yes	<i>Employees have received applicable training</i>
10.9 Major	Is external noise nuisance properly controlled and monitored?	NA	<i>None noted</i>

## ON-SITE PICTURES

**When applicable, following pictures should be displayed:**

*Surroundings of the factory*

*Potential natural areas, humid areas, hospitals or residential areas*

*Outside overview of factory (factory gate)*

*Inside general overview*

*Key activities having potential environmental impact*

*Wastewater treatment plant*

*Ventilation system*

*A/C unit(s)*

*Machineries*

*Environmental permit*

*Material, hazardous and non hazardous chemicals and final products storage / warehouse*

*Air emissions treatment equipment*

*Waste storage (hazardous and non-hazardous)*

*Noise control device*

*Waste handling area*

*Bulk storage tank and secondary containment*

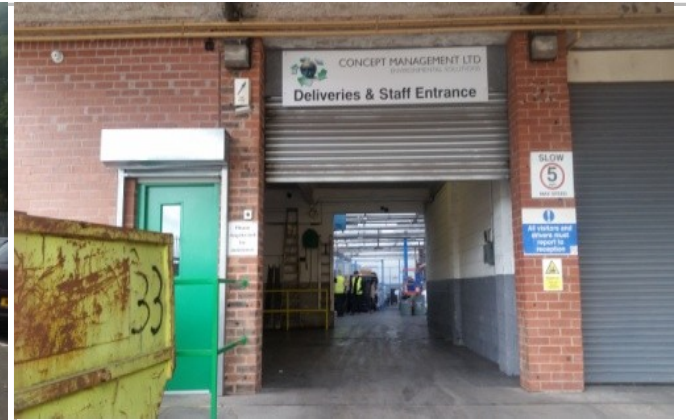
*Good practices and Non-compliances when they can be photographed*



Entrance to the site



Side view



Goods in/out



Incoming goods / rework area



rework area



Segregated products



Chemical cupboard



spill kit

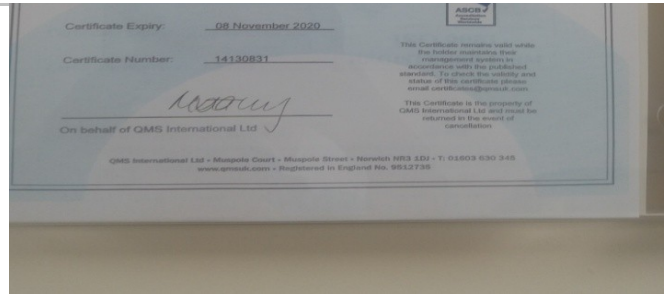


mix waste in general waste (some are recyclable)

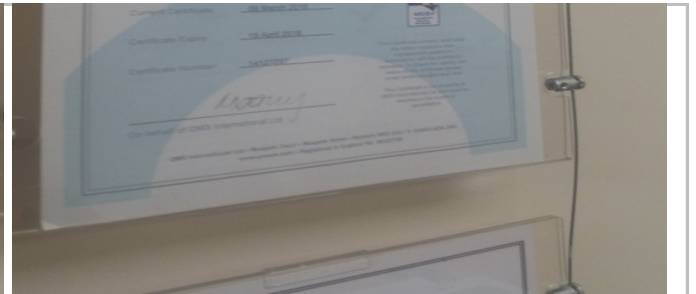




14001 certificate



9001 certificate



27001 certificate