

Inter Office Memorandum

From: EPA Director General Office

To: EPA Deputy Directors and all EPA line General Directorates

Date: 03/07/2023

Subject: Approved Industrial Chemical Registration and Administration Guideline and Environmental Compliance Checklist

Dear Deputy Directors and General Directorates, I am writing to inform you that the EPA has successfully developed the Industrial Chemical Registration and Administration Guideline and Environmental Compliance Checklist. These tools have been created in collaboration with various stakeholders and are essential for the effective implementation, compliance, and enforcement of environmental laws and policies. The Industrial Chemical Registration and Administration Guideline will provide clear instructions and procedures for the registration and management of industrial chemicals. It is crucial for ensuring the safety of chemicals used in various industries and protecting both human health and the environment. On the other hand, the Environmental Compliance Checklist will serve as a comprehensive tool to assess compliance with environmental regulations. It will help identify areas of improvement and ensure that all activities are carried out in accordance with the law.

Recognizing the significance of these tools, I am pleased to announce that the EPA has officially approved the guideline and checklist. Therefore, I kindly request all directorate generals and stakeholders to utilize these instruments in their respective operations. By utilizing these tools, we can strengthen our efforts in promoting environmental sustainability and safeguarding our natural resources. I herewith encourage all directorate generals to familiarize themselves with the guideline and checklist and incorporate them into their daily operations.

Thank you for your cooperation in implementing these important tools. Should you have any questions or require further assistance, please do not hesitate to contact our office or National Environmental Law Development and Enforcement Programme Advisor.

Best regards,


Getahun Garede Wodaje (Ph.D)
Director General

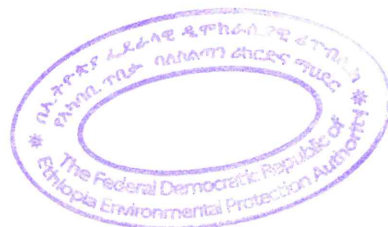




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Federal Democratic Republic of Ethiopia Environmental Protection Authority

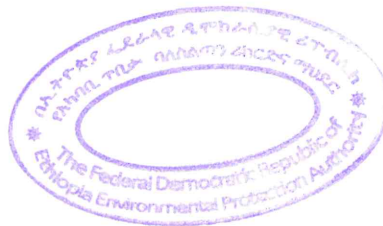
NATIONAL ENVIRONMENTAL COMPLIANCE EVALUATION CHECKLIST FOR INDUSTRIES

JUNE 1, 2023
ADDIS ABABA
Ethiopia



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1. Introduction

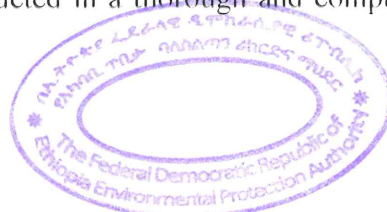
1.1. Background

The Environmental Protection Authority (EPA) is responsible for ensuring that businesses and organizations comply with national laws that protect the public health and the environment. Recently, EPA has begun combining traditional enforcement activities with more innovative compliance approaches. In the National Environmental Law Development and Enforcement Programme, the Authority recognizes the need to assist the regulated industry /industry by providing compliance assistance and guidance that will promote improved the culture of compliance and overall environmental performance. EPA encourages regulated entities to recognize a culture of voluntary compliance as means to enhance environmental performance by internalizing and implementing sound environmental practices. As part of that effort, EPA is encouraging the development of self-assessment programs at individual facilities. Voluntary compliance and audits programs play an important role in helping companies meet their obligation to comply with environmental requirements. Such assessments can be a critical link, not only to improved compliance, but also to improvements in other aspects of an organization's performance. For example, environmental compliance/audits may identify pollution prevention opportunities that can substantially reduce an organization's operating costs.

In the coming years, EPA will encourage regulated entities to initiate environmental compliance audit programs that support and document compliance with environmental laws. EPA has developed this checklist to provide regulated entities with specific guidance in periodically evaluating their compliance with federal environmental requirements.

