Higg Facility Environmental Module (FEM) Verification Protocol

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Acknowledgments

This document is prepared by the Verification Program Manager, Sumerra and the Sustainable Apparel Coalition (SAC).

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1 INTRODUCTION

1.1 BACKGROUND

1.1.1 General

1.1.1.1 The Sustainable Apparel Coalition (SAC) is the apparel, footwear and home textile industry's foremost alliance for sustainable production. It was born from a dynamic and unconventional meeting of the minds when in 2009, Walmart, America's biggest retailer and Patagonia, one of the world's most progressive brands, came together with a radical mission: Collect peers and competitors from across the apparel, footwear and textile sector and together, develop a universal approach to measuring sustainability performance.

1.1.1.2 Today the Coalition has more than 299 members (as of October 2023) and represents more than 40% of the global apparel supply chain. Its focus remains the same: develop a standardized supply chain measurement tool for all industry participants to understand the environmental and social and labor impacts of making and selling their products and services. By measuring sustainability performance, the industry can address inefficiencies, resolve damaging practices, and achieve the environmental and social transparency that consumers are starting to demand. By joining forces in a Coalition, members can address the urgent, systemic challenges that are impossible to change alone.

1.1.2 Higg Index

1.1.2.1 Developed by the Sustainable Apparel Coalition, the Higg Index is a suite of tools that enables brands, retailers, and facilities of all sizes — at every stage in their sustainability journey — to accurately measure and score a company or product's sustainability performance. The Higg Index delivers a holistic overview that empowers businesses to make meaningful improvements that protect the well-being of factory workers, local communities, and the environment.

1.1.2.2 For those just starting to implement sustainable practices, The Higg Index guides their important first steps, helping to distinguish strengths and weaknesses in the supply chain. For those already deeply engaged, it has more advanced potential, such as benchmarking sustainability performance against other SAC members, identifying macro risks and performing targeted research and analytics.

1.1.2.3 With the Higg Index, SAC aims to accomplish the following goals:

1.1.2.3.1 Provide a consistent measurement framework for companies to evaluate and communicate their social and environmental impacts.

1.1.2.3.2 Identify strategic opportunities to implement changes that drive meaningful sustainability improvements.

1.1.2.3.3 Prioritize a safe and healthy work environment to improve the well-being and treatment of workers across the value chain.

1.1.2.3.4 Measure the impacts of products, operations, and value chain activities to identify and implement improvements that preserve the natural world.

1.1.2.3.5 Eliminate the need for do-it-yourself approaches, allowing companies to quickly and easily share data with value chain partners and optimize resources to reduce associated waste and costs.

1.1.2.3.6 Enable public sustainability claims so that consumers can make more informed choices about the products they purchase.

1.1.2.3.7 Identify shared opportunities for improvement across the value chain related to protecting human rights and reducing environmental impacts.

1.1.3 Facility Environmental (FEM) Overview

1.1.3.1 The Higg Facility Environmental Module (Higg FEM) informs manufacturers, brands, and retailers about the environmental performance of their individual facilities, empowering them to scale sustainability improvements.

1.1.3.2 The Higg FEM provides facilities with a clear picture of their environmental impacts. It helps them identify and prioritize opportunities for performance improvements.

1.2 PURPOSE

1.2.1 The objective of the SAC Higg FEM Verification Program is to ensure Higg FEM data provided and shared through the Worldly platform is credible, trusted, and therefore able to be communicated publicly.

1.2.2 The purpose of the Higg FEM Verification Protocol is to communicate the objectives, scope, process, and interpretive guidance for the Higg FEM Verification program. This includes:

1.2.2.1 Ensuring that appropriate information is provided to facilities that utilize this program.

1.2.2.2 Ensure that appropriate information is provided to Verifier Bodies responsible to conduct Higg FEM verifications.

1.2.2.3 Providing a consistent verification program

1.2.3 Individuals and groups to whom this Protocol applies includes:

1.2.3.1 SAC Staff

1.2.3.2 SAC Verification Program Manager (VPM)

1.2.3.3 Verifier Bodies & Verifiers

1.2.3.4 Facilities utilizing the Verification Program.

1.3 DEFINITIONS

1.3.1 **"Core Verification"** - A verified Higg FEM that only includes a subset of the full Higg FEM question set aimed at verifying Higg FEM questions related to foundational environmental practices and selected essential quantitative metrics data.

1.3.2 ***"*Essential Quantitative Metrics"** - These are questions or REFIDs which provide data points that help to calculate a facility's total GHG emissions and water consumption.

1.3.3 **"Facility Foundations"** – A Higg FEM that only includes a subset of the full FEM question set aimed at capturing the foundational environment practices carried out at a manufacturing facility.

1.3.4 **"Foundational Environmental Performance (FEP)"** refers to the essential good practices that a business must demonstrate in order to operate responsibly and sustainably. The specific criteria for including FEM questions in the Foundational Environmental Performance subset are:

1.3.4.1 Critical legal requirements: the regulatory compliance requirements that are common across most jurisdictions, and

1.3.4.2 Basic and foundational management practices: the foundational elements of a management system necessary to identify and prevent the most critical environmental risks.

1.3.5 **"Higg FEM Self-Assessment Module (Higg FEM)"** – This is the set of 'questions' that are answered by the facilities to generate the Higg FEM score. The questions are housed in the Worldly platform. These answers and supporting documents are what is 'Verified' (aka assured) by the Verifier Body.

1.3.6 **"Worldly"** means the website through which users can access the Higg Index.

1.3.7 **"Higg Index"** means the questions, methodology, know-how, scoring metric, algorithms, ideas, and inventions, related to the suite of sustainability assessment tools, including: the Higg Facilities Environmental Module (the "Higg FEM"); the Higg Facilities Social and Labor Module (the "FSLM") (but excluding content related thereto); the Higg Brand & Retailer Module; the Higg Materials Sustainability Index (the "MSI"); the Higg Product Module (the "PM"); and the Higg Design and Development Module (the "DDM"), and any future modules or tools incorporated by SAC, including data requisite to the methodology of the foregoing, and all new versions of any of the foregoing, provided that the foregoing will constitute the "Higg Index" only after approved by SAC.

1.3.8 **"Verification"** - The methods and processes by which a Verified Body obtains appropriate evidence in order to express a conclusion on the reliability and accuracy of the Higg FEM self-assessment data (that is, the outcome of the measurement or evaluation of results against defined criteria).

1.3.9 **"Verification Program Manager (VPM)"** – This is the oversight organization for the Verification program. The role of an oversight organization is to provide quality assurance to the verification process. This may include, but is not limited to, vetting and management of service providers (e.g., Verifier Bodies), application of quality assurance procedures, risk assessment, and general project management.

1.3.10 **"Verified Module (Higg vFEM)"** - The result of the Verification process, indicating the accuracy/reliability of the self-assessment data and corrected data as needed. A Verifier Body will access and complete a Higg vFEM on the Worldly platform.

1.3.11 **"Verifier Body (VB)"** – A company that is qualified and approved to perform the Verification process in accordance with the defined procedures and protocols.

1.3.12 **"Lead Verifier"** - The individual in the Verifier Body who is responsible for the verification and its performance, and for the report that is generated.

1.3.13 **"Verifier"** - The individual(s) conducting the verifications (includes Lead Verifier and other members of the verification team). NOTE: Where the SAC expressly intends that a requirement or responsibility be fulfilled by the Lead Verifier, the term "Lead Verifier" rather than "Verifier" is used.

1.3.14 **"Quantitative Metrics Verifier"** - The Verifier who is responsible for the accuracy of quantitative data in the Higg FEM.

1.3.15 **"Verification Team"** —All Verifiers and staff performing the verification.

1.3.16 **Use of 'shall' or 'should'**: The word 'shall' indicates a requirement and the word 'should' indicates a recommendation.

