



FAIR LABOR
ASSOCIATION®

INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Panini America, Inc.

COUNTRY: United States

ASSESSMENT DATE: 10/23/17

ASSESSOR: Miriam Rodriguez

PRODUCTS: Apparel

NUMBER OF WORKERS: 300

Summary of Code Violations

Companies that join the FLA agree to uphold the FLA Workplace Code of Conduct throughout their entire supply chain. The Code of Conduct is based on International Labour Organization (ILO) standards, and defines labor standards that aim to achieve decent and humane working conditions.

While it is important to note when violations of the FLA Workplace Code of Conduct occur, the purpose of these assessments is not simply to test compliance against a particular benchmark, but rather to develop an understanding of where and how improvements can be made to achieve sustainable compliance. Code of Conduct violations can be found throughout the course of an assessment of the employment and management functions, and are addressed in companies' action plans.

Findings and Action Plans

FINDING NO.1

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Policies & Procedures (Macro)

Finding Explanation

1. There are no written policies for Compensation; however, some procedures exist to manage Compensation. These procedures are not reviewed to ensure compliance with local and federal law. ER.1.1; ER.1.3.
2. There are written Policies and Procedures for Termination, but not for Retrenchment. Consequently, management only reviews its Policies and Procedures for Termination, there is no review of Retrenchment practices. ER.1.1; ER.32.1
3. There are no written policies or formalized procedures on the existing Grievance System. ER.1.1.
4. There are no written policies for Environmental Protection, although some documents are in place. ER.1.1.
5. None of the written procedures have any reference to the law or FLA Workplace Code. ER.1.3.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.1; ER.1.3; ER.3, and ER.32.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Write detailed policies with reference to FLA workplace code on compensation for full time and temporary employees. Incorporate those policies into the handbook and make sure they are explained during employee orientation. Review the policy annually to make sure it still applied as desired. Review the policy with employees semi-annually in existing safety meetings.
2. Formalize retrenchment policies with reference to FLA code into written procedures. Incorporate those policies into the handbook and make sure they are explained during employee orientation. Review the policy annually to make sure it still applies as desired. Review the policy with employees semi-annually in existing safety meetings.
3. Create a grievance/suggestion box and place it in an area where employees can submit with anonymity if desired. Create a policy describing to whom and how a grievance can be submitted directly. Incorporate this policy into the handbook and make sure it is explained during employee orientation. Review the policy annually to make sure it still applies as desired. Review the policy semi-annually with employees in existing safety meetings.
4. Formalize environmental protection policies with reference to FLA code into written procedures. incorporate those policies into the handbook and make sure they are explained during employee orientation. Review the policies annually. Review the policies with employees semi-annually in existing safety meetings.

Planned completion date

09/09/18

Company Action Plan Update

New policies have been written and are under current review by upper management and legal counsel.
they will be enacted as soon as approved.
a grievance/suggestion box has been established.

FINDING NO.2

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

1.New hire orientation:

Hires from the two Staffing Agencies receive an overview of benefits which includes an overview of medical benefits and paid holidays. Employees converted to permanent status go through orientation where they are given the Employee Handbook. This book includes information on Hiring, Disciplinary Procedures, Hours of Work, Compensation, Termination, and Safety. The HR Administrator provides a summary of the handbook. There is no training per se. HR gives employees the handbook, and asks them to sign and return. ER.15.2
2.Though some procedures and documents are in place, the factory has no specific training, whether initial or ongoing, for supervisors or workers in the following employment functions: Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Termination and Retrenchment, and Environmental Protection. ER.1.2; ER.15.2; ER.17.1; ER.17.3

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.2, ER.15.2, ER.17.1, and ER.17.3)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. At orientation, the HR Director will thoroughly explain all policies and procedures including reference to FLA code instead of just having new employees read and sign the handbook. Review policies annually for relevance. Review policies with employees semi-annually in existing safety meetings.
2. The areas mentioned are covered solely by the H/R department and they will attend seminars to get additional training and then make sure the policies and procedures reflect the things they learn.

