



Verification Assessment

COMPANIES: Forward Sports, Ltd
COUNTRY: Pakistan
ASSESSMENT DATE: 10/01/18
ASSESSOR: Innovatus
PRODUCTS: Other
NUMBER OF WORKERS: 1420

FLA Comments

This report was submitted to the FLA and the FLA affiliated company by the assessor. Despite deadline reminders and extensions for submission of a corrective action plan, the FLA has not received a plan to address the risks and noncompliances raised in the report. Therefore, the report is posted in its current state and will be updated once a corrective action plan has been submitted to the FLA.

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.

Previous Report Findings and Verification Results

PREVIOUS FINDING NO.1

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. Until June 2015, factory management had been using short-term employment contracts (of one or two years) with workers instead of indefinite term contracts. However, this practice was eliminated as of June 2015.
2. Although there is a time recording system in place, the factory does not record the working hours of new hires for the first four to five days; only a manual record is kept, showing if a worker is present or not on a particular date.
3. Fourteen percent (14%) of sampled workers had not yet received their employee old age benefit or social security cards from management.
4. Fifty percent (50%) of interviewed workers mentioned that they had not yet received a copy of the appointment letter they had signed.

Local Law or Code Requirement

Standing Orders Ordinance 1968 Section 2 & Section 7 & Section 2A, ER.23, FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.8, ER.9, ER.22 and ER.23)

VERIFICATION RESULT

Finding Status

Partially Remediated

Remediation Details

1. Finding Status (Remediated)

Explanation: No workers are provided short-term employment contracts of one or two years, but indefinite term contracts.

2. Finding Status (Remediated)

Explanation: The factory records working hours of new hires from the first day of their employment.

3. Finding Status (Remediated)

Explanation: All sampled workers received their employee old age benefit and social security cards from management in a timely manner.

4. Finding Status (Partially Remediated)

Explanation: Although there have been some improvements and most of the workers (90%) interviewed confirmed they have received a copy of their signed appointment letter, 10% of the workers haven't yet received the copy of their signed appointment letter. [ER.1]

Root Causes: Heavy workload of HR department.

Local Law or Code Requirement

Standing Orders Ordinance 1968 Section 2A; FLA Workplace Code (Employment Relationship Benchmark ER.1)

PREVIOUS FINDING NO.2

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. The factory does not properly keep records of the working hours of piece-rate workers. Furthermore, the factory compensates workers at regular rates for pieces produced beyond regular working hours, and not at the legally required premium rate.
2. The factory gives an attendance bonus (PKR 500 per month; USD 4.77) to workers in the stitching department but not to workers in other departments.
3. Pay slips are missing the payment date.
4. During the low season when there are fewer orders and not much work, the factory pays piece-rate workers in the stitching section less than the minimum wage (PKR 500 daily). This affected three workers within the last 12 months.
5. Ninety percent (90%) of interviewed workers do not know about the social security system, or the benefits (old age and social security benefits) under the system.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.23, Compensation Benchmarks C.1, C.5 and C.7; Nondiscrimination Benchmark ND.1)

Recommendations for Immediate Action

1. Ensure that piece-rate workers receive at least 500 Rupees per day at all times, including during low season.
2. Ensure that time-in & -out records of piece-rate workers are properly kept, and workers are compensated at premium rates for pieces produced beyond regular hours.
3. Ensure that the attendance bonus is provided to all workers in all departments.
4. Add payment date to pay slips.
5. Train workers on the social security system and its benefits.
6. Conduct a training needs assessment to identify potential training opportunities for CSR and HR staff (e.g. auditing, communication, international standards, environmental protection) and provide where necessary.
7. Improve existing internal audit procedure to ensure that it includes all necessary guidance on, at a minimum: (a) Root Cause Analysis of the findings, (b) Necessary trainings and/or qualifications required for internal assessors, (c) Frequency and type of HQ and factory level assessments, and (d) CAP preparation and implementation
8. Implement a system to ensure that policies and procedures are reviewed on a periodic basis.
9. Ensure that any updates to procedures are reflected in guidelines for implementation and monitoring.
10. Organize a training for the workers to explain the social security system and the old age and social security benefits.
11. Empower compliance staff member and make sure that: (a) he directly reports to the GM in practice and (b) he actively participates in the decision-making process on all important topics related to Recruitment & Hiring, Termination & Retrenchment, Hours of Work, Industrial Relations, Grievance System, Discipline, and Health, Safety & Environment.
12. Organize periodic trainings for CSR and HR staff on the FLA Code and benchmark requirements. Deliver a simplified version of those trainings to other managerial staff and workers.
13. Consult the FLA through its regional managers/PS Program Manager as a member of FLA's PS program in case of any confusion in interpreting local law and/or FLA code requirements.

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status (Remediated)

Explanation: The factory has started to keep records of working hours for piece rate workers through an electronic time keeping system and paying these workers the overtime premium for their overtime work.

2. Finding Status (Not Remediated)

Explanation: There has been no progress on this issue: only stitching department workers receive an attendance bonus. [C.1]

Root Causes: An attendance bonus is not a legal requirement and management's priority is the stitching department since absence in this department creates severe bottlenecks in the production process. Factory management is planning to expand this practice to other departments in the future, but there is no concrete plan.

