



NCS 17-18-01

**LWG ENVIRONMENTAL AUDIT
SUMMARY REPORT
Protocol Issue 6.5.2**

**Santosh Pargal & Co
34, Sports Complex Industrial Area
Murthal, Distt. Sonapat,
Haryana-131027**

November 2017



Nati Consulting Services

AUDIT REPORT

For

Mr. Sanjay Pargal

by



Viswanathan, Munusamy, LWG Auditor

STRICTLY CONFIDENTIAL

Audit Result Summary

Santosh Pargal & Co	% Score	Rating
Environmental Performance	77.3%	BRONZE
	% physically marked	% documentation only
Material Traceability	0%	0%
The primary processing scope for this tannery audit	Category D – Tanned hides/skins to finished leather	
The tannery also undertakes the following activities	Category D – Tanned hides/skins to finished leather	
The types of leathers produced are	Garment leather	
Checked on IPE web-site	N/A	
The number of sub-contractors used is	Nil	

To achieve the rating of **Gold**, **Silver** or **Bronze** it is necessary to gain the minimum score required for that award as an overall percentage and in all critical sections.

		Gold	Silver	Bronze
Overall				
Possible Score	1285			
Actual Score	1016	Minimum Score		
Critical Sections				
Operating permits	100	85.0	75.0	65.0
Tannery data	75	85.0	75.0	65.0
Environmental management systems	74	85.0	75.0	65.0
Restricted substances	76	85.0	75.0	65.0
Energy consumption	89.96	85.0	75.0	65.0
Water usage	100	85.0	75.0	65.0
Air & noise emissions	71.08	85.0	75.0	65.0
Waste management	77	85.0	75.0	65.0
Effluent treatment	68	85.0	75.0	65.0
Emergency plans	67	85.0	75.0	65.0
Non Critical Sections				
Housekeeping	70.64			
Manufacturing processes	51			
Beamhouse processes	N/A			
Post tanning processes	30			
Finishing processes	24			
Complaints and public relations	20			

Audit completed by	Nati Consulting Services
Auditor	Viswanathan Munusamy
Date the audit was conducted	27 & 28 November 2017
The next audit is due	27 November 2019
Audit protocol	* LWG - Issue 6.5.2, September 2017

*The audit was conducted in accordance with the procedures and guidelines specified in the "Tannery Environmental Auditing Protocol" prepared and issued by the Leather Working Group: Issue 6.5.1, April 2017. The assessment was based on sampling and therefore nonconformities may exist which have not been identified.

Key Comments and Observations

Santosh Pargal & Co is operating the tannery in Sports Complex, an industrial estate developed by Haryana State Industrial Infrastructure Development Corporation in Murthar, near Sonipat in Haryana State in India. The tannery produces garment leather from sheep skins. Though the supply is directly to the garment factories operating around National Capital Region of New Delhi, brands like All Saints and Mango are the prominent brands where the production goes. The tannery is abstracting water from on-site bore well. The effluent after primary, secondary treatment and then ultrafiltration, is discharged into industrial estate sewerage system as per the consent from Haryana State Pollution Control Board (HSPCB). The sludge generated at site is disposed off in secure landfill operated by a public private body, GEPIIL under HSPCB norms.

This is the first audit for the tannery. The tannery has achieved 'Bronze' level in this audit, though the tannery obtained overall score of 79%. The tannery is operating in accordance with the legislations and hence the tannery achieved Gold level in operating permits and similarly the water and energy consumptions are meeting the Gold level. The tannery has a solar water heater for its hot water requirement. Emergency plans, air and noise emissions and environmental management systems are the sections the tannery achieved 'Bronze' category.

General comments on overall management

The tannery seems to be well organised in terms of arrangement of the machines and its maintenance. The external portions and outside environment to their proximity is also kept at generally acceptable level. Housekeeping and general cleanliness appears to be good.



Figure 1: Entrance of Santosh Pargal & Co, Murthal, Haryana

Operating permits

The factory license has been applied online to Haryana Enterprises Promotion Centre in which it is being processed in phase II level. The tannery has valid consent from Haryana State Pollution Control Board (HSPCB) for water discharge, air emissions and hazardous waste. Also the tannery has obtained permission from HSIIDC (Government agency) for discharge of treated effluent into sewage drain of the industrial estate. The effluent is further treated in the sewage treatment plant which is operated by HSIIDC and then discharged. The tannery has obtained Gold level in this section.

Tannery data

The wetblue sheep skins mostly are sourced from Iran. The production data are up to September 2017. As the wetblue suppliers have not obtained LWG certifications, the tannery has achieved Silver grade in this section.