1.4 VERIFICATION MINDSET

1.4.1 Moving out of the audit mindset requires a new vocabulary. Below are changes to traditional auditing terminology:

Table 1 Verification Terminology

Audit Terminology	Verification Terminology
Audit	Verification
Auditor	Verifier
Interview	Dialogue
Non-Compliant Criteria	Missing Criteria
Corrective Action Plan (CAP)	Performance Improvement Plan (PIP)

1.5 ROLES AND RESPONSIBILITIES

1.5.1 Roles and responsibilities are summarized in the table below:

Table 2 Roles and Responsibilities for Higg FEM Verification

Who	Roles and Responsibilities
VPM	● Following VPM policies defined in SAC-VPM Agreements. ● Managing the Verifier Body Application Process. ● Vetting VB Applicants. ● Determining Eligibility of Verifier Bodies. ● Conducting Quality Assurance. ● Providing required information and data to the SAC. ● Responding to program queries through the SAC/VPM Support desk.
Verifier Body	● **General** ○ Engaging in Verification procedures and processes. ○ Ensuring competent Verifiers are used in the verification process. ○ Ensuring Verifiers act ethically and honestly. ○ Providing necessary oversight and support to Verifiers. ○ Ensuring necessary quality controls are in place to produce reliable and accurate results. ● **Lead Verifier** ○ Responsible for the verification and its performance, and for the quality of verification report that is generated. ○ Ensures verification protocols are followed. ● **Verifier** ○ Conducting the verification (includes Lead Verifier and other members of the verification team). ● **Quantitative Metrics Verifier** ○ Responsible for the accuracy of quantitative data reported in the Higg FEM. ● **Report Verifier** ○ Responsible for reviewing and verifying the accuracy Verification response and verified data reported in the Higg FEM. ● **Higg FEM Scheme Manager** ○ Overall responsibility for the performance and quality of the Verifications for a VB. ○ Point of contact with SAC to answer queries or to discuss issues for all activities globally. ○ Responsible for ensuring that Verifiers are up to date with training and updates from the SAC and VPM.

SAC	● Programmatic oversight including strategy, capacity, quality, and financial sustainability. ● Managing the VPM. ● Serving as the ultimate decision-maker on issues escalated by the VPM.
Worldly	● Providing and managing data systems and platforms (Worldly). ● Redirecting verification queries to SAC/VPM through Support desk.
Facility	● Completing the self-assessment. ● Completing facility survey at the end of verification. ● Provide documentation to SAC/VPM (as applicable). ● Provide documents, participate in interviews/meetings, etc. as required by VB to make Verification assessment. ● Reviewing and finalizing the vFEM on the Worldly platform.

2 VERIFIER BODIES

2.1 APPLICABILITY

2.1.1.1 Only SAC approved Verifier Bodies shall be permitted to conduct a valid verification. Competency and other VB requirements are provided in *Higg FEM Verifier Body Program Requirements*

2.1.1.2 Only SAC approved Verifiers, associated with an approved Verifier Body can make verification determinations.

2.1.1.3 A list of approved Verifier Bodies shall be maintained by the VPM, and Verifier Body approval status is activated/deactivated on the Worldly platform accordingly.

2.2 VERIFIER DESIGNATIONS

2.2.1 There are three (3) Higg FEM verifier designations as follows:

2.2.1.1 Higg FEM Chemical Specialist Verifier

2.2.1.2 Higg Generalist Verifier

2.2.1.3 Higg FEM Quantitative Metrics Verifier

2.2.2 A Higg FEM Chemical Specialist Verifier can conduct verification of all Higg FEM questions.

2.2.3 A Higg FEM Generalist Verifier can conduct verification of all Higg FEM questions (including Facility Foundations) except for Level 2 and 3 Chemicals Management Section questions unless the following condition is met:

2.2.3.1 A Higg FEM Generalist Verifier can conduct Verification of Level 2 and 3 Chemicals Management Section questions if, based on applicability responses in the Chemicals Management Section, the facility is classified as not using chemicals in production processes. This includes the following facility categories:

2.2.3.1.1 Facility that uses Chemicals in Operation only, Maintenance/Tooling/Equipment only, Only uses Spot Cleaner in production, and/or Facility that has minimal chemical use.

2.2.4 A Higg FEM Quantitative Metrics Verifier is responsible for ensuring the accuracy of quantitative data in the Higg vFEM (e.g., energy and water consumption data, wastewater discharge data, and waste quantity data, etc.)

2.2.4.1 Quantitative Metrics Verifiers shall be an approved Higg FEM Generalist or Chemical Specialist Verifier.

2.3 VERIFICATION TEAM

2.3.1 A verification can be conducted by more than one individual. The individuals involved in the Verification are considered the Verification Team.

2.3.2 A verification team shall include:

2.3.2.1 A designated Lead Verifier who is responsible for the overall Verification activities and reporting.

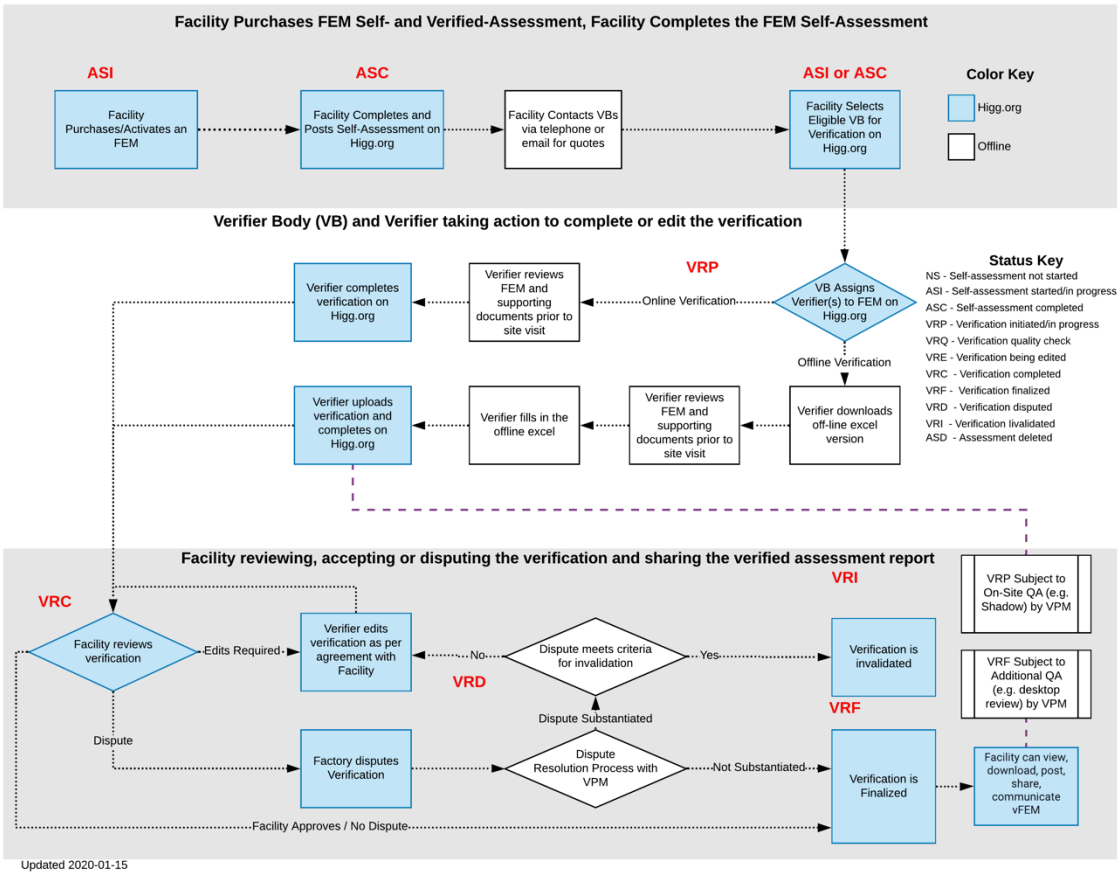
2.3.2.2 A designated Quantitative Metrics Verifier who is responsible for ensuring the accuracy of quantitative data reported in the Higg vFEM.

