

# Site Inspection Procedures for Manufacturing Undertakings in Ghana



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## Presentation Outline



- ✓ Background
- ✓ Main Objectives of Inspections
- ✓ Approach
- ✓ Types of Inspection Visits
- ✓ Inspection Procedures
- ✓ Post Inspection
- ✓ Way Forward

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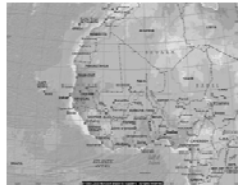
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## Country Profile



- Official name: Republic of Ghana
- Population 28.21 million (2016 est.)
- Surface: Ghana covers a total area of 238,540 sq km.
- System of government: Ghana is a parliamentary democratic republic. Parliament has 225 members
- Capital: Accra is the capital of Ghana, with a population of around 2 million
- Official Language: English is the official language in Ghana. Over 25 ethnic languages
- Climate: Ghana has a tropical climate;
- Time Zone: The standard time of Ghana is the same as GMT.
- Currency: Cedi (GHC)
- GDP (Gross Domestic Product) is 42.69 billion USD (2016 estimate)



## Background



- ❖The industrial sector of Ghana's economy contributes significantly to the growth and development of the nation
- ❖The sector contributed 24% to the country's GDP in 2016
- ❖Main Manufacturing Industrial Sectors include textiles, cement production and milling, cocoa processing, secondary pharmaceutical, paints, crude oil refinery, wood processing, oil palm processing, fish processing among others
- ❖The sector is also a major contributor to pollution of air, water, waste among others
- ❖Need to ensure implementation of appropriate pollution prevention, control and management practices to ensure sustainable production

## Main Objectives of Inspections(I)



- ✧ Assess compliance status of industries with applicable environmental laws, regulations, guidelines and Environmental Permit Schedules and document violations for enforcement actions
- ✧ Assess the adequacy of improvement programmes outlined in the Environmental Assessment Reports (EIS, PER and EMP) to address environmental impacts generated by the facility
- ✧ Evaluate a facility's waste minimisation/pollution prevention/control programmes
- ✧ Identify the need for remedial measures and enforcement action(s) to correct the causes of violations

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## Main Objectives of Inspections(II)



- ✧ Support the permit issuance process (verification, screening etc)
- ✧ Evaluate a facility's self monitoring capability and record keeping practices
- ✧ Establish an enforcement presence to promote compliance
- ✧ Respond to public complaints

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## APPROACH



- ☐ The Agency conducts both announced and unannounced inspection visits in accordance with the EPA Act 490
- ☐ Ensure a coordinated approach by involving all key stakeholders
- ☐ Provide Feedback to ensure redress of violations
- ☐ Follow up with facilities to ensure compliance

## Type of Inspection Visits-Manufacturing Industries



- ☐ **Field Verification Visits** to verify information provided in EMPs and Annual Reports prior to issuance of Permits
- ☐ **Compliance Monitoring** to assess the level of compliance of Industries to:
  - ☐ Conditions in Environmental Permit Schedules
  - ☐ Commitments in Environmental Management Plans
  - ☐ Installation and operation of pollution control systems to comply with required standards
- ☐ **Investigation visits** to check violations/investigate public complaints
- ☐ **Environmental Audit** as part of the Environmental Performance Rating and Public Disclosure Programme

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## Inspection Procedures- Field Verification/Compliance Monitoring Visits



### Field Verification Visits

- This type of inspection is aimed at providing a comprehensive understanding of the different operations in the facility, the sources of pollution and mitigation measures in place. The objectives are:
  - To verify information provided in the Environmental Management Plan & Annual Report
  - To identify additional information for inclusion in the EMP prior to Permitting

### Compliance Monitoring Visits

- Assess compliance status of industries with applicable environmental laws, regulations, guidelines, commitments in EMP and Environmental Permit Schedule and document violations for enforcement actions
- Check whether a facility's waste minimisation/pollution prevention/control measures are sufficient to comply with required guidelines, standards and regulations

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## Key Aspects- Pre inspection



