



FAIR LABOR
ASSOCIATION®

INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Columbia Sportswear Company

COUNTRY: Indonesia

ASSESSMENT DATE: 12/02/16

ASSESSOR: Donny Triwandhani

PRODUCTS: Apparel

NUMBER OF WORKERS: 2015

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: Training (Macro)

Finding Explanation

1. Orientation for new workers only covers wage calculations, working hours, benefits, Freedom of Association, and workplace rules. It does not cover grievance and Human Resources policies or Health & Safety. In addition, new workers did not receive written documentation that substantiates all the issues covered in orientation or a copy of the workplace rules.

2. The factory does not provide workers with ongoing training on any of the Employment Function except Compensation and Grievance System.

3. The factory does not provide specific training for the relevant supervisors on any of the Employment Functions.

4. There is no training for HR Personnel on Workplace Conduct & Discipline.

Local Law or Code Requirement

FLA Workplace Code (Employee Relationship Benchmarks ER.1, ER.15, ER.17, and ER.27)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The factory will update the new employee orientation materials to ensure they receive written documentation of all rules and information that is covered in orientation. The factory will review training materials and ensure that they reflect all rules and regulations of the factory, including EHS.

2. The factory will update their HR policies and procedures to provide workers with ongoing training on topics pertaining to their employment function. The factory will review and prioritize topics where workers may need more information.

3. The factory will update their HR policies and procedures to provide supervisor training on any updates or scope of the employment functions to ensure awareness. The factory will review and prioritize topics where supervisors may need more information.

4. The factory will develop and conduct regular training for HR Personnel on workplace conduct and disciplinary practices.

FINDING NO.2

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Review Process (Macro)

Finding Explanation

1. The factory has not developed policies and procedures on the review process to ensure updates are made according to local law and FLA Workplace Code requirements. As a result, the factory management does not periodically review its policies and procedures for any of the Employment Functions.

Local Law or Code Requirement

FLA Workplace Code (Employee Relationship Benchmarks ER.1, ER.29, ER.30, and ER.31)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The factory will develop policies and procedures on the review process to ensure updates are made according to local law and FLA Workplace Code requirements. The factory will also periodically review policies and procedures for any of the Employment Functions.

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation

1. The factory does not communicate its policies, procedures and possible updates to the general workforce on any Employment Functions except for Compensation and Hours of Work.

2. The worker integration component is missing for all Employment Functions. The factory does not have procedures for receiving worker input and/or feedback on the creation, implementation, and revision of its policies and procedures. Workers are neither systematically integrated nor consulted in the decision-making processes.

Local Law or Code Requirement

FLA Workplace Code (Employee Relationship Benchmarks ER.1, ER.25, ER.27, ER.29, ER.30, and ER.32)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The factory will organize an employee orientation for all employees to communicate the policies, procedures and any possible updates, and include this in the new employee onboarding process. The orientations will take place monthly and this work will be jointly led by HR, General Administrative Department and the Labor Union.

2. The factory will explore and identify channels for communication across employees for the purpose of getting worker input for internal policies and procedures.

FINDING NO.4

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. Out of 1,499 production workers, 561 production workers (37.42%) are employed under short-term contracts (Provision of Work, Time Certain, PKWT) although they were doing permanent jobs such as cutting, sewing, finishing and packing.
2. The factory does not maintain work agreements on file for contract workers that have been employed with repeated contracts. The factory hires workers on two consecutive contracts and then rehires the workers for a third contract without granting workers a 30-day pause between the second and third contracts. By law, the renewal of a PKWT contract may only be made 30 days after the end of the two previous PKWT work agreements. Furthermore, the renewal of a PKWT contract may only be made one time and for a period of no longer than two years. Any PKWT contract that does not fulfill the legal requirements shall become a work agreement for an unspecified period of time or those workers become permanent in status.
3. The factory has not registered its PKWT contracts with the local labor office.
4. According to management, there are only six workers with disabilities out of a total of 1,652 workers; this is not in full compliance with local law that requires the factory to hire one person with disabilities per 100 workers. Thus, to fulfill the legal requirements, the factory must hire at least 17 workers with disabilities. The factory has not established a program to hire and train more workers with disabilities.
5. The factory does not have any policy and procedures on performance reviews. The factory does not conduct performance reviews for production workers; the factory only conducts performance reviews for supervisors and office staff who are eligible for promotion.
6. There are no policies and procedures on Personnel Development.

Local Law or Code Requirement

Law No. 13 on Manpower (2003), Article 59; Stipulation No. KEP/100/MEN/VI on Work agreement for specified period of time (2004), Articles 3.4-7 and 13; Law No. 4/1997; FLA Workplace Code (Employee Relationship Benchmarks ER.1, ER.8, ER.9, ER.11.5, ER.28, ER.29, and ER.30; Nondiscrimination Benchmarks ND.1 and ND.2)

Recommendations for Immediate Action

1. Convert all workers currently hired under PKWT contracts but perform jobs of permanent nature to permanent employee status, as per legal requirements. Provide them with seniority and other fringe benefits dating to the hiring date of their first PKWT contract, as per FLA benchmarks and local law requirements.
2. Maintain all employment contracts on file for each worker, including previously signed employment contracts, so that actual years of service of workers can be transparently verified.
3. Register all PWKT contracts with the local labor department.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The factory will update the job status of workers currently hired under PKWT contracts (but perform jobs of permanent nature) to permanent employee status. The factory will also provide these workers with seniority and other fringe benefits dating to the hiring date of their first PKWT contract, as per FLA benchmarks and local law requirements. The factory will include policies and procedures to address this going forward, including training of relevant personnel.
2. The factory will maintain all employment contracts on file for each worker, including previously signed employment contracts, so that actual years of service of workers can be transparently verified. The factory will review the workers' contracts and make necessary changes on their employment status and communicate this to workers.
3. The factory will register all PWKT contracts with the local labor department. The factory will also include this on recruitment and hiring procedures.
4. The factory will look into this and seek to recruit and accept applicants with disabilities for work. The factory will also look into establishing a program to ensure regular recruitment.
5. The factory will establish policies and procedure for a wage scale. The factory will also begin conducting performance reviews for production workers. The factory will include development for criteria in workers' performance reviews, and also communicate to workers about this process.
6. The factory will develop policies and procedure on Personnel Development to promote long term employment.

