

Environmental and Health Risk Management Plan (EHRMP)

Vphore Labs Private Limited

Proposal entitled: Video Laryngoscope for use in Emergency Rooms, Operation Theatres and Surgeries

i) Brief description of the proposed activity:
Production of Pilot Batch, Clinical Trial, Electrical Environmental and Bio-Compatibility Tests for Vphore Labs' Video Laryngoscope

ii) List of environments related regulatory clearances required for the activity.

Under the CPCB Rules we fall under white category. We will provide an intimation to the Karnataka Pollution control Board (SPCB) with the details and get their NOC.

		Yes	No	Details	Proposed Plan
Institutional Arrangement					
1.	Is there a designated full-time staff for Environment Health and Safety (EHS) issues?		No	As a company we do not indulge in manufacturing of electrical, electronic, plastic, chemical material. We get the sub-assemblies manufactured by contract manufacturers. Our work involves quality-check of the sub-assemblies, final assembly and quality-check of final assembly.	A staff will be identified as (part-time) in-charge for EHS. The identified person along with the grantee will prepare the protocol, ensure the staff is trained, and the system is affected. It will cover: 1) Occupational Health and Safety 2) Waste Management 3) Consents 4) Regulatory clearances 5) Records maintenance Compliance of EMF for Innovate in India shall also be ensured. The plan shall be ready with 3 months months of the project commencement. Complete compliance shall be ensured within 6 months of the project commencement.
2.	Does the EHS staff handle the following?				A staff will be identified as (part-time) in-charge for EHS. The identified person along with the grantee will prepare the protocol, ensure the staff is trained, and the system is affected. It will cover: 6) Occupational Health and Safety 7) Waste Management
	Occupational Health and Safety		No		
	Waste Management		No		
	List of consents and regulatory clearances		No		
	Record keeping of accidents and procedures		No		

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	EHS trainings for staff		No		8) Consents 9) Regulatory clearances 10) Records maintenance Compliance of EMF for Innovate in India shall also be ensured. The plan shall be ready with 3 months months of the project commencement. Complete compliance shall be ensured within 6 months of the project commencement.
	Environment Management Framework compliance for Innovate in India Project		No		
3.	Is there a reporting structure in place regarding EHS issues?		No		We will place reporting structure regarding EHS issues
4.	Are regular EHS trainings provided to staff?		No		We will train the staff on EHS aspects
General Occupational Health and Safety					
5.	Are there Standard Operating Procedures for accidents, hazards, and other emergencies (chemical spills, heat hazards, fire hazards, radioactive hazards etc.)?		No		Within 3-4 months of the project commencement: - A SOP will be created - Employees will be trained on the SOP Display of Procedures at prominent places in the site will be ensured.
6.	Are the following in place?				Compliance with relevant items be ensured within 3-4 months of project commencement Proper equipment will be in place and stock will be maintained as per the Institute's guidelines for Environment Health and Safety (EHS).
	Chemical spill kits		No		
	Eye wash		No		
	Shower stations		No		
	First Aid Kit		Yes		
	Fire Extinguishers		No		
	Register of accidents and injuries		No		
7.	Are proper signage and storage system in place?			System are in place	These would be regularly updated/replaced while carrying out maintenance. Display of emergency numbers and procedures will be ensured
	Display of Material Safety Data Sheet (MSDS) where relevant		Yes		
	Display of emergency numbers and procedures		No		

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	(Person to Contact, Doctor, Ambulance, Fire Emergency, Police) displayed in all critical places				
	Signage across the facility (labs, storage, hazardous areas, etc.)		Yes		
	Are flammable materials appropriately stored to prevent fire hazards?		Yes		
8.	Are smoke detectors, fire alarms, automatic safety/shutoff systems, overflow preventors, etc. in place and regularly maintained?		No		We will establish fire safety equipment's as per the requirement of the project
9.	Are there control measures for VOC, air emissions, high operating temperatures, pathogens/vectors etc. in place?		No	Not required as we do not deal with such material	
10.	Are regular mock drills conducted for emergency preparedness and safety?		No		The schedule for mock drills will be prepared and conducted
11.	Are staff provided with OHS training?		No		Occupational Health and Safety Manual will be created and training will be given within 3-4 months of project commencement
Biomedical Waste (BMW)					
12.	Is there generation of biomedical waste (as described in Bio-Medical Waste Management Rules, 2016) in the grantee?		No	There is no activity undertaken which leads to generation of any biomedical waste As part of our operations we generate the following wastes: 1) Paper Stationary 2) Paper Packing Material 3) Rejected Plastic Parts, rejected plastic prototypes	Any BMW generated will be treated adhering to Bio-Medical Waste Management Rules, 2016.