- ✓ Formation of the Inspection Team with the technical expertise about the facility being visited and the type of information to be collected during the visit
- ✓ Conduct desk top review of available background information on the facility in order to better plan and conduct the inspection/verification visit. Sources of information include company's quarterly reports, annual reports, EMPs, EIS, PERs and/or previous inspection reports
- ✓ Define the objective(s) of the inspection visit, identify logistics required including safety equipment, equipment for sampling etc
- ✓ Consult with EPA staff at the regional/area office where the facility is located on any further issue(s) of environmental concern with respect to the facility
- ✓ Notify the facility if it is an announced inspection, indicating in the letter the areas the inspection will focus on, the information that will be required. (EPRDP Audits are typical examples of Announced Inspection Visits)

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## Pre Inspection Procedures- Team Composition/Logistic requirements



- ✓ **Composition of the team for inspections usually include:**
  - One (1) or Two (2) officers from the Department responsible for the facility
  - One (1) officer from Environmental Quality (EQ) Department if samples are required
  - One (1) officer from the EPA Regional Office where the facility is located
- ✓ **Arrangement of logistics for the visit:**
  - ✓ PPEs appropriate for the site to be visited
  - ✓ Equipment for sampling and analysis
  - ✓ Audio visual equipment such as cameras, video recorders (where necessary)

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## Inspection Procedures- Opening Meeting



- ✓ To inform the facility about the objectives and scope of the inspection and to introduce the team members
- ✓ An opportunity for the team to ask for information about the facility's operations, plant layout, unit operations, number of shifts, raw materials, plant safety requirements and any other information relevant to the visit
- ✓ Inform the facility about areas of interest in the facility to visit, documents to be viewed etc

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## Inspection Procedures- Tour of the Facility



☐ Visual inspection is conducted to collect verifiable information that can be used in addition to physical samples, photographs and copies of facility documents to:

- ❖ Determine the compliance status of a facility
- ❖ Identify specific environmental problems,
- ❖ Assure the quality of self monitoring data
- ❖ Initiate enforcement actions

☐ Areas likely to be visited include production floor, auxillary activities, raw material storage areas, pollution sources, installed pollution control systems including air handling systems, wastewater treatment systems, hazardous/non hazardous waste handling/storage

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## Inspection Procedures- Closing Meeting



◦ At the closing meeting the team will:

- Provide the facility officials with a summary of the preliminary findings of the inspection and make recommendations on general observations made during the visit
- Obtain clarification from the facility on all unresolved issues and obtain any necessary additional information.
- Inform the facility that the findings and recommendations are preliminary and the final findings will be communicated if need be to the facility

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## Post Inspection - Reporting



### ☐ Sample Analysis

- ❖ Samples collected during the inspection visit are sent to the Laboratory for analysis as soon as possible to preserve their integrity.

### ☐ Prepare the Inspection Report

- ❖ The inspection team is required to prepare a report on the inspection using the reporting format for verification visits and compliance monitoring/complaints investigation

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## Post Inspection – Follow up Actions



➤ Follow up actions will be taken depending on the objectives of the inspection visit and the findings. these could include any of the following:

- The facility could be requested to incorporate the findings into the revised EMP for submission to the Agency
- The findings could be incorporated into the Permit Schedule

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## Post Inspection – Follow up Actions (cont.)



- Issuance of Enforcement Notice specifying the breaches and directing corrective measures to remedy damage caused in accordance with section 13 of the EPA Act 490
- A Prohibition Notice may be issued to a facility under the following conditions:
  - There is evidence of a violation of Environmental Regulations
  - Continuance of the activity poses an imminent risk to the environment and public health.
  - The violator is aware of the legal requirements but has failed to comply.

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## Post Inspection – Follow up Actions



### ☐ Prosecution

Prosecution is the last option in the Agency's enforcement procedures to ensure environmental compliance. The Agency will normally prosecute a person/s responsible for a Facility if one or more of the underlisted occurs:

- ❖ Failure to comply with an enforcement/prohibition notice
- ❖ Operations are carried out without relevant environmental permits
- ❖ Failure to comply adequately with mitigation/remedial requirements
- ❖ Excessive or persistent violations of regulatory requirements
- ❖ Incidents or breaches have significant impacts on the environment
- ❖ Failure to supply required information without reasonable excuse

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## Way Forward



- ❖ Document the procedures for various types of inspections
- ❖ Define timelines for the inspection cycle including frequency of inspections preparation of reports and sending feedback to facilities
- ❖ Develop an integrated database (inspection reports and monitoring results) to promote sharing of information amongst EPA departments and regional and Area Offices to facilitate follow up, future inspections and research.

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**Thank  
you for  
your  
Attention**

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