FINDING NO.5

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. The factory calculates annual leave starting in January for all workers and pays workers their balance of annual leave every March. Therefore, for workers who were hired between February and December the previous year, the period before January is not included in the calculations for annual leave.
2. Fix-term workers are hired on PKWT contracts that are for two, three, six, or 12 months although their job duties are of permanent nature. Their contracts were renewed several times after a break from 3 to 18 days at the end of their second contract. The length of employment and other fringe benefits such as annual leave and religious holiday allowance (THR) are not calculated from the first day of their first contract; rather, workers are given new ID numbers and considered new workers for each new contracts signed. For example: Based on the personal file of a worker from warehouse, she had first been hired on September 21, 2016 with current ID number of xxxx0904. Her contract expired on November 21, 2016. Her second contract ran from November 21, 2016 to January 21, 2017. However, the worker had actually been hired on repeated contracts since at least June 2015 and her ID number had been changed five times (xxxxx507, xxxxx904, xxxxx105, xxxxx506 and xxxxx904). Since the factory considered her hiring date September 21, 2016 (and not from the first day of her first contract) she was not entitled to paid annual leave. Moreover, she received a religious holiday allowance (THR) of only IDR 392,200 (USD 29.36) in June 2016 because the factory calculated her length of service as two months (since May 20, 2016) even though she has actually been working at the factory for over a year. She should have received one-month's wages (IDR 2,352,650; USD 176) for her THR, as required by law for employment of at least one year.
3. The final payouts for terminated or resigned workers do not include workers' unused and unexpired annual leave.
4. If workers have to leave early before having worked four hours (or a half-day's work) due to personal reasons or sickness without a doctor's reference letter, the factory does not pay the worker and they are considered absent. For instance:
 - a. On October 21, 2016, a worker from the sewing section requested to go home at 9:15 AM for personal reasons but she was not paid for hours worked (from 7:30 AM to 9:15 AM, 1 hour and 45 minutes), as the factory considered her absent the whole day.
 - b. On July 20, 2016, a worker from the sample section requested to go home at 9:30 AM due to an ill child, but she was not paid her wages for hours worked (from 7:30 AM to 9:30 AM, 2 hours), as she the factory considered her absent the whole day.

Local Law or Code Requirement

Labor Law No. 13 on Manpower (2003), Articles 59.6, 78.2, 79.2.c, 93.2 - 3, and 156.3; Regulation of the Minister of Manpower No. PER-04/MEN/1994, Article 2; Regulation of the Minister of Manpower No. KEP-06/MEN/1990; FLA Workplace Code (Employee Relationship Benchmarks ER.1.1, ER.11.2, ER.11.6, ER.12, ER.19.1, and ER.22; Nondiscrimination Benchmark ND.3; Freedom of Association Benchmark FOA.24; Hours of Work Benchmarks HOW.3, HOW.11, HOW.14, and HOW.16; Compensation Benchmarks C.1, C.5, C.6, C.11, C.13, and C.17)

Recommendations for Immediate Action

1. Provide all workers with the annual leave and religious holiday allowance to which they are legally entitled, calculated from the start date of their first PKWT contract with the factory.
2. Include any unused and unexpired annual leave in termination payouts for terminated or resigned PKWT workers.
3. Accurately compensate all hours of work, including all hours worked on days that workers take sick leave or leave early for personal reasons.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The accounting department in the factory will provide all workers with the annual leave and religious holiday allowance to which they are legally entitled, calculated from the start date of their first PKWT contract with the factory. The factory will also review workers who are affected and compute and provide back pay. The factory will also enhance accounting policies and procedures, and train relevant management personnel and workers.
2. The accounting department in the factory will review fix-term workers that were hired on PKWT contracts who are affected and compute and provide back pay. The factory will also enhance accounting policies and procedures, and train relevant management personnel and workers.
3. The accounting department in the factory will include any unused and unexpired annual leave in termination payouts for terminated or resigned PKWT workers. The factory will review the workers that have been terminated or resigned within the year following the FLA SCI audit and will compute and provide back pay to the workers. The factory will also enhance policies and procedures to support this.
4. The accounting department in the factory will compensate all hours of work, including all hours worked on days that workers

take sick leave or leave early for personal reasons. The accounting department in the factory will review affected workers and compute and provide back pay. The factory will also enhance policies and procedures, and train relevant management personnel and workers.

FINDING NO.6

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. Approximately 30% of sewing workers work during their lunch break (from 11:30 AM to 12:30 PM) starting around 12:00 pm, after eating lunch.
2. A seniority incentive is granted to workers who have worked at the factory one or more years, as required by law. However, the factory has not established a wage scale for the seniority incentive; seniority incentives are instead based on superior's preferences. As a result, the factory provides different seniority incentives to workers who were hired at the same time and in the same position. For instance:
 - a. Two sewing workers were hired in September 2015 but have different wages. One worker received wages of IDR 2,353,650 (USD 176), including a seniority incentive of IDR 1,000 (USD 0.07). The other worker received wages of IDR 2,407,650 (USD 180) including a seniority incentive of IDR 55,000 (USD 4.12).
 - b. The factory does not provide the seniority incentive to workers who are employed under repeated PKWT contracts shorter than 12 months (approximately 15% of the workers), even if those workers have been working at the factory for over a year in total.
3. The deduction for unpaid leave is not clearly reflected in workers' pay slips. The basic wage is reduced when there is unpaid leave instead of the deduction reflected in the pay slip's deduction column. This may confuse workers on the actual wage deduction.
4. The factory deducts a union fee of IDR 5,000 (USD 0.37) per month from payroll without workers' written consent (workers are, however, aware of the deduction).

