



# LWG Tannery of the Future (TOTF)

## Self-Assessment Questionnaire

Version 2.1 — Updated October 2022

## Introduction

The Tannery of the Future Foundation created the original checklist, released in 2015, to increase transparency and sustainability in the international leather supply chain. The self-assessment tool was intended to be easily accessible for leather manufacturers and their buyers: traders, wholesalers, brands, and retailers.

In 2019, Leather Working Group and the Tannery of the Future Foundation agreed to develop the checklist as part of a robust system of environmental improvement and stewardship for the leather industry. By merging the Tannery of the Future Checklist with the Leather Working Group's "Are You Ready For An Audit?" program, it is anticipated that the guidance and mechanism for better environmental and sustainable leather manufacturing will become accessible to more leather manufacturers around the globe.

### Why use this tool?

This questionnaire aims to provide leather manufacturers across the world with an accessible introduction to the environmental and sustainability issues that are relevant to the industry.

Leather Manufacturers are given an initial indication of how they are performing environmentally and which areas they could improve upon to become more responsible manufacturers. There are references to sources of more in-depth information and guidance.

In addition, this self-assessment questionnaire serves to raise awareness. All companies and individuals purchasing leather or leather products gain insight into the leather-related environmental good practice.

### How to use this tool?

Leather Manufacturers should use this document to begin to assess how environmentally they are performing and to evaluate what policies, procedures and data records should be in place to ensure responsible tannery operations. Each section identifies the basics required and allows a leather manufacturer to self-assess how well they meet the requirements and where there are areas for improvement.

The questionnaire primarily addresses environmental issues, however there is additional best practice information relating to social elements contained at the back of the document. After completion of all topic areas, the leather manufacturer will be able to pinpoint and prioritise overall environmental and sustainability areas for further improvement, where necessary, before embarking on the on-line assessment or progressing to a full LWG environmental audit. By completing this self-evaluation, the tannery will be able to assess its environmental capabilities in order to consider formal certification of environmental performance through the Leather Working Group.

This tool is designed as a first step towards understanding what is required to operate in a sustainable and responsible way. It does not result in certification and is not equivalent to a full LWG environmental audit.

### Instructions for tanneries:

Part A: Each section in this part contains essential elements that will be assessed in an LWG environmental audit. By evaluating whether your organisation fulfils these criteria, you will be able to identify how ready you are for a full LWG Environmental Audit and what areas are in need of development. At the end of Part A there is a Critical Evaluation table to help you to assess your preparedness following completion.

Part B: Additional good practice elements that are not critical to successfully pass an LWG Environmental Audit but will assist in achieving a high score and potential medal award.

Part C: This section contains elements that fall outside of the scope of the Leather Working Group but do form the basis of good Corporate and Social Responsibility (CSR).

If you experience difficulties completing this checklist, please contact:

[info@leatherworkinggroup.com](mailto:info@leatherworkinggroup.com)

The links to websites contained in this checklist are provided solely as a source of information on topics that may be useful to the individuals and organisations using this document. The mention of names of specific organisations does not imply any intention to infringe proprietary rights, nor should this be construed as an endorsement or recommendation on the part of the Leather Working Group.

## Glossary of Terms

TERM	DEFINITION
<b>CETP</b>	Common Effluent Treatment Plant — A wastewater treatment facility that receives effluent discharge from multiple tanneries and other industrial facilities.
<b>CMAP</b>	LWG Commissioning Manufacturer Audit Protocol
<b>CPSIA</b>	Consumer Product Safety Improvement Act
<b>Critical Section</b>	A section of the LWG audit protocol in which the assessed facility must score above a specific threshold to achieve a medal rating. E.g. they must score above 65/100 in ALL critical sections to achieve a bronze medal rating, 75 for a silver, and 85 for a gold.
<b>CSR</b>	Corporate Social Responsibility
<b>Effluent</b>	Wastewater – treated or untreated – that flows out of a treatment plant, sewer, or industrial facility.
<b>EMS</b>	Environmental Management System A framework through which environmental performance can be monitored, improved and controlled.
<b>ETP / WWTP</b>	Effluent Treatment Plant / Wastewater Treatment Plant — Equipment and processes solely dedicated to cleaning the leather manufacturing facility wastewater, located on the leather manufacturing facility site or nearby.
<b>LMAP</b>	LWG Leather Manufacturer Audit Protocol
<b>LWG</b>	Leather Working Group
<b>METP</b>	Municipal Effluent Treatment Plant — Government operated equipment and processes for processing wastewater from multiple sources, industrial and domestic.
<b>MRSL</b>	Manufacturing Restricted Substance List A list of chemicals that should not be used in the manufacture of leather.
<b>NGO</b>	Non-Governmental Organisation / Non-Profit Organisation
<b>NPE</b>	Nonylphenol Ethoxylates (a toxin to aquatic life and potentially harmful to animals and humans)
<b>OECD</b>	Organisation for Economic Co-operation and Development
<b>REACH</b>	Registration, Evaluation, Authorisation & Restriction of Chemicals
<b>RSL</b>	Restricted Substance List — A list of chemicals that must not be present in the finished material. Brands provide RSLs to their suppliers and update the lists as needed, based on company-specific requirements or governmental regulations, etc.
<b>SCAP</b>	LWG Subcontractor Audit Protocol

## **PART A: CRITICAL EVALUATION**

This section contains self-evaluation questions that are all important indicators of whether a tannery is operating in a responsible and sustainable way.

At the end of the section there is a table to record a summary of answers and the assess whether your tannery is ready to consider progressing to a full environmental audit with LWG.

Please answer honestly according to your current procedures and operations. You can use the “Plan for Improvement” boxes to comment on any actions you should take and then use this as a tool to become better informed and to reduce and actively manage your impact on the environment.

## A1. General Information

1.1	Company Name:	
	Company Address:	
	Email Address:	
	Telephone number:	
	Principal Contact Name Position:	
	Type of Tannery Activities (e.g. raw hide to crust):	



## A2. Operating Permits

The law requires that leather and leather products are made in factories that possess the necessary operating permits, and as such fulfil all of the applicable legal conditions in the country in which they operate.

		Yes	No	N/A
A	Is your facility operating within the designated limits of its permits or any other applicable legislation or restriction (i.e. is the facility in compliance with permit requirements, local / national regulations, local national emissions limits, etc)?			
	Do you have documentation or evidence to show the facility is operating within its permit limits? (such as a copy of an operating permit a water discharge permit, an air emissions permit, etc.)			
B	If your facility has been subjected to any violations, regulatory enforcement actions or fines in the last 18 months, have you carried out corrective action within the time prescribed?			
	Do you have documentation or evidence to show the site has been inspected by a local authority (e.g., government, fire department, police, etc.)			

Plans for improvement:

For advice on possible improvements and more information:

- [The internationally recognised OECD Guidelines for Multinational Enterprises state:](#) 'Obeying domestic laws is the first obligation of enterprises.' You should therefore contact your local authority to ascertain which operating permits are required.



### A3. Tannery Data

The ability to record the origin of supply is important when demonstrating good environmental practice. It is important to consider the environmental impact of your buying decisions and to minimise that impact.

		Yes	No	N/A
A	If your organisation buys raw material, do you consider the environmental implications of your tanning processes?			
B	If your organisation buys raw material, do you consider and attempt to minimise the environmental impact associated with the condition of the material (i.e. salted or fresh hides)?			
	<p>What percentage of incoming material in the past 12 months was:</p> <p>Fresh</p> <p>Salted/Brined</p> <p>Tanned (e.g. wet blue)</p> <p>Crust</p> <p>What percentage of incoming material in the 12 months before that period was:</p> <p>Fresh</p> <p>Salted/Brined</p> <p>Tanned (e.g. wet blue)</p> <p>Crust</p>			
C	If your organisation buys part-processed material (i.e. wet blue, wet white, crust), do you consider the environmental responsibility of the suppliers you purchase material from.?			
	What percentage of incoming part-processed material is from suppliers who are LWG audited tanners?			



D	Do you keep accurate records of material bought and sold?			
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Plans for improvement:

For advice on possible improvements and more information:

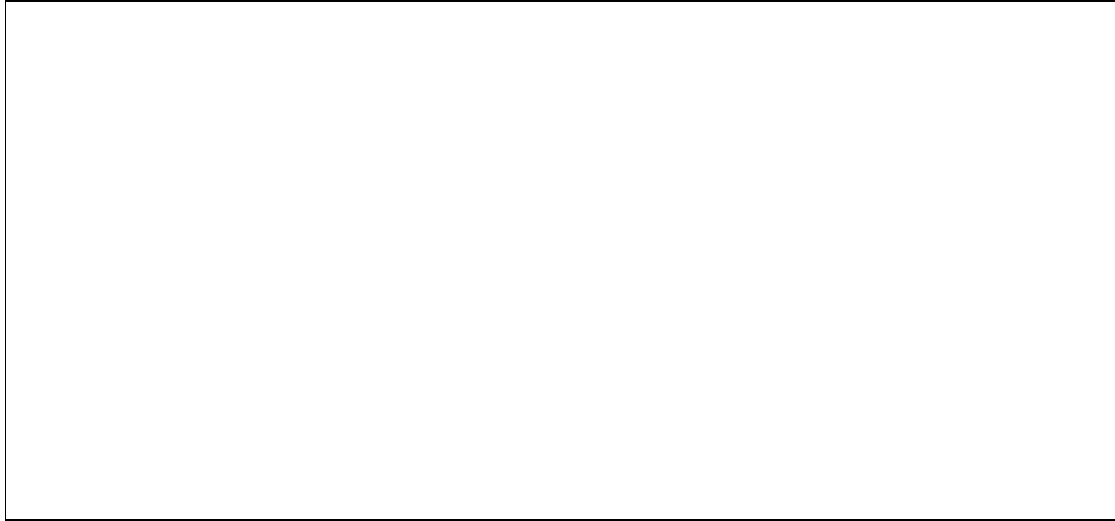
Leather Working Group environmental audit protocol, <https://www.leatherworkinggroup.com/how-we-work/audit-protocols/main-protocol>

## A4. Traceability

Consumers and brands consider it important to understand the origin of hides and skins. Leather manufacturers should aim to demonstrate transparency of supply and as far as possible that there is no connection between leather products and areas of deforestation. Leather manufacturers should adopt traceability methods, e.g. physical marking of hides/skins, robust paperwork, etc. to provide evidence of supply traceability.

		Yes	No	N/A
A	Does your company have a policy / procedure for the purchase of material?			
	Please upload image(s) taken from the traceability procedure document (not front cover) illustrating the procedures			
B	Does the company policy require your suppliers to provide information about the origin of the material being supplied?  Please upload image of communication to a supplier and/or response from supplier			
C	Does your policy require your suppliers to declare that material is not sourced from endangered / environmentally sensitive regions of the world?  If "Yes", please upload image of communication to a supplier and/or response from supplier			

Plans for improvement:



For advice on possible improvements and more information:

Traceability: [Traceability - Leather Working Group](#)

Deforestation: [Deforestation due diligence - Leather Working Group](#)

[The Rainforest Alliance Certified Cattle](#) ensures biodiversity conservation.