Raw Material Traceability

The raw material traceability is only up to the country of origin. There is no system for traceability and the tannery has obtained 0% in traceable to slaughterhouse. The skins are not sourced from Brazil, Australia or New Zealand.

Environmental management systems

The tannery has environmental policy which is also publicly displayed. The tannery has developed procedures and objectives have been set. Implementation of the objectives is ongoing and results are not yet to be quantified. Resources have been allocated and responsibilities have been assigned. The systems are still in evolution. The tannery has obtained bronze in this section.

Restricted substances

All major customers restricted substances specifications are available and the tannery has developed its own restricted substances specification. Major production in this tannery is sheep nappa leather for garments and with mostly of black colour. Tests from ISO17025 certified lab are undertaken regularly for this finished leather type. The tannery has scored silver in this section.

Energy Consumption

Electricity and diesel are the only two sources of fuel for this tannery. The tannery uses solar water heating system for its hot water requirement. The tannery does not have a boiler, the heating system in the two autosprays are electric lamp based. Diesel is used as fuel for power generation during load shedding. The tannery has scored Gold level in this section.



Figure 2: Solar water heating system

Water usage

The source of water is bore well situated within the tannery. About 20% of treated effluent after ultra-filtration is recycled within the tannery for sanitary washings and general cleanings. The tannery has scored Gold in this section.



Figure 3: Water flow meter for measurement of input water



Figure 4: Tank for treated effluent after ultrafiltration

Air & noise emissions

Monitoring of stack for DG set and autospray are undertaken. Solvent consumption is less as most of the production is coated with very less finish season in order to maintain the natural feel on the grain leather. The tannery has scored bronze in this section.

Waste Management

The hazardous wastes manifests are available for the last 15 months in which the sludge is sent to HSPCB authorised common secure landfill. Non-hazardous wastes are sent for various by products manufacturing like leather board. The tannery has scored silver in this section.

Effluent treatment

The tannery is operating its own effluent treatment plant and meeting all parameters other than TDS and chlorides. The TDS and chlorides are met in the sewerage treatment plant of HSIIDC for which the tannery has a valid consent and permission.



Figure 5: Primary treatment units



Figure 6: Primary and secondary settling tanks

Emergency plans

Adequate emergency plan including evacuation maps are available. Evacuation route maps are displayed at strategic locations. However, the tannery has not done the hydrogen sulphide gas risk assessment for the effluent treatment plant. The tannery has scored Bronze in this section.

Recommendations

The following are the opportunities for improvement for this tannery:

- The wetblue sourcing need to be from LWG rated suppliers in order to obtain higher score in overall grade.
- The environmental management programmes for meeting the objectives should be be closely monitored at the implementation stage and necessary adjustments may be necessary. Internal auditing, monitoring and measurement systems are the topics the team has to be provided with proper training.
- Regarding the occupational safety and health aspects, one of the electrical panel, in which some unprotected loose wires, should be immediately addressed so that adequate protection is provided.
- Hydrogen sulphide gas risk assessment should be conducted in the ETP area and recommendations should be implemented.

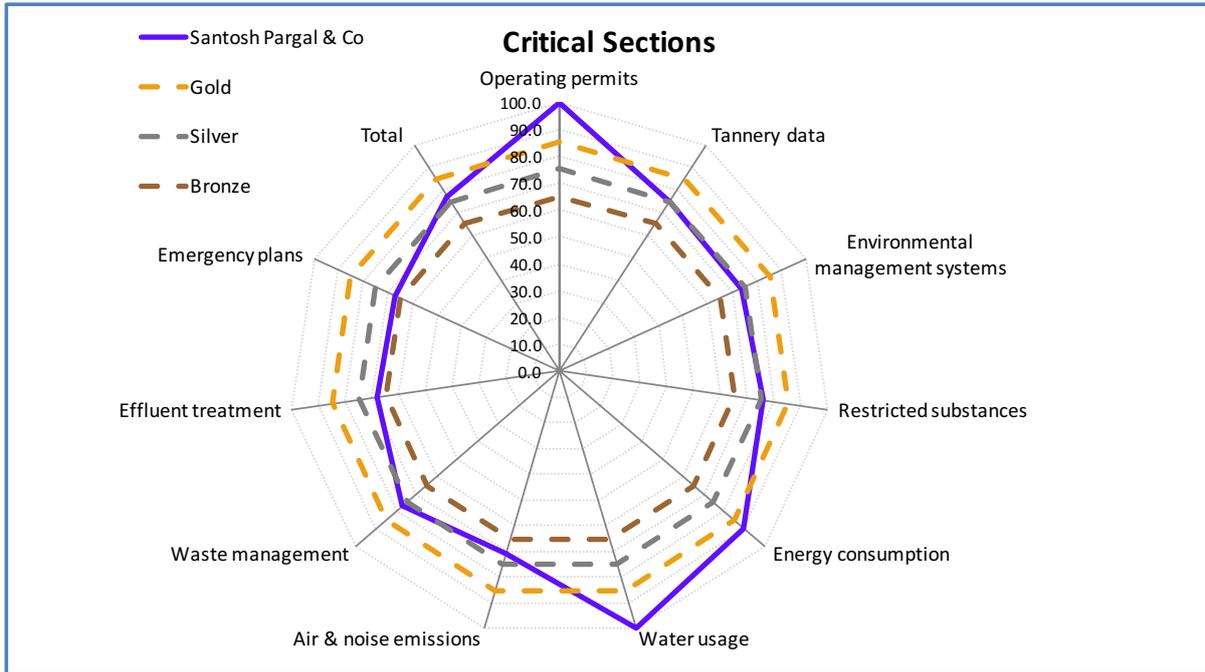
- Two of the autosprays are not having the scrubber or water wash system. It is recommended to install these systems to reduce emissions into air.