1.2. Purpose of the Checklist

This checklist is a tool to assist entities in conducting environmental evaluation and/or audits, which should inform the industry /industry whether the industry is in compliance with national environmental legislations. EPA has developed this checklist to assist and encourage businesses and organizations to perform environmental compliance and/or audits and disclose violations in accordance with EPA's inspection procedures. The checklist is intended to promote consistency among regulated entities when conducting environmental compliance and/or audits and to ensure that inspection or audits are conducted in a thorough and comprehensive manner. It includes a



checklist containing detailed statements for conducting a review of industry conditions. This checklist can be used as a basis to implement, upgrade, or benchmark environmental management activities. The checklist is a management tool for measuring and improving environmental performance by correcting deficiencies.

1.3. Scope of applicability

This checklist applies to any business organization and facilities that involved in manufacturing and services sectors and any industries. Not all checklist items will be applicable to particular industries.

1.4. Review of Federal (Environmental) Legislation

In Ethiopia there are numerous environmental regulatory requirements administered by federal, city administrations and regional governments. Each level of government may have a major impact on areas at the industries that are subject to the audit. Therefore, auditors are advised to review federal, state and local regulations in order to perform a comprehensive audit. The following are some of the lists of environmental laws that should be considered during the self-inspection.

- Constitution of the Federal Democratic Republic of Ethiopia Proclamation No. 1/1995
- Environmental policy of Ethiopia
- Biodiversity policy and laws
- Wildlife policy and laws
- Water resources policy and laws
- Forest policy and laws (forest development, protection and utilization proclamation 1064/2018
- Environmental Pollution Control Proclamation No. 300/2002
- Prevention of Industrial Pollution Council of Ministers Regulation No. 159/2008
- Environmental Impact assessment Proclamation No. 299/2002
- Solid waste Management proclamation No. 513/2007
- Hazardous waste management and disposal proclamation 1090/2018
- Industrial chemical Registration and administration proclamation 1075/2018
- Electrical and electronics waste management and control regulation no 425/2018



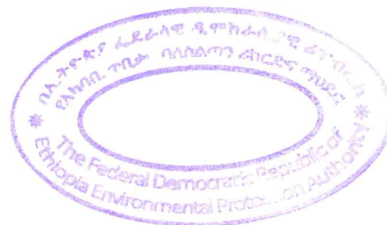
- Guideline Ambient Environmental Standards for Ethiopia
- Environmental Standards for Industrial Pollution Control in Ethiopia
- Sludge Limit- Requirements (ES 6934:2022) and Guideline Sludge management
- Industrial park proclamation no 886/2015
- Others

2. Environmental and Social Compliance Evaluation Checklist

The following checklist provides a starting point for assisting an environmental experts in preparing for a compliance and monitoring report. In most cases additional questions supporting information and clarification from a industry /site staff will be necessary. As much information should be gathered in advance of the industry /site visit. Verify that the items are present or documented, in particular environmental impact and risk assessments, operating permits and other licenses during preliminary meeting and Industry /Site Inspection.

2.1. Industry /Industry General Information

Industry / Industry Name	Industry /SIC	Industry ID Number
Industry Street Address	City	Region
Year of Establishment	License date	Current activities / processes / products
Number of Employees	Type of industry	Types of inputs used for the production
Zip Code/postal number	Phone Number	Fax Number
Contact Person Name	Title	Telephone Number

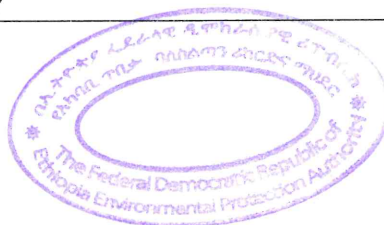


Email Address		

2.2. Compliance Information

2.2.1. Permits and Licenses

No	Requirements	Conformity			Remarks
		Yes	No	NA	
1.	Is the industry committed to any industrial or environmental laws of the country?				
2.	Is the industry hold the required environmental-related documents such as permits, licenses, official contracts, and certificates?				
3.	Have the required permits, licenses, official contracts, and certificates been found valid and consistent with the current situation?				
4.	Are the following licenses, permits, and approvals available to demonstrate full legal compliance?				
	a.Environmental fees, e.g., wastewater discharge fee Registration at authorities (e.g., wastewater discharge, air emission inspection)				
	b.Licenses of waste collectors				
	c.Air emission permits				
	d. Wastewater discharge permits				
	e. Permits and licenses related to dangerous goods				
5.					
6.	Are current copies of all applicable regulatory and other requirements accessible to personnel as necessary?				
7.	Has the industry set up a mechanism to remain up to date with applicable environmental legal requirements?				
8.	Does the industry have a process to periodically review its environmental performance (as per local law or at least every year)?				
9.	Does the industry have a policy defining its approach to environmental management?				
10.	Does the industry assess the significant environmental aspects and impacts associated with its activities?				
11.	Are the training concerning environmental matters and the industry 's environmental procedures repeated regularly?				