3. Finding Status (Remediated)

Explanation: The pay slip format now includes the payment date.

4. Finding Status (Remediated)

Explanation: All piece-rate workers received minimum wage, at minimum.

5. Finding Status (Partially Remediated)

Explanation: Although there have been some orientation training improvements, 20% of workers interviewed were not aware of their benefits under the social security system. [C.17]

Root Causes: Heavy workload of HR department.

Local Law or Code Requirement

FLA Workplace Code (Compensation Benchmarks C.1, C.17)

PREVIOUS FINDING NO.3

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. Most of the sampled production workers (more than 60%) do not use the full amount of paid annual leave they are provided. Three workers have not used their annual leaves for three consecutive years. Worker interviews revealed that workers have requested this in order to receive extra compensation. Although this practice does not violate local law, it violates the FLA Code.
2. Overtime work is occasionally undocumented, mainly because of high production demands and management bypassing the procedure which requires overtime to be approved by the compliance representative (SEA).
3. Working-hours records do not contain the identification of pregnant and lactating women or workers under the age of 18.

Local Law or Code Requirement

Factories Act 1934 (49-B); FLA Workplace Code (Hours of Work Benchmarks HOW.5 and HOW.15)

Recommendations for Immediate Action

1. Ensure that workers are using their paid annual leaves in full even if workers ask for extra compensation instead of using their annual leaves.
2. Ensure all working hours and payment records are accurate and reflect actual working hours and payments.
3. Ensure that the Production Department properly follows the overtime approval process and all overtime work in the factory has been approved by the SEA representative.
4. Thoroughly investigate why formal overtime approval procedure is being bypassed and by whom. Take appropriate steps to prevent its reoccurrence.
5. Review recording software for working hours and add the identification of pregnant and lactating women and juvenile workers.
6. Conduct a training needs assessment to identify potential training opportunities for CSR and HR staff (e.g. auditing, communication, international standards, environmental protection) and provide where necessary.
7. Improve existing internal audit procedure to ensure that it includes all necessary guidance on, at a minimum: (a) Root Cause Analysis of the findings, (b) Necessary trainings and/or qualifications required for internal assessors, (c) Frequency and type of HQ and factory level assessments, and (d) CAP preparation and implementation
8. Implement a system to make sure that policies and procedures are reviewed on a periodic basis
9. Ensure that any updates to procedures are reflected in guidelines for implementation and monitoring.
10. Organize a training for workers to explain the social security system and the old age and social security benefits.
11. Empower compliance staff member and make sure that: (a) he directly reports to the GM (b) he actively participates in the decision-making process on all important topics related to Recruitment & Hiring, Termination & Retrenchment, Hours of Work, Industrial Relations, Grievance System, Discipline, and Health, Safety & Environment.
12. Organize periodic trainings for CSR and HR staff on the FLA Code and benchmark requirements. Deliver a simplified version of those trainings to other managerial staff and workers.
13. Consult the FLA through regional managers or the PS Program Manager as a member of FLA's PS program in case of any confusion on

interpreting of local law and/or FLA Code requirements.

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status (Not Remediated)

Explanation: Although management has made some attempts to encourage workers to use their paid annual leave instead of taking extra compensation, there is still no progress on this issue. It was observed that 50% of the production workers sampled did not use the full amount of paid annual leave provided. [HOW.11]

Root Causes: Workers are willing to take extra compensation rather than use their paid annual leaves as they need extra money – in Pakistan, total income of the workers isn't sufficient to meet and provide discretionary income.

2. Finding Status (Partially Remediated)

Explanation: Although there was not any undocumented overtime work observed for production workers, the factory did not document security staff and canteen worker overtime work. [ER.23]

Root Causes: Management has concentrated its efforts on overtime work conducted by production workers and skipped supportive groups like security and canteen.

3. Finding Status (Remediated)

Explanation: The factory improved the existing working hour records system to note pregnant and lactating women or workers under the age of 18.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.23; Hours of Work Benchmarks HOW.11)

PREVIOUS FINDING NO.4

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Industrial Relations

Finding Explanation

1. Although there are meetings between workers and management representatives, these meetings are not held on a regular basis and there is no effective system in place to follow up on issues discussed during meetings (e.g. demands regarding lunch allowance, absenteeism, marriage bonus).

