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1 INTRODUCTION

After Facilities complete the Self-assessment, the information can be verified through an onsite verification, in which the Verifier completes the Verification from a distance without visiting the Facility, or through an onsite verification, where the Verifier visits and completes the Facility.

Although either an Onsite of Onsite Verification can be used to validate the self-assessment, there are limitations to an Onsite Verification, as compared to the Onsite Verification. As the Verifier does not personally inspect or see the Facility, they must rely on the Facility to provide information (including photos) that demonstrate or show their program. Due to these limitations, the Verified Results of an Onsite Verification cannot be shared publicly.

There are benefits to conducting Onsite Verifications, including:

- The Verifier visits the Facility, increasing the confidence of the Verification
- The Verifier can see the entire Facility
- The Facility spends time with the Verifier, which may increase their understanding of:
  - The Performance Improvement Plan
  - How to better meet expectations
  - The Higg Criterion and Self-assessment

If a Facility wishes to Verify Level 2 and/or 3 Chemical indicators, this can only be done through an Onsite Verification.

1.1 Higg Index FEM Verification Process Chart

The following chart gives an overview of the Higg Index FEM Verification Process.
2 Higg Index FEM Onsite Verification Information

2.1 Onsite Verification Fees
The total verification price should be negotiated by the company requesting the verification (brand, retailer or manufacturer) and the Verifier and their company. Pricing may depend on several factors, such as the number of indicators and the quantity and quality of supporting documentation which must be reviewed.

It is suggested that all Verification fees be pre-paid.

2.1.1 SAC Verification Fee
The SAC charges a fee of up to $185 USD to complete verifications. This money is collected by the SAC prior to the Facility giving access to higg.org to the Verifier, prior to the Verification commencing.

2.1.2 Onsite Verification Scheduling
Onsite Verifications are announced, meaning the Facility and the Verifiers know when the Verification will occur. The Scheduling of the Verification is done between the Verifier/Verification Body and the Facility – the SAC nor the VPM are involved in the scheduling of the Verification.
2.1.3 Verification Bids and Negotiations

Information that is commonly required by Verification Companies when determining rates include:

- Facility Invoicing information
- Name of the company requesting the Verification (Brand/Retailer or Manufacturer)
- Environmental Processes or Impacts that affect the amount of information in the Self-Assessment, such as:
  - Land Lot size
  - Type of processes
  - Products produced
  - Number of buildings
  - Number of floors in each building
  - Size and type of waste water treatment (if any)
  - Energy Source(s)
  - Air Quality Systems

- Information that is needed for Verification purposes, such as:
  - Languages
  - Number of sites (if travel is needed between sites/buildings)

Information that Companies requesting verifications typically want to see include:

- Total Price, broken out by Verification cost, travel, upload, report writing, etc.
- Who will be conducting the Verification
- Dates and timelines for Verification completion
- Information, such as address/location, contact person, etc.

2.2 Onsite Verification Duration

Based on current experience the Higg FEM onsite review typically takes about two days. It can be less for smaller facilities with minimal environmental impact (e.g. small cut and sew facilities) or it can take 1-2 days longer for large, vertically integrated facilities that have several wet or chemically-intense processes. Note this is guidance only, and should be adjusted, as needed, to ensure the verification is accurate and of high quality. Verifiers should fully investigate all factors to determine the required time of the onsite verification.
# Verification Scope

The Verifier shall review the accuracy of the following information:

<table>
<thead>
<tr>
<th>Higg FEM Section</th>
<th>Verification Scope</th>
<th>Verification Method</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility’s Profile</td>
<td>Full content of the facility’s profile</td>
<td>Review the accuracy of the information provided</td>
<td>Accurate information is important to ensure quality of the benchmarking functionalities available on the Higg.org platform</td>
</tr>
<tr>
<td>Applicability Tests</td>
<td>All applicability questions</td>
<td>Review and verify the answers provided by the facility to the applicability questions. If the applicability questions are answered incorrectly, questions may be added to the questionnaire that the facility must complete and verified.</td>
<td>Accurate applicability test ensures that only the relevant criteria and scoring apply at the facility.</td>
</tr>
<tr>
<td>Permits</td>
<td>All business license(s) and permits provided</td>
<td>Review the origin and validity dates of the permits</td>
<td>If the facility does not have a valid operating license it will receive a score of ‘zero’ for the entire assessment.</td>
</tr>
<tr>
<td>Environmental Management</td>
<td>All Level 1, 2 and 3 Criteria provided</td>
<td>Review documentation, discuss answers with the management team and key employees, reviews photos as described in the Higg FEM verification guidance (available at Howtohigg.org)</td>
<td>All criteria shall be reviewed by the verifier. However, Level 2 and Level 3 criteria are only scored if facility achieves level 1.</td>
</tr>
</tbody>
</table>
| Energy and GHG         | All Level 1, 2 and 3 Criteria and consumption and/or quality data provided | Verifier shall follow the Higg FEM verification guidance available at howtohigg.org, including:  
• Documentation Review  
• Discussions with Employees and Management  
• Photo Review  
Verification of all the quantitative metrics should be conducted by reviewing bills and records provided by the facility. | All criteria shall be reviewed by the verifier. However, Level 2 and Level 3 criteria are only scored if facility achieves level 1. Verification of the quantitative metrics is essential to measure the performance of a facility over time. |
| Water Use              |                                                        |                                                                                    |                                                                                                                          |
| Wastewater             |                                                        |                                                                                    |                                                                                                                          |
| Waste Management       |                                                        |                                                                                    |                                                                                                                          |
| Air Emissions          |                                                        |                                                                                    |                                                                                                                          |
| Chemical Management    | Level 1 can be verified by SAC eligible Generalist Verifiers. Levels 2 & 3 can be verified by a Generalist Verifier if:  
• Facility uses chemicals in facility tooling and/or operations only | The Verifier shall follow the Higg FEM verification guidance.  
• Documentation Review  
• Discussions with Employees and Management  
• Photo Review  
All criteria shall be reviewed by the verifier. However, Level 2 and Level 3 criteria are only scored if facility achieves level 1. SAC eligible Generalist Verifiers can verify the full scope of the Higg FEM, excluding the chemical management section Level 2 and Level 3, which must be verified through an Onsite Verification. |                                                                                                                          |
4 Onsite Verification Process

The verification onsite review shall include the following.

4.1 Facility Higg FEM Self-Assessment

The first step of the Higg Index FEM Onsite Verification is the Higg FEM Self-Assessment, completed by the Facility and uploaded on Higg.org.

The Self-Assessment is designed to:

- Capture a description of the facility’s profile to customize the assessment for relevant impacts
- Evaluate environmental practices in place against a set of aspirational practices
- Capture environmental quantitative metrics to benchmark environmental performance
- Guide facilities through continuous improvement practices
- Support supply chain transparency through data exchange between various stakeholders

4.2 Opening Meeting

The onsite verification shall start with an “Opening Meeting” with facility management, environmental manager(s) and other key staff members to discuss objectives, verification scope and methodology.

4.2.1 Purpose

The purpose of the Opening Meeting is to ensure that both parties – the Verifiers and the Facility – understands the process, that proper expectations are set, and that, ultimately, the Verification is as effective and efficient as possible.
4.2.2 Agenda
This meeting should include:

- Introductions from both the verification team and facility management personnel.
- Discussion of the objectives of Higg verification, including:
  - A reminder that the Higg verification is not an audit, but rather it serves to verify the self-assessment submitted by the Facility.
  - An explanation that Higg is not a pass-or-fail assessment/audit.
  - A discussion of scoring, that there is no ‘minimum score’ in Higg. Instead, Higg focuses on performance monitoring of critical and minimum legal and industry standards, and supporting facility in its continuous improvement.
- A clarification of the scope of the Verification and criteria to be checked.
- Discussion on the independence of the verification team and the need for openness, transparency and ethics, including a review of the conflict of interest in that no Trainers or Consultants can act as Verifiers.
- An agreement on how conflicts will be handled.
- A review of the confidentiality associated with employee dialogues.
- A review of the confidentiality associated with verification results.
- Communication of criteria and reporting methodology.
- An explanation of the next steps, including outcome of the verification (i.e. PIP will be prepared and will be summarized/explained/discussed in the closing meeting).

4.3 MANAGEMENT POLICIES AND IMPLEMENTATION REVIEW

4.3.1 Purpose
The purpose of reviewing management policies and the implementation of those policies is to review management’s attitude, understanding, policies, procedures and stated practices about environmental issues. All sections of Higg Index checklist are relevant and should be covered.

4.3.2 Details
Review of management policies and implementation should be conducted at the beginning of the Onsite Verification; however, it may be necessary to go back to this element later in the verification process to “close the loop” on issues identified at later stages of the verification process.

