



First American Corporation (Pvt.) Ltd.
Report from Higg FEM Verification Off-site
September 4th & 5th, 2020

September 2020
Verifier: Farouk BOUJEMAA

Leadership & Sustainability

Agenda

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- Project Scope & Objectives
- Findings
- Next Steps and remaining questions



Project Scope & Objectives

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Objectives

- ✓ Validation of HIGG Facility Environmental Module 3.0
- ✓ Identifying environmental impacts and areas for improvement
- Off-site assessment took place at First American Corporation (Pvt.) Ltd, Main Daska Road, Guinke, Sialkot - 51310 – Pakistan on September, 4th & 5th 2020.
- Verifier: Farouk BOUJEMAA, Leadership & Sustainability



vFEM 3.0 - Findings

Leadership & Sustainability

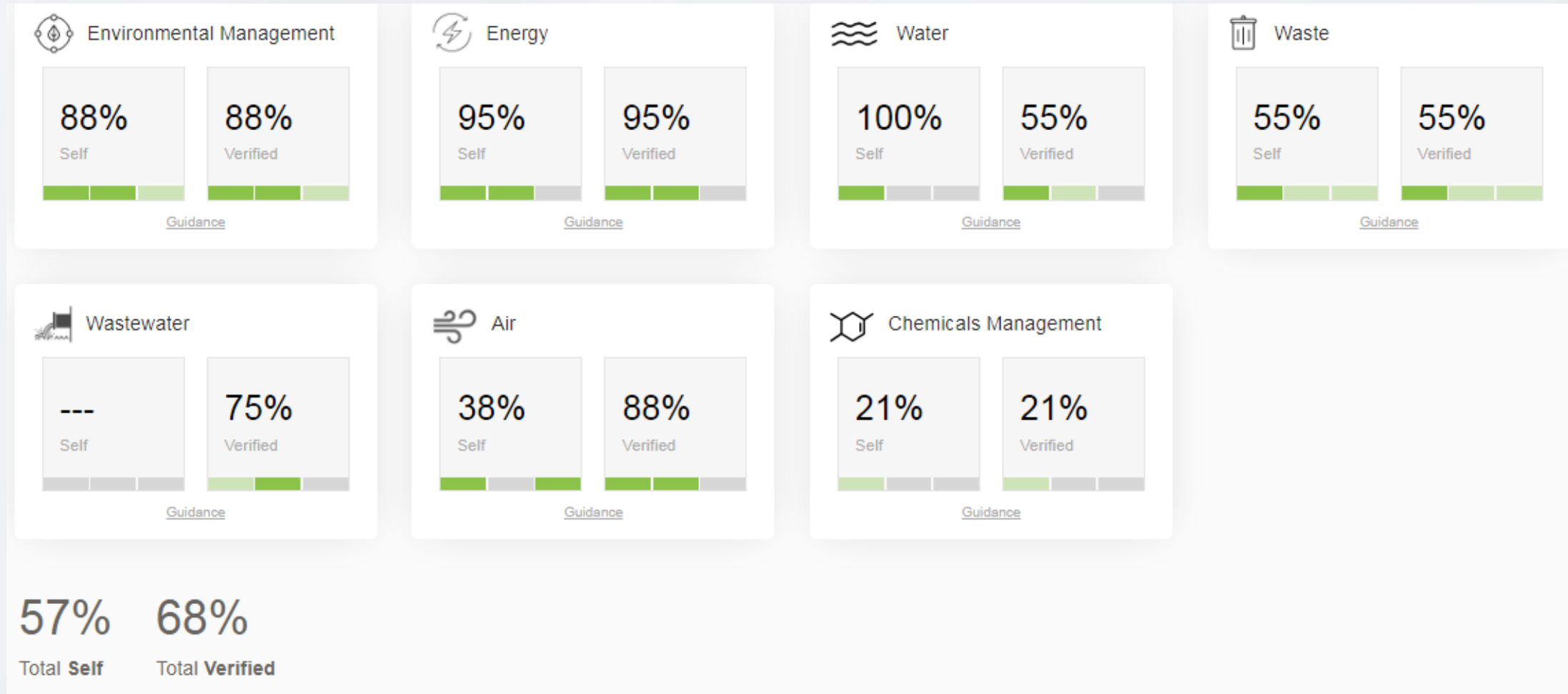
vFEM 3.0 – Findings - overall

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- The facility is clean, organized and well maintained.
- A very engaged and competent compliance team
- An environmental management strategy that guides long term decisions making is set up
- A rigorous follow-up is set up in particular for the monitoring of water and energy consumption data
- We recommend the facility to Set an action plan with specific actions and strategies to achieve waste reduction targets
- Goalsetting could be more clear and elaborate
- It is recommended to pay more attention in the self assessment and to upload the appropriate documents
- It may be helpful to study the [how to higg](#) guidance more in detail in order to ensure that all requirements are met
- The uploaded documents should be specific to the actual question and detailed enough to show the response to the actual questions
- On the next slide the overview of self-assessment and verified scores are given

