



Understand the situation at hand

ASSESSING YOUR REGULATORY AND OTHER REQUIREMENTS

Assessing your regulatory and other requirements



- Requirements as per ZDHC CMS
- Overall regulatory framework
- Regulatory assessment process
- Establishing an inventory of regulatory and other requirements
- Applicable regulations in your country

ASSESSING YOUR REGULATORY AND OTHER REQUIREMENTS



Source: EHS+

Requirements as per ZDHC

ZDHC CMS reference:

- 2.2.1 - Monitoring regulations and permits
- 2.2.2 - Verification of compliance

Expected deliverables as per ZDHC CMS

- Standard Operating Procedures (SOP) for monitoring regulatory requirements
- Up-to-date inventory of legal requirements permits



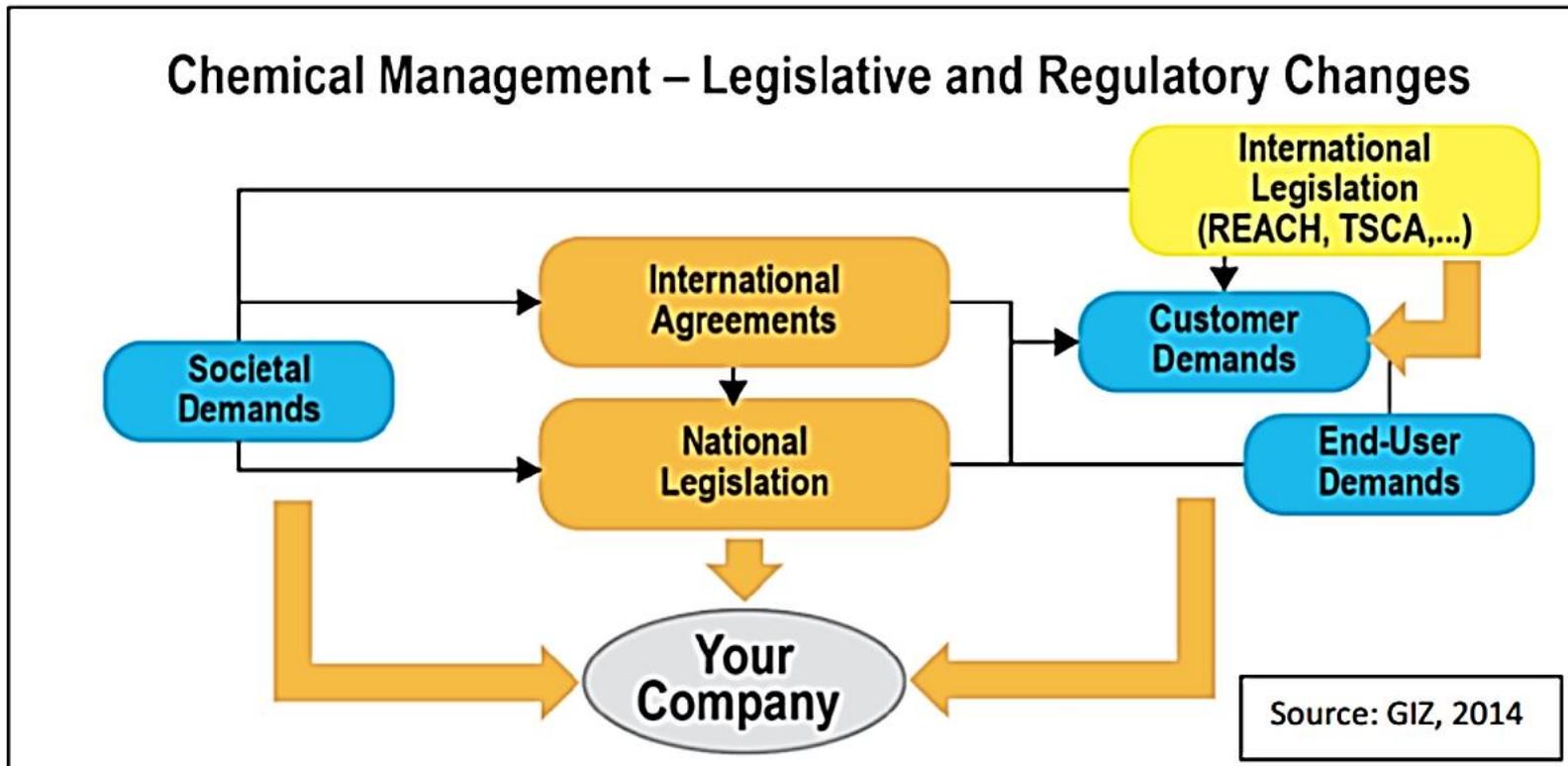
ZDHC CMS Regulatory Assessment

Audit Questions

- Are permits required for the collection, transportation, storage and disposal of all wastes such as hazardous waste and recycled wastes?
- Does the facility have a system of tracking changes in laws and regulations governing environmental management and reporting to management?
- Is there a process for monitoring the validity of the permits required for their facility?



Overall regulatory framework



Overall regulatory framework

Trends relevant for the textile and leather industry

- Key importance of certain enabling conditions including policy environment, market demand and industry pressures
- Regulation and standards in policy domain becoming increasingly stringent in response to growing sustainability imperative
- Life cycle approaches now integrated into regulation – e.g. EU Circular Economy
- Transparency on corporate sustainability performance increasingly mandatory



Compliance benefits

Relevant driving opportunities coming along with ensuring compliance to international standards and industry initiatives:

- Becoming industry leaders
- Accessing new and expanding markets
- Staying ahead of international and local standards and regulation
- Increasing productivity and technical capacity



Regulatory assessment

Access new export markets

“No data, no market” principle

- Requiring registration for substances (in the REACH scope) manufactured, imported or marketed > 1 t/a in the European economic area
- Registrations means submission of registration dossier to ECHA (European Chemical Agency)



Regulatory assessment

Need for maintaining registration dossier, consisting of

- **Technical dossier** (including e.g. classification and labelling of the substance, guidance on safe use of the substance, data on physico-chemistry, toxicity and eco-toxicity of the substance)
- **Chemical safety report** (assessment of the physicochemical hazards, hazards for human health and environment, exposure assessment and risk characterization)



Regulatory assessment

