

Monitored Party <b>Ningbo Changxiang Stationery Co.,Ltd</b>	amfori ID <b>156-057816-000</b>	Address <b>No.21 Zhou jia lu peng,Zhu shan Village,Lizhou Street,Yuyao,Zhejiang,China , 315400 Yuyao, Zhejiang Sheng, China</b>
Monitoring Activity <b>amfori Social Audit - Manufacturing</b>	Monitoring Type <b>Full Monitoring</b>	Monitoring Partner <b>APCER</b>
Monitoring Start Date <b>27/09/2024</b>	Closing Meeting Finished Date <b>27/09/2024</b>	Submission Date <b>10/10/2024</b>
Expiration Date <b>10/10/2025</b>	Announcement Type <b>Semi Announced</b>	
Site <b>Ningbo Changxiang Stationery Co.,Ltd</b>	Site amfori ID <b>156-057816-001</b>	

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## OVERALL RATING



## SECTION RATING

PA1: Social Management System	<b>C</b>	
PA 2: Workers Involvement and Protection	<b>B</b>	
PA 3: The Rights of Freedom of Association and Collective Bargaining	<b>A</b>	
PA 4: No Discrimination, Violence or Harassment	<b>A</b>	
PA 5: Fair Remuneration	<b>B</b>	

PA 6: Decent Working Hours	<b>D</b>	
PA 7: Occupational Health and Safety	<b>B</b>	
PA 8: No Child Labour	<b>A</b>	
PA 9: Special Protection for Young Workers	<b>A</b>	
PA 10: No Precarious Employment	<b>A</b>	
PA 11: No Bonded, Forced Labour or Human Trafficking	<b>A</b>	
PA 12: Protection of the Environment	<b>B</b>	
PA 13: Ethical Business Behaviour	<b>A</b>	

## GENERAL DESCRIPTION

Name of Lead auditor: Blue Peng; APSCA membership number: CSCA 21703917

Monitoring partner name: APCER (Monitoring firm APSCA #: 11600046)

Audit schedule details: The audit is planned for 1 auditor x 1 day

Announcement Type: Semi-announced full monitoring

Business partner information:

Ningbo Changxiang Stationery Co.,Ltd (Local Name: 宁波市畅想文具有限公司, Uniform Code of Social Credit: 91330281MA2KPN4A5T) is currently located at No.21 Zhou jia lu peng, Zhu shan Village, Lizhou Street, Yuyao, Zhejiang Province, China (Local address : 中国浙江省余姚市梨洲街道竹山村周家芦棚21号). The factory was established in Sep. 2021.

The factory is specialized in the manufacturing of water color.

Main production activities include mixing, forming and packing. No production process or service was subcontracted.

As per management interview, peak season in the factory was not obvious.

Audited location information:

Total 4 main buildings were located in the boundary and the property was owned by Individual personal. The auditee rented one 3-storey building with the total area about 2100 square meters.

The layout of the 3-storey building by auditee as below:

1F-Warehouse, mixing and forming workshops.

2F-Packing workshop.

3F-Office and warehouse.

There was no shared worker or workplace identified between the auditee and other factories in the same yard.

Other 3 building were rented out by landlord.

The auditee didn't provide canteen, dormitory or transportation for employees. If needed, the employees have to resolve their accommodation issue by themselves.

Operating shifts and hours:

Normal working hour was 8 hours per day and 5 days per week. One shift was arranged for all workers, working hours 8:00-11:30, 12:30-17:00, and if needed, overtime started from 18:00 to 20:00. Time records from Aug. 2023 to the audit day were reviewed. 5 sampled workers of three sampled months were selected for review. Maximum 2 hours overtime per day, 60 hours per month (including work overtime on weekdays and Saturdays). 1 day off after 6 days consecutive working days was guaranteed. During the worker interview, workers confirmed that they worked overtime voluntarily.

Time recording system:

Workers scan fingerprint to record workers' working hours including regular working hours and overtimes.

Salary payment details:

Payrolls from Aug. 2023 to Jul. 2024 were reviewed. 5 sampled workers of three sampled months were selected for review. The local minimum standard set at RMB 2260 per month since Jan. 1 2024, and RMB 2070 per month before Jan. 1 2024. The lowest wage paid by the factory to workers was RMB 3200 per month, which was above the legal minimum wage. Wage was calculated by monthly rate. The workers' overtime work was compensated legally. Wage was paid by cash at the end of following month. The pay slip was provided to workers. National holidays, annual leave, sick leave etc. were provided.

