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International Bilingual EH&S Audit Protocol

STRATEGIC ENVIRONMENTAL SOLUTIONS

China 2010

### Background

Over the past several years we have witnessed major amendments to China's Environmental, Health, and Safety (EH&S) legislation, standards, and regulations. Essentially, China's regulatory framework is in place and approaching international standards.

Environmental Impact Assessments (EIAs) and the *Three Synchronies Policy* are the primary regulatory instruments used by the State Environmental Protection Administration (SEPA) and local Environmental Protection Bureaus (EPBs) for enforcing environmental regulations and standards, and for requiring pollution control measures for investments and facilities.

Since province-specific requirements are just as important as those issued by SEPA (national), EEl Corporation are creating **12 province/city-specific EH&S audit protocols for China:** (Each include SEPA, Province and City Requirements)

- 1) Beijing City
- 2) Shanghai City
- 3) Tianjin City
- 4) Jiangsu Province (Nanjing, Suzhou, Wuxi)
- 5) Zhejiang Province (Hangzhou, Ningbo)
- 6) Guangdong Province (Guangzhou, Shenzhen)
- 7) Hubei Province (Wuhan)
- 8) Shandong Province (Jinan, Qingdao, Zibo)
- 9) Liaoning Province (Dalian, Shenyang)
- 10) Sichuan (Chengdu, Chongqing, Yibin, Neijiang)
- 11) Jiangxi (Nanchang, Jiujiang)
- 12) Hong Kong (SAR of China, English Only)

It should be NOTED that some regions/cities such as Beijing, Shanghai, Guangdong, Xiamen, etc. have their own wastewater discharge standards and/or air pollutants discharge standards that are stricter than

national standards. Shanghai, Tianjin, Guangdong, and etc. have local Regulations on Safety Production Most regions have their own fire-fighting rules and regulations. Likewise, some of the Provinces have cities that have stricter requirements. Thus, all 3 levels of requirements are provided. As of 2009, the EU requirements such as **RoSH and WEEE requirements have been included.**

In the past, unregulated industrial development has resulted in considerable unrecorded site contamination in China. It is now imperative to conduct a due diligence Environmental Site Assessment and compliance audit at any proposed site, in order to create a baseline profile of environmental conditions prior to the establishment of a proposed facility.

Over the past few years, the Chinese government's attention to safe production and occupational health issues has increased. Most recently, the Ministry of Health also issued 10 regulations and over 500 standards related to the Occupational Disease Prevention and Control Law. The *Safe Production Law* is China's central law for establishing the requirements for workplace safety.

EEl Corporation with our Global Network local auditors in China have prepared these Environmental, Health & Safety audit protocols to assist corporate EH&S managers and supply chain management personnel in the internal auditing process of manufacturing and toll manufacturing facilities in China. They are intended to be used both by corporate EH&S auditors and by the local facilities to manage their self-assessment programs with consistency. To meet both objectives, the audit checklists are in both **Chinese and English**. Since this is an auditing tool against both federal and local

requirements, the regulatory citations at the *lowest level* are included. Additional reference information is provided as reference files pertaining to each audit question. The list of topics and the accompanying list of reference files provide an excellent library of regulatory summaries in itself, outside of strict uses for audits.

### **Protocol Description**

The China EH&S Compliance Audit protocols have been developed to assist clients in understanding the comprehensive regulatory requirements of industrial facility operations in that country. Our product offers the following features:

- Regulatory checklists written in both English and Chinese
- Regulatory citations for each of the relevant checklist questions
- If there is no specific regulatory requirement, “GMP” is used to indicate “good management practice”, as practiced in China
- Readily distinguishable Chinese federal and City/Province-specific requirements
- Sections covering the Chinese Environmental and Occupational Health & Safety regulatory framework, enforcement, and future legislation
- Lists of hazardous and regulated chemicals in China
- Audit checklists developed by experienced auditors which are very “user friendly”. They are not just legal jargon or translations of the regulatory text.

The 2009 audit protocols are divided into five books and cover the following topics:

#### **Book 1: General Section**

Chapter 1 - General Information on China  
Chapter 2 - Environmental Regulatory Framework  
Chapter 3 - Occupational Health & Safety Regulatory Framework  
Chapter 4 - Hazardous Chemicals Lists and Standards at SEPA (National) level

#### **Book 2: National Environmental Topics**

1. Environmental Management Systems
2. General Permitting
3. Air Emissions and Pollution
4. Waste Management and Recycling
5. Water Pollution
6. Water Resources and Drinking Water
7. Chemical Management and Spill Prevention
8. Underground Storage Tanks (UST), Above Ground Storage Tanks (AST) and Other Storage Facilities
9. Soil and Groundwater Preservation
10. Ozone Depleting Substances
11. Transportation and Packaging, Material Safety Data Sheets, and Product Registration
12. Polychlorinated Biphenyls (PCBs)
13. Asbestos
14. GHS & RoHS

#### **Book 3: National Health & Safety Topics**

1. Health & Safety Management Systems
2. Fire Safety
3. Contractor and Construction Safety
4. Noise and Vibration
5. Machine, Equipment, and In-Plant Safety
6. Electrical Safety and Welding
7. Confined Space Entry and Permit Work
8. Industrial Hygiene
9. Medical Surveillance
10. Ergonomics and Material Handling
11. Ventilation
12. Personal Protective Equipment (PPE) and Respiratory Protection

#### **Book 4: Province/City-specific Environmental Topics**

Book 4 has the same topics as Book 2, but is province/city-specific.

#### **Book 5: Province/City-specific Health & Safety Topics**

Book 5 has the same topics as Book 3, but is province/city-specific.