



COMPANIES: PVH Corp
COUNTRY: Philippines
ASSESSMENT DATE: 06/30/16
ASSESSOR: FLA China
PRODUCTS: Apparel
NUMBER OF WORKERS: 1026

FLA Comments

In situations where a FLA-affiliated Company is no longer sourcing from a factory that has received an FLA assessment, the Company shall submit information on (a) the reason for exiting; (b) the status of compliance and summary of efforts to remediate noncompliances in the factory; and (c) plans to follow up on critical issues. Despite multiple reminders and extensions, the FLA-affiliated Company in this case has not submitted this information. It will be posted when received from the company.

The PVH Corporation ended their affiliation with the Fair Labor Association in February 2020. Therefore, there will be no further updates to the Company Action Plans plans contained in this report.

Due to this disaffiliation PVH Corporation is no longer listed on the Fair Labor Association Website, however, their Independent External Assessment reports can still be found at: <https://www.fairlabor.org/transparency/workplace-monitoring-reports>

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. The factory has policies and procedures on performance reviews, however, it is not clear how they link to job grading. Furthermore, not all employees receive performance reviews. Production workers only receive performance evaluations during their probationary period. Regular office staff also receive annual performance reviews.
2. There are no procedures on raising or broadening skills in order to advance workers in their careers.
3. The factory has some written guidelines on promotions and transfers. However, there are no clear steps and requirements on the promotion, demotion, and reassignment of employees.
4. The factory does not have a policy on Hours of Work, Retrenchment & Termination, Industrial Relations, Grievance System, or Environmental Protection.
5. The factory does not have procedures on Retrenchment, Industrial Relations, or Environmental Protection.
6. While there have not been any layoffs at the factory, there are no procedures that require management to consult with worker representatives before reaching a final decision on layoffs.
7. While there are non-retaliation, confidentiality, and formal complaint procedures, there is no guarantee of protection for workers who allege Health, Safety & Environmental Protection violations.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.1, ER.23, ER.25, ER.28, ER.29, ER.30, ER.31, and ER.32; Non-Discrimination Benchmark ND.2)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Immediate Action: The factory will update and conduct a review of policies and procedures for the following Employment Functions: Workplace Conduct & Discipline, Recruitment, Hiring & Personnel Development, Hours of Work, Grievance System, Termination & Retrenchment, Industrial Relations, Health & Safety, and Environmental Protection.

Sustainable Action: The factory will implement an annual review schedule so that policies and procedures are updated as needed.

Planned Completion Date

08/15/16

Planned completion date

FINDING NO.2

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

1. The factory conducts a 30 minute orientation training for all new workers. This training does not cover Industrial Relations.
2. Workers do not receive any training materials that cover the topics covered during orientation training except for a copy of the company's disciplinary measures.
3. Workers do not receive ongoing training on any of the Employment Functions.
4. Supervisors do not receive ongoing training on any of the Employment Functions.
5. HR personnel and administration staff do not receive training on Workplace Conduct & Discipline.
6. The factory's Health & Safety training program is not comprehensive. Employees with maintenance responsibilities are not provided with training on maintenance safety. Furthermore, not all workers have received training on PPE usage and maintenance.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15, ER.17, and ER.27; Health, Safety & Environment Benchmarks HSE.8 and HSE.14.2; Compensation Benchmark C.17)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Immediate Action: The factory has applied for the CoC in 2015 however, receiving the CoC often takes a considerable amount of time.

Sustainable Action: The factory will follow-up with the relevant authorities as necessary.

Planned Completion Date

01/31/17

Planned completion date

06/21/17

Action Plan no 2.

Description

Immediate Action: The factory has applied for the CoC in 2015 however, receiving the CoC often takes a considerable amount of time.

Sustainable Action: The factory will follow-up with the relevant authorities as necessary.

Planned Completion Date

01/31/17

Planned completion date

06/21/17

Action Plan no 3.

Description

Immediate Action: Confirmation of competency for the engineer is confirmed by the stamp utilized on the building inspection certificate. This stamp is available on the inspection report.

Planned Completion Date

10/31/16

Planned completion date

06/21/17

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Review Process (Macro)

Finding Explanation

1. There is no review process for policies and procedures across all Employment Functions. Reviews of policies and procedures are only conducted reactively, when there are changes to existing laws and regulations.
2. The factory's permits expired on April 13, 2016, and the appropriate government agency, the Philippine Export Zone Authority (PEZA), has not inspected the facility for a 2016 permit renewal. The factory sent a letter of request to PEZA on June 3, 2016 requesting an inspection.