Worker number information:

On the audit day, there were total 20 employees (including 4 males and 16 females) in the factory, of which 14 employees were production workers. 17 employees were migrant and all employees were hired by the factory directly. There was no vulnerable worker (such as pregnant, foreign migrant, young, disabled, temporary, seasonal, home-based worker) in the factory. The youngest worker in factory was 25 years old, who was born on Mar. 12 1999 and joined in the factory on Mar. 18 2024. No special group worker (such as interns, apprentices, contractor workers etc.) was found in this factory. During this audit, 5 production workers (including 1 male and 4 females) and 1 male management were interviewed.

Good practices:

The factory provided local living wage prior the audit.

Worker organization details:

There was no union available in the factory, but there was one worker's representative elected by workers in Jan. 2024.

Circumstances:

The management agreed auditor to visit the whole areas of the factory and kept an open attitude during the audit. During the onsite tour, no obvious gap identified between the workforce and production capacity, and all production processes were running normally. There was no special circumstance during the audit.

Summary of findings:

The audit was basically fulfilled according to the audit plan sent prior to the audit. At the end of the audit, auditor communicated the findings in details to factory and allowed them to ask questions and make any needed clarifications. Finally, they agreed on the findings and signed the on-site audit findings report. The performance areas needed improvements were as follows: PA 1-2, PA 5-7 and PA 12. No other serious issue was noted in this audit.

Living wage calculation:

- a. There is no GLWC benchmark for the audited location, so the data of Living Wage in the report were provided by the auditing company. Detailed data for Living Wage calculation were filled in the report.
- b. Generally, by Anker Methodology, Net Living Wage = Cost of Basic but Decent Life for a Family / Number of Workers per Family. Based on the concept of Anker methodology, the formula "Living Wage = per capita consumption expenditure x (0.5 x avg. household size) x 1.1" is used for calculation, because "per capita consumption expenditure" covers the daily basic costs of living.
- c. In the formula, the "Number of Workers per Family" is taken granted as two because of the realistic difficulty in investigation and calculation. The data on "avg. household size" all come from The Seventh National Census report. The data of "per capita consumption expenditure" generally come from local Statistics Bureaus, because those data meet the expectations of Anker methodology, for example, the participation of local people and organizations in order to increase its credibility and acceptance by stakeholders, and, transparency and detailed documentation and analysis to ensure that the living wage estimate is solid and credible.
- d. The factory had collected local data and calculated the Living Wage by using the table of Fair Remuneration Scan, which is RMB 2502.5/month. Relevant evidence was uploaded under Attachment.

Personal data protection:

As Personal Information Protection Law implemented in China since Nov 1, 2021, so workers' faces, names, ID numbers, contact information, brand names and logos etc. taken in the photos are protected in the sake of privacy.

Additional remark:

1. There was no agency, contractor or collective bargaining agreement used by the auditee, which makes these documents not applicable. Also, no government waiver was obtained currently, which makes the waiver not applicable.
2. The finding related to building construction report and fire license in 7.11 was missed and was later manually added in the signed CAP after finish meeting on the audit day. This information was communicated to the factory, which accepted it.

## SITE DETAILS

Site  
**Ningbo Changxiang Stationery Co.,Ltd**

Site amfori ID  
**156-057816-001**

### GICS Classification

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Sector <b>Industrials</b>	Industry Group <b>Commercial &amp; Professional Services</b>	Industry <b>Commercial Services &amp; Supplies</b>
Sub Industry <b>Office Services &amp; Supplies</b>		

### amfori Process Classifications

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N.A.

### GS1 Classifications

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N.A.

### NACE Classification

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N.A.

### Water Stress Situation

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N.A.

## METRICS

### Key Metrics

Total workforce	20	Workers
Legal minimum wage in local currency	2,260	Monthly
Lowest wage paid for regular work at the site	3,200	Monthly
Calculated living wage in local currency	3,245.29	Monthly
Total sample	5	Workers