The staff to be involved in this review include:

- Senior facility management
- Maintenance staff and responsible person(s) for environmental areas in the facility
- Others who have information or knowledge about the management policies and implementation of those policies
4.4 PERMITS, DOCUMENTATION AND PROCEDURES REVIEW

4.4.1 Purpose
The purpose of this part of the verification is to review and validate the permits, document and procedures of the Facility.

4.4.2 Details
Relevant documentation and procedures to be reviewed are described in the Higg verification guidance found at howtohigg.org

4.5 DIALOGUE WITH MANAGEMENT & FACILITY ENVIRONMENTAL MANAGERS

4.5.1 Purpose
The purpose of discussions with management is to learn from key personnel about the Facilities programs and policies, and how they are intended to be implemented throughout the Facility.

4.5.2 Details
Dialogue with managers and dialogs with key personnel who have specific roles and responsibilities for managing environmental issues or environmental management systems will be undertaken via a teleconference call. Dialogues may also be undertaken with Facility Environmental Managers to establish the level of awareness of environmental issues across the facility and to help identify any issues or good practices on-site.

During dialogue with management and key staff, following evidences shall be considered:

- Verbal responses from management personnel
- Legal / regulatory requirements documents collected and maintained by the facility
- Industry standards (if any) collected and maintained by the facility
- Documented facility policies, procedures etc.
- Relevant legal certificates and other legal permits
- Communication of requirements to facility management
- Internal monitoring and subcontractor records and controls

Worker Selection: The Verifier should aim to talk to a number of relevant workers, taking into account:

- Different departments, including workers associated with managing waste, undertaking environmental monitoring as well as production workers
- Health & safety representatives/personnel, where appropriate
- Environmental committee representative(s), if applicable
- New employees/trainees (to evaluate training quality)
- Employees from different shifts

Location for Dialogue:

- Formal discussions should take place in a quiet, private area away from management offices with no representatives of management present
• Informal discussions may also take place during the physical tour of the employment site, at lunch time or in breaks
• Where possible, dialogue with workers should be held in the local language; where this is not possible worker interviews may be conducted through a translator
• Translators must be independent of employment site management and must speak the language of the employee

Protection of workers:

• Verifiers should ensure that problems raised by workers are discussed with management in a non-attributable way. Verifiers must ensure that the comments they report cannot be traced back to an individual worker.
• Verifiers should leave a contact telephone number, preferably their mobile number and their local office phone number, with all workers the Verifier discussed with, in order for workers to alert the Verifier if there are reprisals or intimidation.
• The Verifiers should keep a confidential note of who is being interviewed.

4.6 SITE OBSERVATION

4.6.1 Purpose
The purpose of the visual assessment is for the verifier to review physical conditions and implemented practices in all areas of the facility to establish evidence that activities are consistent with what the factory has presented in their self-assessment scores.

4.6.2 Observation Areas
Verifiers should observe:

• Site perimeter
• Facility premises and surroundings
• Production line(s) / areas
• Raw material/chemical, hazardous & general waste storage area or warehouse
• Bulk storage area
• Boiler room
• Compressor house
• Power generator room
• Wastewater treatment plant including the inlet, treatment processes, and final discharge location (outlet)
• Internal and external transport area (if applicable)
• The roof
• All locked rooms/areas
• Chemical operations area e.g. dyeing, washing, printing, spraying, or other chemical application
• Chemical mixing and dosing area at production areas, and other locations where chemicals are being used, e.g. wastewater treatment plant
• Temporary storage areas for chemicals
• Safety equipment and PPEs storage area
4.6.2.1 Perimeter Survey
A perimeter survey can be useful to provide supplementary information about the employment site and its local context and to identify specific risk issues.

The perimeter survey should include:

- The surrounding environment (e.g. rural, industrial, residential neighborhood, business district, etc.) and its advantages/constraints
- Immediate neighboring facilities (e.g. manufacturing, waste treatment/disposal, etc.) and areas of potential off-site impact (off-site bulk storage tanks, off-site waste storage areas, etc.)
- Areas of potential impact from on-site activities (e.g. distressed vegetation, etc.)
- Local perceptions of the employment site (e.g. waste and water discharge, nuisance to local community, emissions, etc.)
- Other facilities located on the employment property (e.g. canteen, clinic, water treatment, etc.)
- Production units within the employment site property which are outside the verification scope

4.6.2.2 Photographs
Photographs may be taken with the expressed permission of the Facility as they may contain or reveal confidential information.