## A5. Environmental Management Systems

A good management system will assist an organisation in defining and controlling its operations. The Environmental Management System (EMS) is specifically structured towards the environmental aspects of operation. A good EMS, properly executed, will help an organisation with continual improvement of its environmental performance.

		Yes	No	N/A
A	Does your organisation have an environmental policy in place?			
	Please up load image of policy statement			
B	Does your organisation have a set of written procedures addressing the environmental aspects of the company's operations?			
	Please upload procedures related to one of the following  Objective setting  Internal auditing  Control of emissions to atmosphere  Control of emissions to water courses  Control of quantity of incoming water  Control of energy usage			
C	Has the organisation implemented the procedures in place?			
	Please upload image demonstrating any improvement made by implementing procedure and / or results of such implementation. This might be a piece of equipment, it might be before and after test reports etc.			
D	Does the organisation regularly review its environmental performance?			
	Please upload most image showing company's own assessment of performance (e.g. from management team minutes)			

	Please upload most image showing company's own assessment of performance (e.g. from management team minutes) from approximately 6 months to one year previous to the above			
E	Is there a senior member of the management team responsible for environmental issues?			
F	Has the company carried out an evaluation of the organisation's operations and how they might affect the environment?			
	If "Yes", please upload the conclusion from that report			

Plans for improvement:

For advice on possible improvements and more information:

Leather Working Group environmental audit protocol, <https://www.leatherworkinggroup.com/how-we-work/audit-protocols/main-protocol> - guidance notes

ISO 14001 <https://www.iso.org/iso-14001-environmental-management.html>

## A6. Restricted substances

Consumers of leather products want to use them without putting their health at risk. Restricted substances are substances that are not permitted to be present in the final leather product above a certain designated level. While there are mandatory restrictions on these substances such as REACH in the EU and CPSIA in USA, many brands have drawn up their own Restricted Substances Lists (RSLs) to set limits on the occurrence of certain chemicals in leather products. Therefore, limits may be determined by legislation or by the customer and many brands/buyers have their own specific RSL, so it is important to ensure you ask your customer for more information.

Self-evaluation questions:

		Yes	No	N/A
A	Are you aware of the potential negative effects for consumers of some residual chemicals in your leather?			
B	Have you developed a procedure to manage the restricted substances specifications?			
	Please upload image of a page taken from that procedure (not front cover/title page)			
C	Do you have a list of restricted substances and their limits in your products or have your customers specified their restricted substances specifications?			
	Please upload image of your specification			
D	If you have your own restricted substances specifications for your products, can you ensure that they are up-to-date and can meet all of your customers' specifications			
	Please upload image of the part of the procedure that describes how this is done			
E	Do you test your leather in accordance with such an RSL?			
	What is the total area of leather produced per year?			
	How many sets of tests do you undertake per year?			

	Please state testing incidence (one full set of tests per xxxx square ft , or yyyy square mtres of leather .....)			
F	Do you ensure that the labs you use are competent to undertake the testing required?			
	Please upload image of front cover of a test report  Please highlight the laboratory's certification			
G	Do you update the restricted substances specifications and review your procedures and results periodically			



Plans for improvement:

Examples of RSLs may be seen at:

Apparel and Footwear International RSL Management Group, Restricted substances list, Version 7 2022, [2022 AFIRM RSL 2022 02161.pdf \(afirm-group.com\)](https://www.afirm-group.com/2022-AFIRM-RSL-2022-02161.pdf)

List of Restricted Substances in Shoes, CADS RSL 6 – Version 2019, <https://www.cads-shoes.com/en/documents>

For advice on possible improvements and more information:

Leather Working Group environmental audit protocol, <https://www.leatherworkinggroup.com/how-we-work/audit-protocols/main-protocol>

EU regulation on Registration, Evaluation, Authorization and Restriction of Chemicals, <https://echa.europa.eu/regulations/reach/understanding-reach>

USA's The Consumer Product Safety Improvement Act (CPSIA), <https://www.cpsc.gov/Regulations-Laws-Standards/Statutes/The-Consumer-Product-Safety-Improvement-Act>

Websites of international leather brands, which often publish their RSLs.

Your chemicals suppliers.

## A7. Energy consumption

Consumption of fossil-fuel based energy sources results in the emission of greenhouse gases which could affect the environment and contribute to global warming. Energy consumption in leather manufacturing facilities is due to the use of electricity, fossil fuels, biomass, etc. Energy efficient manufacturing results in more production per unit of energy used.

Self-evaluation questions:

		Yes	No	N/A
A	Do you measure all forms of energy consumption, e.g. electricity, diesel, fuel oils, coal, biomass, etc.?			
	<p>Please state the total amount of electrical energy used in the past 12 months.</p> <p>Please upload image of two electricity bills/invoices showing amount of electricity used and the period covered by the bill/invoice.</p> <p>Please state the total amount one other energy source used in the past 12 months (e.g., oil, biomass)</p> <p>Please upload image of two bills/invoices showing amount of energy source used and the period covered by the bill/invoice.</p>			
B	Do you evaluate the energy consumed against the volume of material produced?			
	How much electrical energy was used in the past 12 months (e.g. how many kWh)?			

	<p>What was the total area of leather produced in the past 12 months?</p> <p>What is the electrical energy usage per unit of leather (e.g. kWh per square metre of leather produced)?</p>			
C	<p>Do you take measures to reduce energy consumption?</p> <p>How much electrical energy was used in the 12 months prior to the period assessed for response "B" above?</p> <p>What was the total area of leather produced in the 12 months prior to the period assessed for response "B" above?</p> <p>What was the electrical energy usage per unit of leather (e.g. kWh per square metre of leather produced)?</p>			

Plans for improvement:

For advice on possible improvements and more information:

UNIDO Leather panel website, <https://leatherpanel.org/content/energy-savings-tanneries-through-solar-energy-use-solar-water-heating-and-electrical>

Framework for sustainable leather processing, <https://leatherpanel.org/content/framework-sustainable-leather-manufacture-second-edition>

Some comparisons of thermal energy consumption in a temperate versus a subtropical zone, <http://leatherpanel.org/content/some-comparisons-thermal-energy-consumption-temperate-versus-subtropical-zone>

Best Available Techniques (BAT) Reference Document for the Tanning of Hides and Skins: Industrial Emissions Directive 2010/75/EU:(Integrated Pollution Prevention and Control), <https://ec.europa.eu/jrc/en/publication/reference-reports/best-available-techniques-bat-reference-document-tanning-hides-and-skins-industrial-emissions>

## A8. Water consumption

Leather processing is a water consuming industry with some parts of the leather-making process using more water than others. Conserving water, which is a natural resource, reduces water footprint levels. Water consumption can be an indicator of a leather manufacturer’s environmental performance and should be managed and controlled.

Self-evaluation questions:

		Yes	No	N/A
A	Do you measure all sources of water input?			
	<p>Please state the sources of input water</p> <p>For each source upload image of the water metre or state how the volume of water is calculated</p>			
B	Do you evaluate the water usage against the volume of material produced?			
	<p>How much water was used in the past 12 months (e.g. how many cubic metres/litres)?</p> <p>What was the total area of leather produced in the past 12 months?</p> <p>What is the water usage per unit of leather (e.g. cubic metres/litres per square metre of leather produced)?</p>			
C	Do you take measures to reduce usage of water?			
	How much water was used in the 12 months prior to the period assessed for response “B” above?			

	<p>What was the total area of leather produced in the the 12 months prior to the period assessed for response "B" above?</p>			
	<p>What was the water usage per unit of leather (e.g. cubic metres/litres per square metre of leather produced)?</p>			

Plans for improvement:

For advice on possible improvements and more information:

UNIDO's Leather Panel is a good source of information on the technical sustainability of tanneries, with a focus on developing countries. These documents are prepared by a vast network of leather experts around the world. Framework for sustainable leather processing, <https://leatherpanel.org/content/framework-sustainable-leather-manufacture-second-edition>

Best Available Techniques (BAT) Reference Document for the Tanning of Hides and Skins: Industrial Emissions Directive 2010/75/EU:(Integrated Pollution Prevention and Control), <https://ec.europa.eu/jrc/en/publication/reference-reports/best-available-techniques-bat-reference-document-tanning-hides-and-skins-industrial-emissions>

IUE 1 - Recommendations on Cleaner Technologies for Leather Production, [https://iultcs.org/wp-content/uploads/2020/07/IUE\\_1.pdf](https://iultcs.org/wp-content/uploads/2020/07/IUE_1.pdf)

### A9. Air and noise emissions

In most countries, significant air and noise emissions from industrial sources, e.g. factory boilers, spraying machines, PU coating machines, etc are subject to some form of regulatory control. Good practice dictates that operating facilities not only comply with regulatory requirements, but that they also undertake preventative maintenance programmes and establish relevant management procedures to minimise polluting emissions.

Self-evaluation questions:

		Yes	No	N/A
A	Has an air-emission inventory been completed?			
	Please upload an image of the inventory (either a list of emissions sources or a site plan showing location of each type of emissions source)			
B	Based on the inventory, are you conducting periodic <b>third party</b> testing of air emissions?			
	Please upload image of front cover of test report  Please upload image of concluding statement from test report (or executive summary if no conclusion)			
C	Are emission reduction devices for significant air emissions fitted where it is possible to reduce emissions?			
	Please list equipment and type of emissions limiting device fitted (e.g 2x spray machines with water wash, 1 x coal boiler with cyclone etc)			
D	Do you have a preventative maintenance programme and cleaning schedule for the emissions reduction devices?			
	Please upload image illustrating completed maintenance activities (evidence that they have been undertaken, not the schedule of what is to be done in the future)			



E	Do you regularly measure the ambient air quality of the production facilities?			
	Please upload image of the conclusion from the monitoring report			

Plans for improvement:



For advice on possible improvements and more information:

UNIDO's Leather Panel is a good source of information on the technical sustainability of tanneries, with a focus on developing countries. These documents are prepared by a vast network of leather experts around the world. Framework for sustainable leather processing, <https://leatherpanel.org/content/framework-sustainable-leather-manufacture-second-edition>

Best Available Techniques (BAT) Reference Document for the Tanning of Hides and Skins: Industrial Emissions Directive 2010/75/EU:(Integrated Pollution Prevention and Control), <https://ec.europa.eu/jrc/en/publication/reference-reports/best-available-techniques-bat-reference-document-tanning-hides-and-skins-industrial-emissions>

EU Council Directive 199/13/EC on Determination of VOC emissions

IUE 8 - Recommendations for Odour Control in Tannery, [https://iultcs.org/wp-content/uploads/2020/07/IUE\\_8.pdf](https://iultcs.org/wp-content/uploads/2020/07/IUE_8.pdf)