Planned completion date

09/09/18

Company Action Plan Update

The HR Director thoroughly explains benefits, policies and procedures in orientation instead of just asking new employees to read the handbook and sign that they have done so.
Policies will be reviewed with employees twice a year in regularly scheduled safety meetings

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation

- 1.The factory has no formalized communication regarding its compensation structures and payment policies, procedures and possible updates to the general workforce. The HR Administrator posts the Texas Workplace Posters with minimum wage information on the Wall of Information but there is no communication other than what is presented on the poster. C.17; ER. 16.1
- 2.The factory communicates its Policy and Procedures on Hours of Work to new hires at orientation. There is no communication to workers or supervisors after that. ER.16.1
- 3.Based on the interview with the HR Administrator, the factory has no system through which workers can submit grievances or questions about wage payments and benefits specifically. C.19
- 4.There is no communication to the general workforce on the factory policies and procedures for Termination and Retrenchment.
- 5.Only the relevant workers receive communication on Environmental Protection, not the general workforce. ER.1.2; ER.16.1; ER.31; ER.32

6. there has not be any layoffs in the recent past, in the event of one, management does not have a system in place to consult with workers prior to making a final decision. ER.32

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.1, ER.1.2, ER.16.1, ER.31, and ER.32; Compensation C.17 and C19)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Broaden the orientation procedure to include explaining compensation and payment policies. This is in addition to posting all legal wage information in public areas. Review the compensation policies semi-annually in regularly scheduled safety meetings.
2. Cover policies on work hours during orientation including FLA code. Reinforce the policies with workers semi-annually using existing safety meetings.
3. Develop a system for workers to lodge a grievance. It needs to be simple and free from retribution. There needs to be a way the grievance goes to H/R with anonymity if desired by the worker. A suggestion/grievance box should also be placed in an area with easy access for workers in case they prefer to use that method.
4. Formalize written policies on termination and retrenchment. Review these policies with workers at orientation. Review the policies annually for FLA code compliance. Review the policies with workers semi-annually in existing safety meetings.
5. Review environmental safety procedures with the entire workforce at established safety meetings.
6. Although not a specifically written procedure, the increase and contraction of the needed workforce is part of the reason for using temporary staffing. When work in some areas contracts (on average 1-5 days at a time) and a smaller workforce is needed for a short time, employees are informed about the length of time the reduction will last and the desire that the employees return as soon as more work is available is conveyed. The movement of those workers to other areas is also attempted whenever possible. Retention of workers is highly desired since many of the positions require training which has already taken place.

Planned completion date

09/09/18

Company Action Plan Update

The orientation process now goes more in depth explaining compensation and it is reviewed at least twice a year in safety meetings.

The grievance process has been written and is being reviewed and revised.

Environmental procedures are being reviewed at least twice a year in safety meetings

FINDING NO.4

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Responsibility & Accountability (Macro)

Finding Explanation

- 1.The following employment functions have accountable and recognizable management; however, there is nothing in writing that clearly communicates their roles to the general workforce: Recruitment, Hiring and Personnel Development, Industrial Relations and Freedom of Association, Grievance System, Health and Safety, and Environmental Protection. ER.1.2
- 2.The person with ultimate responsibility is unknown to the workforce. Worker testimony revealed they are unaware of the head person within the factory, the Business Operations Manager. ER.1.2

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.2)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Write clear policy defining roles and responsibilities for recruitment, hiring, personnel development, industrial relations, freedom of association, grievance system, health and safety and environmental protection and review them annually for needed updates. review these staffing responsibilities in orientation and then semi-annually in already established safety meetings.
2. When roles are clearly defined and covered in the meeting defined above, this issue should disappear.

Planned completion date

09/09/18

Company Action Plan Update

New policies have been written and are being reviewed in regular safety meetings.