vFEM 3.0 – preliminary Scores

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vFEM 3.0 – Findings. Site information

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- The facility has a valid business license from Environment Protection Agency (EPA)-Punjab.
- The facility did not receive any government-issued environmental violation records for this reporting year.
- No specific environmental permit required.

ENVIRONMENT PROTECTION DEPARTMENT
Government of the Punjab
National Hockey Stadium, Lahore.

NO. DD(ELA)/EPA/F-928(IEE)/2015/ 699.
Dated: 3 /08/ 2017

To: ✓
Malik Abdul Ghafoor,
R/o House No. 119, Quaid-e-Azam Road,
Sialkot.

Subject: **DECISION OF EPA PUNJAB REGARDING PROJECT "CONSTRUCTION OF GARMENTS STITCHING UNIT BY FIRST AMERICAN CORPORATION, DASKA ROAD, GHUJENKEY, SIALKOT"**

1. Description of Project: Construction of Garment Stitching Unit.
2. Location of Project: Daska Road, Ghuienkey, Sialkot.
3. Date of filing of IEE: 16.10.2015.

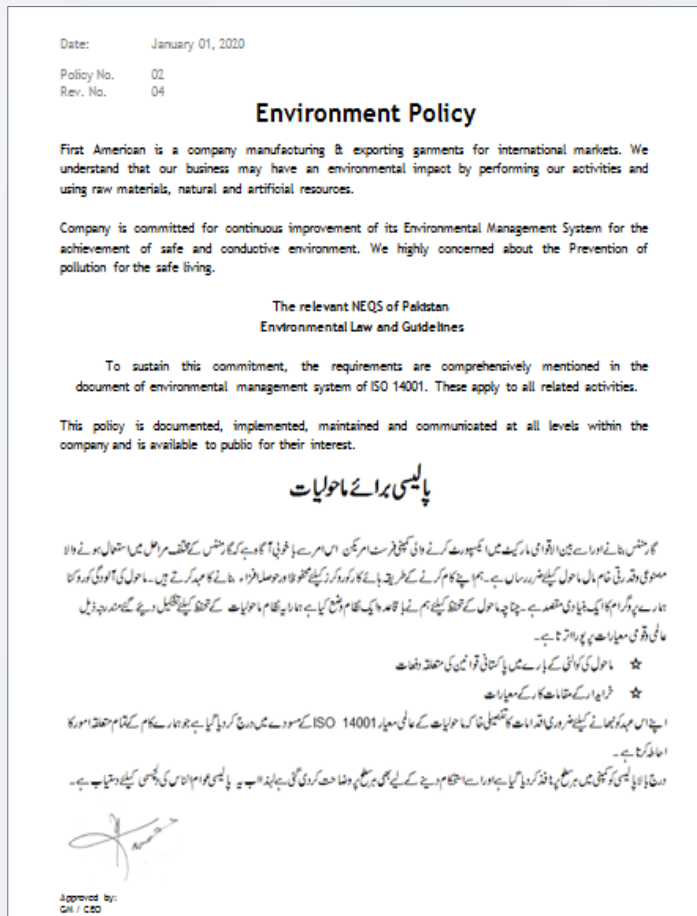
4. EPA Punjab has reviewed the Initial Environmental Examination Report (IEE) and considered Site Inspection Report received from Deputy Director (Field), Sialkot vide letter No. 98/DOE/SLK dated 04.02.2016. EPA Punjab has also considered the recommendations of Committee of Experts (Meeting dated 19.07.2017), recommendations of Committee of Directors (Meeting dated 21.07.2017) and other relevant record of the project / case to take its decision.