Photos should include:

- Outside general overview
- Facility premises and surroundings
- Inside general overview
- General photos of production line(s)
- Key activities and processes that have potential environmental impact, if present, such as:
  - Waste handling and storage area(s)
  - Hazardous substance storage area(s)
  - Hazardous materials transfer area(s)
  - Bulk storage tanks and secondary containment area(s)
  - Wastewater treatment area / plant, including discharge point(s)
  - Water Discharge Point(s)
  - Raw material/chemical and chemical waste storage warehouse/area(s)
  - Boiler room(s)
  - Exhaust vents, stacks, or other air discharge points
  - Waste collection area(s), both Hazardous and Non-hazardous
  - Compressor house(s)
  - Power generator room(s) /area(s)
  - Internal and external transport area(s)
- Area(s) of potential impact to soil and/or groundwater, including stained soil and/or distressed vegetation
- Abatement equipment
- Good practices
4.7 CLOSING MEETING

4.7.1 Purpose
The purpose of the Closing Meeting is to ensure that both parties – the Verifiers and the Facility – have a joint agreement on the findings, and that the Facility understanding the verification and associated information.

4.7.2 Pre-Closing Meeting
Before the closing meeting the verifier(s) must:

- Inform the facility about who should join the closing meeting:
  - Senior Management
  - Staff who will manage the PIP
  - Operations staff who were involved in the review
  - Others, as necessary
- Cross-check the collected data
- Make final decisions on identified issues
- Determine best practices
- Prepare explanations and justification

4.7.3 Closing Meeting Agenda
After the verification process, a Closing Meeting is held with facility via webinar or teleconference. The closing meeting agenda should include, but is not limited to, the following topics:

- Review scope of work/review
- Comment on staff cooperation (or lack thereof)
- Overall evaluation and/or strengths of the facility (if any)
- A summary of the areas of inconsistencies between the self-assessed and verified results
- A reminder of the confidentiality of the results
- Notification to the facility that Verification results will be completed and uploaded on Higg.org and that the factory can review and post it for benchmarking or sharing, if the factory chooses, on Higg.org
- Answer questions from the Facility
- Thank verifiers

During this meeting, Verifiers should seek to gain agreement from the Facility on the areas of improvement identified to avoid later disputes.

After the closing meeting, Verifiers shall obtain a signature or approval as necessary and required (e.g. for the Verifier Log) from the facility’s representative.
4.8 PERFORMANCE IMPROVEMENT PLAN (PIP)

4.8.1 Purpose
The purpose of the PIP is to provide the facility with the opportunity to outline their planned actions to address environmental impacts at their facility. The facility completes this form. It does not need to be complete at the end of verification but can be completed later. The factory may choose to use the verification process to identify or discuss planned actions. Verifiers can provide feedback related to questions from the facility but are not required to do so.

4.9 REPORTING

4.9.1 Instructions for 2017 vFEMs

- Factories can download the module files on 2017 FEM data portal website and email verifiers these files, so verifiers can perform verification. Please note: if any facility is having trouble accessing their module in fem2017.higg.org they should reset their password.
- Once verifiers complete verification, they should include the verified Excel file in the Verification Completion Form submitted to Sumerra (found in the verification registration confirmation email).
  - Important: Please make sure the module is attached to the form. In the screenshot below verifiers can see successfully attached documents

- The facility verified will automatically receive a copy of that verification report.
- The facility can directly share a copy (e.g. via email) of the verified Excel report with its customers between now and December 31.
- 2017 vFEMs submitted to Sumerra will be added to factories Higg.org accounts in January. These 2017 vFEMs will be corrected for the scoring and applicability errors verifiers have experienced in the Excel exports. SAC will handle this work.
- Please note: the scoring update will change the scores for verified reports. SAC is communicating this to Higg customers, but please set expectations that the posted files in January could have a different score than what verified report currently show.
4.9.2 Instructions for 2018 vFEMs
The Verifier must go onto Higg.org and upload the Verification Report.

Reporting Requirements include:

- The Verifier must describe the situation and conditions and give evidence for meeting/not meeting the criterion.
- For each indicator, a comment shall be provided.
- The Verifier must also report examples of good practices found during onsite verification.

The verification score is automatically calculated when all the verification results have been entered for every indicator and is called the “Verified Score.”

5 Verification Records

Verifying organizations must keep all documents and evidence from the Verifications through the entire verification process, including through any quality review activities that may take place, to justify the services performed and answer questions through the quality assessment process.

These include but are not limited to:

- Facility Higg Index Facilities Environmental Module self-assessment questionnaire
- Number, name and details from management dialogue(s)
- Copy of license and permits
- Evidence for areas of improvement
- Notes
- Photos