FINDING NO.5

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

- 1.The factory works with two Staffing Agencies. Workers hired through the Staffing Agencies do not have a direct employment relationship with the factory; however, the agencies assure workers are paid accurately and on time. The factory Business Operations Manager, the head person at the factory, stated at the closing meeting that he is not fully aware of the business practices of the staffing agencies, nor does he interfere with the practices of the agencies. ER.6.1
- 2.The factory consistently uses temporary workers as a means to support normal business needs. ER.8.1 and ER.9.2
- 3.Staffing Agency A has applicants submit a medical self-assessment consisting of 3 pages of questions about their health status and history that could potentially eliminate an applicant from the hiring process. ND.9
- 4.In addition to the medical self-assessment, Staffing Agency A requires that hires read and sign a document entitled Policies and Procedures. This document, one page, has 19 policies and procedures, the last one, number 19, mandating that hires agree to a non-compete clause where they cannot accept a position with another manufacturer producing similar products, for one year. Although the document is offered in Spanish, it is highly unlikely that any hire will carefully read through the 19 points and fully understand the content and implications. Also, this kind of a clause is highly unusual for this skill level. ER.6.2
- 5.Factory violates the stipulations on temporary workers and the layoff policy of the state of Texas, which mandates that after a temporary worker has worked consistently for the factory for three years, the factory must lay off that person for no less than one year prior to rehire. Roughly 60% of the workers have worked in the factory for three year or more continuously under temporary status. ER.9.1, ER.9.2, ER.9.3
- 6.Factory does not recognize seniority or calculate fringe benefits for converted workers going back to their initial day as a temporary worker. ER.12

Local Law or Code Requirement

Texas Workforce Commission Payday Law, Deductions from Wages; Federal Equal Employment Opportunity Law: Title VII of the Civil Rights Act of 1964 (Title VII), prohibits employment discrimination based on race, color, religion, sex, or national origin; FLA Workplace Code (Employment Relationship Benchmarks ER.1.1, ER.6.1, ER.6.2, ER. 8.1, ER.9.1, ER.9.2, ER.9.3 and ER.12 and Non-Discrimination Benchmarks ND.1 and ND.9)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Establish a full time employee that is known to the workers as someone they can go to with any employment issues, whether they are a full time or temporary employee. Monitor and intervene as needed, in the policies and procedures of the staffing agencies used.
2. Develop a plan to convert more employees from temporary status to full time status as they acquire skills.
3. Work with the staffing agency to modify their medical questionnaire and eliminate discriminatory questions while still asking questions that pertain to skills needed to do the job, like can you lift a 40 lb. box.
4. Work with the staffing agency to revamp their policies and procedures document to be compliant with Fair Labor code and to make sure each item is explained to workers. The non-compete clause is to prevent movement from one temp agency to another that would still place the worker in the GCI factory.
5. in our audit clarification, the auditor confirmed that the way temp labor is used does not violate Texas law and our additional research of the Dept. of Labor citing she gives is just the Dept of Labor,s policy for their own employees, not a mandate by the Dept. of Labor for all industry so we are not addressing this item.
6. This is a correct statement and the factory does not plan to change the policy. None of us can come up with an appropriate way to calculate time worked when there are gaps between times of employment.

Planned completion date

09/09/18

Company Action Plan Update

GCI has changed staffing agencies and has a higher participation role.

they are working on converting more temp personnel to full time where the work is sustainable.
the medical questionnaire has been reduced to only a few questions that strictly pertain to abilities needed to do the job.
there is no non-compete clause in the new agency's contract.