12.	Has a procedure been established, implemented, and maintained to identify the environmental aspects of its current and relevant past activities?				
13.	Is there environmental unit?				
14.	Have you received citizen complaints? Or are there any negative media reports about the industry causing pollution in the locality?				
15.	<ul style="list-style-type: none"> a. Does industry have to face any challenges to fulfill the compliance regulations? b. Are those regulations realistic and in use globally and /or in other cities of Ethiopia? c. Is the government being of any help or assistance and facilitating the whole process to keep this industry staying environmentally compliant? (e.g., challenges (e.g., lack of funds, understaffed agencies, any other legal/documentation issues, etc.) 				

2.2.2. Air Emission

No	Requirements	Conformity			Remark
		Yes	No	NA	
1.	Has the industry identified point and fugitive sources of emissions to air?				
2.	Are there or will there be air emissions from stacks and/or vents or other uncontrolled emissions?				
3.	Is each air emission (from different sources such as boiler, fiber preparation-heat setting, dying with disperse dyes) adequately treated before its discharge to ensure compliance with the standards/limits?				
4.	Have you calculated your current or potential emissions?				
5.	Does your industry have control devices or abatement processes for on-site emissions into the air?				
6.	Do you have a base line data to calculate the potential future emission?				



2.2.3. Noise/Sound Pollution Management

No	Requirements	Conformity			Remarks
		Yes	No	NA	
1.	Is there a process that generates Noise pollution identified by the industry?				
2.	Does your industry have control devices or abatement processes for noise pollution emissions?				
3.	Is there any public complaint on noise pollution in case of your industry?				
4.	Does industry assess risk area use noise standard and aware employees to use personal protective equipment in industry?				
5.	Is there public and employee complaint resolving mechanism?				
6.	Is there existing environmental training programmes including sound/noise pollution?				



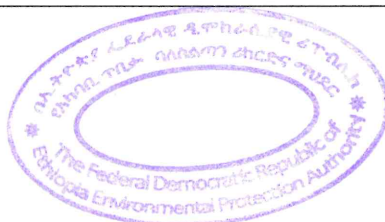
2.2.4. Energy and GHG

No	Requirements	Conformity			Remarks
		Yes	No	NA	
1.	Does the industry has the required permits, licenses, or official authorizations for this activity if the industry produces energy (steam, electricity, heat...)?				
2.	Does the industry record the type/source of energy consumed and quantity utilized?				
3.	Is the industry aware of the applicable legal requirements to monitor and track energy consumption?				
4.	Does the industry have power consumption meters in place or any other means to measure the entire industry's power consumption?				
5.	Does the industry monitor regularly (every month) its overall energy consumption?				
6.	Does the industry estimate, analyze and document its energy consumption at a department, section, and/or process level?				
7.	Does the industry conduct internal inspections, at least every 6 months, to identify and avoid common situations where energy is wasted in the production (e.g., steam leaks, useless lighting, etc.)?				
8.	Does the industry conduct training for relevant workers concerning energy, transport, and greenhouse gases (GHGs)?				
9.	Does the industry have power consumption meters in place to measure the energy consumption at a department, section, and/or process level?				
10.	Does the industry analyze and document its energy consumption for 1 unit of product processed?				
11.	Does the industry monitor or routinely assess emissions of GHGs associated with the industry's processes/activities, fuel use for on-site or off-site transportation, agricultural activities, etc.?				
12.	Does the industry have targets and action plans that seek to reduce its environmental impact and increase efficiency from energy, transport, and greenhouse gases (GHGs)?				
13.	Does the industry use energy efficient appliances?				