### A10. Waste management

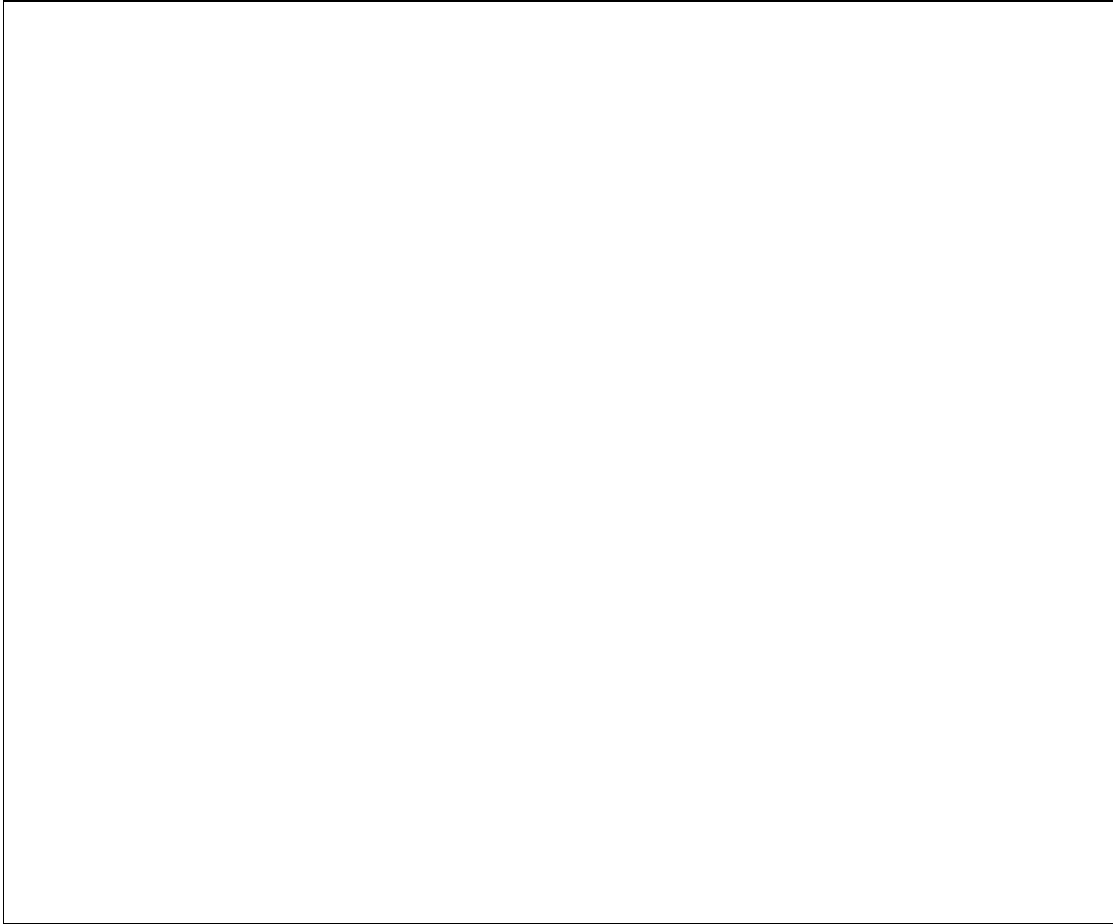
As in most manufacturing processes a proportion of input material will not be fully incorporated into the final product, resulting in some waste. Some waste materials can be reused or recycled into other products. Where this is not possible, it is important that waste materials are disposed of in a safe and appropriate manner, complying with regulatory requirements.

Self-evaluation questions:

		Yes	No	N/A
A	Do you measure the quantity of all waste material produced, e.g. fleshings, shavings, packaging materials, etc?			
	Please state amount of waste produced in the past 12 months for 3 different types of waste (and state nature of the waste (hazardous/non-hazardous)).			
B	Do you take measures to control or reduce waste quantities?  Please describe the measures used.  Please state amount of waste produced in the 12 months prior to the period stated in response A" for the same 3 types of waste.			
C	Do you have adequate segregation of all hazardous and non-hazardous wastes and store them appropriately before they are disposed of?  Please upload images of the storage locations for each of the 3 types of waste in responses A and B			

	<p>If each of the three wastes are non-hazardous please upload an image of the hazardous waste storage location.</p> <p>If each of the three wastes are hazardous please upload an image of the non-hazardous waste storage location.</p>			
D	<p>Are all of the wastes disposed of in a legally and environmentally acceptable method?</p> <p>For each of the three wastes please indicate</p> <p>Name of organisation that transports waste from site</p> <p>Their permit number (if applicable)</p> <p>Permit expiry date</p> <p>Name of the organisation that receives waste</p> <p>Their permit number (if applicable)</p> <p>Permit expiry date</p> <p>Treatment of waste (recycled, incinerated etc)</p>			

Plans for improvement:



For advice on possible improvements and more information:

UNIDO's Leather Panel is a good source of information on the technical sustainability of tanneries, with a focus on developing countries. These documents are prepared by a vast network of leather experts around the world. Framework for sustainable leather processing, <https://leatherpanel.org/content/framework-sustainable-leather-manufacture-second-edition>

Best Available Techniques (BAT) Reference Document for the Tanning of Hides and Skins: Industrial Emissions Directive 2010/75/EU:(Integrated Pollution Prevention and Control), <https://ec.europa.eu/jrc/en/publication/reference-reports/best-available-techniques-bat-reference-document-tanning-hides-and-skins-industrial-emissions>

IUE 2 - Recommendations for Tannery Solid By-Product Management, [https://iultcs.org/wp-content/uploads/2020/07/IUE\\_2.pdf](https://iultcs.org/wp-content/uploads/2020/07/IUE_2.pdf)

## 11. Effluent treatment

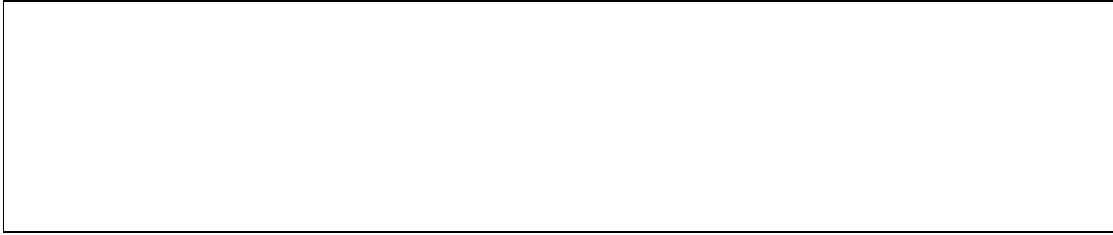
Leather processing generates large quantities of wastewater as effluents. If the effluent is not properly treated this can pose a threat to the environment and public health. The pollutant characteristics of effluent from leather manufacturers arise due to the release of unwanted materials resulting from leather production, e.g. unfixed chemicals, products of reaction, impurities present in the chemicals, solids. Treatment of effluents can be done within the tannery's own Effluent Treatment Plant (ETP), in a Common Effluent Treatment plant (CETP) or a Municipal Effluent Treatment Plant (METP).

Self-evaluation questions:

		Yes	No	N/A
A	Do you measure the quantity of effluent generated from the tannery operations?			
	Please upload image of the water meter or describe how this is measured			
B	Do you conduct water balance (output volume Vs input volume) in your tannery to ensure all inputs are accounted for?			
	What is the percentage of water discharged from the tannery compared to the water brought in to the tannery?			
C	Is the treated effluent tested to ensure it meets all regulatory requirements?			
	Please upload images of laboratory test reports for three different months.			
D	Do you submit reports to the authorities demonstrating your compliance to regulatory requirements?			
	Please upload image of the cover page of the report.			

	Please upload image of your conclusion/declaration of compliance			
E	<p>Do you check the functioning of your effluent treatment system on a regular basis?</p> <p>Please submit images of your own laboratory where effluent testing is undertaken.</p> <p>If this is not a laboratory dedicated to effluent testing please upload images of the equipment used for effluent testing</p> <p>Please state the level of education and/or applicable qualification of the person in charge of effluent treatment</p>			
F	If the treated effluent is used for irrigation, are the pollutant levels in the soil measured periodically?			

Plans for improvement:



For advice on possible improvements and more information:

UNIDO's Leather Panel is a good source of information on the technical sustainability of tanneries, with a focus on developing countries. These documents are prepared by a vast network of leather experts around the world.

Introduction to Treatment of Tannery Effluents, <http://leatherpanel.org/content/introduction-treatment-tannery-effluents>

E-learning course on Introduction to Treatment of Tannery Effluents, <http://leatherpanel.org/content/introduction-treatment-tannery-effluents-0> (requires registration)

Assessment of performance of ZLD operations and Analysis of flow and energy aspects of Zero Liquid Discharge (ZLD) technology in treatment of tannery effluents in Tamil Nadu, India, <http://leatherpanel.org/content/assessment-performance-zld-operations-and-analysis-flow-and-energy-aspects-zero-liquid>

## A12. Emergency plans

Emergency situations might occur at any point even though precautions are in place. Proper management should always be prepared to deal with any sort of emergency and the employees should be adequately trained.

Consumers and brands require that leather products are made in safe working conditions, which includes safe buildings. Emergency plans are required to guarantee building safety and evacuation. Everyone in the company should be familiar with the emergency plans and they should be rehearsed frequently.

Self-evaluation questions:

		Yes	No	N/A
A	Have you identified all possible emergency situations that could occur in your tannery?			
	Please upload an image of the list of possible emergencies			
B	Do you have an up-to-date emergency plan to deal with each of the emergency situations identified in A above?			
	Please upload an image of the index of the plan			
C	Do you have list of emergency contacts which is accessible to all employees?			
	Please upload an image of the poster/list clearly illustrating this to be from within the production areas.			
D	Do you have readily available personal protective equipment (PPE) required to deal with emergencies?			
	Please upload an image of the PPE ready to be issued in the event of an emergency.			
	Please upload an image of the storage location(s) on a site plan			



	Please list type and number of PPE in the emergency PPE access location			
E	Do you have evacuation procedures that are available to all?			
	Please upload an image of the poster/list clearly illustrating this to be from within the production areas.			
F	Do you have an emergency response team trained to deal with emergencies?			
	Please upload images of training certificates from at least three first responders			
G	Have you conducted risk assessments for potential exposure to Hydrogen Sulphide Gas in areas of risk, e.g. beamhouse, effluent drains, tanks and other workplaces?			
	<p>Please upload an image of the conclusion</p> <p>Please state the level of education and/or applicable qualification of the person(s) who undertook the assessment.</p> <p>If the assessment was undertaken by an external agency please upload an image from their publicity material or from the report that illustrates that they were competent to undertake this type of assessment</p>			
H	Have you provided appropriate H2S detection devices in all potential risk areas?			
	<p>If you believe that hydrogen sulphide detection devices are not required in your tannery, please state why not:</p> <p>Alternatively</p> <p>Please state the number of fixed detectors.</p> <p>Please upload an image of one of the fixed detectors.</p>			

	<p>Please state the number of portable detectors.</p> <p>Please upload an image of one of the portable detectors</p>			
I	Have the risk assessments been undertaken by a competent, qualified assessor?			