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.25)

VERIFICATION RESULT

Finding Status

Partially Remediated

Remediation Details

1. Finding Status Partially Remediated

Explanation: Meetings are held on a quarterly basis. Most of the important issues discussed during these meetings, including lunch allowance, absenteeism, marriage bonus, etc. are still pending under management's review. [ER.25]

Root Causes: No clear guidelines or defined timelines about evaluation of worker requests raised and recorded during the worker representatives-management meetings.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.25)

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory does not provide a secondary container for most of the chemicals stored in the production and chemical warehouse areas.
2. The factory stores most of the chemicals outside due to lack of warehouse space. As a result, some of the barrels have expanded or deformed because they are exposed to direct sunlight and precipitation.
3. Some of the Material Safety Data Sheets (MSDS) forms provided are not in line with international standards and do not include all 16 sections (For example, "Opp As Screen Printing Ink" has only 13 points without ingredients). Some sheets are without chemical composition (for example, "Opp As Retarder").
4. Some products currently in use contain hazardous chemicals that have highly adverse health effects and require special safety precautions (e.g., Koltex-10 Spray Adhesive which contains n-hexane and Euroflex 450 which contains Toluene).
5. The factory has not established and implemented steps to provide the appropriate Personal Protective Equipment (PPE). For example, the factory does not review MSDSs to identify the PPE needed, and therefore does not provide the appropriate PPE in the Thinner and Adhesive Implementation areas. Additionally, at the time of the assessment, most of the workers were not using PPE; during the walkthrough, only some wore the provided masks, and none wore the provided gloves. Workers only had basic understanding on the proper use of PPE and were not adequately trained.
6. The fume hoods do not work efficiently in the gluing section, where there was chemical application, which adversely affects the air quality within the production area. Furthermore, there is no system in place to conduct periodic maintenance of these systems.

Local Law or Code Requirement

FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.7, HSE.9, HSE.10 and HSE13)

VERIFICATION RESULT

Finding Status

Partially Remediated

Remediation Details

1. Finding Status (Remediated)

Explanation: The factory provided secondary containment for chemicals in productions and warehouse areas.

2. Finding Status (Remediated)

Explanation: The factory has constructed a new chemical warehouse building for chemicals previously stored outside; all chemicals are now in this new warehouse.

3. Finding Status (Partially Remediated)

Explanation: 30% of the MSDS and CSDS forms of the sampled chemicals are not in the local language or aligned with international standards; they do not include the 16 required sections. [HSE.2, HSE.10]

Root Cause: Lack of awareness and monitoring.

4. Finding Status (Remediated)

Explanation: The factory conducted a study and identified n-hexane and Toluene-containing chemicals and replaced them with safer alternatives.

5. Finding Status (Partially Remediated)

Explanation: Some improvements were observed, such as organic vapor cartridge filter respirators provided in thinner and adhesive implementation areas. On the other hand, there was no effective usage of the respirators and gloves that were provided in these sections. [HSE.7]

Root Causes: There is not a system in place to evaluate training efficiency delivered to the workers. The internal monitoring system is ineffective, as there is no post-training survey or assessment of behavior change on issues like PPE use.

6. Finding Status (Partially Remediated)

Explanation: The factory maintains fume and the system was working efficiently during the day of the visit; however, there is no clearly defined procedure or timeline for periodic maintenance activities. [HSE.13]

Root Causes: Factory management did not think that they needed a procedure for this.

Local Law or Code Requirement

FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.2, HSE.7, HSE.10, HSE.13)

Recommendations for Immediate Action

1. Ensure all MSDS forms are available in the local language and cover all 16 subjects.

PREVIOUS FINDING NO.6

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

There is no automatic and centralized emergency alarm system in place but rather an independent fire alarm system for each building. Furthermore, there is no effective inspection and test system in place.

The factory internally refills empty fire extinguishers, as there is a dedicated section for this process. However, there are no trained personnel to do so, nor is the factory certified to refill its own fire extinguishers.

The factory burns solid waste around the factory buildings which is a fire risk.

The fire alarm panel in the building of the sister company was not active at the time of the assessment.

There is no fire alarm or fire detectors in the newly built warehouse building.

The fire alarm panel in the Thermal Bonding Unit was on "pre-alarm" mode because of a false alarm signal from Zone 1 in the same building, keeping the fire alarm from triggering. Furthermore, there are no fire alarm buttons on second floor of this building.

There are locks and padlocks on about 60% of the door handles on the emergency exit doors. Furthermore, some emergency doors are heavy sliding doors (e.g. in the canteen).

One emergency exit in the production area was locked, however management claimed that this was not an emergency exit anymore.

The emergency assembly areas are not marked.

One fire extinguisher near the compressor room was missing but was provided later during the assessment.

There are only two fire extinguishers in the motorbike parking area, which is insufficient for easy access.

There are some automatic fire extinguishers in the chemical warehouse area, but no fire load calculations were made to verify if these fire extinguishers are enough for a potential fire.

There is no standard parking order for cars parked in the factory car park areas which could hinder evacuation and emergency vehicle access.

Fire alarm panels are not located in areas where 24-hour supervision is possible for the security guards.

The factory stores a large amount of flammable liquid in the fabric warehouse without the proper fire safety precautions.

Two firefighting buckets around the motorbike area and compressor room are empty and are used as waste bins.

At least two Liquefied Petroleum Gas (LPG) canisters (one in the kitchen and one in the compressor room) are rusted and corroded.

The LPG canisters around the compressor room is positioned upside-down, posing risk of fire.

Three LPG canisters are located next to the air tanks, which poses a risk of fire and/or explosion.

Cardboard boxes are not properly stored and block the aisles in some sections of the finished goods warehouse.

There are cardboard boxes stored in front of the electrical panels in the finished goods warehouse, which increases the risk of fire.