Local Law or Code Requirement

Labor Law No. 13 on Manpower (2003), Articles 59.6, 78.2, 79.2.c, 93.2 - 3, and 156.3; Regulation of the Minister of Manpower No. PER-04/MEN/1994, Article 2; Regulation of the Minister of Manpower No. KEP-06/MEN/1990; FLA Workplace Code (Employee Relationship Benchmarks ER.1.1, ER.11.2, ER.11.6, ER.12, ER.19.1, and ER.22; Nondiscrimination Benchmark ND.3; Freedom of Association Benchmark FOA.24; Hours of Work Benchmarks HOW.3, HOW.11, HOW.14, and HOW.16; Compensation Benchmarks C.1, C.5, C.6, C.11, C.13, and C.17)

Recommendations for Immediate Action

1. Ensure workers do not work during their break time.
2. Grant the seniority allowance consistently across the workforce according to an established scale.
3. Clearly show any deductions in workers' pay slips, including those for unpaid leave.
4. Obtain written consent for any deductions from workers' wages that are not legally required, such as union dues.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The HR department in the factory informed employees about the need to take a rest during lunch break, and will remind workers going forward on a consistent basis. The factory will also review the policy on lunch breaks, and make necessary changes to ensure that no work is done during that time. The factory will also communicate with supervisors and managers on implementation, and communicate the importance of taking a lunch break to workers for rest.
2. The HR department in the factory will set up a regular checking system and wage scale to review workers' seniority, and ensure that seniority allowance and incentives are consistently implemented across the workforce according to an established scale. The factory will also include training of supervisors.
3. The Accounting Department in the factory will update the payroll system so that any wage deductions are communicated clearly to workers.
4. The factory is working with the Union to collect all workers' written consent. The factory will also update policies and

procedures.

FINDING NO.7

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. The time records of the security guards are not reliable; the head of security manually records, in writing, the security guards' time-in and -out.
2. The working-hours records do not identify pregnant or lactating women.

Local Law or Code Requirement

FLA Workplace Code (Employee Relationship Benchmarks ER.2 and ER.23.3; Hours of Work Benchmark HOW.5)

Recommendations for Immediate Action

1. Establish a reliable time recording system, such as time cards or other mechanical or electronic recording systems, for the security guards.
2. Identify pregnant and lactating women in the working-hours records.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The factory will provide a mechanical recording system to track the time that security guards worked, and instruct them with training on how to properly record this.
2. The factory will identify pregnant and lactating women in the working-hours records.

FINDING NO.8

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

1. Written warnings do not include any reference to the alleged misconduct as regulated in the Collective Bargaining Agreement (CBA).
2. Written warnings are not reviewed by direct superior before they are issued.
3. There is no a process for workers to appeal disciplinary actions taken against them. In addition, the disciplinary procedures did not include the presence of a third-party witness during imposition of disciplinary actions.

Local Law or Code Requirement

FLA Workplace Code (Employee Relationship Benchmarks ER.1 and ER.27)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The factory will include any references to alleged misconduct in written warnings, and ensure that they are reviewed by direct supervisors before they are issued.

2. The factory will establish a process for workers to appeal any disciplinary actions that may be taken against them, and ensure that these procedures include the presence of a third-party witness during imposition of any disciplinary actions.

FINDING NO.9

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Grievance System

Finding Explanation

1. Management does not communicate back to workers the resolutions of grievances. In addition, grievance procedures are not posted near the suggestion boxes.

2. Two out of the six suggestion boxes in the factory are not locked.

Local Law or Code Requirement

FLA Workplace Code (Employee Relationship Benchmark ER.25)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The factory will look into setting up a regular communication channel to respond to workers about how their grievances have been addressed or resolved.

2. The factory will lock all suggestion boxes, and only assign authorized personnel with keys to open the box. The factory will update its policies and procedures on grievances to ensure that these boxes are checked regularly and suggestions responded to on a timely basis.

FINDING NO.10

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. There is no statement of 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. Furthermore, the factory's environment policy is merged with its Health & Safety policy.

2. The factory does not have any procedures for managing its environmental impact to the surroundings.

3. The factory has not conducted an internal Environment Impact Analysis (AMDAL) which is then reported to the local environmental bureau. The Analysis reviews the environmental impact inside the factory (recycling empty chemical containers, waste management, reuse and reduction system for chemicals currently used - D-Ply 233BF, Spot Remover, white oil, WD 40, Uzziel, and diesel fuel) and outside the factory (dumping of empty chemical containers, unauthorized usage of empty chemical containers, contracting a third party to dispose of empty chemical containers who is authorized by the government to handle toxic and hazardous waste).

4. The factory does not provide the relevant workers with training on handling waste, including toxic and hazardous waste.

5. The factory does not have an appropriate system to respond to any unexpected environmental emergencies such as chemical spills or gas leaks.

Local Law or Code Requirement

Act 32/2009, Articles 22.1 and 65.2; Act No. 18/2008, Article 12.1; Safety Act No. 1/1970, Article 9.1; Attachment I Manpower Minister Regulation No. 05/1996 Article 3.3.5.; FLA Workplace Code (Employee Relationship Benchmark ER. 31; Health, Safety and Environment

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The factory will adapt its Environmental Policy to include a statement for general support of energy and water efficiency, and commit to minimizing impacts with respect to air emissions, waste, hazardous materials and other applicable environmental risks. The factory will also train employees.
2. The factory will update its Environmental Policy to include the procedure for managing environmental impact to the surroundings.
3. The factory will conduct the Environmental and Social Impact Assessment (UKL-UPL) and report this to the local environmental bureau. This assessment was previously conducted June 2016.
4. The factory will provide all new and existing relevant workers with training on handling waste, including toxic and hazardous waste. A system will be set up to ensure regular training as a refresher. The factory will request the Ministry of Environment to give a presentation to our employees.
5. The factory will establish a system to respond to urgent environmental emergencies. This system will be integrated into the factory's Environmental Policy with relevant staff trained to adequately manage. The General Administrative Department will develop the system by getting advice from the Ministry of Environment.