Plans for improvement:

For advice on possible improvements and more information:

UNIDO on-line course - How to deal with hydrogen sulphide gas,  
<https://leatherpanel.org/content/unido-line-course-how-deal-hydrogen-sulphide-gas>

Online interactive risk assessment (OIRA) tool for leather and tanning industry,  
<https://oiraproject.eu/en/oiraproject/leather-and-tanning-0>

Safety and PPE poster from TEGEWA, [https://www.tegewa.de/en/wp-content/uploads/sites/2/2019/07/Plakat\\_Safetyneu\\_chin-1.pdf](https://www.tegewa.de/en/wp-content/uploads/sites/2/2019/07/Plakat_Safetyneu_chin-1.pdf)

### A13. Housekeeping

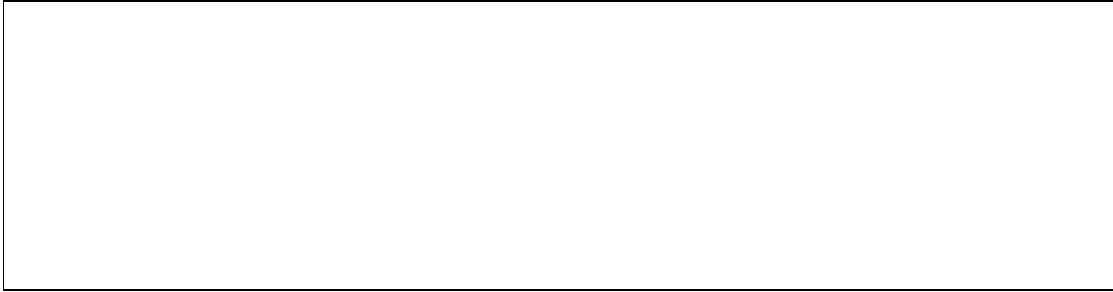
Good housekeeping minimises the risk of environmental incidents (e.g. spillages) and health and safety incidents (e.g. tripping) occurring on the work floor. Well maintained and clean machinery will run more efficiently resulting in less energy use, longer machinery life and cost savings.

Self-evaluation questions:

		Yes	No	N/A
A	Do you have a procedure for housekeeping both inside and outside the tannery (within the tannery boundary)?			
	Please upload an image of the procedure			
B	Do you have a procedure for traffic management both inside and outside the tannery (within the tannery boundary)?			
	Please upload an image of the procedure			
C	Do the production and other areas have clearly defined obstruction-free access routes?			
	Please upload three images of different process areas illustrating access routes (for pedestrians, fork trucks etc)			
D	Are chemicals labelled and stored safely in designated places?			
	Please upload images of chemicals in a storage area			
E	Do all personnel use appropriate personal protective equipment (PPE)?			
	Please upload an image of the PPE ready to be issued as required in the stores.			
	Please upload an image of a worker using/wearing PPE			
	Please upload an image used/discarded PPE.			

	Please upload an image of PPE waste disposal records			
F	Are the moving parts of the machines adequately guarded with auto-cut off mechanisms, wherever necessary?			
	Please upload an image			
G	Are all platforms and overhead working areas (including access stairs) appropriately and sufficiently guarded?			
	Please upload an image			
H	Do the electrical systems (wires and distribution panel boards) appear to be suitably enclosed so as to prevent electrocution?			

Plans for improvement:



For advice on possible improvements and more information:

IUE 11 – Occupational Health and Safety in the use of Chemicals in Tanneries,  
[https://iultcs.org/wp-content/uploads/2020/07/IUE\\_11.pdf](https://iultcs.org/wp-content/uploads/2020/07/IUE_11.pdf)

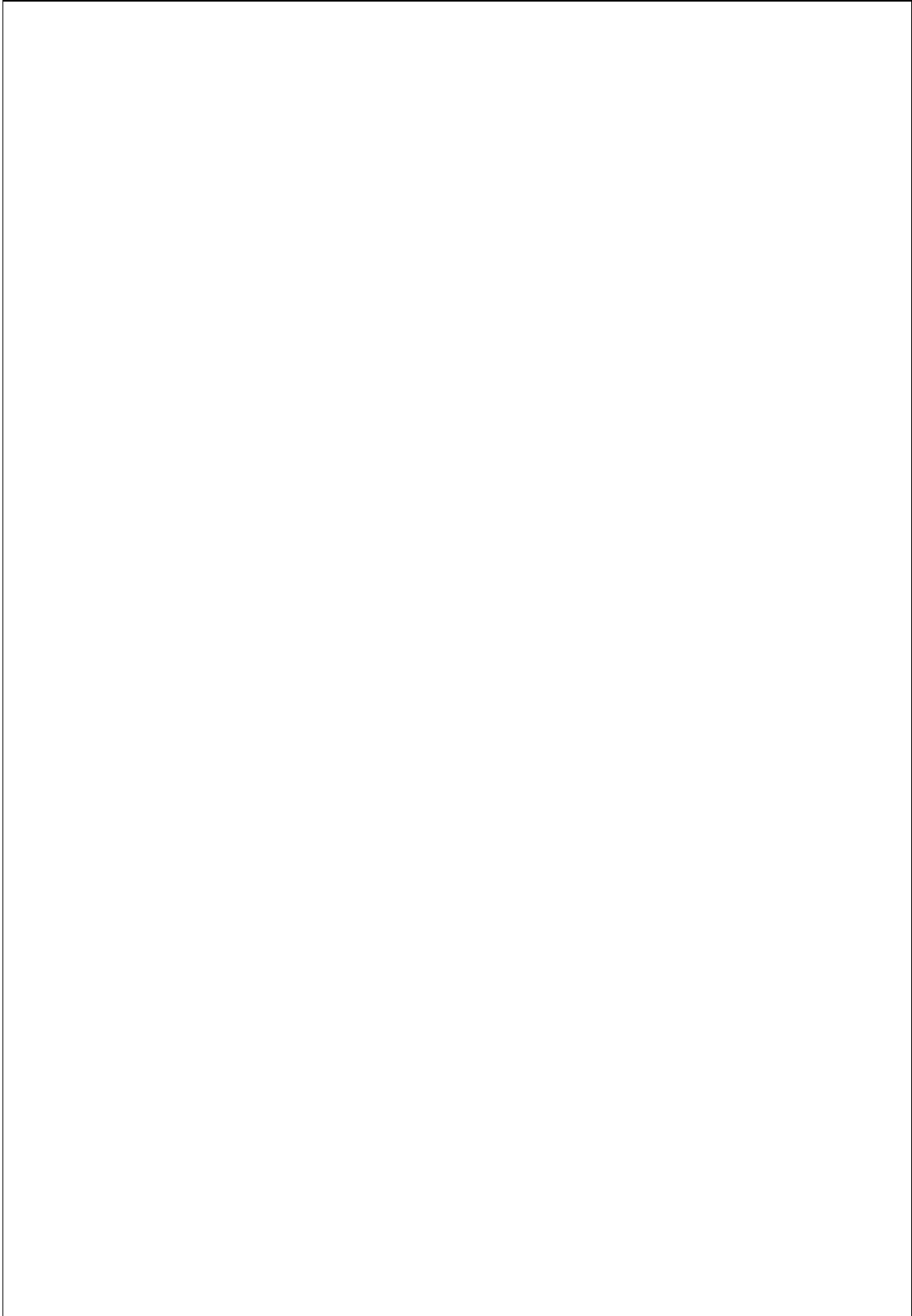
## A14. Manufacturing processes

Control of manufacturing processes, adopting best practices, use of measuring equipment and regular calibrations, etc. will contribute to consistency of quality, reduction of re-works and waste, resulting in reduced resource requirement, e.g. energy and water, and therefore contribute to improved environmental performance.

Self-evaluation questions:

		Yes	No	N/A
A	Do you have safety data sheets for all chemicals used and have them available in local language, readily available to workers?			
	Please state the total number of production chemicals used			
	Please state the total number of production chemicals for which an SDS is available.			
	Please upload an image of the location of the Safety Data information (e.g on a shelf in an office, in a cabinet on the wall in a production area).			
B	Is the chemical storage area adequately ventilated, bunded and provided with fire extinguishers?			
	Please upload an image of the main storage area.			
	Please upload an image of the containment walling or drainage channels			
	Please upload an image of the type of fire extinguisher used in the main storage area.			

Plans for improvement:





For advice on possible improvements and more information:

Framework for sustainable leather processing, <https://leatherpanel.org/content/framework-sustainable-leather-manufacture-second-edition>

Best Available Techniques (BAT) Reference Document for the Tanning of Hides and Skins:  
Industrial Emissions Directive 2010/75/EU:(Integrated Pollution Prevention and Control),  
<https://ec.europa.eu/jrc/en/publication/reference-reports/best-available-techniques-bat-reference-document-tanning-hides-and-skins-industrial-emissions>

## Summary of Responses

Section	Total Number of Answers Yes or N/A	Total Number of Answers No
A1. General Information		
A2. Operating Permits		
A3. Tannery Data		
A4. Traceability		
A5. E. M. S.		
A6. Restricted Substances		
A7. Energy Consumption		
A8. Water Consumption		
A9. Air & Noise Emissions		
A10. Waste Management		
A11. Effluent Treatment		
A12. Emergency Plans		
A13. Housekeeping		
A14. Manufacturing Processes		
Total		

### Critical Evaluation

Please use the following guide to evaluate preparedness for an LWG Environmental Audit:

If you answered "Yes" or "N/A" to all the above questions	You are likely to be ready for an LWG Environmental Audit
-----------------------------------------------------------	-----------------------------------------------------------

If you answered "No" to less than 3 questions	You should be capable of an LWG Environmental Audit as long as you answered "Yes" to all legal permit questions
If you answered "No" to less than 5 questions	You may be capable of an LWG Environmental Audit as long as you answered "Yes" to all legal permit questions. <a href="#">Please seek advice on responses.</a>
If you answered "No" to more than 5 questions	You are not yet ready and should continue to work on the improvements as identified in your plans for improvement completed above.

Supplementary Self-Evaluation Questions:

Do you require any additional support from external parties in setting up plans or actions, and in the subsequent implementation phase?



What is your vision for the future?

Completion of this self-evaluation tool does not guarantee that a tannery will be able to successfully achieve a Leather Working Group Environmental Audit Certificate, however it should provide an indication of whether a tannery is sufficiently prepared to proceed.

Date Completed: .....

Name of Evaluator: .....

Signature: .....