FINDING NO.6

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1.The factory uses two staffing agencies, Agency A and Agency B. Agency A deducts \$1.00 from every weekly paycheck of the approximately 450 temporary workers. This is allegedly deducted to defray the costs of background checks, drug testing, and payroll check stubs. Agency A has their hires sign three different documents acknowledging the deduction of this fee. Agency B does not deduct this fee and acknowledges it as unethical. ER.5.3 and ER.6.2, F.7.4; ND.2.1; ND.3.1.3; C.11.1

2.The factory uses temporary employees on a full-time basis and for functions normally conducted by permanent employees, who constitute only about 10% of the workforce. Temporary workers have in some cases worked at the factory for up to 18 years without being considered for conversion. Of the 450 temporary employees from Agency A and the 20 temporary employees from Agency B, only 19 from Agency B were converted within the last 12 months. None of the start dates were before 2016. ER.9.1, ER.9.2, ER.9.3

3.Neither Agency A nor the factory uses the services of E-Verify, a government-linked organization that vets applicants through government data bases to verify age and legal status. Agency A and the factory accepts two forms of a government issued ID. Of Agency A's ten I-9s reviewed that belong to interviewed temporary employees, two workers had expired visas. Furthermore, there were whited-out numbers on page 2 of the I-9s associated with workers' permanent legal status. ER.1.1, ER.2.1, and ER.5.6

Local Law or Code Requirement

Texas Workforce Commission/Texas Payday Law; FLA Workplace Code (Employment Relations Benchmarks: ER.1.1; ER.3.1; ER.5.6; ER.5.3 and ER.6.2, ER.9.1, ER.9.2, ER.9.3; Forced Labor Benchmark F.7.4; Non-Discrimination Benchmarks ND.2.1, ND.3.1.3, C.11.1)

Recommendations for Immediate Action

1.Immediately cease the practice of \$1 deduction from each person's paycheck. Provide backpay going back to initial date of hire through the temporary agency for each worker who has been subject to these deductions. Have each such worker sign a statement acknowledging the removal and backpay of the amount going back to their first day of hire. Factory management to provide a written statement to Agency A prohibiting the \$1 administrative fee.

2.Develop an analysis of the temporary worker situation and arrive at a solution to convert workers within a reasonable timeframe.

3.The FLA affiliate to hire an external consultancy to develop specific non-discrimination training to the factory and Agency A's management.

4.The factory and Agency A to fully convert to the E-Verify system and to allow the workers with "permanent legal status", as indicated on their I-9 forms, the allowable time period to be vetted through the E-Verify system.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The \$1 deduction per paycheck has been stopped. The factory has provided a written statement to the agency prohibiting the \$1 administrative fee.

2. Although we disagree with the conversion rate and length of work time stated in the audit findings, the factory will develop a clearer plan for the conversion from temp employee to full time and make sure temp employees understand the steps to get to full time employment. At that point,a large part of the decision will be the employee's.

3. Factory management will work with the agency to develop review processes to insure that either I-9 information is re-verified more frequently or switch to e-verify. E-verify is also only a snapshot of time, not a recurring verification.

Planned completion date

09/09/18

Company Action Plan Update

The \$1 per paycheck was stopped when the findings were released.

GCI no longer uses the Staffing Agency that had the negative practices.

the new agency does not ask medical questions nor is there a non compete clause in their contract

FINDING NO.7

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

- 1.The factory does not have a written Policy on Recruitment, Hiring, and Personnel Development.
- 2.There are Procedures in place for personnel development but none that outline the steps and requirements in the promotion, demotion, and reassignment schemes. Nor do the procedures on performance reviews include steps, processes, linkages to job grading, nondiscrimination, written feedback, and compliance with legal requirements. Not all job openings have written job descriptions. ER.1.1, ER.28.1, ER.29, ER.30
- 3.The majority of temporary employees with tenure up to 18 years have not been given the opportunity for salary increase or promotion. ER.30
- 4.Factory does not communicate its Recruitment, Hiring & Personnel Development policies and procedures to the general workforce. Procedures are mentioned in orientation but there is no communication after that meeting. Furthermore, the factory does not review its policies and procedures on Recruitment, Hiring & Personnel Development on an ongoing basis. ER.1.2; ER. 29; ER.30

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.1, ER.1.2, ER.28.1, ER.29 and ER.30)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Write a detailed policy on recruitment, hiring and personnel development including steps/requirements for promotion, demotion and reassignment using FLA code references.
2. Broaden performance reviews to include job grading and written feedback. Write any missing job descriptions.
3. we disagree with the statement in the audit finding and can provide numerous examples that dispute the statement but will work on a method to better convey existing opportunities for salary increases and promotions without regard for temp or full time status.
4. Review the policies and practices annually to determine any needed updates. Review the policies with the entire work force semi-annually in already established safety meetings.