FINDING NO.11

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. The factory had not conducted an air emission test for the period of January – June 2016. The results shall be merged into the Environmental Management and Plan report and submitted to local environmental bureau. As a results, it also has not yet identified and or controlled any possible air emissions. Therefore, there is no evidence that the factory's emissions are within the legal parameters.
2. The factory also has not included documentation of rain water utilization activities (such as wells, collection pond, or bio-pore holes) in the aforementioned periodic report from January - June 2016.
3. A used tool box (non-toxic and non-hazardous waste) is stored with empty chemical containers (toxic and hazardous waste) in the temporary toxic and hazardous waste storage.
4. The factory has not installed a fence and lockable door to prevent unauthorized access of the solid waste storage.
5. The factory has not arranged for an authorized waste facility to dispose of its toxic and hazardous waste. By law, the maximum temporary storage of toxic and hazardous waste shall not exceed 365 days from when the waste generated.
6. The factory has not provided a segregated water stream in the solid waste temporary storage for leachate.
7. The factory's daily extraction for soil or ground water (61 – 131 cubic meters) is in excess of the soil and ground water extraction permit (32 - 47.5 cubic meters).
8. The factory does not have an appropriate system to respond to unexpected environmental emergencies, such as chemical spills.
9. The temporary storage area for toxic and hazardous waste is inadequate, and is not equipped with the following: a light fire extinguisher, fire alarm, fire detectors (a smoke and heat detector), first aid apparatus such as first aid kits and eye wash stations, sprinklers, hydrant and water reservoir, spill kit, Material Safety Data Sheets (MSDSs), Personal Protective Equipment (PPE), and explosion-proof lighting.
10. The factory has not made an inventory of its toxic and hazardous materials and therefore does not submit the corresponding report to the local environmental bureau every three months, as legally required.
11. The factory does not provide a secondary container for any chemicals stored in the temporary storage area for toxic and hazardous waste, nor is the area's floor set at a one-degree slant. Furthermore, the sump in the storage area is in dirty condition.

Local Law or Code Requirement

Act No. 18/2008, Article 29.1.c; Act No. 32/2009, Articles 20.1, 47.1-2, and 53.2; Attachment III of Environmental Minister Regulation No. 30/2009; Attachment of Environmental Impact Controller Bureau Head Decree No. 01/BAPEDAL/09/1995. Article 2.2. b.5; Environmental Impact Controller Bureau Head Decree No. 01/1995. Articles 3.2. b.1.5. and 3.2.b.g. a – c; Environmental Impact Controller Bureau Head Decree No. 255/1996. Article 2.f; Environment Minister Regulation of General Work No. 03/2013, Article 37.3; Government Regulation No. 27/2012, Articles 53.1 – 2; Government Regulation No. 74/2001, Article 31; West Java Governor's Decree No 546.2/767/10.1.01.2/BPMPT/2015. Section Decided, point m; FLA Workplace Code (Employee Relationship Benchmark ER.31; Health, Safety & Environment Benchmarks HSE.1, HSE.2, HSE.4, and HSE.9)

Recommendations for Immediate Action

1. Test air emissions every six months to ensure it is within the legal parameters. Report results of the air emissions test in the environmental management plan to local environmental bureau along with report on rain water utilization.
2. Separate toxic and hazardous waste from non-toxic and non-hazardous waste.
3. Install a fence and lockable door in the solid waste storage to prevent unauthorized access.
4. Dispose of toxic and hazardous waste within 365 days.
5. Provide a segregated water stream for leachate in the temporary storage area for solid waste. Ensure maximum daily extraction of soil or ground water is within the permitted amount.
6. Establish system to respond to environmental emergencies.
7. Equip the temporary storage area for toxic and hazardous waste with the following: light fire extinguisher, fire alarm, smoke and heat detectors, first aid kits, eye wash station, sprinklers, hydrants and water reservoir, spill kit, MSDSs, PPE, and explosion-proof lighting.
8. Submit report every three months of toxic and hazardous inventory to local environmental bureau.
9. Provide secondary container and/or one-degree slanted floor in the temporary storage area for toxic and hazardous waste. Periodically clean the sump.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. To ensure that the factory's air emissions are within legal requirements and parameters, the General Administrative department will conduct air emission tests every six months. Results for the air emissions tests will be reported in the environmental management plan to the local environmental bureau. The factory will include this in their procedures to ensure consistent implementation.
2. The factory's General Administrative department will include the documentation of all rain water utilization activities, and will include this log of activities in the aforementioned periodic report to local environmental bureau. The factory will include this in their procedures to ensure consistent implementation.
3. The factory's General Administrative department will inform relevant workers about the need to separate different streams of waste and/or materials containing certain wastes to ensure that all toxic and hazardous waste is stored separately from non-toxic and non-hazardous waste. The factory will include this in their procedures to ensure consistent implementation.
4. The factory's General Administrative department is in the process of installing a fence and lockable door in the solid waste storage.
5. The factory's General Administrative department will contract with a 3rd party to dispose toxic and hazardous waste in order to dispose waste immediately. The factory will also set up a checking system to ensure that the hazardous waste storage will not exceed 365 days from when it was generated, and dispose as soon as possible.
6. The factory's General Administrative department will provide a segregated water stream in the solid waste temporary storage for leachate.
7. The factory's extraction volume limit for ground water was initially determined in 1998 when they had around 800 employees. As the factory's permit will expire on October 23, 2017, the factory will update the extraction volume limit for ground water according to requirements and new number of employees.
8. The factory will set up an internal system and process to respond to environmental emergencies, and seek to regularly communicate this procedure to workers, including posting this system in a conspicuous location. The factory will include training to relevant management personnel and workers.
9. The factory will equip the temporary storage area for toxic and hazardous waste with the adequate tools according the regulation. The factory will also establish a system for internal monitoring to ensure this area is periodically checked by a designated person.
10. The factory created an inventory for all toxic and hazardous inventory in a log book and established a system to report it to the

local environmental bureau every three months.

11. The factory will review the chemicals storage system to ensure that all toxic and hazardous waste are stored in a secondary container on a one degree slanted floor in the temporary storage area. A system will also be established for regular checking and cleaning of the storage.

FINDING NO.12

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory has not established a written Health & Safety policy that consists of risk consideration (based on risk assessment, legal and other requirements, technological options, financial, operational, and business requirements, stakeholders point of view) or includes SMART objectives (specific, measurable, achievable, realistic, and time bound) that may be combined or separated from overall business plan for facility, or who is responsible for the implementation of Health & Safety policy (management staff and others).