The self-evaluation questions on the following pages in Part B are not crucial for the purposes of assessing preparedness for a full LWG Environmental Audit but will assist you in scoring well and improving your chances of a medal award. They are good practice elements that leather manufacturers should be following or working towards:

## PART B: ADDITIONAL GOOD PRACTICE QUESTIONS

Operational Processes

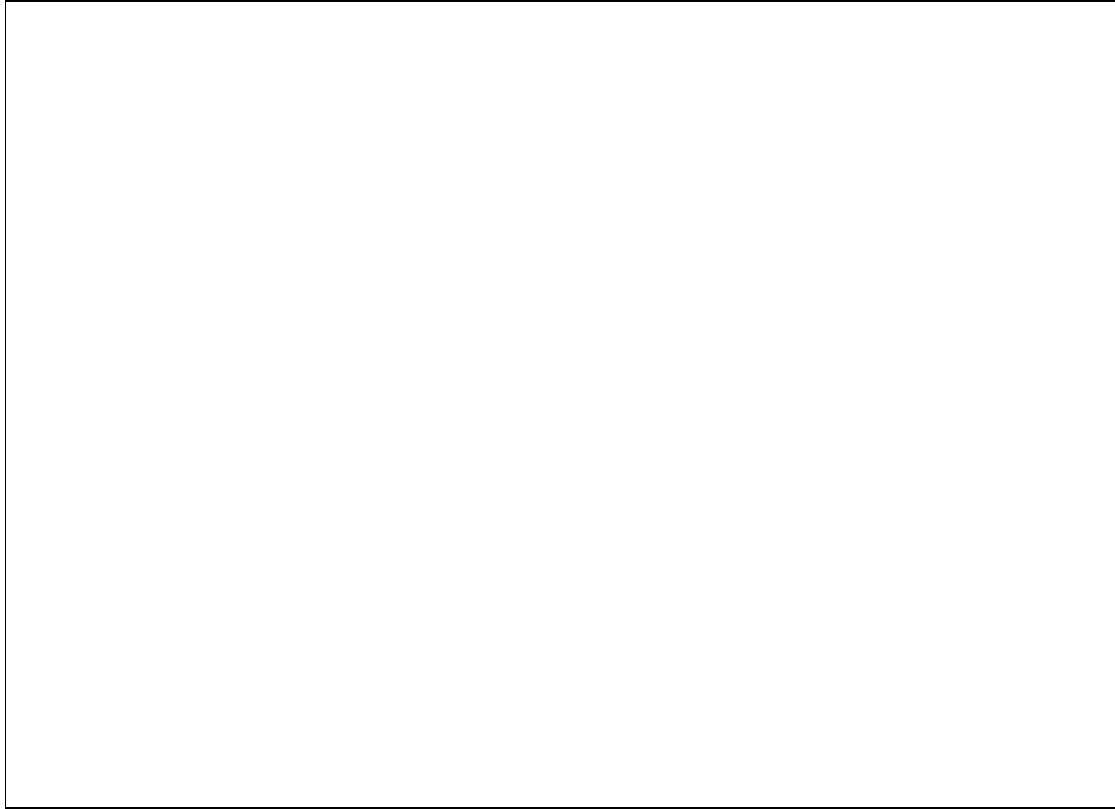
### B1 Manufacturing processes

Control of manufacturing processes, adopting best practices, use of measuring equipment and regular calibrations, etc. will contribute to consistency of quality, reduction of re-works and waste, resulting in reduced resource requirement, e.g. energy and water, and therefore contribute to improved environmental performance.

Self-evaluation questions:

		Yes	No	N/A
A	Do you regularly calibrate all the measuring instruments such as weighing scales, flow meters, pressure gauges, temperature gauges, etc.?			
B	For all salted raw hides and skins, do you remove the excess surface salt?			
C	If you remove excess surface salt, do you ensure that it is disposed of in a safe and environmentally responsible manner and in accordance with any legal requirements?			

Plans for improvement:



For advice on possible improvements and more information:

Framework for sustainable leather processing, <https://leatherpanel.org/content/framework-sustainable-leather-manufacture-second-edition>

Best Available Techniques (BAT) Reference Document for the Tanning of Hides and Skins: Industrial Emissions Directive 2010/75/EU:(Integrated Pollution Prevention and Control), <https://ec.europa.eu/jrc/en/publication/reference-reports/best-available-techniques-bat-reference-document-tanning-hides-and-skins-industrial-emissions>

## B2 Beamhouse processes

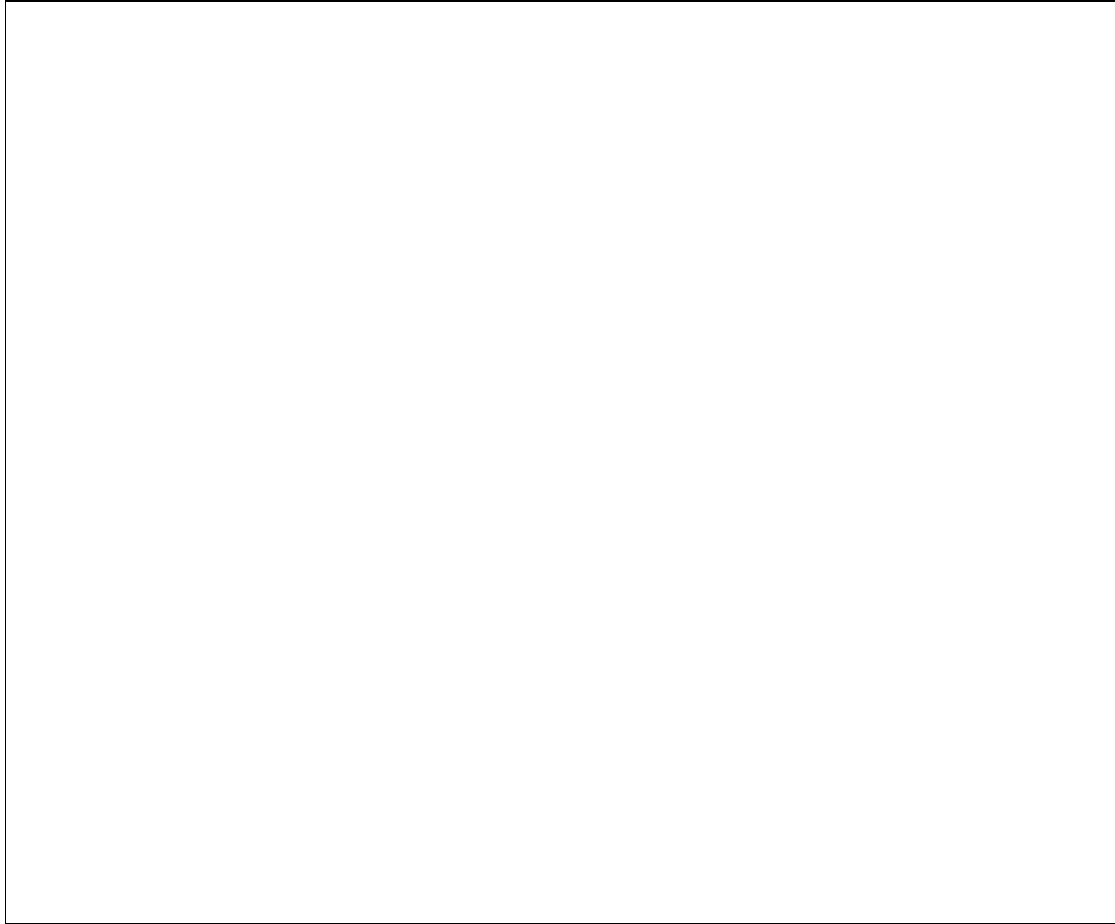
Control of manufacturing processes, adopting best practices, use of measuring equipment and periodical calibrations, etc. will contribute to positive improvement of environmental impact in beamhouse operations of leather processing.

Self-evaluation questions:

		Yes	No	N/A
A	Are the wetting agents used biodegradable and NPE free?			
B	Is the amount of bactericide well controlled by dip slide method?			
C	Are the liquid and solid chemicals including water controlled by adequate measurement?			
D	Are the solid wastes from the beamhouse operations, namely, trimmings, fleshings, hair, put to use in the by-products industry?			
E	Is your sulphide consumption in liming/unhairing <2% offer on 60% Na <sub>2</sub> S			
F	Is there a technology in place to reduce the ammonium salts in the de-liming process			

Plans for improvement:





For advice on possible improvements and more information:

Framework for sustainable leather processing, <https://leatherpanel.org/content/framework-sustainable-leather-manufacture-second-edition>

Best Available Techniques (BAT) Reference Document for the Tanning of Hides and Skins: Industrial Emissions Directive 2010/75/EU:(Integrated Pollution Prevention and Control), <https://ec.europa.eu/jrc/en/publication/reference-reports/best-available-techniques-bat-reference-document-tanning-hides-and-skins-industrial-emissions>



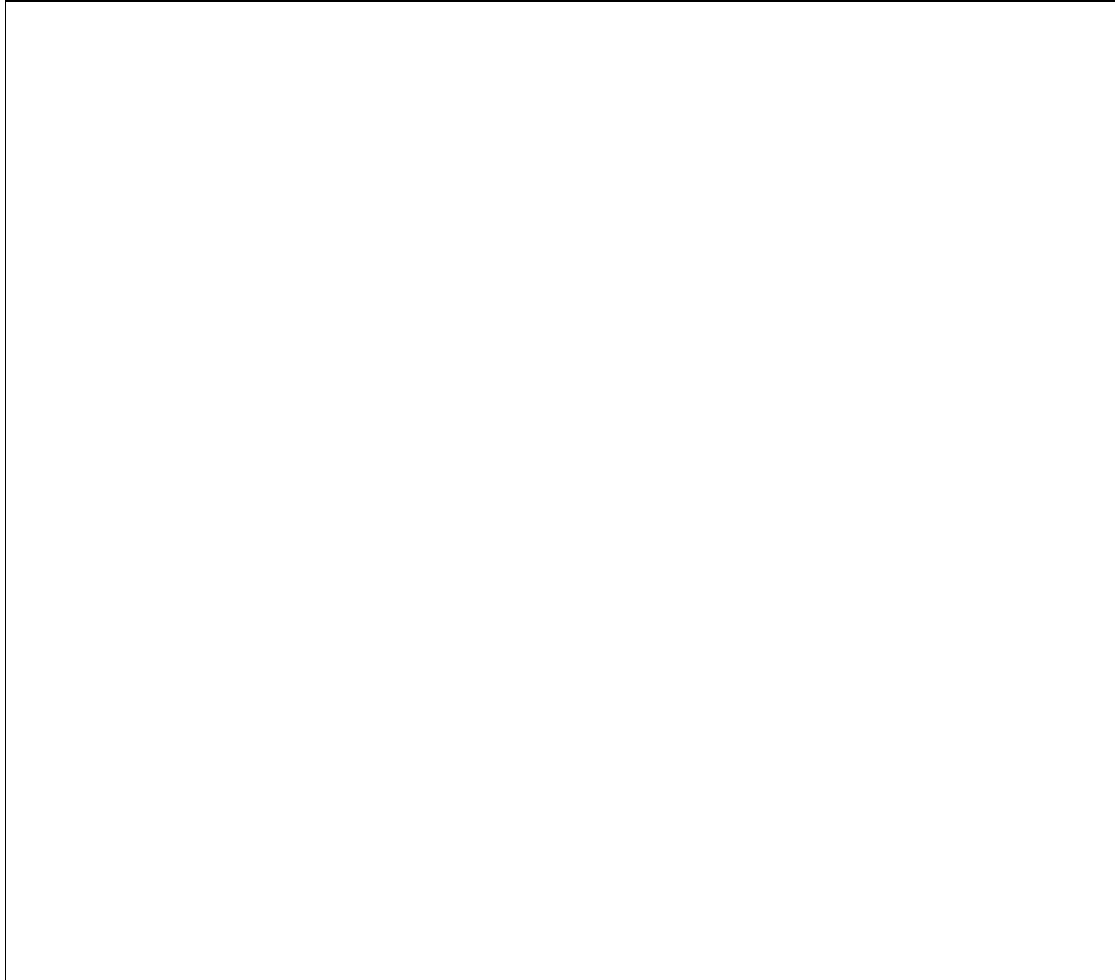
### B3. Post tanning processes

Control of manufacturing processes, adopting best practices, use of measuring equipment and periodical calibrations, etc. will contribute to positive improvement of environmental impact in post tanning operations of leather processing.