Planned completion date

09/09/18

Company Action Plan Update

New policy on recruitment, hiring and personnel development has been written and is under current review by upper management and legal.
Performance review and job descriptions have been rewritten and are also under review.
Both will be enacted upon approval.

FINDING NO.8

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

Based on review of sample time records from peak production months, within the past 12 months, permanent workers have worked beyond 60 hours in these areas:
October 2017 biweekly pay period: one Lead/Supervisor "Foil" worked 70 hours
October 2017 biweekly pay period: one worker in "Numbering" worked 80 hours
October 2017 biweekly pay period: two workers in "UV" each worked 73.5 hours
February 2017 biweekly pay period: one Lead/Supervisor in "Foil" worked 70 hours (same Lead as in item a. above) HOW.1.2; HOW.1.3; HOW.8.3

Local Law or Code Requirement

FLA Workplace Code (Hours of Work Benchmarks HOW.1.2, HOW.1.3, and HOW.8.3)

Recommendations for Immediate Action

Factory to take measures (e.g. converting adequate number of temporary workers to full-time workers) to ensure that weekly hours of

work do not exceed 60.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1-4. the recommendation of converting more temporary workers to full time will not solve this issue as that will not increase the size of the currently available work force. Even though overtime that creates an over 60 hour work week is on a voluntary basis, the factory will more closely monitor individual work hours to limit or eliminate the instances of more than 60 hour work weeks. They will re-enforce in training meetings that no one is ever expected to work more than 60 hours in any given week.

Planned completion date

09/09/18

Company Action Plan Update

They have established a monitoring process to insure one day of rest in 7 and to not exceed the 60 hours per week.

FINDING NO.9

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

- 1.The state of Texas allows for sick leave to be deducted from an employee's vacation time as practiced by the factory. While it is not against the law, the practice violates an FLA Benchmark. HOW.18
- 2.Production planning always incorporates overtime in the weekly schedule for the UV and finishing production areas. Workers in these areas consistently work a 48-hour work week with 8 hours of overtime. HOW.1.2, HOW.6, HOW.7, HOW.8.2
- 3.Management sets production targets at a rate that overtime is required on a weekly basis. ER.24
- 4.The standard four hours of weekly overtime is required due to insufficient number of full time employees. HOW.6.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.24; Hours of Work Benchmark HOW.1.2; HOW.6; HOW.7; HOW.8.2; HOW.18)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Factory will follow HOW 16 and handle sick time as required by law. Workers are not required to use vacation time if they have been out sick. The factory will review their current policies on vacation to see if they deem any changes appropriate.
- 2-4. Production targets in the entire factory including UV and finishing as mentioned are not set to systematically require 8 hours or overtime per week. As an example, in the months of January and February of this year, the overall overtime for the entire factory has run at only 1-5%. Clearly, no factory takes on the added expense of overtime if it can be avoided except due to seasonality of business.

Planned completion date

09/09/18

Company Action Plan Update

The company is reviewing their vacation / sick time policies.

They are working with customers to balance their workload in UV and finishing to better balance the work force in those areas and better limit overtime