Local Law or Code Requirement

Special Economic Zone Act of 1995; PEZA's Citizen's Charter; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.2, ER.29, ER.30, and ER.31; Health, Safety & Environment Benchmarks HSE.1 and HSE.4)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Immediate Action: PVH is working with the factory in order to comply with this requirement.

Planned Completion Date

01/31/17

Planned completion date

06/21/17

Company Action Plan Update

PVH is currently working with the factory to facilitate compliance with this requirement.

Action Plan no 2.

Description

Immediate Action: The agreement with the 3rd party janitorial services company has already been revised as per requirement of 45 hours per week,

(1) the factory has revised the working hours to 8 hours /day for 3rd party janitorial service employees

(2) the factory has revised the working hours to 45 hours per week (8 hours on weekdays & 5 hours on Saturdays as per legal requirements.

Planned Completion Date

08/22/16

Planned completion date

06/21/17

Company Action Plan Update

Pending PVH Verification.

Action Plan no 3.

Description

Recruitment, Hiring & Personnel Development 3

Details

Immediate Action: The factory has advised the 3rd party security services company to correct the overtime payments. The factory has been advised that the issue has been corrected.

Sustainable Action: The factory will regularly monitor the working hours and payments made to the security guards.

Planned Completion Date

09/01/16

Planned completion date
06/21/17
Company Action Plan Update
Pending PVH Verification.

FINDING NO.4

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation

The worker integration component is missing across all Employment Functions. This indicates that the factory has not established procedures to request and/or receive workers' input/feedback regarding the creation, implementation, and updating of its policies and procedures. Workers are neither systematically integrated nor consulted in decision-making processes. There is no mechanism in place for policies and procedures to be proactively communicated to all employees.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.16, ER.25, ER.27, ER.29, ER.30, and ER.32; Health, Safety & Environment Benchmark HSE.2; Compensation Benchmark C.17)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Immediate Action: The factory has drafted and implemented a policy on Personnel Development.

Sustainable action: All the workers will be trained annually on the revised policy

Planned Completion Date

09/01/16

Planned completion date

06/21/17

Company Action Plan Update

Pending PVH Verification.

Action Plan no 2.

Description

Immediate Action: The factory has updated the current Hiring and Recruitment procedure to address promotions, demotions and reassignment schemes. Additionally, the factory has implemented a procedure on career paths for each category of worker/staff.

Sustainable action: All workers will be trained on the Hiring and Recruitment procedure during the initial induction.

Planned Completion Date

09/01/16

Planned completion date

06/21/17

Company Action Plan Update

Pending PVH Verification.

Action Plan no 3.

Description

Sustainable Action: Training for supervisors and workers on workplace conduct will be included in our training plan. Trainings on these topics will also be scheduled.

Planned Completion Date

01/31/17

Planned completion date

06/21/17
Company Action Plan Update
Pending PVH Verification.

Action Plan no 4.

Description

Immediate Action: Job descriptions will be drafted for all positions.

Sustainable action: Worker activities will be monitored by the floor managers and changes will be made to job descriptions when required.

Planned Completion Date
10/31/16

Planned completion date

06/21/17

Company Action Plan Update
Pending PVH Verification.

Action Plan no 5.

Description

Immediate Action: The factory has implemented a procedure whereby the worker signs the performance review or grading evaluation sheet.

Sustainable action: Work study manager will monitor the program on a bi-annual basis to ensure compliance.

Planned Completion Date
10/31/16

Planned completion date

06/21/17

Company Action Plan Update
Pending PVH Verification.

FINDING NO.5

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. According to the factory's employment policy, the probationary period for a new worker is 6 months, which meets the legal requirements. However, this practice does not meet FLA requirements, which limits the probationary period to 3 months. There is also a clause in the employment policy which states that the probationary period may be extended before or after the lapse of the probationary period which does not comply with legal requirements.
2. The factory claims that pregnancy testing is not a part of the medical examination conducted on new workers. However, while reviewing the factory's records assessors found medical test results showing that pregnancy tests were conducted. The factory could not explain these records. There are no indications that pregnancy testing is conducted for specific jobs. Through interviews, assessors found that workers were not aware that pregnancy testing was conducted.
3. Job advertisements include gender requirements and age limits.