3 VERIFICATION DETAILS

3.1 PROCESS FLOW

3.1.1 The following chart gives an overview of the Higg FEM Verification Process.

Table 2 Higg FEM Verification Process and platform workflow



Source: https://howtohigg.org/higg-fem-verification-program/#section4

3.2 VERIFICATION SCOPE

3.2.1 Verification shall cover all Higg FEM sections and applicable questions.

3.2.2 Quantitative environmental data from the full calendar year of the Higg FEM reporting year (January 1 to December 31) shall be in scope. For example, for FEM2020 the data reporting scope is from January 1, 2020 to December 31, 2020.

3.2.2.1 If a facility has not been in operation for the full calendar year, additional notes (in the self-assessment) or Verifier Comments shall be provided to describe any gaps in data. For example, if a facility moved to a new location during the reporting year and had only accumulated 7 months of resource consumption data at the new location, the facility can still complete the Higg FEM self-assessment and have it verified.

3.2.3 Verification shall cover the entire facility site including all owned and operated onsite processes, equipment and areas noted in the Site Observations section of this document.

3.2.3.1 If a process or piece of equipment at a facility began operating during the Verification year (the year the Verification is being conducted), it is not applicable in the Higg FEM reporting year and should not be included in the applicability selections. For example, if a screen-printing process was installed in 2021, it is not in scope of the FEM 2020 verification.

3.2.3.2 In cases where the above applies, Higg FEM questions related to material handling, storage, disposal and worker safety for the processes/equipment shall be in scope. For example, a facility is expected to appropriately store and dispose of any associated wastes generated from a new process, however there would be no waste quantity to report in the FEM reporting year).

3.2.4 One (1) Higg FEM is required for each legal business entity as defined by the applicable business license/operating permit except in the following circumstance:

3.2.4.1 Where multiple manufacturing units (facilities) are located at the same premises with different business licenses, however the facilities are fully owned and operated by a single legal business entity, one (1) Higg FEM can be completed. ***Note:*** *If the separate facilities are not legally owned/operated by a single parent business entity with a valid operating license, which includes ownership of all facilities, separate Higg FEMs must be completed for each facility.*

3.2.4.2 Where a material or component supplier of the facility with a separate business license is located at the same premises and supplies 100% of its materials/services to the facility, its operations can be included in the facility's Higg FEM. ***Note****: If the material or component supplier provides materials or services to other facilities, it must not be included in the facility's Higg FEM scope and would require a separate Higg FEM.*

3.2.5 Facilities located at two separate physical locations (i.e., different legal addresses) must complete one (1) FEM per location regardless of ownership (e.g., if two facilities are located at different physical locations, but their operations are covered under one (1) parent business license, separate FEMs are still required.)

3.2.6 Where multiple facilities which require separate FEMs are located at the same premises, verification activities may be combined (i.e., on the same or consecutive days) if appropriate. For example, the facilities are part of a manufacturing group with the same overarching environmental management programs.

3.2.6.1 Where verification activities for multiple facilities are combined as per the above, it is the responsibility of the VB/Verifier to ensure all verification activities required in this protocol are applied at each facility.

3.3 Higg FEM Core Verification (for FEM2023)

3.3.1 Higg FEM Core Verification shall apply to Higg FEM Verifications occurring in the FEM2023 cadence (calendar year 2024).

3.3.1.1 For FEM2023, facility users will complete the full Higg FEM Self-Assessment, however only Higg FEM Core Verification questions shall be verified.

3.3.1.2 The Higg FEM Core Verification question set consists of all Higg FEM primary questions from Facility Foundations including all sub-questions for these primary questions, and additional Higg FEM questions covering Essential Quantitative Metrics.

3.3.1.2.1 A list of the Higg FEM Core Verification questions is provided in Appendix C.

3.3.2 Higg FEM Core Verification does not result in a full Higg FEM Verified Score.

3.3.3 Higg FEM Generalist Verifiers shall be able to conduct Verification of all Higg FEM Core Verification

3.3.3.1 Where applicable, a Quantitative Metrics Verifier shall be part of the Verification team for Higg FEM Core Verification and shall be responsible for the accuracy of quantitative data reported in the Higg FEM.

3.3.4 Unless specifically noted, all applicable requirements outlined in this Protocol shall apply to Higg FEM Core Verification.

3.4 Facility Foundations

3.4.1 First time Higg FEM users shall choose to complete either a full Higg FEM or Facility Foundations self-assessment.

3.4.1.1 If a facility has already completed a full Higg FEM in a previous Higg FEM cadence, they shall not be able to complete Facility Foundations.

3.4.2 The Self-Assessment and Verification scope of Facility Foundations shall be the previous 12 months from the time Facility Foundations was completed. For example, if a facility completes Facility Foundations in May 2022, the Facility Foundations Verification shall consider facility performance from May 2021 to April 2022.

3.4.3 A first time Higg FEM user choosing to complete Facility Foundations shall not be able to upgrade to a full FEM once verification is initiated on the platform (i.e., module status is VRP). Should such a user wish to complete the full Higg FEM, they shall only do so in the next cadence cycle.

3.4.4 Higg FEM Generalist Verifiers shall be able to conduct Verification of all Facility Foundations questions.

3.4.5 Facility Foundations questions shall be verified in accordance with Appendix A (Facility Foundations) guidance included in the Higg FEM Guidance.

3.4.6 Unless specifically noted, all applicable requirements outlined in this Protocol shall apply to Facility Foundations.

3.5 VERIFICATION TYPE (ONSITE OR OFFSITE)

3.5.1 Verifications shall be conducted onsite or offsite.

3.5.2 The following considerations/limitations should be noted for Verifications that are conducted offsite:

3.5.2.1 The verified results of an offsite verification (which include but are not limited to core verification, verified scores, levels achieved) shall not be shared publicly nor shall they be shared via the SAC Higg FEM Performance Communication toolkit.

3.5.2.2 An offsite verified assessment can be shared with connections of a facility through their Worldly account.

3.5.2.3 If a facility chooses to have their Higg FEM self-assessment verified offsite and completes the verification process (the Higg vFEM status is changed to VRF), it will not be possible for the facility to switch the Higg vFEM to an on-site verification OR complete a new self-assessment to be verified onsite within the same assessment year (i.e., facilities shall only have one verified Higg FEM per year).

3.5.2.4 Before completing an offsite verification, facilities should confirm with all relevant business partners that they will not be expected to complete an onsite verification.

3.5.2.5 If a facility has achieved Level 1 in Chemicals Management section, is classified as using chemicals in production, and answered questions in Level 2 and 3, a Higg FEM Chemical Specialist Verifier is required to complete the offsite verification.

3.5.2.5.1 For FEM2023, Level 2 and 3 Chemicals Management questions will not be included in Core Verification.

3.6 VERIFICATION FEES

3.6.1 Fees associated with Verification shall be negotiated and agreed upon between the organization requesting the Verification and the Verifier Body.

3.7 VERIFICATION DURATION

3.7.1 **Onsite Verification:** SAC does not define the required amount of time to conduct a Verification, but has developed non-prescriptive guidance for onsite verification that is provided in Appendix A.

3.7.2 **Offsite Verification**: The total duration (inclusive of reporting time) to conduct an offsite verification must not exceed 2 person-days.

3.7.3 Verification (onsite or offsite) shall not be less than one (1) person day.

3.8 REPEAT VERIFICATION

3.8.1 A Repeat Verification is defined as the same verifier conducting a facility verification in two (2) consecutive Higg FEM cycles.

3.8.2 Except under extraordinary circumstances (i.e., countries/regions where there are a limited number of verifiers available), verifiers should not conduct consecutive verifications.