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				<p>4) Other packing material – Tape, Thermocol</p> <p>5) Rejected Electronic Parts, rejected printed circuit boards, wires,</p> <p>6) Old office equipments – Computers, Keyboards, Monitors, Printer, Printer Cartridges,</p> <p>7) Dead/Old Batteries from Laptops, Laboratory equipment, products</p>	
13.	Is there trained staff to handle biomedical waste in the grantee?		No	Not required as no generation of biomedical waste	
14.	Has the grantee obtained authorization from State Pollution Control Board /Pollution Control Committee?		No	Not required as no generation of biomedical waste	
15.	Is the biomedical waste segregated at point of generation in the facility and stored in suitable containers?		No	Not required as no generation of biomedical waste	
16.	Is the bar code system for the segregated waste in place?		No	Not required as no generation of biomedical waste	
17.	Is the biomedical waste being sent to an authorized common BMW facility?		No	Not required as no generation of biomedical waste	
18.	Does the grantee have an in-house BMW treatment facility?		No	Not required as no generation of biomedical waste	
	Is the treatment facility own (individual)?		No		
	Is the treatment facility a shared facility in an industrial park?		No		
19.	Are lab waste, microbiological waste and chemical liquid waste pre-treated before storing and sending to treatment			Not applicable as no generation of biomedical waste	

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	facilities according to guidelines prescribed in BWM, 2016 regulations?				
20.	Is the liquid waste checked for active cells before sending to treatment plant?			Not applicable as no generation of biomedical waste	
21.	Are necessary waste pre-treatment equipment in place?	No	N/A	Not required as no generation of biomedical waste	
	Do the equipment adhere to prescribed norms by State Pollution Control Board (SPCB)?				
22.	Are non-chlorinated plastic gloves and bags phased out in the grantee?		N/A		
23.	Are grantee's personnel involved in handling BMW provided with regular training?	No		Not required as no generation of biomedical waste	
24.	Are medical examination provided to personnel involved in BMW waste handling and are they provided with relevant immunization like Hepatitis B and Tetanus?	No		Not required as no generation of biomedical waste	
25.	Is a daily register for biomedical waste maintained including accident reporting record?	No		Not required as no generation of biomedical waste	
26.	Are annual reports on BWM submitted to SPCB as per required form (see Bio-Medical Waste Rules 2016)?	No		Not required as no generation of biomedical waste	
Hazardous Waste (HW)					
27.	Is there generation of hazardous waste (as per Hazardous Waste Rules, 2016) in the grantee?	No		There is no activity undertaken which leads to generation of any hazardous waste As part of our operations we generate the following wastes:	Compliance with the waste management rules shall be ensured within 6 months of the project commencement.

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				<p>1) Paper Stationary 2) Paper Packing Material 3) Rejected Plastic Parts, rejected plastic prototypes 4) Other packing material – Tape, Thermocol 5) Rejected Electronic Parts, rejected printed circuit boards, wires, 6) Old office equipments – Computers, Keyboards, Monitors, Printer, Printer Cartridges, 7) Dead/Old Batteries from Laptops, Laboratory equipment, products</p>	
28.	Is there trained staff in the facility to identify and handle hazardous waste?		No	There is no activity undertaken which leads to generation of any hazardous waste	Compliance with the waste management rules shall be ensured within 6 months of the project commencement.
29.	Does the grantee have authorization from SPCB for hazardous waste?		No	There is no activity undertaken which leads to generation of any hazardous waste	Compliance with the waste management rules shall be ensured within 6 months of the project commencement.
30.	Is there a secure location for storage of HW with proper signage?		No	There is no activity undertaken which leads to generation of any hazardous waste	Compliance with the waste management rules shall be ensured within 6 months of the project commencement.
	Are hazardous waste stored for more than 90 days in the grantee’s premises?		No		
31.	Is the hazardous being send to an authorized disposal facility or user?		No	There is no activity undertaken which leads to generation of any hazardous waste	Compliance with the waste management rules shall be ensured within 6 months of the project commencement.
	Is the disposal facility in house?		No		
	Is the disposal facility external/outourced?		No		
32.	Is a register maintained on production and treatment, and a manifest system followed for transport of hazardous waste from the grantee to treatment facility?		No	There is no activity undertaken which leads to generation of any hazardous waste	Compliance with the waste management rules shall be ensured within 6 months of the project commencement.