Local Law or Code Requirement

Philippine Labor Code, Art. 281; FLA Workplace Code (Employment Relationship ER.3; Compensation Benchmark C.3; Non-Discrimination Benchmarks ND.2 and ND.5)

Recommendations for Immediate Action

1. Reduce the probationary period to three months and cease the practice of extending workers' probationary periods.
2. Do not include pregnancy testing in new workers' medical examinations.
3. Employment decisions should be based on candidates' qualifications, without discrimination. Eliminate any discriminatory requirements regarding age, gender, pregnancy, marital status, sexual orientation, race, religion, health status, marital status, nationality, political opinion, social group, and origin.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Immediate Action: The factory has begun to correctly calculate and compensate overtime hours in compliance with local law.

Sustainable action: All the workers will be trained on this issue annually.

Planned Completion Date

09/01/16

Planned completion date

06/21/17

Company Action Plan Update

Pending PVH Verification.

Action Plan no 2.

Description

Immediate Action: The factory will implement a procedure to pay out any required leave payment with the gratuity payment.

Sustainable Action: HR and payroll officers will be trained annually on the exit procedure for the employees and these procedures will be monitored by the HR manager.

Planned Completion Date

09/01/16

Planned completion date

06/21/17

Company Action Plan Update

Pending PVH Verification.

Action Plan no 3.

Description

Immediate Action: The factory has requested that the 3rd party security firm include BBA, legal wages a& OT payments on the pay slip. The factory has confirmed that this has been implemented.

Planned Completion Date

09/01/16

Planned completion date

06/21/17

Company Action Plan Update

Pending PVH Verification.

Action Plan no 4.

Description

Immediate Action: PVH is working with the factory to address this issue.

Planned Completion Date

09/01/16

Planned completion date

06/21/17

Company Action Plan Update

Pending PVH Verification. PVH is in the process of working with the factory to address this issue.

FINDING NO.6

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. The factory's Human Resources (HR) Department officer handles the day-to-day HR management, including Environment, Health & Safety (EHS) responsibilities. Assessors are concerned that the HRD officer may not be able to effectively perform these functions as there are limited resources available in the factory to support her. There are similar concerns about the HRD/Admin Manager, who is also the Compliance Manager and the Accounting Head.
2. The factory only has job descriptions available for office personnel staff.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1.1 and ER.1.2)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Immediate Action: The factory will comply with all legal requirements on working hours and ensure that workers are accurately compensated for all hours worked.

Planned Completion Date

09/01/16

Planned completion date

06/21/17

Company Action Plan Update

Pending PVH Verification.

Action Plan no 2.

Description

Immediate Action: The factory will comply with all legal requirements on working hours and ensure that workers are accurately compensated for all hours worked.

Planned Completion Date

09/01/16

Planned completion date

06/21/17

Company Action Plan Update

Pending PVH Verification.

Action Plan no 3.

Description

Immediate Action: The factory will comply with all legal requirements on working hours and ensure that workers are accurately compensated for all hours worked.

Planned Completion Date

09/01/16

Planned completion date

06/21/17

Company Action Plan Update

Pending PVH Verification.

FINDING NO.7

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. There are piece-rate workers involved in the pressing and packing operations. The factory has the necessary legal permits for these processes to operate under a piece-rate system. The factory also has clear documentation of workers' piece rate outputs and costs. While in practice workers receive above minimum wage, there is no mechanism in place to guarantee that piece-rate workers working regular hours are paid minimum wage.

2. The factory calculates overtime correctly, and the computation of overtime pay is covered during the new worker orientation. This information is also posted on one of the bulletin boards. However, during worker interviews not all workers were aware of how overtime pay is calculated.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.11.2; Compensation Benchmark C.17)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Immediate Action: The factory will work towards complying with the FLA benchmark of 60 hours a week. Additionally the factory will ensure that additional hours worked beyond the regular hours as overtime will receive the appropriate compensation.

Planned Completion Date

12/31/16

Planned completion date

06/21/17

Action Plan no 2.

Description

Immediate Action: The factory will provide workers with the holidays as defined by the Board of Investments.

Planned Completion Date

12/31/16

Planned completion date

06/21/17

FINDING NO.8

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. From June-November 2015, an average of 76% of the total workforce worked more than 60 hours per week. During the months of July, October, and November, 80% or more of the workforce worked more than 60 hours weekly. This included workers performing work during their day-off. These circumstances were the result of unusual port congestion/delayed shipments that led to production backlogs.
2. From January to March 2016, an average 37% of the total workforce exceeded 60 hours per week. In March, 15% worked more than 60 hours.
3. The factory does not obtain workers' consent for overtime work on the day that overtime is being requested. Instead, during the hiring process workers are asked to sign a document at hiring that states that they agree to work overtime voluntarily. Furthermore it is very difficult for workers to refuse overtime.
4. There is no identifying sign/mark in workers' time records to determine if they are pregnant or nursing. The factory employed 10 pregnant workers at the time of the assessment.
5. During lunch breaks, workers are not allowed to leave the factory. If workers need to leave, they have to get permission from a supervisor or HR.