Documents provided and filed with the report:

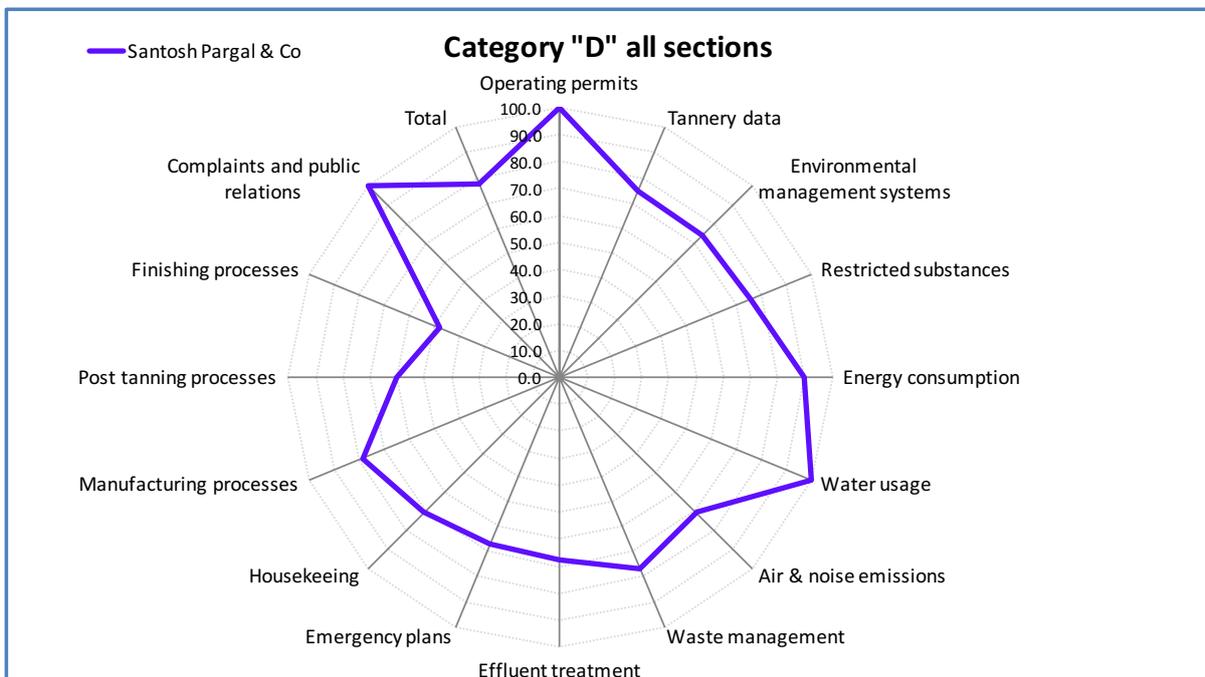
- Site plan was provided and included in the responses report.
- Photographs of various locations in the tannery – indicative or representative ones are included in the report.

Graphical Performance

Radar Graph 1, "Critical Sections" scores in comparison with Gold, Silver and Bronze targets



Radar Graph 2 Scores as a percentage of the possible total.



These graphics are best viewed on computer screen or when printed in colour.

Notes

The assessment was based on sampling and therefore nonconformities may exist which have not been identified.

If you wish to distribute copies of this report external to your organisation, then all pages must be included.

Regulatory Compliance

The conditions of contract for this audit require that the auditor be informed of all regulatory non-compliance or incidents that require notification to any regulatory authority. Acceptance of this report by the client signifies that all such issues have been disclosed as part of the assessment process and agreement that any such non-compliance or incidents occurring after this visit will be notified to the auditor as soon as is reasonably practical.