Self-evaluation questions:

		Yes	No	N/A
A	Are the solid wastes from the tanning operations, e.g. flesh splits, shavings and trimmings put to use in the by-products industry?			
B	Are the liquid and solid chemicals including water controlled by adequate measurement?			
C	Are the processes always controlled at key points to ensure efficiency and exhaustion (time, temperature, pH, etc.) always?			
D	Is the moisture content in the leather carefully controlled?			
E	Is the buffing operation controlled with a high level of extraction and automatic compacting for disposal			

Plans for improvement:



For advice on possible improvements and more information:

Framework for sustainable leather processing, <https://leatherpanel.org/content/framework-sustainable-leather-manufacture-second-edition>

Best Available Techniques (BAT) Reference Document for the Tanning of Hides and Skins: Industrial Emissions Directive 2010/75/EU;(Integrated Pollution Prevention and Control), <https://ec.europa.eu/jrc/en/publication/reference-reports/best-available-techniques-bat-reference-document-tanning-hides-and-skins-industrial-emissions>

## B4. Finishing processes

Control of manufacturing processes, adopting best practices, use of measuring equipment and periodical calibrations, etc. will contribute to positive improvement of environmental impact in finishing operations of leather processing.

Self-evaluation questions:

		Yes	No	N/A
A	Is the solvent (pure solvents and solvents forming part of finishing chemicals) consumption monitored regularly at least monthly?			
B	Are the finishing systems fundamentally of aqueous type?			
C	Are the facilities in the mixing area always cleaned and properly maintained?			
D	Do you have a system to reduce the wastes emitted during spraying by adopting roller coating and/or high volume, low pressure (HVLP) spray guns etc.?			
E	Is there a system to reduce the wastage of excess finishing formulations?			
F	Are the solid wastes from the finishing operations, e.g. trimmings put to use in the by-products industry?			

Plans for improvement:



For advice on possible improvements and more information:

Framework for sustainable leather processing, <https://leatherpanel.org/content/framework-sustainable-leather-manufacture-second-edition>

Best Available Techniques (BAT) Reference Document for the Tanning of Hides and Skins: Industrial Emissions Directive 2010/75/EU:(Integrated Pollution Prevention and Control), <https://ec.europa.eu/jrc/en/publication/reference-reports/best-available-techniques-bat-reference-document-tanning-hides-and-skins-industrial-emissions>

Reduction Of VOC Emissions Using HVLP Guns And Electrostatic Spraying (Translated Title)  
Tomaselli M & et al, Cuoio Pelli Mater Concianti 1996, 72 (1) 21-31

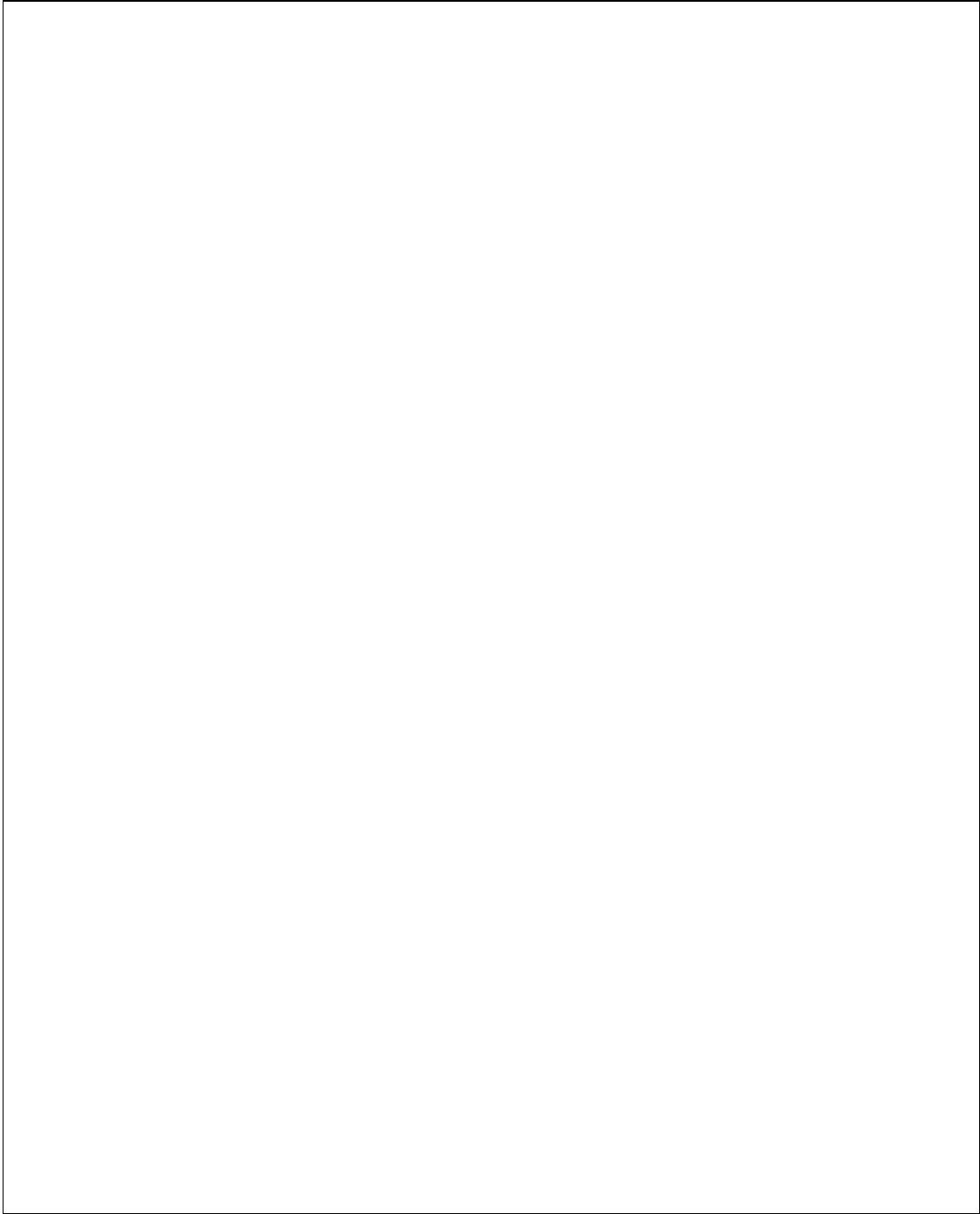
## B5 Complaints and public relations

Processes to manage and deal with site related complaints such as noise or odour are necessary.

Self-evaluation questions:

		Yes	No	N/A
A	Do you maintain your facility so that there is no complaint from neighbours or the public about nuisance/visual impact?			
B	Is there a defined, written procedure that ensures all complaints are investigated and acted upon (including records being maintained)			
C	Do you maintain your facility so that there is no regulatory enforcement actions or prosecutions outstanding in relation to complaints?			

Plans for improvement:



## PART C: BEST PRACTICE GUIDANCE ON CORPORATE SOCIAL RESPONSIBILITY

The following questions do not form part of the Leather Working Group Audit Process. However, it is recognised that a responsible organisation should be implementing or working towards compliance in the following areas:

### C1 International Labour Organisation (ILO) Fundamental Convention

Consumers and brands consider it important that all workers have equal rights, that they can freely choose to do their work and are allowed to voice their opinion on work-related matters. They also consider it important that children should have opportunities focused on their future: they want them to be safe, healthy and able to go to school. The International Labour Organisation (ILO) has developed eight widely-recognised conventions. Considered by the ILO to be fundamental, the conventions cover four areas:

1. the elimination of discrimination in respect of employment and occupation;
2. the elimination of all forms of forced or compulsory labour;
3. the effective abolition of child labour;
4. freedom of association and effective recognition of the right to collective bargaining.

These four subjects can be found in all credible social standards (see list in question B below for examples) and the labour chapter of the UN Global Compact.

Self-evaluation questions:

		Yes	No	N/A
A	Do you have an existing, valid social audit?			
B	If yes, please select the audit system from below:			
	BSCI			
	SA8000			
	SMETA (SEDEX 2 pillar / 4 pillar)			



	WRAP			
	WCA			
	FLA			
	Other (please specify):			

Plans for improvement:

For advice on possible improvements and more information:

Labour Chapter of the UN Global Compact,  
[https://www.unglobalcompact.org/docs/issues\\_doc/labour/the\\_labour\\_principles\\_a\\_guide\\_for\\_business.pdf](https://www.unglobalcompact.org/docs/issues_doc/labour/the_labour_principles_a_guide_for_business.pdf)

## C2 Equality of opportunity and treatment

The ILO labour standard on the elimination of discrimination requires that all people, including vulnerable groups in society, be given equal opportunities and treatment. Enterprises should not discriminate against workers, or in the hiring process, in terms of race, colour, sex, religion, political opinion, nationality or social origin. As an employer trying to combat or prevent discrimination, it is especially important to ensure that employment-related decisions (including

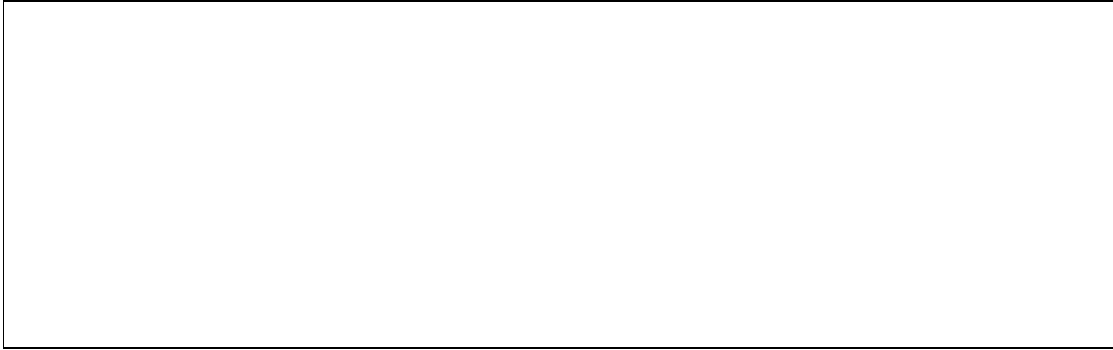


salary-related decisions) are based on relevant and objective criteria. Targeted HR management and policies can help to prevent discrimination.