Local Law or Code Requirement

FLA Workplace Code (Hours of Work Benchmarks HOW.1, HOW.2, HOW.5, and HOW.8; Forced Labor Benchmarks F.4 and F.8; Harassment or Abuse Benchmark H/A.7)

Recommendations for Immediate Action

1. Ensure that workers do not work more than 60 hours per week.
2. Provide workers with at least one day off (24 consecutive hours of rest) for every seven-day working period.
3. Ensure that overtime work is voluntary. Cease the practice of having new workers sign a blanket consent form; instead, obtain consent for overtime each time that overtime is requested.
4. Establish a system to identify employees who are pregnant or nursing and provide them the legally required protection.
5. Allow workers to leave the factory during their lunch break without permission.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Immediate Action: The factory will draft policies and procedures to address managing working hours.

Planned Completion Date

10/31/16

Planned completion date

06/21/17

Company Action Plan Update

Pending PVH Verification

Action Plan no 2.

Description

Immediate Action: The factory will revise relevant policies to address special working hours for special categories of employee, identification of pregnant/lactating women and young workers below 18 years of age.

Planned Completion Date

10/31/16

Planned completion date

06/21/17

Company Action Plan Update

Pending PVH Verification.

Action Plan no 3.

Description

Immediate Action: Training will be arranged for all relevant staff on working hours in case of extraordinary business circumstances.

Planned Completion Date

10/31/16

Planned completion date

06/21/17

Company Action Plan Update

Pending PVH Verification.

FINDING NO.9

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

Security personnel perform daily pat-downs on workers as part of the factory's security procedures.

Local Law or Code Requirement

FLA Workplace Code (Harassment or Abuse Benchmarks H/A.10)

Recommendations for Immediate Action

Cease the practice of performing daily pat downs. Only conduct pat-downs when there is a legitimate reason to do so.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Immediate Action: The factory will revise its written policies and procedures to include additional information on the termination process, calculating final payouts and timelines for payments etc.

Planned Completion Date
10/31/16

Planned completion date
06/21/17
Company Action Plan Update
Pending PVH Verification.

Action Plan no 2.

Description

Immediate Action: The factory will revise its written policies and procedures to include additional information on types of termination of employment and the procedures for the different types of termination. The procedure for termination in the separation policy will also be revised to include complete information on the termination process; and will include methods for calculating final payouts, timelines for payments, and procedures for payments.

Planned Completion Date
10/31/16

Planned completion date
06/21/17
Company Action Plan Update
Pending PVH Verification.

Action Plan no 3.

Description

Immediate Action: The factory will provide training to all relevant workers and supervisors on termination and retrenchment policies.

Planned Completion Date
10/31/16

Planned completion date
06/21/17
Company Action Plan Update
Pending PVH Verification.

Action Plan no 4.

Description

Immediate Action: The factory will provide training to all relevant workers on termination and retrenchment policies.

Planned Completion Date
10/31/16

Planned completion date
06/21/17
Company Action Plan Update
Pending PVH Verification.

FINDING NO.10

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Termination & Retrenchment

Finding Explanation

According to the factory's resignation and termination procedures, workers are required to get exit clearance before they can get their final salary. As part of the exit clearance, workers must sign a legally binding waiver that prevents them from filing any future lawsuits (monetary claims, etc.) against the factory.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.19.3; Forced Labor Benchmark F.2)

Recommendations for Immediate Action

Do not require workers to sign a declaration of good health, waivers, or releases of other rights as a condition of receiving their severance pay or last salary.

FINDING NO.11

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. The factory has various procedures and guidelines on emergency preparedness in case of fire, natural disaster, etc., as well as risk assessment procedures. However, it does not have an appropriate system to respond to an unexpected environmental emergency, such as a chemical spill or gas leak.
2. The factory has not identified whether its on-site operations generate any negative environmental impacts.
3. The factory does not clearly define who is responsible for Environmental Protection in all areas/department within the factory.

Local Law or Code Requirement

Labor Code Article 83, Hours of Work; FLA Workplace Code (Health, Safety & Environment Benchmark HSE.5; Employment Relationship Benchmark ER.1 and ER.31)

Recommendations for Immediate Action

1. Establish a system to respond to environmental emergency such as chemical spills or gas leaks.
2. Identify any operational processes that have an environmental impact, and take actions to reduce that impact.