At fire pump section, there is no emergency illumination, the main suction and flow valves are not kept locked in an open position, and there are no handrails on the stairs.

The factory has not calculated the fire load to verify the capacity of the fire tank (100 tons) would be sufficient.

Fire drill logs do not include important details (e.g. attendance time, the department of the last person who arrived in the assembly area, problems observed during evacuation process). During the last two fire drills, in January and May, only a small group assembled in the assembly area and female workers did not participate.

Local Law or Code Requirement

Factories Act 1934 Section 33-C/14/53/25/29/49/53/33-L, Punjab Factories Rules 49 (1) (a); FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.1, HSE.5, and HSE.6)

Recommendations for Immediate Action

1. Train and certify personnel in charge of filling empty fire extinguishers; furthermore, ensure that equipment and materials are in line with local and international standards.
2. Cease burning solid waste around factory buildings.
3. Ensure that the fire alarm panel is in good working condition.
4. Place fire alarm buttons and detectors in newly built warehouse building and second floor of Thermal Bonding building.
5. Remove locks and padlocks on emergency exit doors and add outward-opening emergency exit doors on heavy sliding doors.
6. Provide signage leading to the emergency assembly areas and mark these areas for improved visibility.
7. Keep fire extinguishers in their marked positions.

8. Provide at least six fire extinguishers in the motorbike parking area.
9. Ensure fire alarm panels are connected to a main fire alarm panel which is located at security cabin.
10. Ensure that the LPG canisters are in good condition and properly fixed in their permanent locations away from any air tanks and compressors.
11. Move flammable liquid containers in the fabric warehouse building to the chemical warehouse area.
12. Remove cardboard boxes from the aisles in the finished goods warehouse and carton boxes from in front of the electrical panels.
13. Install emergency illumination and hand rails in the fire pump section. Ensure that main suction and flow valves are locked in the open position
14. Include details such as attendance time, problems observed, power cut, and arrival of last person in the assembly area in the fire drill log. Ensure that the evacuation time is properly documented and include more photos clearly showing all workers who are gathered in the emergency assembly areas.
15. Ensure that all aisles and emergency evacuation routes remain unobstructed at all times.
16. Ensure that there are enough fire extinguishers in the chemical warehouse and the capacity of the fire tank is sufficient for supplying the existing fire extinguishing system.
17. Regularly monitor the firefighting buckets.
18. Organize the car park areas and ensure parking is standardized for easy evacuation.
19. Conduct a training needs assessment to identify potential training opportunities for CSR and HR staff (e.g. auditing, communication, international standards, environmental protection) and provide where necessary.
20. Improve existing internal audit procedure to ensure that it includes all necessary guidance on, at a minimum: (a) Root Cause Analysis of the findings, (b) Necessary trainings and/or qualifications required for internal assessors, (c) Frequency and type of HQ and factory level assessments, and (d) CAP preparation and implementation
21. Implement a system to ensure that policies and procedures are reviewed on a periodic basis.
22. Ensure that any updates to procedures are reflected in guidelines for implementation and monitoring.
23. Improve training for the Health, Safety & Environment Committee and empower the Committee with responsibility over key issues.

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status (Partially Remediated)

Explanation: A main control panel is installed at the security cabin, connected to the independent fire alarm systems throughout the factory; the system is centralized. On the other hand, this main fire alarm panel was not active during the day of the visit due to maintenance related issues. [HSE.5]

Root Causes: Lack of qualified service provider companies in the region.

2. Finding Status (Remediated)

Explanation: Factory ceased the practice of refilling empty fire extinguishers onsite and started to work with a certified service provider to refill its fire extinguishers. (Documents review and visual observation)

3. Finding Status (Remediated)

Explanation: Factory management prohibited burning solid waste within the factory premises and there is no evidence of solid waste burning. (Visual observation)

4. Finding Status (Remediated)

Explanation: The fire alarm panel in the building of the sister company was active at the time of the assessment. (Visual Observation)

5. Finding Status (Remediated)

Explanation: There was a fire alarm and fire detectors installed in the newly built warehouse building. (Visual observation)

6. Finding Status (Remediated)

Explanation: The false alarm signal coming from Zone 1 in the Thermal Bonding Unit has been addressed. The factory provided a fire alarm pull station on the second floor of this building. (Visual observation)

7. Finding Status (Partially Remediated)

Explanation: The factory removed the locks and padlocks on door handles of the emergency exit doors. There has been no progress on the heavy sliding emergency doors. [HSE.5]

Root Causes: Factory management prioritized several fire safety issues and did not consider changing sliding doors or making modifications on them a priority.

8. Finding Status (Remediated)

Explanation: All emergency exits in the production areas were unlocked. (Visual observation)

9. Finding Status (Remediated)

Explanation: Emergency assembly areas are marked. (Visual observation)

10. Finding Status (Remediated)

Explanation: No missing fire extinguishers observed during the assessment. (Visual observation)

11. Finding Status (Remediated)

Explanation: Additional fire extinguishers provided in the motorbike area. (Visual observation)

12. Finding Status (Not Remediated)

Explanation: There is no documentation to prove the extinguishing capacity of the sprinkler or dry chemical fire extinguishers in the chemical warehouse are sufficient to extinguish a potential fire in this section. [HSE.5, HSE.6]

Root Causes: Factory couldn't find competent service providers to calculate.