2. The factory has not established written procedures for Health & Safety.

3. There was no written guidance for external contractors and/or service providers concerning the factory's Health & Safety policies.

4. The factory has not trained every worker on PPE based on their job hazards, including what the hazards are and how to protect against those hazards. On May 26, 2016, PPE training was conducted for the following workers: five of 996 sewing workers, five of 102 cutters, two of 36 warehouse workers, two of 19 mechanics, two of 76 inspectors, two of 39 iron workers, one of 26 Security personnel, and three of 35 general workers. On November 2, 2016, 17 out of 83 cutting workers were trained on PPE. The remaining 186 workers (19 embroidery workers, 39 ironing workers, one spot cleaner, 97 assort workers, 76 packers, and four electricians) have not yet been trained yet on PPE.

5. The factory has not designated maintenance workers with special tasks or areas of responsibility, such as confined spaces, warehouse heights, and building maintenance.

6. The factory has not conducted workplace safety training for the following workers:

a. Lockout-tagout training for 19 maintenance people

b. Confined Space training for 19 maintenance people

c. Fall prevention training for 19 maintenance people and 36 warehouse workers

d. Ergonomic training for all employees as per their job hazards.

7. The factory has not provided workers with specific or ongoing training on fire safety, which at a minimum should include: fire hazards, emergency routes and exits, and workers' roles and responsibilities.

8. The last first aid training on May 22, 2016 was only provided to 22 out of 1,652 workers. Furthermore, the training did not include the following: who to contact for incidents that require first aid or other medical assistance; the location of first aid equipment; and, how to report work-related incidents that require first aid or other medical assistance

9. The factory has not provided members of the firefighting brigade with specific fire safety training.

10. The factory has not provided a written description of the responsibilities of the fire warden, including helping workers safely evacuate in the event of an emergency.

Local Law or Code Requirement

Attachment I: Manpower Minister Regulation No. 05/1996, Article 3.3.5; Government Regulation No. 50/2012 Section C.2.1.a.2; Industrial Minister Decree No. 148/1985 article 4.c; Labor Minister Regulation PER-03/MEN/1982 article 2.h; Manpower Minister No. PER.01/MEN/1980; Manpower Minister Regulation No.8/2010. Article 7.2.c; Manpower and Transmigration Minister Decree No.KEP.187/MEN/1999, Article 22 (3); Manpower Minister Decree 186/99, Article 2.c and 8.1.c; PP No. 50/ 2012, Articles 15.1-2; Safety Act No.1/1970, Article 9.1; FLA Workplace Code (Employee Relationship Benchmarks ER.1 and ER.31.1; Health, Safety & Environment Benchmarks HSE.1, HSE.5.2, HSE.6, HSE.8, HSE.14.2, and HSE.17.2)

COMPANY ACTION PLANS

Action Plan no 1.

Description

- 1/2. The factory will work to establish written procedures for Health & Safety and will seek to integrate best practices to include any considerations of risk. The factory will also assign certain managerial staff to ensure that this policy is implemented and regularly followed.
- 2/3. As the factory works to establish a written procedure for Health and Safety, it will also include guidance for external contractors and/or service providers concerning the factory's Health & Safety.
4. The factory will train all workers on the importance of PPE and how to wear it. Thus far the factory has arranged PPE training for sewing workers on May 18, 2017, mechanics on May 22, 2017, and cutting operators on May 22, 2017. The factory will also monitor and measure implementation.
5. The factory will specifically designate maintenance workers with special tasks or areas of responsibility, such as confined spaces, warehouse heights, and building maintenance. The factory will also include this in the job description and train accordingly.
6. The factory will coordinate and conduct workplace safety training, lockout-tagout, confined space, fall prevention and ergonomic training for all relevant personnel. It will also update policies and procedures to ensure this training on a regular basis to cover new workers and provide a refresher for workers.
7. Before evacuation training, the factory will first educate each department's chief and supervisor. Following this, they will train other employees on fire safety issues such as fire hazards, emergency roles, and emergency exits.
8. The factory will provide a full first aid training to all workers, which will include important information such as emergency contacts in case of incidents where first aid is needed; location of first aid equipment; and reporting these work-related incidents.
9. The factory will coordinate and convene fire safety training for members of the firefighting brigade. The factory will include the job description for all members of the fire brigade.
10. The factory will write up a description of the responsibilities of the fire warden and share with workers so there is awareness.

FINDING NO.13

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory does not provide all relevant workers with audiometric testing.
2. Most lighting fixtures in the fabric warehouse are blocked by fabric on the racks, posing a fire hazard and causing the lighting to be dimmer than the 50 lux minimum.
3. The factory's Health & Safety policy does not explicitly permit workers to refuse or pause working with machines when machinery and equipment or the related PPE are not properly installed or are damaged.
4. The factory has not posted safety instructions, a warning sign and working instructions for safe operation at every machine.
5. The needle guards installed on approximate 80% of sewing machines in all 16 lines in the production area and the 3 lines in the sample area were displaced by the operators, rendering them ineffective.
6. Nineteen (19) bar tack machines in the production area are missing a safety button to reduce the risk of injury during operation.
7. None of the cutters or workers in the sample section wear any footwear, increasing the risk of injury; approximately 75% of the sewing and embroidery operators do not wear footwear. Additionally, the factory does not provide any of the workers in the finished goods warehouse, accessories warehouse, administrators at fabric warehouse, cutters, packers with the appropriate footwear to protect them from injury caused by job hazards.
8. One spot cleaner in the production area wears a chemical mask (P95) that has already exceeded its shelf life (40 hours or 30 days).
9. Approximately 90% sewing workers, cutters, packers, and sample workers do not wear dust masks. The factory provides workers with the first dust mask, but does not follow up with regularly inspections of the PPE to identify when replacements are needed. Therefore, workers in the production areas, such as sewing lines, finishing and warehouses, purchase their own dust masks.
10. The PPE is not in good condition as the factory does not inspect and replace damaged or expired PPE, or maintain documentation of PPE maintenance.