FINDING NO.10

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Industrial Relations

Finding Explanation

- 1.The factory does not have oral or written policies or procedures on Industrial Relations; it therefore does not communicate such information to the workforce, nor does it involve workers in its implementation. ER.1.1, ER.16.1
- 2.The general workforce is unaware of the person accountable for Industrial Relations. ER.1.2
- 3.There is no system in place to ensure that workers are aware of their rights under the Freedom of Association as per the FLA Workplace Code. ER.1.1; ER.16.1; ER.25.1
- 4.The factory does not provide specific training for supervisors on policies, procedures, and applicable legal provisions regarding Industrial Relations. Therefore, they also do not provide supervisors with ongoing training that would enhance their knowledge and skills in managing Industrial Relations situations. ER.17.1; ER.17.3
- 5.The factory has not provided specific or ongoing training for the general workforce on policies, procedures, and applicable legal provisions regarding Industrial Relations. ER.1.3
- 6.Because the factory does not have policies or procedures on Industrial Relations, it also does not conduct a periodic review of such policies/procedures or update them according to local laws and regulations. ER.1.3.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.1, ER.1.2, ER.1.3, ER.16.1, ER.17.1, ER.17.3, and ER.25.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Factory to send H/R staff member to seminars on Industrial Relations to help write policies and educate workers and supervisors of their rights with regard to Industrial Relations and Freedom of Association.
2. Establish a person accountable for Industrial Relations and convey that to workers.
3. Educate workers of their rights once policies have been written.
4. Educate supervisors once policies have been established.
5. Educate workers once policies have been written using the already established safety meetings.
6. Review the established policies annually

Planned completion date

09/09/18

Company Action Plan Update

they are still looking for a good Industrial Relations seminar to attend.
Policies have been written and are under review by upper management and legal.
They have started a supervisory training program on Freedom of Association.
as soon as the written policy is approved, employee training will take place.

FINDING NO.11

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

There are no statements or procedures in place that acknowledge the factory management's general support of energy and water efficiency, and a commitment to minimize impacts with respect to air emissions, waste, hazardous materials and other applicable environmental risks. Nor are there procedures for reporting environmental emergencies. HSE.1; ER.31.1; ER.31.2; ER.3.3

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.3.1, ER.3.3, ER.31.2; Health, Safety, and Environment Benchmark HSE.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Research areas where continued environmental impact may be reduced such as air emissions, water and energy savings and

handling of hazardous materials. Then develop procedures to accomplish those activities. The factory is currently working with Valley Solvents for the safe disposal of hazardous material. They shred waste paper on site and recycle with Pioneer Paper. GCI recycled over 2000 tons of paper in each of the last 2 years. There is no production water used in the facility. Have Valley Solvents conduct an in-house seminar on environmental safety for the whole workforce

Planned completion date

09/09/18

Company Action Plan Update

The factory works with Valley Solvents for the safe disposal of hazardous material. They shred waste paper on site and recycle with Pioneer Paper. GCI recycled over 2000 tons of paper in each of the last 2 years. There is no production water used in the facility. Valley Solvents conducted an in-house seminar on environmental safety for the whole workforce

FINDING NO.12

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

- 1.Workers are not using hearing protection consistently in the Rollem (printing machine) print areas with higher decibels consistently at 84db. Audiometric testing is conducted annually, and results show no higher than 84decibels in any one area. Management encourages workers in the higher decibel printing areas to use earplugs. It appeared to the auditor that ear protection should be used in the areas with consistent decibel levels of 84. HSE.7, HSE.8
- 2.Most areas in the factory have repetitive motion that could lead to stress in the musculoskeletal system. Management is not taking proactive measures to mitigate the ergonomic risks, and workstations are not adaptable for the heights of workers. It is recommended that management contract with an external ergonomics expert to assess the processes throughout the factory and recommend solutions to reduce long-term injury. HSE.17.2.
- 3.Factory manager was not aware if a lightning rod system was in place. HSE.13
- 4.PPE is available, and workers are encouraged to use it, however there is no management oversight on whether workers use the PPE or not. In the Rollem area, workers should be wearing ear protection and goggles. None were observed using it. Furthermore, steel toed shoes are required in various areas of the factory and workers are obligated to pay for the shoes. HSE.7, HSE.8

Local Law or Code Requirement

OSHA Regulation 29 CFR 1910.132(a)(f); OSHA General Duty Clause, Section 5(a)(1); FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.7, HSE.8, HSE.13 and HSE.17.2)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Safety officer will test decibel levels throughout the plant on a regular basis. Make sure ear plugs are readily available in high decibel areas. Do regular training on the benefits of using PPE and the dangers of not using PPE in the currently established safety meetings.
2. Continue ongoing work to identify and improve ergonomic situations. Cushioned manufacturing mats have been added in standing areas. Adjustable stools or chairs have been added in several areas and the worker has to option to stand or sit.
3. Will ask the building owner if there is a lightning rod system and make that information known.
4. Have training sessions with supervisors for the encouragement of workers to use PPE as well as re-enforcing it in safety meetings.