### Other Metrics

Male workers	4	Workers
Female workers	16	Workers
Non-binary workers	0	Workers
Permanent workers - Male	4	Workers
Permanent workers - Female	16	Workers
Permanent workers - Non-binary	0	Workers
Temporary workers - Male	0	Workers
Temporary workers - Female	0	Workers
Temporary workers - Non-binary	0	Workers
Seasonal workers - Male	0	Workers
Seasonal workers - Female	0	Workers
Seasonal workers - Non-binary	0	Workers
Management - Male	1	Workers
Management - Female	1	Workers
Management - Non-binary	0	Workers
Apprentices - Male	0	Workers
Apprentices - Female	0	Workers
Apprentices - Non-binary	0	Workers
Workers on probation - Male	0	Workers
Workers on probation - Female	0	Workers
Workers on probation - Non-binary	0	Workers
Workers with night shift - Male	0	Workers
Workers with night shift - Female	0	Workers
Workers with night shift - Non-binary	0	Workers
Workers with disabilities - Male	0	Workers
Workers with disabilities - Female	0	Workers
Workers with disabilities - Non-binary	0	Workers
Domestic migrant workers - Male	4	Workers
Domestic migrant workers - Female	13	Workers
Domestic migrant workers - Non-binary	0	Workers
Foreign migrant workers - Male	0	Workers

Foreign migrant workers - Female	0	Workers
Foreign migrant workers - Non-binary	0	Workers
Workers hired directly - Male	4	Workers
Workers hired directly - Female	16	Workers
Workers hired directly - Non-binary	0	Workers
Workers hired indirectly - Male	0	Workers
Workers hired indirectly - Female	0	Workers
Workers hired indirectly - Non-binary	0	Workers
Unionised workers - Male	0	Workers
Unionised workers - Female	0	Workers
Unionised workers - Non-binary	0	Workers
Workers under CBA - Male	0	Workers
Workers under CBA - Female	0	Workers
Workers under CBA - Non-binary	0	Workers
Pregnant workers	0	Workers
Workers on parental leave - Male	0	Workers
Workers on parental leave - Female	0	Workers
Workers on parental leave - Non-binary	0	Workers
Sample - Male	1	Workers
Sample - Female	4	Workers
Sample - Non-binary	0	Workers

# FINDINGS



## PA1: Social Management System

Site: Ningbo Changxiang Stationery Co.,Ltd | Site amfori ID: 156-057816-001

**Question:** 1.1 Is there satisfactory evidence that the auditee has set up an effective management system to implement the amfori BSCI Code of Conduct?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>By interviewing with management, worker representative and workers as well as documents review, factory already established the social responsibility management manual and procedures based on amfori BSCI principles and local legal requirements. Relevant laws and regulations had been collected and updated by assigned person periodically. The factory management also conducted regular internal audits and provided related training for workers. However, the management system was not operated effectively as there were findings identified in PA2, PA5, PA6, PA7 and PA12, such as monthly overtime not controlled well. This question is rated as partially because the general condition in the factory is acceptable and no serious issue was found.</p>	<p>通过与管理层、工人代表和工人的面谈以及文件审查，工厂已经根据amfori BSCI原则和当地法律要求建立了社会责任管理手册和程序。相关法律法规由专人定期收集和更新。工厂管理层还定期进行内部审核，并为工人提供相关培训。但是，由于PA2, PA5, PA6, PA7和PA12中发现的每月加班控制不佳等问题，管理系统没有有效运行。这个问题被评为部分符合，因为工厂的总体情况是可以接受的，没有发现严重的问题。</p>

**Question:** 1.4 Is there satisfactory evidence that the auditee's workforce capacity is properly organised to meet the expectations of the delivery order and/or contracts?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>By interviewing with management, worker representative and workers as well as documents review, the factory had established work capacity planning procedure, but it was not effective due to the workers' monthly overtime exceeded the legal requirement. This question is rated as partially because the factory had established related procedure, but not well implemented.</p>	<p>通过与管理层工人代表和工人的面谈以及文件审查，工厂已建立一个产能规划流程，但是没有效果，原因是工人的月加班时间超法规要求。这个问题被评为部分符合，因为工厂已经建立了相应的程序，但是没有很好地执行。</p>



## PA 2: Workers Involvement and Protection

Site: Ningbo Changxiang Stationery Co.,Ltd | Site amfori ID: 156-057816-001



**Question:** 2.4 Is there satisfactory evidence that the auditee builds sufficient competence among managers, workers and workers representatives to successfully embed responsible practices in the business operation?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>By interviewing with management, worker representative and workers as well as documents review, records showed the workers were communicated with social responsibility code of conduct. However, the workers did not have awareness of amfori BSCI code of conduct via interview. This question is rated as partially because the factory had established related training system, but didn't evaluate the effectiveness of the training.</p>	<p>通过与管理层、工人代表和工人的面谈以及文件审查，记录显示工厂已将社会责任行为准则培训给了员工。但是，通过访谈发现员工对amfori BSCI 行为准则不是很清楚。这个问题被评为部分符合，因为工厂已经建立了相应培训系统，但是没有评估培训效果。</p>