11. The factory has not provided adequate PPE such as ear muffs and/or ear plugs and lifting belts to maintenance workers or fire resistant clothing and gloves to welders.

12. The factory has not identified the shelf life or expiration date of the goggles worn by the spot cleaner in the production area.

13. The ear muffs in the boiler room are damaged due to negligence (not properly stored, regularly maintained or inspected).

14. The factory does not take any proactive steps to reduce repetitive-motion stress and/or injuries, through programs such as job rotation, training, stretching, or exercise.

Local Law or Code Requirement

Attachment II Health Minister Decree No. 1405/2002 section III.A, Articles 1.a – b, and 3; Attachment I PP No. 50/2012, Section C.1.b, Paragraph 2; ESDM Minister Regulation No. 10/2016, Article 11(1); Government Regulation No. 50/2012, Section C, Articles 2.1.a.2, 6.5.7, and 6.5.8; Labor Minister Regulation No. 07/64, Article 7.1, 10.1, 14.2, and 14.4.f; Labor Minister Regulation PER-01/MEN/1988, Chapter III, Article 3.f; Manpower Minister Regulation No. 8/2010, Articles 2.1, 5, 5.2, 6.1, 7.1, and 7.2.h; Manpower Minister Regulation No. 9/2016, Articles 1, 2, 3.d, 6.3, and 10; Manpower Supervisory Management General Director Decree No. 45/DJPPK/IX/2008 Attachment Section D, Point 3; Manpower Regulation No. PER. 02/MEN/198, Article 3.1; Manpower Minister Decree No. 186/99, Article 2.2; PUIL 2000, Article 4.11.4.1; PP No. 36/2005, Article 55, Subsection 2-3; Regulation of the Minister of Labor No.4/MEN/1985, Article 4; Safety Act 1/1970, Articles 9.2.1, 14.b, and 14.3; FLA Workplace Code (Employee Relationship Benchmark ER.16; Health, Safety and Environment Benchmarks HSE.1, HSE.4, HSE.6, HSE.7, HSE.8, HSE.13, HSE.14.1, HSE.14.2, HSE.16, and HSE.17)

Recommendations for Immediate Action

1. Ensure the lighting intensity level is at the regulated level.

2. Establish written procedure and communicate it to worker that they have right to refuse or pause working with machine when the machinery safety or related PPE are not properly installed or damaged, then post safety warning and or safety working instruction on heavy machineries for related operators

3. Ensure all needle guards are in place and operational. Train workers on the importance of machine guards and PPE. Regularly monitor for compliance.

4. Install safety button on all rotating and or moving parts of machinery. Install 2 safety buttons for machinery that pose serious threat for workers, provide PPE for every worker.

5. Provide PPE to every worker appropriate to their job hazards and ensure they are using it appropriately. Inspect and record the shelf life, usage, replacement, and reason for replacement of all PPE provided.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The factory will identify relevant workers that would benefit from audiometric testing and conduct this accordingly.

2. The factory will remove the fabric blocking the lighting fixtures and ensure the lighting intensity level is at the regulated level. The factory will also communicate with workers in that section in order to raise their awareness about this issue.

3. The factory will update written procedures to include the permission of workers to refuse or pause working with machines when machinery and equipment or the related PPE are not properly installed or are damaged. The factory will communicate this update to workers.

4. The factory will post safety instructions, warning signs and working instructions to ensure safe operations at every machine. The factory will communicate this to all workers.

5. The factory will ensure that all needleguards are in place and operational. The factory will also assign someone to periodically check to ensure they are in compliance. The factory will also train workers on the importance of using these needle guards for their safety.

6. The factory will replace safety buttons for bartack machines, and ensure that these are replaced in a timely manner in the future. The factory will also include a periodic inspection in their policies and procedures.

7. The factory will communicate to workers the importance of wearing proper footwear to protect them from any potential injuries. The factory will also provide adequate PPE to every workers to protect them from any job hazards, demonstrate how to use it, and ensure ongoing compliance.

8. The factory will provide adequate PPE -- such as dust masks, goggles, ear plugs -- to every worker appropriate to their job hazards and set up a system to ensure that they are regularly changing these out in a timely manner.

9. The factory will provide ergonomic training for all workers as part of their regular safety training.

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. The factory does not provide workers with anti-fatigue mats or adjustable work stations.
2. The ambient temperature in the finished goods warehouse, embroidery building, fabric warehouse, accessories warehouse, embroidery panel warehouse, folding and packing area is too high. Most windows in the factory are closed which reduces air circulation, and does not adequately lower the indoor temperature. Exact temperature could not be determined since there is no thermometer or hygrometer installed for inspection each morning, midday, and afternoon.
3. The factory has not established or implemented a lockout-tagout procedure (LOTO) for damaged equipment and machinery.
4. Currently the only fall protection provided by the factory is a secured lock on one ladder in the warehouse. The factory does not provide a full fall prevention system, including a body harness, ascender, descender, carabiner, figure-eight, anchorage, lanyard, D-clap, and kernmantle rope. Therefore, workers do not use proper fall protection when working at heights. Furthermore, there was no evidence that the factory periodically inspects the existing ladder with the secured lock.
5. The ladder on the diesel fuel tank, located in front of the boiler, is not equipped with a safety cage for fall protection.
6. One eye wash station in the spot cleaning room is damaged: one of the two water faucets does not spray water for eye rinsing. Additionally, there is no eye wash station installed in the temporary storage area for toxic and hazardous waste.
7. Workers' lockers are decayed and therefore structurally damaged and unstable and are a risk of falling, posing a risk of injury.
8. The factory does not inspect the emergency lights to ensure the lighting intensity is at least 1 lux.
9. The factory does not have a Proper Function Certificate (Sertifikat Laik Operasi, SLO) for the compressor, boiler, generator or electrical installation in the factory.
10. The maintenance worker who works as a welder does not hold a government certification for welding. None of the maintenance workers are government certified to work at heights.
11. Only one of four boiler operators is a government-licensed boiler operator.
12. The factory has not provided adequate PPE such as ear muffs and/or ear plugs and lifting belts to maintenance workers or fire resistant clothing and gloves to welders.
13. The factory has not installed a fence on one of three loading docks for the finished goods warehouse for fall protection.