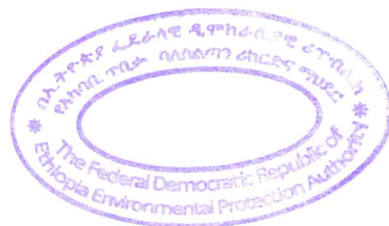
2.2.5. Water Utilization

No	Requirements	Conformity			Remark
		Yes	No	NA	
1.	Does the industry uses water abstracted from on-site boreholes or rivers, streams, lakes, etc.?				
2.	Does the industry have permits, licenses, or official contracts for water abstraction?				
3.	Are policies and written procedures in place to manage water utility?				
4.	Is the industry aware of the applicable legal requirements to monitor and track water consumption?				
5.	Does the industry have water flow meters in place at the raw or freshwater extraction/source point to measure the entire water consumption?				
6.	Does the industry monitor every month its overall water consumption?				
7.	Does the industry estimate, analyze and document its water consumption at a department, section, and/or process level?				
8.	Does the industry conduct internal inspections to identify and avoid common situations where water is wasted in production (e.g., water leaks, useless excessive water consumption for a given operation, etc.)?				
9.	Does the industry conduct training for relevant workers concerning water use?				
10.	Does the industry have water flow meters in place to measure the water consumption at a department, section, and/or process level?				
11.	Does the industry analyze and document its water consumption for a unit of product processed?				
12.	Does the industry have targets and an action plan to achieve water savings?				
13.	Does the industry have water flow meters in place at the outlet to measure the entire water discharge?				
14.	Does the industry use 'grey' water (e.g., water typically generated from domestic-style activities, for example, washing machines, showers, bathtubs, hand washing, and sinks, together with some industrial processes and recycled on-site) or reuse/recycle water used in the production?				



2.2.6. Wastewater and Sludge Management

No	Requirements	Conformity			Remarks
		Yes	No	NA	
1.	Are the wastewater streams, their sources, parameters and effluent identified?				
2.	Are sewerage and waste water production/utility process drainage systems separated?				
3.	Are policies and written procedures in place to manage wastewater generation, collection, pre-treatment, and treatment?				
4.	Does the industry have emergency holding tank in case the treatment industry can stop or the wastewater pre-treatment/treatment industry /equipment/system malfunctions?				
5.	Is regular wastewater and sludge quality testing/monitoring undertaken to ensure ongoing compliance with permitted effluent standard limits				
6.	Are spill response materials/equipment (e.g., granules, etc.) available near containers of liquid wastes?				
7.	Is domestic wastewater and industrial wastewater adequately treated before its discharge to ensure compliance with the standards/limits where available?				
8.	Does your industry have a signed contract including the name, address, and contact information of the offsite wastewater treatment plant operator?				
9.	Does your industry recycle and/or reuse wastewater as waste water treatment (closed loop)?				
10.	Does your industry handle sludge as per applicable legal requirements?				
11.	Do any complain from the surrounding society before?				
12.	Does the firm determines the amount of waste water generated?				
13.	Does the waste treatment plant has a conveyer for transporting the sludge into dry bed?				



2.2.7. Solid Waste Management

No	Requirements	Conformity			Remarks
		Yes	No	NA	
1.	Does the industry have integrated solid waste management plan?				
2.	Do generated solid waste is segregated, inventoried, and properly labeled by the industry?				
3.	Does the industry determine its generation rate?				
4.	Are policies and written procedures in place for solid waste management (from source reduction to final disposal)?				
5.	Are policies and written procedures in place to manage waste leaks/spill response?				
6.	Is there a separate solid waste temporary storage industry protected from weather and fire risks and with a proper containment area for the stored waste type?				
7.	Does the firm recycle/reuse its solid waste?				
8.	Is the firm outsourcing the generated solid waste to properly permitted/licensed legal person?				
9.	Does the industry provide training to relevant personnel responsible for Solid waste management?				
10.	Does the industry provide PPE to personnel who engaged in solid waste management?				
11.	Do any complain from the surrounding society before?				