**Question:** 2.5 Is there satisfactory evidence that the auditee has established, or participates in, an effective operational-level grievance mechanism for individuals and communities?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>By interviewing with management and site observation, the factory did not post complaints procedure beside the suggestion box and no grievance was recorded, the effectiveness of the grievance mechanism could not be guaranteed. This question is rated as partially because the factory had set up related suggestion box management procedures and related grievance mechanism, the responsible staff would open the suggestion box regularly.</p>	<p>通过与管理层的面谈和现场观察，工厂没有在意见箱边上张贴申诉程序，也没有不满被记录，无法确保申诉机制的有效性。这个问题被评为部分符合，因为工厂建立了相关的意见箱管理程序和相关的申诉机制，负责的员工会定期打开意见箱。</p>

## PA 5: Fair Remuneration

Site: Ningbo Changxiang Stationery Co.,Ltd | Site amfori ID: 156-057816-001

**Question:** 5.5 Is there satisfactory evidence that the auditee provides workers with the social benefits that are legally granted without negative impact on their pay, level of seniority, position, or promotion prospects?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>By interviewing with management and workers as well as documents review, insufficient social insurance was provided for workers. In current month, there were total 20 permanent employees</p>	<p>通过与管理层和工人的面谈以及文件审查，提供给员工的社保参保不足。当前月，工厂有20人(其中退休人员6人，无新聘、临时、派遣员工)。14个员工中有3人(21%)购买了工伤保险，养老保险，医疗保</p>

### Finding

(including 6 retired employees, no newly hired, temporary or dispatched employee). 3 out of 14 employees (21%) were participated in accident insurance, basic retirement insurance, basic illness, unemployment insurance and child-bearing insurance. The commercial accident insurance was provided for other 5 employees, it was effective on Oct. 27 2023, with 12 months valid period. No any social insurance waiver was obtained by factory. This question is rated as no because the participation of social insurance was less than 80%. (Labor Law of P.R.C, Article 72 & 73)  
Remark: Through worker and management interviews, they stated that participating in social insurance was voluntary and some employees were reluctant to participate in social insurance.

险，失业保险和生育保险。工厂给其他5个员工购买了商业意外险，于2023年10月27号生效，有效期12个月。工厂没有获得相关社保批文。这个问题被评为不符合，因为社保参保率低于80%。（《中华人民共和国劳动法》第72条和第73条）  
备注：通过对员工和管理层的访谈，他们表示，参加社会保险是自愿的，部分员工不愿意参加社会保险。

## PA 6: Decent Working Hours

Site: Ningbo Changxiang Stationery Co.,Ltd | Site amfori ID: 156-057816-001

**Question:** 6.2 CRUCIAL: Is there satisfactory evidence that the auditee request of overtime is in line with the requirements of the amfori BSCI Code of Conduct?

### ENGLISH

### LOCAL LANGUAGE

#### Finding

According to workers' attendance records from Aug. 2023 to the audit day, workers' monthly overtime working hours exceeded 36 hours for all months except Feb. 2024. For three sampled months of 5 sampled workers: 5 workers' overtime were 40 to 60 hours in Dec. 2023; 4 workers' overtime were 50 hours in Apr. 2024; 4 workers' overtime were 52 hours in Jul. 2024. This question is rated as no because systematic monthly overtime exceeding legal requirement existed in the factory. (PRC Labor Law article 41)

根据工人的2023年8月至审核当日的考勤，除了2024年2月份外，工人所有月的月加班超出36小时。抽样3个月的5个抽样的工人：5个工人在2023年12月加班时间为40到60小时，4个工人在2024年4月加班时间为50小时，4个工人在2024年7月加班时间为52小时。这个问题被评为不符合，因为工厂存在系统性月加班违反法规要求的情况。（《中华人民共和国劳动法》第41条）

## PA 7: Occupational Health and Safety

Site: Ningbo Changxiang Stationery Co.,Ltd | Site amfori ID: 156-057816-001

**Question:** 7.1 Is there satisfactory evidence that the auditee observes occupational health and safety regulations applicable for its activities?