13. Finding Status (Remediated)

Explanation: Parking areas are marked and there is a standard parking order for cars parked in the factory car park areas.

14. Finding Status ((Remediated)

Explanation: The factory installed a control panel at the security cabin entrance, so 24/7 supervision is now possible.

15. Finding Status (Remediated)

Explanation: The factory moved all flammable liquids to the chemical warehouse area.

16. Finding Status (Remediated)

Explanation: All firefighting buckets are in good condition and not used as waste bins.

17. Finding Status (Remediated)

Explanation: The rusted and corroded LPG cannisters were replaced with new ones.

18. Finding Status (Remediated)

Explanation: There were no LPG cannisters observed in the compressor room.

19. Finding Status (Remediated)

Explanation: LPG cannisters were removed from the vicinity of the air compressor/air tanks.

20. Finding Status (Remediated)

Explanation: Cardboard boxes are properly stored in the finished goods warehouse and no blockages observed in the aisles of this section.

21. Finding Status (Remediated)

Explanation: Cardboard boxes were removed from the vicinity of the electrical panels in the finished goods warehouse; it was clear of any stored items.

22. Finding Status (Partially Remediated)

Explanation: The factory now has emergency illumination and handrails in the fire pump section, however, the main suction valves are still not kept locked in the open position. [HSE.5]

Root Causes: Lack of awareness and monitoring.

23. Finding Status (Partially Remediated)

Explanation: Factory management reached an external expert on this issue but there is not a report to verify the existing fire tank capacity of 100 tons would be enough to source the fire hydrants and hoses for at least 60 minutes in case of a fire. [HSE.5]

Root Causes: Lack of qualified service providers.

24. Finding Status (Remediated)

Explanation: The factory revised the fire drill log template to include all necessary details. All workers, including female workers, participated in all fire drills since the last FLA assessment.

Local Law or Code Requirement

Factories Act 1934 Chapter 3, Punjab Factories Rules Part III; Factories Act 1934 Section 25, Punjab Factories Rules 49 (1) (a); FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.5, HSE.6)

Recommendations for Immediate Action

1. Activate main fire alarm panel as soon as possible.
2. Ensure that none of the emergency exit doors are heavy sliding doors that would impede an evacuation in the event of an emergency.
3. Ensure that the extinguishing capacity of the sprinkler or dry chemical fire extinguishers in the chemical warehouse are sufficient to extinguish a potential fire. Also, ensure that appropriate documentation is maintained.
4. Ensure that the main suction valves in the fire pump section are kept locked in the open position.
5. Have a third party expert verify the existing fire tank capacity of 100 tons is enough to source the fire hydrants and hoses for at least 60 minutes in case of a fire.

PREVIOUS FINDING NO.7

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. Several different production machines and machines in the mechanical workshop do not have machine guards (e.g. table saw, lathe, metal processing machines, drills, needle guards, belt covers, needle guards).
2. There are no seatbelts on the forklift, nor was a fire extinguisher provided. The factory uses a diesel forklift in a closed environment (the warehouse). Furthermore, during the assessment, two people were seen riding a forklift designed for one.
3. One of the air tanks -forward gear building- is corroded on the body of the tank and has a serious air leakage from the safety vent. It is also not fixed to its permanent position.
4. The factory has not provided safety interlocks for the laser cutting machine, furthermore the factory has not posted the required safety information on this machine (e.g. laser class, wavelength, power, laser color).
5. The cover of the manometer of the one of the air tanks in the compressor room is broken and there is not a system in place for marking the working and maximum working pressure of the pressure vessels.
6. Although factory management claimed that there is a system in place for periodically conducting lifting tests on the lifting equipment, there was not any report or document in place to prove this claim.
7. The factory has not conducted hydrostatic pressure tests on the air tanks

Local Law or Code Requirement

Punjab Factories Rules 1978 section 65/66/67/74/71/73, Factories Act 1934 Section 33; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.1, HSE.13, and HSE.14)

Recommendations for Immediate Action

1. Ensure that all production and maintenance machinery have the proper machine guards.
2. Immediately inform and warn the sister company about leaking and corroded air tank and ask for maintenance.
3. Provide functioning interlocks for the laser cutting machine and post warning signs with laser information.
4. Provide seatbelts and fire extinguishers for forklifts and limit the use of the diesel forklift in closed environments.
5. Maintain the air tank and fix it to its permanent position.
6. Replace damaged and broken manometers and monitor regularly. Ensure that working and maximum working pressure limits are marked on manometers.
7. Document periodic lifting tests and ensure that there is a report that verifies the safety of tested equipment and machines.
8. Conduct annual hydrostatic pressure tests on air tanks and ensure a qualified engineer issues a report.
9. Conduct a training needs assessment to identify potential trainings opportunities for CSR and HR staff (e.g. auditing, communication, international standards, environmental protection) and provide where necessary.
10. Improve existing internal audit procedure to ensure that it includes all necessary guidance on at minimum: (a) Root Cause Analysis of the findings, (b) Necessary trainings and/or qualifications required for internal assessors, (c) Frequency and type of HQ and factory level assessments, and (d) CAP preparation and implementation.
11. Implement a system to ensure that policies and procedures are reviewed on a periodic basis
12. Ensure that any updates to procedures are reflected in guidelines for implementation and monitoring.
13. Improve the training for Health, Safety & Environment Committee and empower the Committee with responsibility over key issues.