3.8.3 If a Repeat Verification is required, the VB shall register the Verification by completing the Higg FEM Repeat Verification Form here: https://www.sumerra.com/programs/sac/sac-fem-verification-program/fem-repeat-request/

3.8.4 No formal approval from the SAC or VPM shall be required and once the form is completed, the Repeat Verification can be conducted.

3.8.5 Repeat Verifications may be subject to additional quality assurance checks by the VPM.

3.8.6 VBs are expected to plan appropriately and allocate the necessary staffing resources to avoid repeat verifications to the extent possible.

4 VERIFICATION PROCESS

4.1 VERIFICATION PREPARATION

4.1.1 VB shall assign Verifier(s) to the Higg vFEM on Worldly no later than 10 working days prior to the start date of the verification.

4.1.2 Verifiers shall review the facility's self-assessment prior to the scheduled verification date to identify aspects of the facility's Higg FEM that may require additional clarification or facility preparation.

4.1.3 Quantitative Metrics Verifier shall review the quantitative metrics data reported in the facility's self-assessment prior to the scheduled verification date to identify data points that may require additional clarification or facility preparation.

4.1.3.1 This review shall include review of all source data (e.g., invoices, metering records, aggregated tracking totals, historical consumption data, etc.) and other supporting evidence uploaded as attachments to the Higg FEM.

4.1.4 Verifier/VB shall communicate a verification plan to the facility no later than 10 working days prior to the start date of the verification. Information in the verification plan shall include:

4.1.4.1 The number of person-days and calendar days required to complete the verification.

4.1.4.2 The hours of verification (start and finish for each day)

4.1.4.3 Contact details of Verifiers/VB (telephone number and email)

4.1.4.4 The expectations for the opening meeting, including who should be in attendance.

4.1.4.5 The expectation that onsite verification requires access to all areas of the facility and its grounds, photographs (respecting and avoiding sensitive or proprietary information).

4.1.4.6 The expectation that supporting evidence to verify the facility's self-assessment responses is required to be available for review.

4.1.4.7 If applicable, Verifier/VB should provide the facility with a list of supporting evidence that needs to be reviewed if it is not listed in the Higg FEM Guidance.

4.1.4.8 Any other relevant information or instruction to support the facility in preparing for verification.

4.2 DATA COLLECTION

4.2.1 General

4.2.1.1 To achieve a verified assessment report that is of high quality and meets the user's needs, it is important to provide the following data in the Verified Higg FEM which will form the Verified Module (Report) and any associated scoring (if applicable) that can be shared:

4.2.1.1.1 Make the appropriate Verification Selection.

4.2.1.1.2 Provide the right narrative in the Verifier Comments.

4.2.1.2 The following data collection requirements shall apply to both Higg FEM Core Verification and Facility Foundations.

4.3 COMPLETING THE VERIFICATION SELECTION

4.3.1 For each question and any sub-questions/data tables in the Higg FEM Self-Assessment, a Verification Selections shall be selected as follows:

*4.3.1.1 '**Accurate**' shall be selected when the self-assessment response is accurate as per the Verification Guidance ("how this will be verified" section) of the latest version of Higg FEM Guidance, and no change is required to the facility's self-assessment response.*

4.3.1.1.1 When Accurate is selected, Verifiers should add Verifier Comments, if:

- *The information provided is not sufficient to explain circumstances.*
- *The Verifier wants to provide additional information about circumstances.*

*4.3.1.2 '**Inaccurate**' shall be selected when the self-assessment response is not accurate as per the Verification Guidance ("how this will be verified" section) of the latest version of Higg FEM Guidance.*

4.3.1.2.1 Verifiers shall provide the "Corrected Response" (e.g., a "Yes" answer becomes a "No") and support the response by providing details in the "Verifier Comments" field.

*4.3.1.3 '**No Response**' shall be selected when the facility's self-assessment does not include a response to the question, or the question was opened due to a change in applicability questions or level achievement.*

4.3.1.3.1 Verifiers shall provide the "Corrected Response" and support the response by providing details in the "Verifier Comments" field.

4.4 VERIFIER COMMENTS

4.4.1 Verifier Comments may be best considered as an evidentiary statement. An evidentiary (aka assurance) statement is designed to support the Verification Selection (see above) of the Verifier.

4.4.2 All Verifier Comments shall be entered in English.

4.4.2.1 In cases where a facility's response is not in English, but it is accurate, the Verifier shall select "accurate" as the verification response and provide details (in English) in the Verifier Comment field to describe the facility's input.

4.4.2.2 In cases where a facility's response is not in English and is inaccurate, the Verifier shall select "inaccurate" as the verification response and provide the correct response and appropriate Verifier Comments in English.

4.4.2.3 Uploaded documentation is not required to be in English. However, it is expected all documents are appropriately reviewed by verifiers and any necessary Verifier Comments shall be provided in English (as noted above).

4.4.3 In all cases where an answer to a question is noted as “Inaccurate” or “No Response” Verifier Comments shall be included. Generally, statements should provide sufficient details on:

4.4.3.1 Context

4.4.3.2 Details of methodologies used, observations, and evidence gathered.

4.4.3.3 Link to specific Higg FEM question or guidance criteria

4.4.3.4 An Example of Verifier Comments are provided in the Table below:

Table 3 Verifier Comments Example

Question	Has your facility reduced water withdrawal for this source in the last calendar year?
Higg FEM Self-Assessment Response	Yes
Verification Selection	Inaccurate
Corrected Response	No
Verification Comment Examples	
Poor Example	The facility did not reduce water use.
Good Example	Based on a review of municipal water tracking records and dialogue with the facility’s environmental manager, the facility did not track normalized water use or the impacts on water use from production output variation in the previous calendar year which did not allow for an appropriate comparison of the water consumption data to demonstrate actual water use reductions.

4.5 VERIFYING QUANTITATIVE METRICS IN THE HIGG FEM

4.5.1 Quantitative metrics are quantitative (numerical) values input in the Higg FEM (e.g., production volume, energy and water use quantities, wastewater discharge quantities, waste generation quantities, baseline and improvement quantities, etc.)

4.5.2 The accuracy of quantitative metric data shall be verified in accordance with the Higg FEM Guidance to ensure the reported values are accurate and verified against sufficient supporting evidence.

4.5.3 At least one (1) member of the Verification team shall be designated as the Quantitative Metrics Verifier who is responsible for ensuring the accuracy of quantitative data in the Higg vFEM.

4.5.3.1 The Quantitative Metrics Verifier shall be listed on the 'Verification Details' page of the Higg vFEM and the Quantitative Metrics Verifier shall complete the relevant Quantitative Metrics Verification questions.

4.5.3.2 If the Verification Team consists of only one (1) Verifier, the Lead Verifier shall also be listed as the Quantitative Metris Verifier.

4.5.4 Review of quantitative metrics data shall include:

4.5.4.1 Review of source data (e.g., utility invoices, on-site meters, metering logs, etc.) against aggregated totals to ensure accuracy.

4.5.4.1.1 Quantitative Metrics Verifiers shall request and review copies of all source data from the facility.

4.5.4.1.2 Source data for each data collection period (e.g., month, week, day) shall be reviewed against the facility's tracking records and reported totals in the Higg FEM to verify the accuracy of reported data.

4.5.4.2 Comparison of the current year with historical data. Any significant changes (e.g., an increase or decrease of over 10%) or other data anomalies should be attributable to known changes at the facility. If not, further investigation should be conducted to verify data accuracy.

4.5.4.3 Review of the reported unit(s) of measure and verify any unit conversions from source data to reported data are accurate.

4.5.4.4 Review of any estimation methodologies/calculations used to ensure accuracy.

4.5.4.5 Review of the data collection management systems, processes, and data sources (e.g., data collection procedures, invoices, on-site meters, metering logs, etc.)