Self-evaluation questions:

		Yes	No	N/A
A	Do you pay men and women equally, i.e. equal pay for equal work?			
B	Do you give equal opportunities to your workers and not discriminate when:  Hiring  Undertaking daily activities in the workplace  Dismissing  Providing training opportunities  Promoting employees  Paying social benefits			
C	Do you take care to avoid discrimination against vulnerable groups, e.g. disabled workers, pregnant women, young workers or migrant workers?			
D	Do you discourage discriminatory behaviours, particularly when workers are hired, promoted, dismissed or assigned benefits?			

Plans for improvement:



For advice on possible improvements and more information:

Efforts to improve could include:

Written procedures on disciplinary actions in the workplace, based on law, available to all workers or relevant stakeholders

Workers and their representatives should be consulted on disciplinary actions and how they are to be enforced

A record-keeping system that maintains an overview of disciplinary actions that have been taken

Regular training for managers and workers on disciplinary actions that can be applied in the workplace

Regular training for managers and workers on the risks of discrimination and how to overcome them

The ILO has developed [a step-by-step guide](#) to performing job evaluations in a gender-neutral fashion (for example, to assess whether the salary distribution in your organisation is gender-biased). When modified slightly, this approach can be used to assess whether other forms of discrimination, such as in relation to age or race, are influencing employment practices.

3 Employers can establish safe and good [working conditions](#) for women by introducing relatively minor changes. For example, by arranging for separate dressing rooms, sanitary facilities and transport to/from home. Good arrangements concerning pregnancy and day-care for children are also important. For more measures, see [the Women's Empowerment Principles in the Global Compact](#).

4 [The Gender Equality Seal](#) is an auditable standard and certification system developed by the UNDP to measure business conduct in relation to gender equality. It is important to note that not only are employers responsible for achieving a good gender-balance in their workforce, but that this also leads to better financial performance, as has been shown in research by the IFC.

5 The ILO also provides information on other discrimination-related subjects, such as [how to respect the rights of indigenous and tribal people in the workplace](#), [how to deal with managing disability in the workplace](#), and a [HIV/Aids workplace policy and programmes training manual](#)

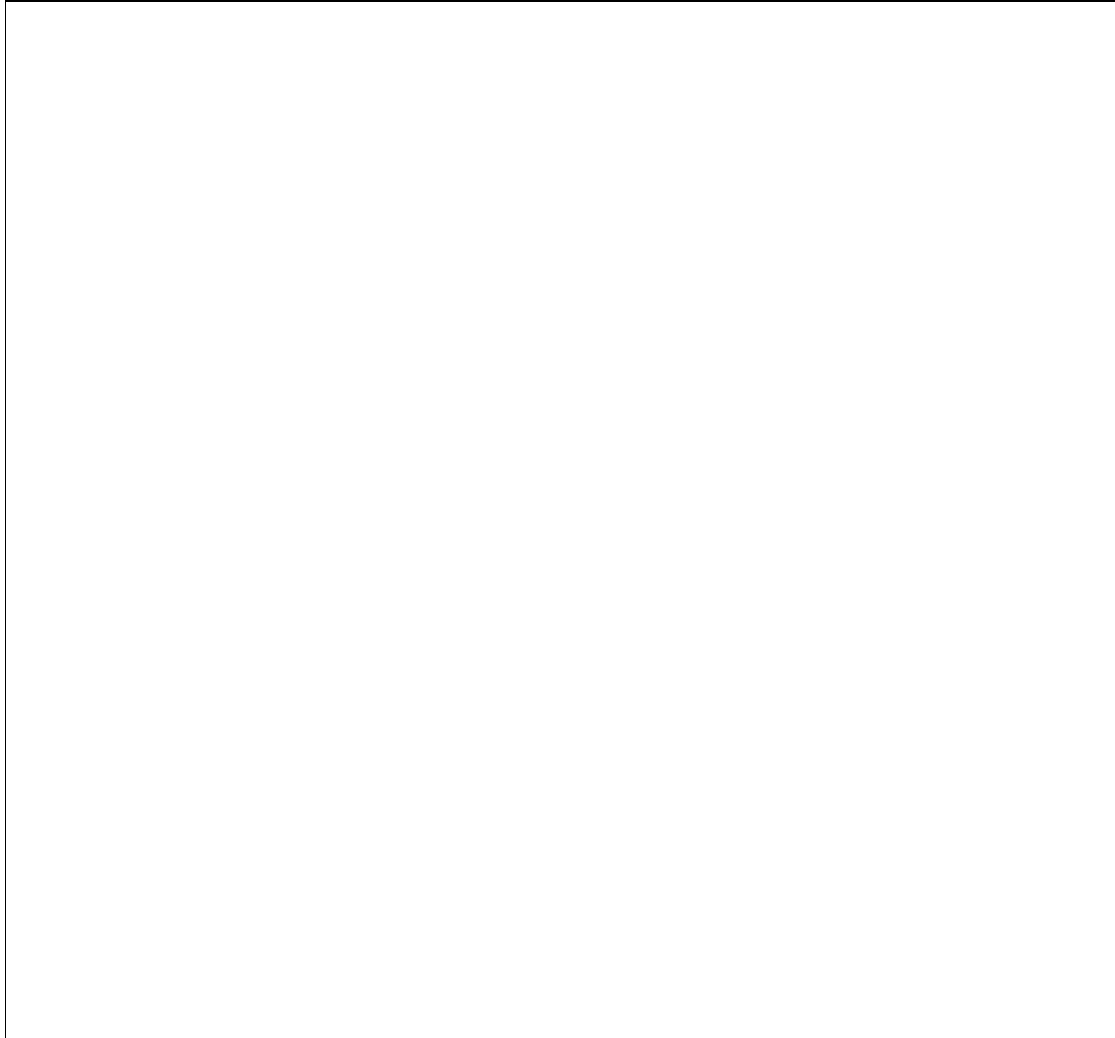
### C3 Compulsory labour

Organisations should not participate in any form of forced servitude, trafficked or non-voluntary labour. Work should be freely chosen. This topic covers both bonded and forced labour.

Self-evaluation questions:

		Yes	No	N/A
A	Are workers free to move around the workplace?			
B	Are workers free to leave the premises when they want?			
C	Are workers free to quit and receive their last salary and retrieve deposits when they wish to?			
D	Are workers free from fines or wage deductions as disciplinary measures?			
E	Are deposits (salary, passports or other legal documents) requested from your workers?			
F	If loan or credit schemes are provided for your workers, is there a link to workers' indebtedness?			
G	Are specifications on loans and possible advance payments respected and documented?			

Plans for improvement:



For advice on possible improvements and more information:

Forced labour: to combat and prevent forced labour and human trafficking, follow [the ten ILO principles](#) (page 3 of the publication 'Strengthening Employers' Activities against Forced Labour') and use the [UN GIFT eLearning course](#). The ILO handbook for combating forced labour describes forced labour and provides advice on this issue.

The [ILO Handbook](#) for combating forced labour describes forced labour and provides advice on this issue.

#### C4 Age of workers

Enterprises should not hire any worker below the legal minimum age and should provide special protection to any workers that are not yet adults. Not all children’s work is considered child labour. The ILO’s definition of child labour is as follows: work that is mentally, physically, socially or morally dangerous and harmful to children and/or interferes with their schooling. In its recommendations, the ILO specifies minimum ages for different types of activities. For the lightest type of work, the minimum age is 12.

Self-evaluation questions:

		Yes	No	N/A
A	Do you keep records of the ages of all workers?			
B	Is the youngest person working in your tannery older than the legal minimum age (this includes workers serving beverages and undertaking other small tasks)?			
C	Is the youngest person working in your tannery at least 13 years old (or at least 12 years old in countries that do not set a minimum age of 14)?			
D	Do you have restrictions for workers under the age of 18 regarding heavy work, the use of dangerous machinery, exposure to hazardous chemicals and waste?			

Plans for improvement:



For advice on possible improvements and more information:

1 The International Finance Corporation (IFC) provides a [Guidance Document](#) for countering child labour. The IFC's recommendations include: provide training and awareness programmes for workers of all levels; reward staff for their efforts to eliminate harmful child labour; create a mechanism by which workers and others can report violations with the assurance of confidentiality; and partner with other companies and organisations.

You can use the comprehensive set of [Children's Rights and Business Principles \(2012\)](#) to guide your company on the full range of actions that can be taken in the workplace, marketplace and community to respect and support children's rights.

The book '[Stepping Stones for creating child labour free zones](#)' provides practical information on the development of child labour-free zones; in which all parties cooperate to send children to school.

[The Children's Rights Impact Assessment](#) (2013) is a tool that can help you identify and manage the impact on children's rights. The checklist contains a set of questions and indicators covering the 10 Children's Rights and Business Principles, addressing different aspects of company policies and operations and the impact on children's rights.



## C5 Workers' representation

Enterprises should respect the right of workers to form unions or other kinds of workers' associations and to engage in collective bargaining.

Self-evaluation questions:

		Yes	No	N/A
A	Are your workers free to join trade unions and other associations?			
B	Have your workers democratically elected a workers' representative?			
C	Does your management have regular meetings with workers or the workers' representative on work-related issues?			
D	Do you provide a suggestion box for your workers?			
E	If no trade union or workers' representatives are present, are workers involved in decision-making processes in other ways?			
F	Are NGOs free to discuss work-related issues with your workers?			

Plans for improvement:





For advice on possible improvements and more information:

1 [IndustriALL Global Union](#) represents 50 million workers in 140 countries and strives for better working conditions and trade union rights worldwide. IndustriALL represents workers in various sectors, including the textiles, garments, leather and footwear sectors.

2 Freedom of association and the right to organise and bargain collectively are fundamental human rights, the exercise of which has a major impact on work and living conditions. It is important that you allow your workers (or the workers of your suppliers) to unite and discuss work-related issues with management. [The Dutch trade union FNV](#) urges companies to inform workers of their rights (for example, by inviting NGOs to speak on the topic), allow alternative forms of worker organisation, if needed, and make it explicit that participants will not be disadvantaged in any way.

## C6 Wages and benefits

Consumers and brands want to be sure that the people who make their leather products earn enough to take care of themselves and satisfy their basic needs; that is, that they receive a living wage. Enterprises should respect the right of workers to receive fair remuneration and hire workers on the basis of documented contracts based in law. Permanent work should give workers permanent labour rights. Enterprises should provide official contracts for such work and only use outsourcing, day labourers, ‘independent contractors’ or short-term contracts when the work is genuinely temporary.