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status (Not Remediated)

Explanation: Several production and mechanical workshop machines do not have machine guards (e.g. table saw, lathe, metal processing machines, drills, needle guards, belt covers, needle guards). [HSE.13, HSE.14]

Root Causes: Lack of awareness and monitoring. Additionally, the factory had not received this finding in the original FLA report due to a technical issue, therefore no proper CAPs prepared or implemented.

2. Finding Status (Not Remediated)

Explanation: There are no seatbelts on the forklift, nor a fire extinguisher nearby. The factory uses a diesel forklift in a closed environment (the warehouse). Furthermore, during the assessment, two people were seen riding a forklift designed for one person. [HSE.13, HSE.14]

Root Causes: Lack of awareness and monitoring. Additionally, the factory had not received this finding in the original FLA report due to a technical issue, therefore no proper CAPs prepared or implemented.

3. Finding Status (Partially Remediated)

Explanation: The factory replaced the air tank and there wasn't any leakage observed. However, the tank is not fixed to a permanent position. [HSE.14]

Root Causes: Lack of awareness and monitoring. Additionally, the factory had not received this finding in the original FLA report due to a technical issue, therefore no proper CAPs prepared or implemented.

4. Finding Status (Partially Remediated)

Explanation: The safety information with relevant details had been posted on laser cutting machines, however, safety interlocks were inactive. [HSE.14]

Root Causes: Lack of awareness and monitoring. Additionally, the factory had not received this finding in the original FLA report due to a technical issue, therefore no proper CAPs prepared or implemented.

5. Finding Status (Partially Remediated)

Explanation: The factory replaced the broken manometer, but not all the manometers had maximum and working pressure levels (50% of the manometers checked). [HSE.14]

Root Causes: Lack of awareness and monitoring. Additionally, the factory had not received this finding in the original FLA report due to a technical issue, therefore no proper CAPs prepared or implemented.

6. Finding Status (Not Remediated)

Explanation: Although factory management claimed there is a system in place to periodically conduct tests of the lifting equipment, there was no report or document to prove this claim. [HSE.14]

Root Causes: Lack of awareness and monitoring. Additionally, the factory had not received this finding in the original FLA report due to a technical issue, therefore no proper CAPs prepared or implemented.

7. Finding Status (Remediated)

Explanation: The factory provided hydrostatic pressure test reports for the air tanks.

Local Law or Code Requirement

Punjab Factories Rules 1978 section 65/66/67/74/71/73, Factories Act 1934 Section 33; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.1, HSE.13, and HSE.14)

Recommendations for Immediate Action

1. The factory will provide proper guards to all high-risk machinery in the mechanical workshop: lathe, drills, grinding machines, metal processing machines.
2. Provide seatbelts and fire extinguishers for forklifts and limit the use of the diesel forklift in closed environments.
3. Air tank will be fixed to its permanent location.
4. Safety interlocks of laser cutting machines should be activated
5. Document periodic lifting tests and document the safety verification of tested equipment and machines.

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

There is only partial grounding of some production machinery and most of the sockets do not have a grounding connection.

There were electrical cables fixed with tape throughout the production area.

Some electrical panels were not properly isolated and had other maintenance issues (e.g., covers opened, not properly grounded, etc.). The factory has not provided all electrical panels with insulator mats. Furthermore, there is no documentation proving that the existing insulator mats are suitable.

According to the electrical engineer's declaration, there is one lightning rod within the factory, but it was not verified that its protective radius is enough for the entire factory.

Although there is a grounding measurement report in place, there was not any measurement carried out from machines' chassis and sockets; measurements were only carried out for the electrical panels.

Local Law or Code Requirement

FLA Workplace Code (Health, Safety and Environment Benchmark HSE.13)

Recommendations for Immediate Action

1. Ensure that the grounding system covers all electrical systems in the factory.
2. Correctly repair or replace damaged electrical wires.
3. Provide all electrical panels and switchboards with proper isolation mats.
4. Provide all factory buildings, especially the chemical warehouse, with lightning rods.
5. Improve grounding measurement reports and take measurements from machine chassis and sockets in addition to the electrical panels.
6. Provide insulator mats in front of the electrical panels and make sure that existing insulator mats can protect workers from potential electrical shocks.
7. Conduct a training needs assessment to identify potential training opportunities for CSR and HR staff (e.g. auditing, communication, international standards, environmental protection) and provide where necessary.
8. Improve the existing internal audit procedure to ensure that it includes all necessary guidance on, at a minimum: (a) Root Cause Analysis of the findings, (b) Necessary trainings and/or qualifications required for internal assessors, (c) Frequency and type of HQ and factory level assessments, and (d) CAP preparation and implementation.
9. Implement a system to ensure that policies and procedures are reviewed on a periodic basis.
10. Ensure that any updates to procedures are reflected in guidelines for implementation and monitoring.
11. Improve the training for Health, Safety & Environment Committee and empower the Committee with responsibility over key issues.