4.5.4.6 Review of the processes and tools used to collect, track, and aggregate data (e.g., spreadsheets calculations, unit conversions, etc.) to ensure automated calculations/formulas are correct.

4.6 VERIFYING QUESTIONS THAT ARE UNLOCKED DURING VERIFICATION

4.6.1 If unanswered questions (main question or sub-questions) are unlocked during the Verification, due to a change in applicability questions or level achievement, the Verifier shall:

4.6.1.1 Select the verification response of "No Response."

4.6.1.2 Update the facility response(s) to the extent possible.

4.6.1.2.1 If there are questions that cannot be answered (for example Level 2 and 3 questions in the Chemicals Management section are unlocked and the verification is being conducted by generalist verifier), the verification response should be “No Response” and the facility responses should be left blank.

4.6.1.2.2 For FEM2023, Level 2 and 3 Chemicals Management questions will not be included in Core Verification

4.6.1.2.3 If a facility response is required to reach 100% verification completion percentage, the Verifier shall enter the ‘Negative’ response (e.g., No).

4.6.1.3 In all cases, appropriate Verifier Comments must be provided to describe the situation.

4.7 REPORTING

4.7.1 The Verifier shall complete the Higg vFEM module on Worldly in accordance with the requirements set forth in this protocol.

4.7.2 Onsite and Offsite Verification results must be input into the Worldly platform within 14 business days of completing the Verification process.

4.7.2.1 This means all verification selections, corrected responses (where required), and verifier comments must be input into Higg vFEM and the module must be placed in Verification Complete (VRC) status to initiate the facility’s review process.

4.7.2.2 If a facility places the Higg vFEM into Verification Being Edited (VRE) status for the Verifier to make revisions, the Verifier must consult with the facility as required to address and resolve edits and convert the report back to VRC status within 7 business days of the module being place into VRE status.

4.8 INTERNAL QUALITY ASSURANCE

4.8.1 The accuracy of all Verification Selections, Higg FEM response and quantitative data, and Verifier Comments in a Verified Higg FEM are the responsibility of the Lead Verifier and Verifier Body.

4.8.2 Before submitting the verified assessment report for facility review, the Verifier Body shall conduct an internal quality check. Minimally, the review shall ensure:

4.8.2.1 Correct use of spelling and grammar.

4.8.2.2 Verification entries, including photos, do not contain employee names or any personally identifiable information for reasons of confidentiality and privacy.

4.8.2.3 Evidentiary Documents are attached, as applicable, where the Verification Selection is “Inaccurate”, and the Verifier has a copy or example of evidence.

4.8.2.4 All quantitative data reported in the Higg FEM was accurately verified in accordance with the Higg FEM Guidance - "How this will be Verified" requirements (e.g., production volume, energy, water, wastewater, air, and waste source, baseline, target, and improvement data).

4.8.1.4.1 The designated Quantitative Metrics Verifier shall be responsible for the accuracy of all quantitative data reported in the Higg FEM and shall complete the relevant Quantitative Metrics questions on the 'Verification Details' page of the Higg vFEM.

4.8.2.5 If any Higg FEM questions response is inaccurate, "Inaccurate" must be selected as the Verification Selection and a corrected response is provided.

4.8.2.6 When applicable, any time the Verifier Comments field is completed, a thorough response must be provided that supports the verification selection and data narrative.

4.9 FACILITY REVIEW

4.9.1 Once the verification is completed, the facility shall be notified via Worldly and shall access the verified assessment report online for review (status is VRC). The facility should do one of the following:

4.9.1.1 Reach out to the VB/Lead Verifier for clarifications, concerns, questions about the verified assessment report, especially with regards to question related issues and Verifier Comments.

4.9.1.1.1 A Verification can be placed in VRE status to make agreed upon edits. Once a Verifier has completed any agreed upon edits, the status is returned to VRC. From VRC status, the module can be changed back to VRE (for additional edits) or to VRF/VRD as noted below.

4.9.1.1.2 Should the facility and Lead Verifier/ Verifier Body agree to change the verified assessment report at this stage of review (VRE), the Verifier can access the report again through the Worldly platform and make the agreed changes. Any changes a Verifier makes to the report after completion/ during this facility review phase must be agreed upon by the facility, and the facility shall be informed about the changes, so they can go back to the review (the changes) and accept the verification.

4.9.1.2 Dispute the verified assessment report due to Verifiers not following Verification Protocol or complaints about Verifier Body verification team conduct. This changes the assessment status from "Verification Completed" to "Verification Disputed" (VRD). When doing this, the facility shall provide more detailed information about the Dispute, so the VPM is well informed.

4.9.1.3 Accept the verified assessment report, which changes the assessment status from "Verification Completed" to "Verification Finalized" (VRF). Once finalized, facilities need to post the verified module so that their connections can view the verified scores (if applicable) and detailed results.

4.9.1.1.3 Once a module is placed in VRF status, no further edits can be made.

4.10 Quality Assurance / Integrity

4.10.1 The VPM can choose to conduct any type of quality assurance procedures for any verified assessment as outlined in the *SAC Higg FEM Verification Quality Assurance Manual.*

4.10.2 QA activities conducted by the VPM can result in invalidations of the verified assessment report, which means that the report can no longer be shared with end users and the full report is no longer available on Worldly.

5 Verification Activities

5.1 Opening Meeting

5.1.1 All Verifications shall begin with an Opening Meeting.

5.1.1.1 Opening meeting attendees should include facility management, environmental manager(s) and other key staff members.

5.1.1.2 The Opening Meeting should include discussion on the items listed in the table below:

Table 4 Opening Meeting Agenda Items

Opening Meeting Agenda

● Introductions from both the verification team and facility management personnel.
● Discussion of the objectives of Higg verification, including:
  ○ A reminder that the Higg verification is not an audit, but rather it serves to verify the self-assessment submitted by the Facility.
  ○ An explanation that Higg is not a pass-or-fail assessment/audit.
  ○ A discussion of scoring, that there is no 'minimum score' in Higg. Instead, Higg focuses on performance monitoring of critical and minimum legal and industry standards and supporting facility in its continuous improvement.
  ○ An overview of Higg FEM Core Verification (for FEM2023).
● A clarification of the scope of the Verification and criteria to be checked.
● Discussion on the independence of the assessment team and the need for openness, transparency and ethics, including a review of the conflict of interest in that no Trainers or Consultants can act as Verifiers.
● An agreement on how conflicts will be handled.
● A review of the confidentiality associated with employee dialogues.
● A review of the confidentiality associated with verification results.
● Communication of criteria and reporting methodology.
● An explanation of the next steps, including outcome of the verification

5.2 DIALOGUE WITH FACILITY STAFF

5.2.1 Dialogue shall be undertaken with the Facility Environmental Managers to establish the level of awareness of environmental issues across the facility and to help identify any issues or good practices on-site.

5.2.2 The Verifier shall also engage in dialogue with managers and with key staff who have specific roles and responsibilities related to managing environmental aspects or environmental management systems.

5.2.3 Verifiers should talk to a number of relevant workers, taking into account:

5.2.3.1.1 Different departments, including workers associated with managing waste, undertaking environmental monitoring as well as production workers.

5.2.3.1.2 Health & safety representatives/personnel, where appropriate

5.2.3.1.3 Environmental committee representative(s), if applicable

5.2.3.1.4 New employees/trainees (to evaluate training quality)

5.2.3.1.5 Employees from different shifts

5.2.4 For offsite Verification, dialogue shall be undertaken via a teleconference or web-based call.

5.2.5 Verifiers shall ensure that problems raised by workers are discussed with management in a non-attributable way. Verifiers must ensure that the comments they report cannot be traced back to an individual worker.

5.2.6 Verifiers should leave a contact telephone number, preferably their mobile number and their local office phone number, with all workers the Verifier discussed with, in order for workers to alert the Verifier if there are reprisals or intimidation.