Self-evaluation questions:

		Yes	No	N/A
A	Do you pay the minimum wage (or more), as set by the government for every worker and in line with the minimum reference for a 48 hour working week?			
B	Do you ensure that wages are paid in the local, valid currency and that payments occur at the time and frequency that has been agreed with workers?			
C	Are the wages you pay sufficient for your workers to meet their basic needs (living wage)?			
D	Do you pay contributions for all workers to social insurance funds such as:			
	- Health insurance			
	- Retirement benefits			
	- Unemployment benefits			
	- Accident insurance			
E	Are pregnant women entitled to maternity leave and benefits?			
F	Do you compensate workers when they are ill?			
G	Do you provide permanent contracts to all workers who do permanent work?			
H	When you provide accommodation to your workers, is this considered to:			

	- Be appropriately constructed and located (separate from the production area)?			
	- Be clean, safe (including access to emergency exits and appropriate fire-fighting equipment) and adequately lit?			
	- Provide a good level of privacy (for example, segregated sleeping quarters by gender)?			
	- Provide clean drinking water?			
	- Provide clean washing facilities and toilets?			
I	Do you provide day-care for children below school age for your workers?			

Plans for improvement

For advice on possible improvements and more information:

- 1 Living wage: [Wageindicator.org](http://Wageindicator.org) offers a map of the world indicating local living wages.
- 2 Appropriate housing: the International Labour Organisation (ILO) provides [information on appropriate housing for workers](#), as does the International Finance Corporation (IFC).

## C7 Working hours

Consumers and brands want to be sure that the people who make their leather products have a decent standard of living and are treated well. Enterprises should observe the law regarding hours of work and the ILO norms prescribing the number of working hours that are acceptable for workers in industries such as tanneries, so that workers remain healthy and productive.

Self-evaluation questions:

		Yes	No	N/A
A	Do your workers work eight hours or less per day?			
B	Do your workers work 48 hours or less per week?			
C	Do workers have at least one day off after six days of work?			
D	Is overtime voluntary?			
E	Is overtime properly compensated, e.g. paid at a premium rate or as time off?			
F	Do you keep records of hours worked by all workers (day labourers, temps and permanent staff)?			

Plans for improvement:



For advice on possible improvements and more information:

1 The International Labour Organisation (ILO) recommends a maximum of 48 hours of work per week, limited overtime, sufficient rest time, holidays and sick-leave. [The ILO Helpdesk for Business](#) provides information on working time.

## C8 Grievance mechanisms and worker voice

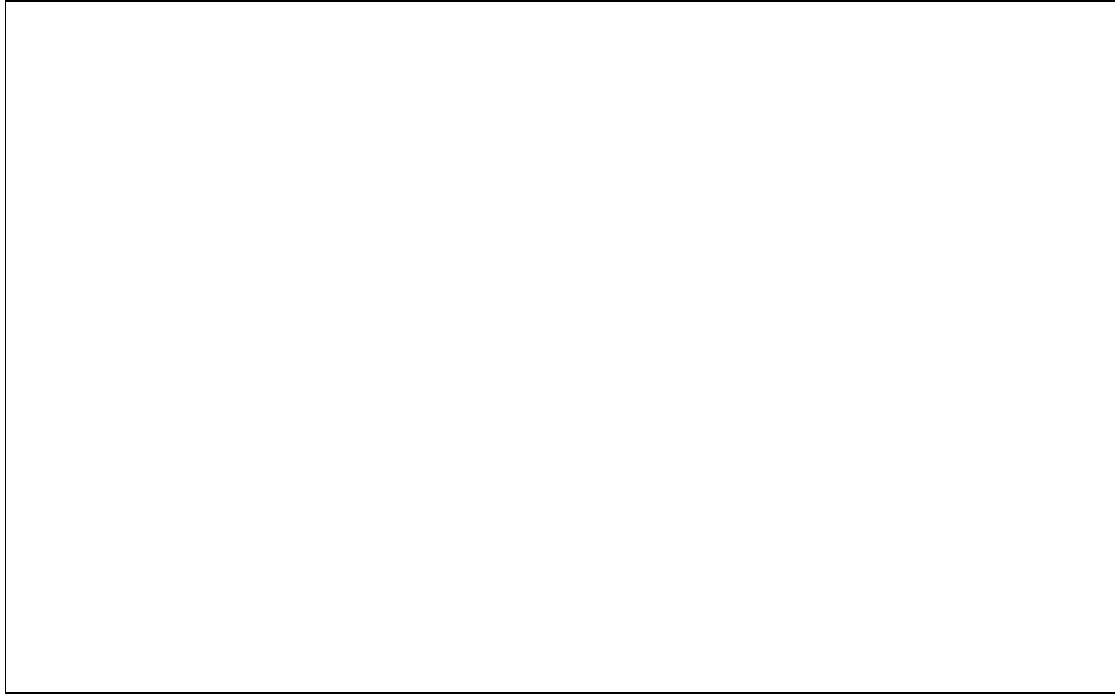
It is important that workers have the ability to express concern or grievance in relation to their work or the working environment.



Self-evaluation questions:

		Yes	No	N/A
A	Do you have an anonymous grievance procedure for workers? land?			
B	If yes, does it take the form of (mark all that apply):			
	Anonymous suggestion box			
	Open door policy			
	Worker clinics / focus groups			
	Supervisor communication			
	Worker committees			
	Union communication			

Plans for improvement:



For advice on possible improvements and more information:

- 1 Sedex Members Ethical Trader Audit (SMETA) Measurement Criteria,  
<https://www.sedex.com/wp-content/uploads/2019/05/SMETA-6.1-Measurement-Criteria.pdf>
- 2 UN's Guiding Principles on Business and Human Rights,  
[https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)



### C9 Ethical business behaviour

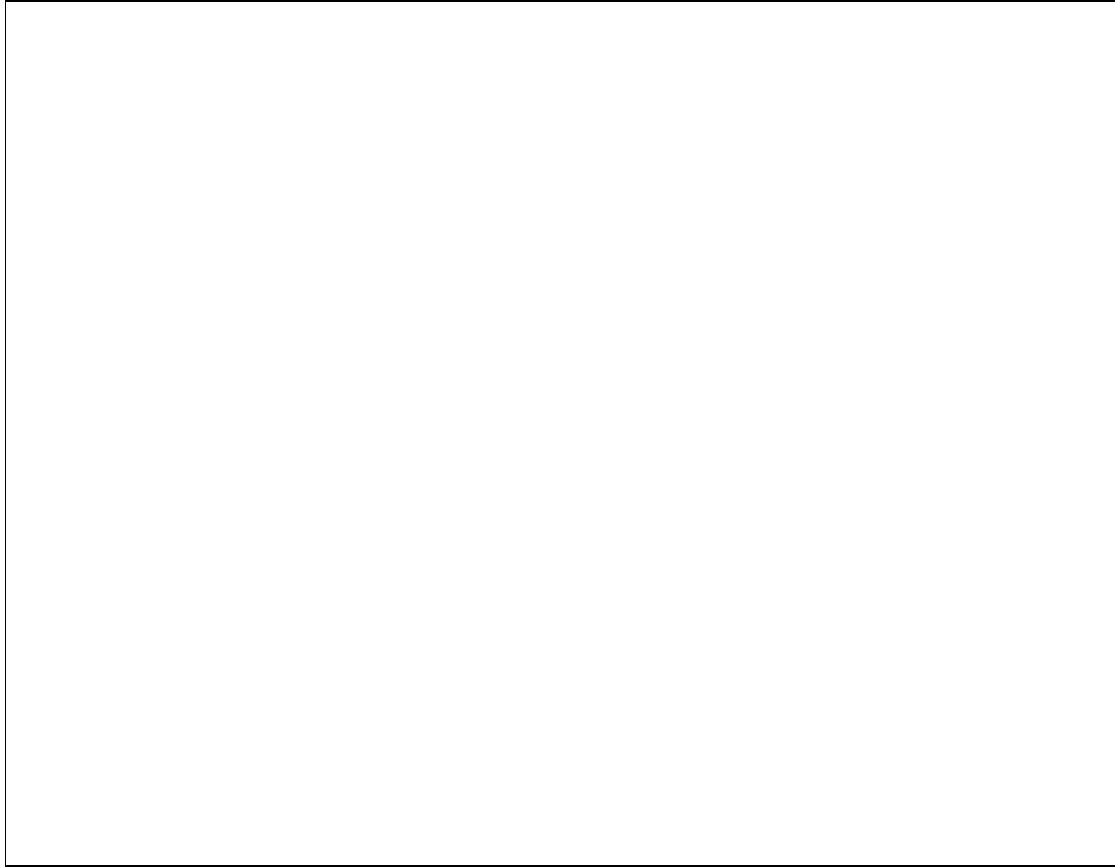
Consumers and brands do not want to buy products from businesses that behave in an unethical manner. Enterprises should not tolerate any acts of corruption, extortion, embezzlement or bribery, and should act ethically.

Self-evaluation questions:

		Yes	No	N/A
A	Did you acquire the land for your tannery without any undue payment to government officials and in a way that did not involve people's forced eviction from their land?			
B	Do you take necessary measures to collect and process the personal data of individuals with respect to the individuals' fundamental rights (particularly the right to privacy)?			
C	Have you been sure not to offer, promise, give, request, agree to or accept undue financial or any other advantages to or from public officials, or the workers of business partners?			
D	Have you ensured appropriate and regular oversight of third parties such as agents and other intermediaries and ensured that remuneration is appropriate and for legitimate services only?			
E	Do you pay a fair level of tax (i.e., no tax evasion through agreements with governments, subsidies, loopholes, use of tax havens, creative accounting practices or transfer-pricing)?			
F	Do you allow fair competition between yourself and your competitors?			

Plans for improvement:





For advice on possible improvements and more information:

1 Land acquisition: in line with the UN Guiding Principles on Business and Human Rights, any company taking over land should make due diligence checks to discover who was previously on the land and whether they were subject to any human rights violations in the context of making the land available for company operations.

2 Corruption: [the UN Convention Against Corruption](#) is a legally binding international anti-corruption instrument. [The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions](#) makes bribery of officials in international business transactions punishable in 38 countries. The Convention describes the concept of corruption, instruments to combat corruption and supervision. [The OECD Guidelines for Multinational Enterprises](#) provides advice on combating bribery (chapter VII).

3 Furthermore,

a. You could adopt [the Whistleblowing Guidelines](#) outlined by the ICC to create a policy for reporting fraud.

b. You could add [the ICC Anti-Corruption Clause](#) to contracts and agreements.

c. You could join [the Partnering Against Corruption Initiative \(PACI\)](#).

4 [The Business Anti-Corruption Portal](#) provides several [guidelines, country profiles and tools, such as this E-learning course](#).

5 Taxes: the NGOs VBDO and Oikos have formulated six guiding principles for good tax governance. [The Fair Tax Mark](#) is a label for companies that want to show that they are open and transparent about their tax affairs and pay the right amount of tax at the right time, in the right place.

6 Competition: you are expected to refrain from practices that restrict competition, such as fixed price agreements, open tender arrangements, or the division of markets, customers, suppliers, geographical zones or activities. For more information, please visit [the website of the WTO](#).