Local Law or Code Requirement

Attachment II Health Minister Decree No. 1405/2002 section III.A, Articles 1.a – b, and 3; Attachment I PP No. 50/2012, Section C.1.b, Paragraph 2; ESDM Minister Regulation No. 10/2016, Article 11(1); Government Regulation No. 50/2012, Section C, Articles 2.1.a.2, 6.5.7, and 6.5.8; Labor Minister Regulation No. 07/64, Article 7.1, 10.1, 14.2, and 14.4.f; Labor Minister Regulation PER-01/MEN/1988, Chapter III, Article 3.f; Manpower Minister Regulation No. 8/2010, Articles 2.1, 5, 5.2, 6.1, 7.1, and 7.2.h; Manpower Minister Regulation No. 9/2016, Articles 1, 2, 3.d, 6.3, and 10; Manpower Supervisory Management General Director Decree No. 45/DJPPK/IX/2008 Attachment Section D, Point 3; Manpower Regulation No. PER. 02/MEN/198, Article 3.1; Manpower Minister Decree No. 186/99, Article 2.2; PUIL 2000, Article 4.11.4.1; PP No. 36/2005, Article 55, Subsection 2-3; Regulation of the Minister of Labor No.4/MEN/1985, Article 4; Safety Act 1/1970, Articles 9.2.1, 14.b, and 14.3; FLA Workplace Code (Employee Relationship Benchmark ER.16; Health, Safety and Environment Benchmarks HSE.1, HSE.4, HSE.6, HSE.7, HSE.8, HSE.13, HSE.14.1, HSE.14.2, HSE.16, and HSE.17)

Recommendations for Immediate Action

1. Establish a system to maintain the temperature in all working area, such as: providing thermometer in every area, opening windows whenever necessary to lower the ambient room temperature through air circulation, install insulation sheets on ceiling to minimize heat trapped within the working area, change the asbestos ceiling with material that will not trap heat, and/or install exhaust fan on wall and ceiling.
2. Establish and implement the LOTO procedure. Train all relevant workers on the procedure.
3. Establish a fall prevention system, and provide the necessary equipment. Train all relevant workers.

4. Ensure workers obtain all necessary certification for their job responsibilities.
5. Provide all necessary PPE to maintenance workers and train them on its proper use.
6. Install a functioning eye wash station where chemicals are used and stored.
7. Repair the workers' lockers to ensure they are not at risk of falling.
8. Inspect and record the lighting intensity level of every emergency light. Ensure all emergency lights meet the minimum intensity level.
9. Obtain a Proper Function Certificate from the relevant government department for all machinery powered with electricity.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The factory will provide anti-fatigue mats for all ironing operators and workers that stand for long period of time.
2. The factory will look into utilizing the FLA suggestions in order to increase the amount of air circulation and help control the high temperature.
3. The factory will establish and implement the LOTO (Log Out Tag Out) procedure and include this in the safety policies and procedures.
4. The factory will establish a fall prevention system to reduce worker risk of falling. The factory will provide the necessary equipment, such as a ladder with a safety cage, and communicate this to workers.
5. The factory will fix the eye wash station in the spot cleaning room, ensuring regular maintenance. The factory will also install an eye wash station in the temporary storage area for toxic and hazardous waste.
6. The factory will repair the lockers to ensure that they are not at a risk of falling.
7. The factory will inspect the intensity level of all emergency lights to ensure that they meet the minimum intensity level. The factory will include this in the safety policies and procedures to ensure this is done regularly.
8. The factory will obtain a Proper Function Certificate (Sertifikat Laik Operasi, SLO) for the compressor, boiler, generator or electrical installation in the factory.
9. The factory will have the maintenance worker obtain the required government certificate for welding and set up a system to check and ensure that this certificate is kept up to date.
10. The factory will ensure that all boiler operators are licensed by the government, and set up a system to check going forward to ensure this is up to date.
11. The factory will provide the relevant PPE (ear muffs /ear plugs and lifting belt) to maintenance workers and will training them on its proper use.
12. The factory will install a fence on the loading dock to reduce the risk of falling for workers.

FINDING NO.15

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The electrical panel in the embroidery building does not have the following: labels on switches inside electrical panel, on/off indicator for the switch, no electrical diagram posted on the back of panel cover, and rubber mat for insulation.
2. The electrical panel installed in the front of the office building does not have the following: a warning sign on the front door at panel, damaged inner cover, no labels on switches inside panel, no on/off indicator for the switch, no electrical diagram posted on the back of panel cover, and rubber mat for insulation.
3. The 12 air conditioners installed in the office buildings have messy wires and are fixed with black duct tape.
4. Electrical cord for the iron in the finishing area is insulated with clear tape instead of electrical tape.
5. The wiring for the electrical socket on one of the embroidery machines in the embroidery room is hanging and not permanently affixed.

6. Many wires in the production areas are not properly secured to permanent fixtures. Cables are hanging from the ceiling to floor or to the machinery or desk.
7. The factory does not regularly clean the electrical panels; approximately 90% are dusty and some panels have spider webs inside.
8. There is no lightning rod installed in the temporary storage area for toxic and hazardous waste.
9. The factory has not hired a government-certified electrician.
10. The factory does not immediately isolate or remove equipment from service when there is an electrical problem.