5.2.7 The Verifiers should keep a confidential note of who is being interviewed.

5.3 SITE OBSERVATIONS

5.3.1 All Verifications shall include site observations to evaluate physical conditions and implemented practices in all areas of the facility to establish evidence that activities are consistent with what the factory has presented in their Higg FEM self-assessment.

5.3.2 Verifiers shall observe all relevant areas at the facility as defined by the facility's Higg FEM self-assessment and the applicable Higg FEM guidance.

5.3.3 For Offsite Verification, Verifiers shall request and review appropriate photos or short video clips (hereafter referred to as 'photos') of all applicable facility areas and processes.

5.3.4 Areas to be observed include, but are not limited to, the items listed in the table below:

Table 5 Observation Areas

Observation Areas

● Site perimeter
● Facility premises and surroundings
● Production line(s) / areas
● Raw material/chemical, hazardous & general waste storage areas and/or warehouse
● Bulk storage areas
● Utility Rooms/Areas
  ○ Boiler rooms
  ○ Compressor houses
  ○ Generator rooms
● Wastewater treatment plant including the inlet, treatment processes, and final discharge location (outlet)
● Exhaust vents, stacks, or other air discharge points
● All locked rooms/areas
● Chemical operations area e.g., dyeing, washing, printing, spraying, or other chemical application
● Chemical mixing and dosing area at production areas, and other locations where chemicals are being used, e.g., wastewater treatment plant
● Temporary storage areas for chemicals
● Safety equipment and PPEs storage area
● Any other areas or processes that may result in environmental impacts.

5.4 PHOTOGRAPHS

5.4.1 Verifiers shall take photographs during the Verification to support onsite observations.

5.4.2 Photographs shall only be taken with the expressed permission of the Facility as they may contain or reveal confidential information.

5.4.3 Photos should include, but are not limited to, the items listed in the table below:

Table 6 Areas to Photograph

Photographs
● Outside general overview ● Facility premises and surroundings ● Inside general overview ● General photos of production line(s) ● Key activities and processes that have potential environmental impact, if present, such as: ○ Waste handling and storage area(s)

- Hazardous substance storage area(s)
- Hazardous materials transfer area(s)
- Bulk storage tanks and secondary containment area(s)
- Wastewater treatment area / plant, including discharge point(s)
- Water Discharge Point(s)
- Raw material/chemical and waste storage warehouse/area(s)
- Boiler room(s)
- Exhaust vents, stacks, or other air discharge points
- Waste collection area(s), both Hazardous and Non-hazardous
- Compressor house(s)
- Power generator room(s) /area(s)

- Area(s) of potential impact to soil and/or groundwater, including stained soil and/or distressed vegetation
- Abatement equipment
- Good practices

5.4.4 For Offsite Verification photos shall meet the following requirements:

5.4.4.1 Accurately show the common practices, actions, and process that are occurring at the factory (no 'staged' photos)

5.4.4.2 Be recently taken (generally within 2 weeks of the Verification start date)

5.4.4.3 Be clearly viewable (proper lighting, proper camera angles, etc.)

5.4.4.4 Be provided in a manner that the Verifier can view (using common technology and in a commonly used format, such as .jpg or .pdf)

5.4.4.5 If appropriate, the photos should be labeled or explained to help the Verifier understand the photo, or context to the photo.

5.4.5 The Verifier shall not use or show the Photos to anyone other than for the purposes of completing the Verification.

5.4.6 The Facility may request or require that the Verifier delete or destroy the photos when the Verification is complete.

5.5 Closing Meeting

5.5.1 All Verifications shall end with a Closing Meeting.

5.5.1.1 Closing meeting attendees should include facility management, environmental manager(s) and other key staff members.

5.5.1.2 The Closing Meeting should include discussion on the items listed in the table below:

Closing Meeting Agenda
• A review of the Verification activities that took place. • A Comment on staff cooperation (or lack thereof) • Overall evaluation and/or strengths of the facility (if any) • A summary of the areas of inconsistencies between the self-assessed and verified results • A reminder of the confidentiality of the results • Notification to the facility that Verification results will be completed on Worldly and that the factory can review and post it for benchmarking or sharing, if the factory choses, on Worldly • The process to request edits from the Verifier/VB through the VRE process. • Answer questions from the Facility • A show of appreciated for the facility's support during the Verification

6 Verification Records

6.1.1 The Verifier Body must keep all documents and evidence from the Verification through the entire verification process, including through any quality review activities that may take place, to justify the services performed and quality assessment processes.

6.1.1.1 At minimum, documentation shall be retained in accordance with the VB's internal documentation retention policy or at the specified duration in any contractual agreements with the facility, whichever is longer.

7 Related Documents

Higg FEM How to Higg Guidance

Higg FEM Verifier Body Program Requirements

SAC Higg FEM Verification Quality Assurance Manual

Verifier Code of Professional Conduct

Higg FEM Verification Complaint Form

8 DOCUMENT CHANGE LOG

Date	Section	Summary of Changes

2021-06-21	All	• On-site and Offsite Protocols combined into single document.
		• Incorporated the following Guidance/ Procedures
		  ○ Guidance for Determining Person-Days for Higg Facility Environment Module (Higg FEM) Verification
		  ○ Higg Verification Introduction (VPM-001)

2021-10-05 FEMVP2021111.2	Definitions; New Section - 3.3; *Appendix A Person-Day Guidance*	• Added content on Facility Foundations
	New Section - 4.1	• Added requirements for pre-verification communications with facilities.
	Related Documents	• Added links to Higg FEM Verification Complaints Form.
2022-04-28 FEMVP2022041.3	Definitions; Table 2 (1.5.1); New Section – 4.5; *Verifying Quantitative Metrics in the Higg FEM*; Added 2.3.2.2; Added 4.8.4.1	• Added definition/responsibilities of Quantitative Metrics Verifier and requirements for the Verification of quantitative metrics.
2023-10-20 FEMVP2023101.4	All	• Changed references to Higg.org to Worldly
	Section 1.3	• Added definitions for Core Verification, Foundational Environmental Performance and Essential Quantitative Metrics
	Section 2.2	• Updated scenarios where a generalist can be used to Verify Level 2 and 3 Chemicals questions.
	Section 3.2	• Updated guidance for when individual FEMs are required.
	Section 3.3	• Added content on Higg FEM Core Verification.
	Section 4.1	• Added requirement for Quantitative Metrics Verifiers to review quantitative data and supporting evidence prior to the planned verification date.
	Section 4.5	• Clarified requirements for review of source data for quantitative metrics.
	Appendix B	• Added Guidance for Observation of Higg FEM Verifications
	Appendix C	• Added to clarify understanding of core question set

9 APPENDICES

9.1 APPENDIX A - PERSON-DAY GUIDANCE FOR ONSITE VERIFICATION

9.1.1 Introduction

9.1.1.1 Person-days required to complete an on-site Higg FEM Verification will depend on various criteria summarized below. The number of person-days should be determined by taking all the applicable criteria into consideration. This non-prescriptive guidance is aimed to assist a Verifier Body (VB) determine the estimated number of person-days for the purposes of quoting cost (if applicable) and scheduling.