FINDING NO.12

NOTABLE FEATURE

FINDING TYPE: Environmental Protection

Finding Explanation

The factory uses a "waste steam boiler". This technology uses factory waste (paper, cartons, waste fabrics, etc.) as boiler fuel to generate steam. This has decreased the amount of waste going to a landfill, significantly reduced fuel oil consumption, and improved energy use. The factory has secured the necessary legal permit to operate the boiler and performs periodic maintenance work.

FINDING NO.13

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. Management has not commissioned a fire risk assessment from a third-party expert.
2. The factory has a fire brigade and a fire marshal, but there are no fire-wardens responsible for helping workers safely evacuate in case of an emergency.
3. The fire brigade does not have the appropriate PPE (e.g., breathing apparatus, heat resistant clothing) to use in case of a fire emergency.
4. The width of the aisles between the sewing lines is approximately 0.8m. The minimum width should be at least 1.0m. In addition, there are holes in the work-floor of the sewing line in Building 2 from old machinery fittings or damage to the floor.
5. At least 10 workstations in the sewing lines (located in the main production building) do not have immediate access to aisles. The workers are surrounded on all sides by materials (work in progress) and the one side with an opening to the work-floor aisles is not easily accessible.
6. At least three exits are not marked (located in the Embroidery, Assorted Building 2, and Packing areas). These same three exits are also missing emergency lights.
7. The markings on the work-floor aisles are faded in sewing lines 6, 7, and 8 of Building 2. There are also areas in the warehouse and cutting section where the emergency evacuation maps do not depict the actual layout of the factory due to changes in the production setup.

Local Law or Code Requirement

Fire Code of the Philippines of 2008, Rule 10: Fire Safety in Buildings, Structures & Facilities, Division 2: General Requirements and Division 5: Means of Egress, Sec. 10.2.5.11 & 10.2.5.12; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.5, HSE.6, and HSE.7)

Recommendations for Immediate Action

1. Commission a third-party expert to conduct a fire risk assessment.
2. Designate fire wardens to ensure that workers are safely evacuated in an emergency.
3. Provide the fire brigade with the proper resources. These employees should be trained and given proper PPE and fire-fighting equipment.
4. Widen the aisles so that the sewing lines are at least 1.0 m apart. Repair any holes in the work-floors to prevent injury.
5. Ensure that all workstations have unimpeded access to the aisles.
6. Clearly mark and install emergency lights above all exits.
7. Repaint faded floor markings and ensure that emergency evacuation maps match the actual layout of the factory.

FINDING NO.14

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. While the factory health clinic is well maintained, the dentist does not have an Occupational Safety and Health (OSH) accreditation.
2. The clinic is only in operation during the day shift. Furthermore, the factory has not verified whether workers trained in first aid are available during the night shift.
3. At least two first aid kits in the production area are missing supplies (burn cream and scissors).
4. There is no guidance for external contractors/service providers on the factory's Health & Safety policies and procedures.
5. The factory does not clearly define who is responsible for Health & Safety in all areas/departments within the facility.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.1; Health, Safety & Environment Benchmark HSE.1, HSE.6, and HSE.18)

Recommendations for Immediate Action

1. Ensure that all clinic practitioners are OSH accredited.
2. Verify that there are workers trained in first aid available during the night shift.
3. Regularly check the first aid kits and replace any missing items.

FINDING NO.15

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. During the assessment, at least two workers in the embroidery section of the main production building were not using earplugs. In addition, three were not using their earplugs properly. One stain removal worker in the main production building was not using their respirator correctly; they were wearing a facemask beneath the respirator. At least 10 overlock and hi-speed machine operators are not using eye guards.
2. At least two out of four Liquefied Petroleum Gas (LPG) cylinders are not secured. These are located at the back of the kitchen.
3. The factory has not properly implemented a lockout/tagout program.
4. There are portable eyewash stations available in the factory. These, however, will not provide for the MSDS-specified 15-minute continuous water flow. There is no system in place to regularly maintain these stations or determine the duration of the water flow. In addition, there are no shower stations.
5. Workstations and chairs are not adjustable for workers height, and the factory does not provide anti-fatigue mats for standing workers.

Local Law or Code Requirement

FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.8, HSE.9, HSE.14, and HSE.17)

Recommendations for Immediate Action

1. Train workers on the proper use and maintenance of PPE. Monitor PPE use to ensure that workers are protected.

2. Secure all chemicals properly, including the LPG cylinders.
3. Implement a lockout/tagout program.
4. Install shower stations and adequate eyewash stations.