Create reimbursement program for workers that are required to wear steel toed shies.

Planned completion date

09/09/18

Company Action Plan Update

Decibel levels are being monitored regularly and hearing protection is readily available. Employees are encouraged to wear PPE in ongoing safety training sessions. cushioned mats and adjustable chairs have been added to work stations. supervisors have had training on the importance of employees wearing PPE and there is ongoing reinforcement in safety meetings a re-imbursement program for steel toed shoes has been instituted

FINDING NO.13

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

- 1.To date, there have not been any evacuation drills. HSE.5.1 HSE.5.2
- 2.None of the traffic lanes or emergency aisles are clearly marked. HSE.1
- 3.There are no floor markings within the entirety of the factory that indicate evacuation routes or aisles. HSE.1; HSE.5.1
- 4.Factory has not to date provided any basic fire safety or first aid training. None of the workers have been trained in the use of fire extinguishers. HSE.5.1; HSE.5.2; HSE.6.2
- 5.Extension cords are used throughout the factory in lieu of hard wiring. HSE.13

Local Law or Code Requirement

OSHA Regulation 29 CFR 1910.38; 29 CFR 1910.22(b); 29 CFR.1910.152; 29 CFR 1910.157(g)(3); CFR 1910.334; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.5.1, HSE.5.2, HSE.6.2 and HSE.13)

Recommendations for Immediate Action

- 1.Conduct and document evacuation drills on a regular basis.
- 2.Clearly mark traffic lanes and emergency aisles.
- 3.Mark the floors to delineate evacuation routes/aisles.
- 4.Ensure that all workers are trained on basic fire safety and a sufficient number on first aid training.
- 5.Replace extension cords with hard-wiring.

COMPANY ACTION PLANS

Action Plan no 1.

Description

- Hired a full time Safety Manager and have had one fire/evacuation drill and one weather/emergency action plan drill.
2. Have already striped aisles for walkways and emergency exits. Established procedure to repaint those lanes twice a year.
 3. have posted evacuation route maps in multiple locations. Will continue to investigate improvements in that area including worker discussions in safety meetings.
 4. Have established an emergency safety team and are currently holding monthly safety meetings with varied topics to reinforce policies that ensure worker safety. Had training by the city Fire Marshal on the use of fire extinguishers and general fire safety. Have multiple people on each shift trained in first aid, CPR and the use of defibrillators. Two defibrillators are located in strategic plant locations to maximize efficiency.
 5. Safety Manager has reduced the volume of extension cords in use. Will continue to review power needs in all areas to reduce further.

Planned completion date

09/09/18

Company Action Plan Update

- Hired a full time Safety Manager and have had one fire/evacuation drill and one weather/emergency action plan drill.
2. Have already striped aisles for walkways and emergency exits. Established procedure to repaint those lanes twice a year.
 3. have posted evacuation route maps in multiple locations. Will continue to investigate improvements in that area including worker discussions in safety meetings.
 4. Have established an emergency safety team and are currently holding monthly safety meetings with varied topics to reinforce policies that ensure worker safety. Had training by the city Fire Marshal on the use of fire extinguishers and general fire safety. Have multiple people on each shift trained in first aid, CPR and the use of defibrillators. Two defibrillators are located in strategic plant locations to maximize efficiency.
 5. Safety Manager has reduced the volume of extension cords in use. Will continue to review power needs in all areas to reduce further.