Local Law or Code Requirement

Government Regulation No. 36/2005, Article 32; PUIL 2000 Articles 2.1.6.1, 2.5.2.3 b., 2.5.3.3, 4.8.1.3.a, 8.8.1.f, and 9.2.1; Safety Act No.1/1970, Articles 3.1.a and 3.1.q; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.1, HSE.4, and HSE.13)

Recommendations for Immediate Action

1. Electrical safety management must be established at the factory to minimize accident and fire hazards.
2. Label switches in the electrical panels.
3. Provide a rubber mat under every electrical panel.
4. Secure electrical cables inside plastic tubes or plastic wrappers. Fix cables to walls or columns to ensure they are not hanging.
5. Regularly clean electrical panels for dust and lint.
6. Install a lightning rod in the temporary storage area for toxic and hazardous waste.
7. Employ a government-certified electrician.
8. Establish and implement a procedure to isolate or remove equipment from service when there is an electrical problem.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The factory will equip the electrical panel with labels on switches inside the electrical panel, on/off indicator for the switch, electrical diagram on back of panel cover, and rubber mat for insulation. The factory will conduct periodic inspections to ensure this is monitored.
2. The factory will equip the electrical panel with labels on switches inside the electrical panel, on/off indicator for the switch, electrical diagram on back of panel cover, and rubber mat for insulation. The factory will conduct periodic inspections to ensure this is monitored.
3. The factory will fix cables to walls or columns to ensure they are not hanging and inform management to ensure this does not happen again. The factory will conduct periodic inspections to ensure this is monitored.
4. The factory will secure loose electrical cords with plastic tubes or plastic wrappers and inform management for their awareness. The factory will conduct periodic inspections to ensure this is monitored.
5. The factory will repair and affix the wiring so it does not pose any fire hazards. The factory will conduct periodic inspections to ensure this is monitored.
6. The factory will create a new layout for the position of cables so that they pose less of a fire risk and hazard.
7. The factory will update their regularly clean electrical panels from dust and lint, and inform management that this needs to be kept clean. The factory will conduct periodic inspections to ensure this is monitored.
8. The factory will install a lightning rod in the temporary storage area for toxic and hazardous waste.
9. The factory will seek to hire a government-certified electrician.
10. The factory will update its policies and procedures to include a safety procedure that isolates or removes equipment from service when there is an electrical problem. The factory will inform management and workers.

FINDING NO.16

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory has not commissioned a third party to conduct a fire risk assessment, nor has it performed an internal fire risk assessment. As a result, the factory has not addressed any possible fire safety issues.
2. The factory does not have any hydrants or sprinklers to reduce the fire risk.
3. There was no water reservoir provided for firefighting. The minimum amount of water for a non-sprinkle building of 10,116 square meters is at least 114 tons, by law.
4. There was no system to count evacuees once they have arrived at assembly point.
5. The fire alarm system would not function during a power outage since it is powered by the factory's main electricity panel, does not have an alternate power source or a backup battery. Furthermore, the fire alarm is not centralized and controlled from a fire control panel.
6. The current fire alarm system does not have flashing lights as a visible warning for workers, contractors and/or visitors who might be hearing impaired or in areas where production would inhibit workers from hearing an alarm.

Local Law or Code Requirement

Environmental Impact Controller Bureau Head Decree No. 1/1995, Article 3.2.b.g.; INS. 11/M/BW/1997 III, Article 3; Manpower Minister Decree No 186/99, Article 2.2; Minister Regulation PU No. 26/2008, Article 11; PP No 36 Year 2005, Articles 55.2 – 3; PUIL 2000, Article 4.11.4.1; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.1, HSE.5, and HSE.6)

Recommendations for Immediate Action

1. Commission a third party to conduct a fire risk assessment, and respond to any issues.
2. Install a fire sprinkler system and hydrant with an appropriate water reservoir.
3. Establish a system for evacuation, including a mechanism for counting people.
4. Install a fire alarm that has an audible siren and flashing lights.
5. Provide an alternate power source and/or backup battery for the fire alarm.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The factory will look into commissioning a third party expert to perform a fire risk assessment in order to ensure there are no preventable fire safety hazards.
- 2/3. The factory will look into installing regular fire extinguishing devices such as hydrants or sprinklers. It will also look into establishing a water reservoir for firefighting.
4. The factory will update its evacuation process to include a system for counting people and identify specific personnel that will do the counting and training.
5. The factory will look into installing an alternative power source or backup battery for the fire alarm in case there may be a power outage during a fire.
6. The factory will update its fire alarm system to include flashing lights as a visible warning for workers. This will be part of a centralized fire alarm system.

FINDING NO.17

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The toilet located near the canteen is dirty and emits a strong odor. One station of five sinks in the smoking area and two stations of

ten hand washers in the dining area and canteen are very dirty.

2. Although toilets cubicles are separated between male and female, these cubicles are placed in a same area which does not allow for female workers to have a private space or parlor, as required by law.

3. The break room for cleaning workers, which is near the solid waste storage area, is dirty.

4. The factory does not conduct a monthly potable water test for microbiology and physical parameters or test for chemical parameters every six months.

5. The factory does not adequately track and manage injuries or illnesses. Since the corrective action is regarded as preventative action in the records, the factory does not perform proper root cause analysis to find the actual source of injuries and illness to take or record proper preventative actions.

Local Law or Code Requirement

Act 28/02, Articles 21 and 24.1-2; Attachment II Health Minister Decree No. 261/98, Point K.b; Attachment II Health Minister Decree No. 405/2001, Section XI.B, Article 22 (a-b); Attachment of Health Minister Regulation No. 736/2010, Section II.A.c, Section II.B.3; Labor Minister Regulation No: PER-04/MEN/1987, Article 4.2, Points a, c.1-4; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.1, HSE.3.1, HSE.19, HSE.20, and HSE.23)

Recommendations for Immediate Action

1. Establish a sanitation regime for toilets and sinks that includes regularly recorded inspections.

2. Separate the men's and women's toilets.

3. Test drinking water as per regulations.

4. Accurately track and manage injuries and illnesses, distinguishing between corrective action and preventative action. Conduct a proper root cause analysis to find the actual source of illness and injury and take any necessary preventative actions.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The factory will establish a schedule for the cleaning service department to ensure that the toilets are regularly cleaned. The factory will also train cleaners and provide information and posters in the bathroom to indicate proper use of toilets.

2. The factory will separate the men's and women's toilets.

3. The factory will establish a schedule for the cleaning service department to ensure that the break room for cleaning workers is also cleaned regularly.

4. The factory will conduct the monthly potable water test for microbiology and physical parameters, and will make these results available as soon as it is received. The factory will identify a designated person to be responsible for this, and update its policies and procedures.

5. The factory will track and manage injuries and illnesses. The factory will regularly review and perform root cause analysis to find the actual source of injuries or illness to ensure a safe working environment.