### ENGLISH

### LOCAL LANGUAGE

Finding	
By interviewing with management, worker representative and workers as well as documents review, factory already established the OHS management system based on amfori BSCI principles and local legal requirements. Relevant laws and regulations had been collected and updated by assigned person periodically. The OHS management system was not operated effectively by factory, that led to partial issues detected in this PA. This question is rated as partially because the general condition of health and safety in the factory is acceptable and no serious issue was found.	通过与管理层、工人代表和工人的面谈以及文件审查，工厂已经根据amfori BSCI原则和当地法律要求建立了职业健康安全管理系统。相关法律法规由专人定期收集和更新。工厂没有有效地执行其职业健康安全管理系统，导致在这个表现区域还有部分问题存在。这个问题被评为部分符合，因为工厂的健康安全总体情况是可以接受的，没有发现严重的问题。

**Question: 7.2** Is there satisfactory evidence that the auditee seeks to improve workers' protection in case of accident, including through compulsory insurance schemes?

ENGLISH	LOCAL LANGUAGE
Finding	
By interviewing with management and workers as well as documents review, 12 out of 20 employees were not provided with accident insurance or commercial injury insurance. This question is rated as no because most workers were not covered by work-related injury insurance or commercial insurance.	通过与管理层、工人的面谈以及文件审查，企业一共有20人，其中有12个人没有购买工伤保险或商业意外险。这个问题被评为不符合，因为大多数工人没有参加工伤保险或商业保险。

**Question: 7.3** Is there satisfactory evidence that the auditee set up an effective management system that ensures they regularly carry out risk assessments for safe, healthy and hygienic working conditions?

ENGLISH	LOCAL LANGUAGE
Finding	
By interviewing with management and workers as well as documents review. 1. The factory didn't provide the occupational health examination reports of hazardous position workers for review, such as for mixing worker who contacting noise and dust. (PRC Law of Prevention and Control of Occupational Diseases article 35) 2. The factory could not provide the occupational hazards factors testing report of hazardous workshop for review, such as for noise and dust in mixing area. (Workplace Occupational Health Management Regulations Article 20) This question is rated as partially because the factory has established health and safety	通过与管理层、工人的面谈以及文件审查。 1.工厂无法提供危害岗位工人的职业病体检报告供审核，如接触噪音和粉尘作业的拌料工人。（《中华人民共和国职业病防治法》第35条） 2.工厂无法提供危害车间的职业危害因素检测报告供审核，如拌料区域的噪音和粉尘。（《工作场所职业卫生管理规定》第二十条） 这个问题被评为部分符合，因为工厂有制定健康安全程序文件，且进行了危险源识别及各类型风险评估。工厂也给员工提供了培训，且员工知道岗位风险。

Finding	
procedures, and carried out hazard factors identification and various types of risk assessment. The factory also provided training to the employees, and they were aware of the risks.	

**Question:** 7.6 Is there satisfactory evidence that the auditee enforces the use of PPE to provide protection to workers alongside other controls and safety systems?

ENGLISH	LOCAL LANGUAGE
Finding	
Based on site observation and documents review, the mixing worker did not wear provided goggle during operation. This question is rated as partially because factory provided free PPE and PPE training for workers, PPE warning sign also posted in the workshop. (Law of the PRC on Work Safety article 45)	基于现场观察和文件查阅，拌料工人作业时没有佩戴提供的护目镜。这个问题被评为部分符合，因为工厂为员工提供了免费的劳保用品以及培训，车间也有张贴PPE警示标识。（《中华人民共和国安全生产法》第45条）

**Question:** 7.9 Is there satisfactory evidence that the auditee makes visible potential hazards to the workers and visitors through signs and warnings?

ENGLISH	LOCAL LANGUAGE
Finding	
Based on site observation and management interview, the warnings signs for two electricity were not available in production area. This question is rated as partially because the warning sign, such as PPE, was post on site. (Article 2-7 of Warning Sign in the Guidelines for Safety Signs and Usage GB 2894-2008)	根据现场观察和管理人员访谈，生产车间有2个电箱的用电安全的警告标识没有。这个问题被评为部分符合，因为警告标识如劳保用品已粘贴到现场。（《安全标志及使用导则(GB 2894-2008)》警示标志2-7）

**Question:** 7.11 Is there satisfactory evidence that the auditee confirms that the equipment and buildings used for production are stable and safe?