VERIFICATION RESULT

Finding Status

Partially Remediated

Remediation Details

1. Finding Status (Partially Remediated)

Explanation: 30% of the sockets controlled did not have a proper grounding connection. [HSE.13]

Root Causes: Changes on the production floor & absence of an effective maintenance system.

2. Finding Status (Partially Remediated)

Explanation: There was significant improvement observed in production areas, but there was still some tape affixed to wiring in electrical panels and extension cables in the production area. Also, several tape-affixed electrical panels were observed outside of production areas. [HSE.13]

Root Causes: Changes on the production floor & absence of an effective maintenance system.

3. Finding Status (Partially Remediated)

Explanation: Although some improvements have been made, 30% of the electrical panels were not properly isolated and had other maintenance issues (e.g., covers opened, not properly grounded, etc.). [HSE.13]

Root Causes: Changes on the production floor & absence of an effective maintenance system.

4. Finding Status (Partially Remediated)

Explanation: Insulator mats are provided but there is no documentation to prove the insulator mats are voltage resistant. [HSE.13]

Root Causes: Lack of reliable service providers in region.

5. Finding Status (Partially Remediated)

Explanation: A written document available which provides some basic information about existing lightning rod, but this document doesn't contain any information on protective radius of the lightning rod. [HSE.13]

Root Causes: Lack of competent service providers.

6. Finding Status (Remediated)

Explanation: New grounding measurement report including measurement carried out from sockets and machines' chassis.

Local Law or Code Requirement

FLA Workplace Code (Health, Safety and Environment Benchmark HSE.13)

PREVIOUS FINDING NO.9

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

Although there are no registered children in the childcare room, the room is located in the production building and is not entirely separated from the production area.

The factory does not have a system to regularly sanitize and clean the drinking water dispensers. As a result, most of the drinking water dispensers are not maintained or cleaned on a periodic basis and are rusted. Furthermore, some of the cups used for drinking water are in common use. The drinking water test report does not mention the locations from where water was sampled.

Some of the bathrooms in the factory are not clean or sanitized.

There are no labels for indicating the maximum carriage capacity of the shelves in the warehouse areas.

Although there are some heavy loads manually carried and transported by workers (e.g. latex rolls), the factory has not defined a limit for manual handling operations.

Factory management is planning to add one more floor to the canteen and warehouse building (which is currently one story) but there was no project plan related with this expansion proving that such an expansion would be safe.

The factory does not conduct semi-annual health checks of the workers, which is the legally defined time-period.

There are no handrails on the stairs in the warehouse area.

One handrail is missing on the stairs in the canteen building.

The cover of the septic tank has been removed which poses a risk of falling.

The factory does not provide caps for the sprinklers at the eye washing stations.

There was an open manhole cover and a tape-fixed electrical cable in front of the generator room.

There was medicine (anti-acid) in the production area.

The factory has not posted a maximum allowed height limit on the bridges or flyover pipelines for the trucks on factory premises.

Part of the fencing around the factory has been removed due to construction work. Furthermore, unauthorized accesses to the construction areas is not properly restricted with safety signs or barricade tape.

The chairs and stools are not adjustable to the workers' physical dimensions.

The factory does not provide anti-fatigue mats to standing workers.

The factory does not take proactive steps to reduce stress or injury from repetitive motion.

Local Law or Code Requirement

Punjab Factories Rules 1978 section (33-F) 78/ 76 / (33-Q) 95 / Factories Act 1934 (25) / (33-D)/ (33-E); FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.3, HSE.14 HSE.17, HSe.19, HSE.23, and HSE.27)

Recommendations for Immediate Action

1. Consult a civil engineer and obtain a report before commencing construction on the addition of the canteen building.
2. Ensure that the childcare room is in an area that is not connected to the production or the warehouse areas (e.g. the hospital building).
3. Ensure that there is a system in place for the regular sanitation of drinking water dispensers.
4. Eliminate the common use of drinking water cups.
5. Ensure that the drinking water test report includes the locations of sampled drinking water.
6. Provide all standing workers with anti-fatigue mats.

7. Label the maximum carriage capacity of the shelves in warehouse areas.
8. Define a limit for hand carriage (manual handling) operations.
9. Ensure that health checks are conducted within the legally defined periods.
10. Install handrails on all stairs in the warehouse area and canteen building.
11. Ensure that the septic tank is closed at all times. If it is left open due to a ventilation issue, install ventilation hoods instead.
12. Provide caps for the sprinklers at the eye washing stations.
13. Ensure that all manhole covers are kept closed.
14. Properly repair the electrical cable in front of the generator room.
15. Ensure that there is no medicine in the production area.
16. Post maximum allowed load height limit on bridges and flyover pipelines
17. Close gaps in the fence around the factory. Place safety signs and barricade tape that limiting unauthorized access to construction areas.
18. Carry out a comprehensive study on ergonomic conditions within the factory.
19. Provide workers with adjustable chairs and stools.
20. Ensure that all restrooms are cleaned and sanitized on a regular basis
21. Conduct a training needs assessment to identify potential training opportunities for CSR and HR staff (e.g. auditing, communication, international standards, environmental protection) and provide where necessary.
22. Improve existing internal audit procedure to ensure that it includes all necessary guidance on, at a minimum: (a) Root Cause Analysis of the findings, (b) Necessary trainings and/or qualifications required for internal assessors, (c) Frequency and type of HQ and factory level assessments, and (d) CAP preparation and implementation
23. Implement a system to ensure that policies and procedures are reviewed on a regular basis.
24. Ensure that any updates to procedures are reflected in guidelines for implementation and monitoring.
25. Improve the training for the Health, Safety & Environment Committee and empower the Committee with responsibility over key issues.