Staying ahead of international and local standards and regulation (supply chain and non-supply chain driven)

For example:

- EU REACH, ZDHC/Detox pushing for substitution of most dangerous chemicals when suitable alternatives have been identified
- Industry initiative (e.g. ZDHC) working towards regulation of chemical thresholds, which in many cases are more stringent than required by legal regulations or industry standards
- ZDHC helping industry by providing guidance and support to undertake regulatory assessment and establish monitoring system for regulations and permits

Regulatory assessment process

Process to identify and monitor regulations and permits

- State all applicable jurisdictions, regulations and permits necessary to operate (city, state and country level)
- Assign regulatory identification to a person or a team (initial and ongoing)
- Describe communication processes in case of regulatory changes and/or when permits expire, operational limits change etc.



Maintaining inventory of regulatory requirements

Example



No.	Title	Descriptions	Applicable to		Area of Applicability	Licenses / Compliance Records Required	Reviewed
			Company	Contract or / Supplier			
xxx	Environment Conservation Act 1996 (section xx)	Provides for the control of air pollution from stationary sources and motor vehicles. Also enables promulgation of regulations	✓	✓	Air emissions from plant (e.g. cranes, generators, excavators, vehicles), and dust	xxx	
Xx	Environment Conservation Act 1996 (section xx)	Provides for the control of water pollution, including reference to specific discharge standards	✓		Discharge of waste water from production and other sources in the company	xxx	
Xxx	Sludge ordinance	Provides for the control of management and disposal of treatment sludge	✓		Disposal of treatment sludge from ETP	xxxxx	

Regulatory assessment

Increasing productivity and technical capacity

Setting up an internal chemical management programme helps companies to implement standards, enhance safety and ensure compliance

For compliant companies, value comes from:

- Reduced hazardous waste amounts
- Increased material or production efficiency
- Improved health and safety conditions
- Reduced environmental impacts



Regulatory assessment

For discussion

- Which are the regulatory issues (legal and other) relevant for textile and leather industry in your country?
- Which are other requirements your company subscribes to? (Code of Conducts by association/buyers, certification systems, voluntary standards)



Regulatory framework in your country

- insert list of relevant legislation as applicable in company/ies` country



Regulatory assessment

Summary

By being informed of legislative developments in your domestic and export markets, you can provide your potential clients with a competitive advantage for being ahead of regulations.