5. Environmental Protection Agency, Punjab accords Environmental Approval for construction of your aforesaid project subject to the following conditions:

- i. The proponent shall ensure compliance of Punjab Environmental Quality Standards (PEQS) for liquid and gaseous wastes.
- ii. Mitigation measures suggested in the IEE Report and Environmental Management Plan (EMP) shall be adhered to minimize any negative impacts on soil, ground water, air and biological resources of the project area.
- iii. Monitoring shall be carried out during the entire period of the project activities. Monitoring reports of the whole operation shall be submitted to EPA Field Office on quarterly basis.
- iv. The proponent shall dispose off solid waste in a proper scientific way in consultation with District Government.
- v. The proponent shall plant at least 1000 trees of minimum height 7-8 feet especially of indigenous species in consultation with EPA Field office. The proponent shall also take measures for the protection and maintenance of these trees and maintain their proper record for verification by EPA.
- vi. The proponent shall ensure that strict and efficient health and safety measures are in place for protection of workers backed by a comprehensive emergency response system.
- vii. The proponent will install generator (if required) by adopting sound proofing techniques i.e. by installation of silencer and smoke arrestor / scrubber on stack / chimney.
- viii. The proponent shall do proper landscaping after completion of the project.
- ix. The proponent shall follow building by laws and the construction plan approved by the competent authority/TMA.
- x. The proponent shall obtain NOC / clearance from all other concerned departments including TMA before commencement of work.
- xi. This approval can be withdrawn at anytime without any prior notice if deemed necessary in the public / national interest.

P.T.O.

- The facility has an environmental strategy that guides long-term decision-making on environmental management.
- An environmental analysis containing significant aspects and impacts associated with current operations within the factory premises has been prepared.
- The facility has an internal system to review and monitor environmental permit status and renewal and ensure compliance.
- The facility is promoting awareness of environmental strategy to employees via trainings and internal communication.
- The facility is engaging in environmental improvement in its local context.
- We recommend the facility to work with its upstream suppliers on environmental performance using the Higg Index.



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- [illegible]





- Reached Level 1: 55%
- The facility is tracking groundwater consumption.
- The facility is setting baseline for water use.
- A water assessment has been carried out.
- The facility has targets for reducing water use and sets an implementation plan to achieve targets.
- The facility has improved water consumption compared with its baseline in the last calendar year.
- The facility has not implemented a water balance.
- We recommend the facility to implement a water balance or another analysis to evaluate the traceability of water intake vs. usage) and output.

vFEM 3.0 – Findings. Wastewater

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- Reached Level 1: 75%
- The facility does not generate industrial wastewater.
- The facility is tracking domestic wastewater.
- Domestic wastewater is treated offsite.



Report No: 27322-19

Test Results:

Waste Water Analysis:

Sr.#	Parameter	Method	Unit	MDL	PEQS Limits	Concentration
1	pH Value	APHA 4500 H ⁺ -B	-	-	6-9	8.33
2	Total Dissolved Solids (TDS)	APHA 2540 C	mg/L	5.0	3500	901
3	Sulphate	APHA 4500-SO ₄ ²⁻ E	mg/L	5.0	600	59
4	Chloride	APHA 4500-Cl B Argentometric	mg/L	1.0	1000	92.5
5	Sulfide	APHA 4500-S ²⁻ D	mg/L	0.002	1.0	0.5
6	Chemical Oxygen Demand (COD)	APHA 5220 D	mg/L	5.0	150	125
7	Biochemical Oxygen Demand (BOD ₅)	APHA 5210 B	mg/L	2.0	80	76.3
8	Phenolic Compound	APHA 5530 D	mg/L	0.05	0.1	N.D
9	Total suspended Solids (TSS)	APHA 2540 D	mg/L	1.0	200	112
10	Chromium (Cr)	APHA 3111 / 3120 B	mg/L	0.01	1.0	N.D
11	Iron (Fe)	APHA 3111 / 3120 B	mg/L	0.1	8.0	1.4
12	Chromium (VI)	ISO 17075	mg/L	N.S	N.S	N.D

Note:

PEQS = Punjab Environmental Quality Standards
APHA = American Public Health Association
N.S = Not specified
N.D = Not Detected
mg/L = milligram per liter
MDL = Method Detection Limit

