

Common Pitfalls

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- Policy not appropriate to nature of business
- ◆ 環境政策對企業運作不恰當
- ◆ Aspects / Hazards identification incomplete (design, tendering, purchasing, subletting...)
- ◆ 識認環境因素不完整 如欠缺:設計、投標、採購、分判…等
- Unclear method for evaluation of significance impact level
- ◆ 對重大環境影响程度的評價,方法不清晰.







- Aspects identification not specific to activities (update, review, new activities)
- ◆ 對企業活動環境因素的識認不明確
- Other requirements always missing (Code of practice, client's requirement...)
- ◆經常欠缺其它環境要求,如行業守則、客户指 定要求等.
- **♦** Legal requirements updating? area of application not identified. Only EPD / Labour Dept???
- ◆ 法例法現要求的更新?應用範圍不詳?只列出 環保署和勞工署的法律法現要求,其它???







- ◆ Competence Requirement not clearly addressed (PM, SA, SS, Engineer, PC, Foreman, mechanics, workers...)
- ◆ 對員工的環境資格需求沒有清楚說明,如項目 經理、工地總管、工地監察員、工程司、工 頭、机械員、工人、等.
- Only define management team's responsibilities
- ◆ 只定名管理事會的責權







- ◆ Inadequate operational control, mostly site activities....(pollution source without proper control, stockpile, muddy water, dust, stagnant pool, drip tray, exhaust from plant equipment, chemical handling, housekeeping etc)
- ◆ 對工地活動的運行控制不足夠.對污染源沒有正確地控制,如:物料堆存,泥水,塵埃,滯流池水,防漏盆,机械 廢氣排放,化學品處理,家務管理(HKQAA-5S)...等.
- Inadequate monitoring: evaluating of compliance status, operational control, O/Ts
- ◆ 監控不足: 對環境狀態符合性、運行控制、目標和指標的評價





- ◆ Root cause identification not specific, no follow up on effectiveness of corrective action.
- ◆ 對根源問題的識別不確實, 糾正行動沒有有效 地跟進
- ♦ Internal audit coverage & depth insufficient
- ◆ 內審的覆蓋範圍和深度不足夠
- ◆ Training to Subcontractors???? Interface management????
- ◆ 對分判商的培訓??? 介面管理???





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