ENGLISH	LOCAL LANGUAGE
Finding	
Based on management interview, documents review and site observation. 1. The fire prevention inspection report and construction inspection report could not be provided by factory for review. The building of the factory was constructed in around 2010 with the area of 2100 square meters. (PRC Fire Prevention	基于管理层面谈，文件审查及现场观察。 1.工厂不能提供建筑物的消防验收报告和竣工验收报告供审核。工厂使用的厂房约在2010年竣工，面积约为2100平。（《中华人民共和国消防法》第十一条和《中华人民共和国建筑法》61条） 2.生产大楼存放区有部分来料和成品靠墙存放(低于法规要求的0.5米)。（《仓库防火安全管理规则》第

Finding	
<p>Law article 11 and Construction Law of the People's Republic of China, Article 61)</p> <p>2. Partial incoming and finished goods were stored against the wall (less than 0.5 meters as required by law) in the storage area of the production building. (Article 18 of the Warehouse Fire Safety Management Rules)</p> <p>This question is rated as no because no any official document of building safety was provided.</p>	<p>18条 )</p> <p>这个问题被评为不符合，因为工厂未提供任何官方出具的有关建筑安全的文件。</p>

**Question:** 7.13 Is there satisfactory evidence that the auditee makes sure a competent person periodically checks the electrical installations and equipment?

ENGLISH	LOCAL LANGUAGE
Finding	
<p>Based on site observation and documents review, three electrical boxes in production area were not locked for protection and missed inner cover. This question is rated as partially because the warning sign was post on electrical box and the electrician conducted electrical safety inspection monthly. (Article 6.5 and 6.7 of the General Guide for Safety of Electric User)</p>	<p>根据现场观察和文件查阅，生产区域有3个电箱没有上锁，并且缺少内盖。这个问题被评为部分符合，原因是电箱都粘贴了警示标识，电工每月进行电气安全检查。（《用电安全导则GB/T13869-2008》第6.5和6.7条）</p>

**Question:** 7.17 Is there satisfactory evidence that the auditee ensures adequate safeguards for any machine part, function, or process which may cause injury to workers?

ENGLISH	LOCAL LANGUAGE
Finding	
<p>Based on site observation and documents review.</p> <p>1. The factory could not provide valid inspection report of one cargo lift. (Special Appliance Quality Safety Monitoring Regulation article 28)</p> <p>2. No qualified safeguard of pulley was installed for one mixing machine used in mixing workshop. (General rules of design on health and safety of production facility (GB5083-1999), Article 6.1.2)</p> <p>This question is rated as partially because most of machines were maintained in good condition, and no work injury accident was detected via worker interview.</p>	<p>根据现场观察和文件审核。</p> <p>1.工厂不能提供一台货梯的检查报告供审核。（《特种设备安全监察条例》第28条）</p> <p>2.拌料车间有一台拌料机器没有安装皮带轮防护罩。（生产设备安全卫生设计总则（GB5083-1999）6.1.2）</p> <p>这个问题被评为部分符合，原因是大部分设备都有在很好的维护，并且通过员工访谈没有发生工伤事故。</p>



## PA 12: Protection of the Environment

Site: Ningbo Changxiang Stationery Co.,Ltd | Site amfori ID: 156-057816-001

**Question:** 12.3 Is there satisfactory evidence of the auditee's required environmental permits and licences?

**ENGLISH**

**LOCAL LANGUAGE**

**Finding**

According to management interview and document review, the factory could not provide the fixed source discharge registration for review. This question is rated as partially because factory had minor impact on the environment, and conducted risk assessment regarding environment. (Regulations on the Administration of Pollutant Discharge Permits, Article 24)

根据管理层的面谈以及文件审查，工厂无法提供固定污染源排污登记供审核。这个问题被评为部分符合，因为工厂对环境的影响较小，并做了有关环境的风险评估。（《排污许可管理条例》第24条）

**Question:** 12.4 Is there satisfactory evidence that waste is managed in a way that does not lead to the pollution of the environment?

**ENGLISH**

**LOCAL LANGUAGE**

**Finding**

According to management interview and document review, the factory could not provide the regular emission testing report of waste air and boundary noise for review. This question is rated as partially because there were no significant emissions from the factory, moreover, the factory had established an external complaint mechanism, and no complaints have been received. (Measures for the Administration of Environmental Surveillance, Article 21)

根据管理层的面谈以及文件审查，工厂无法提供废气和厂界噪音的定期检测报告供审核。这个问题被评为部分符合，因为工厂没有明显的污染排放，另外，工厂建立了外部投诉机制，目前尚未收到任何投诉。（《环境监测管理办法》第21条）