9.1.2 Criteria for Determining Person-days

9.1.2.1 Is this facility a light water user?

9.1.2.1.1 Facilities which are light water users may use water only for drinking and other domestic purposes. They may not have advanced water treatment procedures either.
Maximum number of Person-days recommended for onsite verification: 2

9.1.2.2 Does this facility have an onsite wastewater treatment plant?

9.1.2.2.1 Facilities with onsite process wastewater treatment plants are likely to have a full applicability in the wastewater and chemicals management sections. Some facilities that have a small-scale onsite process wastewater treatment plant may require lesser number of Person-days.
Maximum number of Person-days recommended for onsite verification: 3

9.1.2.3 Does the facility have wet processes and use chemicals onsite?

9.1.2.3.1 Facilities that have wet processes (determined through Site Info and Permits section) like Printing, Dyeing or Laundry will use chemicals onsite. Facilities which have multiple storage and handling locations of chemicals spread across its premises will require more time to assess and verify the Chemicals Management section.
Maximum number of Person-days recommended for onsite verification: 3

9.1.2.4 Has the facility been verified before?

9.1.2.4.1 Facilities which are familiar with the Higg FEM need a verification which suits their needs. Determining the accuracy at Level 2 and 3 questions may require more dialogue with the management and review of documentation. Quantitative metrics should be fully reviewed during each verification as they would change year over year.
Maximum number of Person-days recommended for onsite verification: 2

9.1.2.5 Is a Higg FEM Core or Facility Foundations Verification required?

9.1.2.5.1 Facility Foundations does not include verification of quantitative metrics and is expected to require less time for verification.
Maximum number of Person-days recommended for onsite verification of Facility Foundations: 2

9.1.2.6 Notes

9.1.2.7 One Person-day corresponds to 8-hours working time for 1 Verifier. It excludes lunch breaks and breaks unless required by law in the country of execution of the verification.

9.1.2.8 On-site verification should not be less than 1 person-day.

9.1.2.9 The total number of person-days spent on-site shall not exceed 3.

9.1.2.10 Verification scheduling and preparation, travel time and report writing are not in the scope of this guidance.

9.1.2.11 Verifier should review the facility's profile, self-assessment and relevant documentation prior to the site visit. The verifier should utilize the time onsite to delve into specific questions where more clarification is required.

9.1.2.12 Facilities and VBs should mutually agree upon the number of person-days required.

9.1.2.13 This guidance is subject to updates based on feedback from SAC membership and other Higg FEM program stakeholders.

9.1.3 **Guidance Use Cases**

9.1.3.1 Case 1: Facility A is a cut and sew unit with a capacity of sewing 50,000 pieces per day. It has a washing unit and an effluent treatment plant (with a capacity of treating 1000 litres per day) on the same premises. The facility is a light water user. It will be verified for the first time and has not achieved Level 1 in all sections.
Recommended number of person-days required for onsite verification: 2

9.1.3.2 Case 2: Facility B is a textile mill with spinning, weaving, dyeing and finishing facilities. It is spread over an area of 250,000 square metres, with a zero liquid discharge effluent treatment plant, rainwater harvesting system, rooftop solar panels installed in the same premises. The facility has been completing Higg FEM since 2017 and has undergone brand led capacity building programs on environment management in the past. Facility is a heavy water user and requires verification of quantitative metrics.
Recommended number of person-days required for onsite verification: 3

9.1.3.3 Case 3: Facility C is a standalone screen-printing unit with a screen washing facility. This light water user facility has primary and secondary effluent treatment processes. It is spread over 45,000 square meters. It has been classified as a low environment impact facility by the local pollution control & monitoring agency. It has completed Higg FEM for the first time and has not achieved Level 1 in all sections.
Recommended number of person-days required for onsite verification: 2

9.1.3.4 Case 4: Facility D is a fabric dyeing unit. While reviewing its chemical inventory list, it has been found to use 120 different chemicals. The facility has no on-site treatment of wastewater and wastewater is treated by an off-site Common Effluent Treatment Plant. The facility is a third time Higg FEM user and has implemented several improvement initiatives identified in the previous assessments.
Recommended number of person-days required for onsite verification: 2

9.2 APPENDIX B – HIGG FEM VERIFICATION OBSERVATION GUIDELINES

9.2.1 Introduction

9.2.1.1 If an interested stakeholder that is not representative of a Verifier Body (e.g., brand, non-governmental organization, etc.) wishes to observe a scheduled verification, they must inform and obtain approval from the facility and VB to attend the verification. The observer(s) must confirm this directly with the facility and VB.

9.2.1.2 Once a facility has approved of the observation the observer shall follow the guidelines below.

9.2.1.3 Higg FEM Observations are not considered formal SAC/VPM quality assurance (QA) activities conducted as part of the FEM QA Program, however any reported verification quality or other concerns will be investigated by the SAC/VPM.

9.2.1.4 Higg FEM Observations shall not impact the verification process at the facility or verification outcomes.

9.2.2 Observation Guidelines

9.2.2.1 During the on-site verification observation, the observer(s) may periodically ask the Verifier questions for clarification, but this should not interfere with the Verification process. The observers must NOT:

- *Actively participate in the verification.*
- *Provide guidance or recommendations to the Verifier or facility.*
- *Ask the facility questions about their self-assessment data.*
- *Ask the facility questions about their compliance with Standards (e.g., the brand's Code of Conduct/requirements).*
- *Interpret questions in the FEM data collection tool or FEM Content Guidance.*
- *Join private worker interviews.*
- *Observers must also follow any facility and/or Verifier requirements in addition to those listed above.*

9.2.2.2 The presence of observers during the verification has the potential to impact the impartiality of the verification. Observers should look for any indication that their presence is having an impact, such as the facility trying to persuade a Verifier to enter specific data and take any necessary measures to avoid this.

9.2.2.3 If at any time the Verifier feels the presence of the observer is impeding their ability to conduct an impartial verification, the Verifier may ask the observer to leave. This should be reported to the VPM at SAC@Sumerra.com.

9.2.3 Observation Feedback

9.2.3.1 The VPM is interested in receiving continued feedback on Verification activities. Observer(s) can provide feedback on the verification quality or any other observed concerns to the VPM at SAC@Sumerra.com.

9.2.3.2 Any input observers provide will not impact Verifier or VB scoring but will be used to make improvements to the verification process.

9.2.3.3 **Ethics, Integrity, and Impartiality**

9.2.3.4 All observers must follow Higg FEM Verifier Body Requirements as well as their own professional code of conduct related to ethics, integrity, and impartiality.

9.3 APPENDIX C – HIGG FEM CORE VERIFICATION QUESTION SET

Understanding the Higg FEM Core Verification Question Set

The figure below shows how the Higg FEM Core Verification question set is structured in relation to the full Higg FEM 4.0 question set.

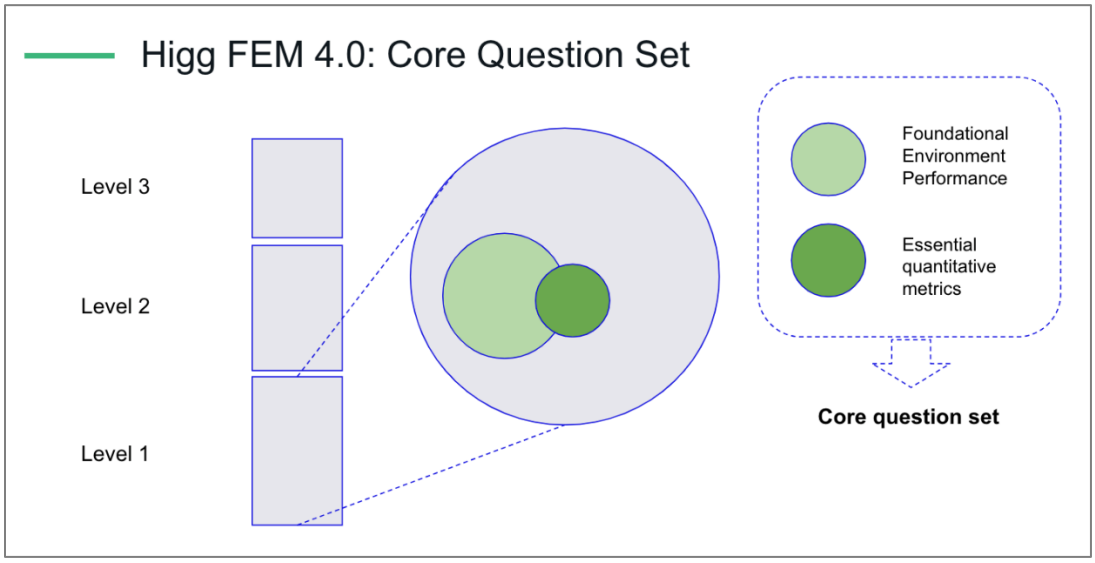


Figure 1: Understanding Higg FEM Core Verification Question Set

Higg FEM Core Verification Question Set

Notes:

- The Higg FEM Core Verification question set includes all sub-questions related to the Higg FEM primary questions listed below.
- (QM) Indicates a question that requires reporting/Verification of Quantitative Metrics if applicable.