2.2.8. Hazardous Waste Management

No	Requirements	Conformity			Remarks
		Yes	No	NA	
1.	Are policies and written procedures for hazardous waste management?				
2.	Are policies and written procedures in place to manage hazardous waste leaks/spill response?				
3.	Does the industry have hazardous waste management plan?				
4.	Does the industry have hazardous waste minimization actions/targets?				
5.	Does the industry determine its hazardous waste generation rate?				
6.	Are the generated hazardous wastes segregated, inventoried, and properly labeled?				
7.	Is your industry aware of the ZDHC (Zero discharge hazardous chemicals) Wastewater Guidelines and/or other stricter standards (e.g., specific customer requirements)?				
8.	Does your industry meet the ZDHC Wastewater Foundational Limits and/or other stricter limits (e.g., specific customer requirements)?				
9.	Is there a separate hazardous waste temporary storage industry protected from weather and fire risks and with a proper containment area for the stored waste type?				
10.	Is the industry outsourcing the generated hazardous waste to properly permitted/ licensed legal person?				
11.	Does your industry provide training to relevant personnel responsible for hazardous waste management?				
12.	Does the industry provide PPE to personnel who engaged hazardous waste management?				
13.	Do any complain from the surrounding society before?				



2.2.9. Chemical Management

No	Requirements	Conformity			Remarks
		Yes	No	NA	
1.	Does all chemicals used by the industry are registered by national competent authority?				
2.	Does the industry have chemical management plan?				
3.	Does the industry have appropriate chemical utilization system/ methods/mechanisms?				
4.	Does the industry have responsible personnel for chemical management?				
5.	Is there a plan for monitoring and controlling banned and restricted substances that are applied to all chemicals used at the industry?				
6.	Are there well-documented and implemented SOPs that cover chemical management such as proper handling, use, storage, and disposal of chemicals and hazardous chemicals according to the (M)SDS / technical data sheets (TDS), approved chemical list, and chemical classification?				
7.	Does the industry have an up-to-date chemical inventory (on paper, or electronic)?				
8.	Is the annual usage (volume/weight) of each chemical monitored and recorded?				
9.	Does the industry have basic documentation for the production and chemical operations performed in the industry?				
10.	Does the industry record quantities of chemical products used for each work order/production order?				
11.	Does the industry regularly identify the number of chemicals lost due to accidents (e.g., spillages, poor labeling, accidental mixtures)?				
12.	Is there a corrective action procedure(s) when inaccuracies are identified in the chemical inventory reconciliation?				
13.	Is there secondary containment at all locations where chemicals are stored and an emergency response plan in place for those critical areas?				
14.	Has the industry documented and implemented procedures to re-evaluate chemicals after a defined period of storage to determine their suitability for use?				
15.	Does your industry provide training to employees responsible for the chemical management system on the Restricted Substances List (RSLs) and Manufacturing Restricted Substances List (MRSLs)?				
16.	Are training records maintained to demonstrate that industry personnel				



	handling chemicals have the required education, training, and skills to perform their assigned responsibilities and activities?				
17.	Does the industry have established procedures or alternative systems to ensure that only quality control-approved chemicals are used?				
18.	Has the industry documented and implemented procedures to ensure that the identification of raw chemicals includes the following information?				
	a. Name of the chemical as marked on the delivery note				
	b. The date or number of receipt or other tracking numbers				
	c. The chemical supplier's name				
19.	Is the Chemical container having proper CLP or GHS labeling or equivalent labeling for countries not adopting GHS				
20.	Has the industry established and implemented procedures to ensure chemicals used are from oldest to newest receipt date?				
21.	Is there a documented procedure to deal with chemical spills/leaks and chemical emergency response plan in place and practiced periodically?				
22.	Has the industry established procedures to ensure that chemicals are handled in a timely and environmentally responsible manner and accordance with any applicable legal/regulatory requirements?				
23.	Does the industry have a current (chemical) (M/SDS for each chemical in the language understood by workers in the areas where chemicals are handled and stored?				
24.	Are special storage conditions identified and followed from chemical specifications or (M/SDS)?				
25.	Does the industry have and maintain personal protective equipment, safety showers, laboratory/industry eye wash bottles or stations, fire extinguishers, etc. appropriate for the chemical hazards?				
26.	Has management established procedures that clearly define and communicate the areas in which authorized personnel is allowed to enter?				
27.	Is there an internal audit unit that reviews, audits, and verifies chemical hazards and inventory?				