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E-Waste and Batteries					
33.	Does the grantee generate e-waste, produce or manufacture electrical and electronic equipment?	Yes		<p>We do not produce or manufacture electrical / electronic parts.</p> <p>However, as part of our operations we generate the following wastes:</p> <ol style="list-style-type: none"> 1) Paper Stationary 2) Paper Packing Material 3) Rejected Plastic Parts, rejected plastic prototypes 4) Other packing material – Tape, Thermocol 5) Rejected Electronic Parts, rejected printed circuit boards, wires, 6) Old office equipments – Computers, Keyboards, Monitors, Printer, Printer Cartridges, 7) Dead/Old Batteries from Laptops, Laboratory equipment, products 	<p>Compliance with the e-waste management rules shall be ensured within 6 months of the project commencement.</p> <p>We will ensure channelizing the e-waste properly through authorized recyclers.</p>
34.	Has the grantee obtained SPCB authorization on e-waste?		No		<p>We will review the rules and ensure compliance, if applicable, within 4-6 months of the project commencement.</p>
35.	Does the grantee channelize the e-waste to authorized recycling or disposal facility?		No		<p>Compliance with the e-waste management rules shall be ensured within 6 months of the project commencement.</p> <p>We will ensure channelizing the e-waste properly through authorized recyclers.</p>
36.	Does the manufacturing grantee have Extended Producer Responsibility system and EPR-authorization in place?		No		<p>We will review the rules and ensure compliance, if applicable, within 4-6 months of the project commencement.</p>
37.	Does the grantee practice reduction in the usage of hazardous substances in the manufacture of electrical and electronic	Yes		<p>We source only RoHS compliant raw material for assembly/sub-assembly.</p>	<p>Will continue to maintain and follow this throughout the Project.</p>

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	equipment and its parts?				
38.	Does the grantee provide detailed information on the constituents of the equipment and their components/spares and declaration of conformation to Reduction in Hazardous Substances in the product user documentation?		No		We will ensure the compliance by the production of Pilot Batch
39.	Does the grantee maintain a record of collection, storage, sale and transport of e-waste?		No		We will review the rules and ensure compliance, if applicable, within 4-6 months of the project commencement.
40	Does the grantee submit annual reports on e-waste to SPCB?		No		We will review the rules and ensure compliance, if applicable, within 4-6 months of the project commencement.
41	Is there accident reporting and records in place?		No		Relevant provisions will be made within 3 months of project commencement
42	Are PPEs available to staff?		Yes	Gloves and Masks are used during assembly of products	The stock status of PPE will be regularly monitored and procurement will be done in time to avoid any situation of stock out.
43	Is the grantee involved in manufacture of batteries?		No	We don't manufacture batteries	
44	Does the grantee generate battery waste?	Yes		The battery waste generated is normal office use and dead batteries from old equipment.	Compliance with the waste management rules shall be ensured within 6 months of the project commencement.
45	Does the grantee deposit the battery waste to registered recycler/dealer/manufacture r/reconditioner/collectio n center?		No		Will ensure compliance within 3 months of project commencement
46	In case of manufacturing, does the grantee comply to Battery Management Rules 2000 and ensure collection of old batteries?		No	We don't manufacture batteries	
Others					

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47.	Does the grantee use any radioactive materials (isotopes tracers, radiation equipment, etc.)?	No	There is no activity undertaken which requires radioactive materials	
	Does the grantee have appropriate radioactive material and waste storage and disposal system in place?	No	There is no activity undertaken which requires radioactive materials	
	Are radioactive warning signs in place?	No	There is no activity undertaken which requires radioactive materials	
48.	Is the lab/room air regularly checked for microbial contamination?	No	There is no activity undertaken which requires these checks.	Will review this regularly and implement necessary measures as and when required.
49.	Are there any odor control measures in place?	No	The activity involved in the project does not produce any odour.	Regular checks will be ensured throughout the Project.
50.	Are fume hoods and exhausts regularly checked and maintained?	No	The activities involved in the Project do not produce any fumes.	Regular checks and maintenance will be done during the project.
51.	Does the grantee use DG set > 15 KVA?	No	The DG set used is 10 KVA	emissions from DG sets regularly monitored as per CPCB prescribed norms
	Does the grantee have consent for DG > 15 KVA?	No		
	Are emissions from boilers and DG sets regularly monitored to be within the prescribed norms?	No		
52.	Does the grantee have proper disposal process for solid and plastic waste in compliance to Solid Waste Management Rules, 2016 and Plastic Waste Management Rules, 2016?	Yes	We are not a bulk generator of Solid or Plastic Waste. Currently the waste generated is handed over to the municipality.	We will review the specified rules and will ensure compliance within 3 months of the project start.
53.	Is wastewater treated separately by the grantee? (Liquid waste from laboratory, chemicals, fluids, solvents, medium and cultures, coolants, etc.)	No	There is no generation of wastewater	
	Are there sludge management and cut off drains in place for	No	There is no generation of wastewater	

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	wastewater?				
54.	Are necessary provisions for noise cancellation in place?		No	No use of heavy machinery	
55.	Are there any settlements, water bodies, cultivated land, or any other eco-sensitive areas near the grantee's premises?		No	There are no settlements, water bodies, cultivated land, or any other eco-sensitive areas	
56.	Are there any buffers, fire vehicle routes in the grantee's premises?		Yes	Our rented space is approachable by (fire) vehicles.	Will maintain this facility throughout the project.

Notwithstanding the above other risk (relevant to the project activities) that will be identified in the course shall be addressed as per standard mitigation monitoring parameters and manner of records keeping shall be in accordance to the recommendations of the project monitoring committee on subject experts engaged by BIRAC