----- END OF REPORT -----

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347-G, Quaid-e-Azam Industrial Estate, Kot Lakhpal, Lahore-54500, Pakistan.
Tel: (+92-42) 111 796 001 Fax: (+92-42) 3515 4555 Website: www.ttilabs.net

vFEM 3.0 – Findings. Air emissions

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- Reached Level 2: 88%

- The facility does not have any air emissions from facility operations that are not regulated by a permit or that are regulated by a permit but not in compliance.
- The facility did not add additional refrigerants to any existing equipment during this reporting year.
- The facility has gone beyond permit requirements to achieve **aspirational** level of air performance.
- The facility does not have a process for implementing modernized equipment to reduce or eliminate air emissions and indoor air quality issues.
- We recommend the facility to set up a process for implementing modernized equipment to reduce or eliminate air emissions and indoor air quality issues.

tti **TEST REPORT**
Report No: 27590-18

Stack Emissions Analysis

Customer Name: First American Corporation Address: Main Daska Road, Sukkot - Pakistan.
Contact Person: Mr. Sultan Mahmood Fuel: Natural Gas
Source: Boiler
Monitoring Date: 12-12-2018 Report Issue Date: 13-12-2018

Results are as under

Sr. #	Parameter	Unit	Results	PEQS
1	Oxygen (O ₂)	%	9.8	N.S.
2	Carbon Dioxide (CO ₂)	%	11.90	N.S.
3	Carbon Monoxide (CO)	mg/Nm ³	88	800
4	Nitrogen Dioxide (NO ₂)	mg/Nm ³	5.1	N.S.
5	Nitric Oxide (NO)	mg/Nm ³	9.2	N.S.
6	Oxides of Nitrogen (NO _x)	mg/Nm ³	14.7	800
7	Sulfur Dioxide (SO ₂)	mg/Nm ³	19.0	1700
8	Net Efficiency	%	85.1	-
9	Gross Efficiency	%	81.2	-
10	Ambient Temperature	°C	26.7	-
11	Final Temperature	°C	277.9	-

PEQS = Punjab Environmental Quality Standards
N.S. = No Standard

Signed on the behalf of:
TTi Testing Laboratories

Ali Aslam
G. M. Operations

TTi Testing Laboratories
347 G. Quaid-e-Azam Industrial Estate, 1st Lakhna, Lahore-6800, Pakistan.
Tel: (042-62) 711 700-001 Fax: (042-62) 2015 4000 Website: www.tti-lab.com

vFEM 3.0 – Findings. Waste

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- Reached Level 1: 55%
- The facility is tracking all hazardous and non hazardous streams.
- The facility has well-marked, designated hazardous and non hazardous waste storage areas.
- The facility provides trainings to all employees whose work involves hazardous waste handling
- The facility has set baselines for all waste streams.
- The facility did not set baselines for all waste disposal methods for its overall waste.
- We recommend the facility to set baselines for all waste disposal methods for its overall waste.
- The facility sets formal targets to reduce waste quantities.



vFEM 3.0 – Findings. Waste

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- Reached Level 1: 55%
- The facility does not validate the final disposal and treatment of all hazardous wastes
- We recommend the facility to validate the final disposal and treatment of all hazardous wastes
- The facility has not reduced waste quantity or improved type of treatment in this reporting year, compared with the established baseline.
- We recommend the facility to set an action plan to reduce waste quantity and to improve type of treatment.
- The facility has not diverted at least 90 percent of all discarded materials from landfills, incinerators and the environment.
- We recommend the facility to divert at least 90 percent of all discarded materials from landfills, incinerators and the environment.





- Level 1 Not Reached: 21%
- The facility keeps an inventory of chemicals used and the suppliers of each chemical product.
- The facility trains all employees responsible for the chemical management system on chemical hazards, risk, proper handling, and what to do in case of emergency.
- The facility has an environmental and occupational health and safety program specific to chemicals management
- The facility has a documented process to systematically identify, monitor and verify compliance with all product Restricted Substance Lists (RSLs).
- The facility has a chemical spill and emergency response plan that is practiced periodically.



Next Steps

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Next Steps and questions

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- Send this presentation to First American Corporation (Pvt.) Ltd. (Farouk BOUJEMAA)
- Submit verification (Farouk BOUJEMAA)
- Let First American Corporation (Pvt.) Ltd. know when the quality check has been done (Farouk BOUJEMAA)
- Finalize and post verification (First American Corporation (Pvt.) Ltd.)
- Send out feedback form from Leadership & Sustainability (Farouk BOUJEMAA; within a few weeks)



Contact



Leadership & Sustainability

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End of presentation