FEM Section/ Question	FEM 4.0 Question
Site Information & Permits	
All	All Site Information & Permits Questions apply.
EMS	
Q1	Are one or more employees at your facility responsible for coordinating your facility's environmental management activities?
Q2	Has your facility identified the significant environmental impacts associated with current operations within the factory premises?

Q3	Does your facility have a company environmental policy?
Q5	Does your facility have a mechanism in place to regularly review and monitor environmental permit status and renewal (where appropriate) and ensure compliance?
Q6	Does your facility maintain a documented system to identify, monitor and periodically verify all laws, regulations, standards, codes, and other legislative and regulatory requirements for your significant environmental impacts (in addition to areas that are covered in required permits)?
Q8	Does your facility have documented procedures to enable employees to report on environmental incidents?
Q9	Does your facility have a process and schedule to maintain all equipment?
Q10	Can you please confirm there is no soil and/or groundwater contamination in your facility?
Energy and GHG	
Q1(QM)	Select all sources of energy for your facility (exclude sources used for company owned and controlled vehicles) (inclusive of sub-questions on energy source details)
Q2(QM)	Select all sources of energy/fuel for company owned and controlled vehicles (inclusive of sub-questions on energy source details)
Q3(QM)	Does your facility purchase Energy Attribute Certificates (EACs) (e.g., Renewable Energy Certificates (RECs))?
Q4(QM)	Does your facility purchase Carbon Offsets?
Q5	Does your facility track any of its energy use?
Q6	Does your facility track energy use from each energy source your facility utilizes?
Q7(QM)	Does your facility identify and track separately energy use in domestic vs. production? (inclusive of energy use tracking tables)
Q8(QM)	Does your facility track energy/fuel use from each energy/fuel source of company owned and controlled vehicles that your facility utilize? (inclusive of energy use tracking tables)
Water	
Applicability Questions	All Applicability Questions apply.
Q1	Select all water sources used by your facility
Q2	Does your facility track any of its water use?
Q3	Does your facility track the consumption of water from all of the sources it utilizes?

Q4(QM)	Does the water consumption you track and report include the rejected water quantity from pre-treatment? (inclusive of water use tracking tables)
Q5(QM)	Are you able to identify and track domestic and production water use separately? (inclusive of water use tracking tables)
Q6(QM)	Is there any Legally Mandated Groundwater Abstraction Restrictions in your country?
Q7	Does your facility have a process to monitor the water supply network in your facility for leaks?
Wastewater	
Applicability Questions	All Applicability Questions apply.
Q1(QM)	Does your facility track its wastewater volume? (inclusive of wastewater volume tracking tables)
Q2(QM)	Does your facility monitor the BOD5 Level of your wastewater?
Q3	Does your facility have a mechanism to prevent stormwater from being contaminated before it is discharged into the environment?
Q4	Does your facility maintain a copy of the current contract, permit, agreement or invoices regarding wastewater discharge regulatory compliance requirements for your facility to the offsite wastewater treatment plant?
Q5	Does your facility have a mechanism or process to monitor whether your wastewater treatment plant is functioning as per the design parameters (Volume, Flow Rate, Input /Output Quality)?
Q6	Does your facility have a back-up plan if there is an emergency related to wastewater?
Q7	Can you please confirm that, wastewater generated by the facility is not discharged to the environment through leaking and/or bypassing?
Q9(QM)	Does your facility track its industrial wastewater sludge generated in the reporting year?
Q11	Does your facility have well-marked, designated wastewater sludge storage areas?
Q12	Is industrial wastewater sludge disposed of properly?
Q13	Does your facility maintain manifests or similar documentation of the handling, transportation, processing, and disposal of sludge, accounting for all industrial wastewater sludge generated at the facility?
Q14	Does your facility provide training to all employees whose work involves wastewater sludge handling (such as maintenance and custodial staff)?
Q15	Is domestic wastewater sludge disposed of properly?
Q16	Does your facility manage the residue of the Septic System?

Q17	Have you tested your wastewater against the legal requirements that apply to your facility?
Q18	Are you reporting against any wastewater standard (additional to the legal requirement)?
Air	
Applicability Questions	All Applicability Questions apply.
Q1	Has your facility created an inventory of all point source air emission sources at your facility?
Q3	Is your facility in compliance with all applicable legal requirements relating to air emissions including all permitting, reporting and testing requirements?
Q4	Do you know what refrigerant(s) your facility uses?
Q5	Does your facility have preventative maintenance procedures in place to avoid refrigerant leakage from your equipment?
Q6(QM)	Does your facility track refrigerant usage? (inclusive of refrigerant tracking tables)
Q7	Are you monitoring or reporting against any industry guidelines or tools for air emissions (additional to the legal requirement)?
Waste	
Q1	Which non-hazardous waste streams does your site produce? Select all that apply
Q2	Does your facility track any of its non-hazardous waste streams?
Q3	Does your facility track each non-hazardous waste stream your facility generates?
Q5	Which hazardous waste streams does your site produce? Select all that apply
Q6	Does your facility track any of its hazardous waste streams?
Q7	Does your facility track each hazardous waste stream your facility generates?
Q9	Does your facility both segregate waste (hazardous and non-hazardous) and store these waste separately?
Q10	Does your facility have well-marked, designated hazardous waste storage areas and proper containers for all hazardous waste?
Q11	Does your facility have well-marked, designated non-hazardous waste storage area(s) and containers?
Q12	Does your facility forbid all irresponsible waste disposal actions including open burning, open dumping, burying waste and intentional release into soil and/or water?

Q13	Does your facility provide awareness training to employees regarding segregation of waste?
Q14	Does your facility provide training to all employees whose work involves hazardous waste handling (such as maintenance and custodial staff) within the facility?
Chemicals	
Applicability Questions	All Applicability Questions apply.
Q1	Does your facility have a written Chemical Management System (CMS) policy?
Q2	Have you assigned the responsibility of implementing and maintaining the Chemical Management System (CMS) to a team/staff member?
Q3	Does your facility have a chemical purchasing policy?
Q4	Does your facility keep a Chemical Inventory List (CIL) and the suppliers of each chemical product?
Q5	Does your facility's Chemical Inventory List (CIL) include the following data?
Q6	Does your facility make Safety Data Sheets (SDS) available to employees for all chemicals used?
Q7	Does your facility train all employees who use chemicals on chemical hazards, risk, proper handling, and what to do in case of emergency or spill?
Q8	Does your facility have a chemical spill and emergency response plan that is practiced periodically?
Q9	Does your facility have appropriate and operable protective and safety equipment, as recommended by the Global Harmonization System compliant (or equivalent) Safety Data Sheet, in all areas where chemicals are stored and used?
Q10	Does your facility have chemical hazard signage and safe handling equipment in the areas of the facility where chemicals are used?
Q11	Does your facility select and purchase chemicals based on their hazards and MRSL requirements?
Q12	Does your facility select and purchase chemicals based on their hazards and RSL requirements?
Q14	Does your facility have well marked, designated chemical storage areas?
Q15	Does your facility have well marked sub-storage areas?
Q16	Does your facility train employees responsible for the chemical management system on Restricted Substance Lists (RSLs)?
Q17	Does your facility train employees responsible for the chemical management system on Manufacturing Restricted Substance Lists (MRSLs)?
Q18	Does your facility have an established process to investigate and resolve a potential RSL failure?