VERIFICATION RESULT

Finding Status

Not Remediated

Remediation Details

1. Finding Status (Remediated)

Explanation: Factory management has separated childcare from the production area.

2. Finding Status (Remediated)

Explanation: The factory has designated staff for periodical control of the drinking water dispensers; the same person oversees regular sanitation and cleaning of dispensers. Drinking water cups are not commonly used by workers and drinking water test reports are with the location information where water was sampled.

3. Finding Status (Remediated)

Explanation: Bathrooms were clean and sanitized. Factory management uses daily checklists to ensure the quality of cleaning services.

4. Finding Status (Partially Remediated)

Explanation: Not all shelves in the warehouse areas are provided with maximum carriage capacity labels (50% of the shelves have no labels). [HSE.1, HSE.14]

Root Causes: Factory management prioritized the labeling of new racks in warehouse areas and old racks mainly used for temporary storage activities still pending.

5. Finding Status (Remediated)

Explanation: The factory has defined a maximum manual load of 20 kg for workers. Warning signs are posted in the warehouse and other storage areas within the factory.

6. Finding Status (Remediated)

Explanation: Factory management received the building stability report for the canteen and warehouse building expansions from a certified consultant.

7. Finding Status (Partially Remediated)

Explanation: 50% of sampled workers do not receive semi-annual health checks in a timely manner. [HSE.1]

Root Causes: Workload of the production departments; some workers were unaware of this requirement or have yet to visit the factory's health unit to schedule periodical health checks.

8. Finding Status (Remediated)

Explanation: The stairs in the warehouse area now have handrails.

9. Finding Status (Remediated)

Explanation: The stairs in the canteen building now have handrails.

10. Finding Status (Remediated)

Explanation: The septic tank now has a lid.

11. Finding Status (Partially Remediated)

Explanation: The factory provided caps for sprinklers at eye washing stations, but most (75%) have since been removed by workers. [HSE.6]

Root Causes: Workers are throwing caps away after using sprinklers as they have not been properly trained on the importance of the caps to maintain hygiene.

12. Finding Status (Remediated)

Explanation: Manhole cover was closed and tape-fixed electrical cable replaced.

13. Finding Status (Remediated)

Explanation: There was no medicine found in the first aid kits or the production area.

14. Finding Status (Partially Remediated)

Explanation: Maximum height limit labels are posted on some flyover pipelines, but not all have labels, such as the main bridge connecting the two production buildings. [HSE.1]

Root Causes: Management's oversight; absence of an effective internal monitoring system.

15. Finding Status (Remediated)

Explanation: The fencing around the factory is complete and access to construction areas limited with signs and barricade tapes.

16. Finding Status (Not Remediated)

Explanation: There has been no progress on this issue, as chairs and stools are still not adjustable. [HSE.1, HSE.17]

Root Causes: The factory didn't provide a CAP for this finding or prioritize this finding. Management concentrated its efforts on providing missing anti-fatigue mats to standing workers.

17. Finding Status (Remediated))

Explanation: The factory provided anti-fatigue mats to standing workers.

18. Finding Status (Not Remediated)

Explanation: There has been no progress on this issue; there wasn't any effort observed to reduce stress or injury from repetitive motion. [HSE.17]

Root Causes: Factory didn't provide a CAP for this finding as they didn't prioritize this finding. Management concentrated its efforts on providing missing anti-fatigue mats to workers working by standing.

Local Law or Code Requirement

Punjab Factories Rules 1978 section (33-F); Factories Act 1934 (33-D); FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.6, HSE.14, HSE.17)

PREVIOUS FINDING NO.10

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

There is a practice of burning solid waste within the factory premises, which generates pollution.

The factory dumps hazardous and non-hazardous solid waste around factory buildings.

The factory does not provide a spill kit in the chemical warehouse area.

Solid waste is mixed in the waste storage areas.

There is a sewage leakage from a domestic wastewater pipe at one building of the sister company.

The diesel tank is missing a secondary container.
There is electrical waste stored outside.
There is oil contamination on the concrete in the motorbike parking area.
There is soil contamination from oil and chemical spills in different sections near the waste storage areas.
The compressors and air tanks dispense oil-contaminated water.
The solid waste handler (TUP) does not have the proper license.
The procedures do not include protections for workers who allege environmental violations.

Local Law or Code Requirement

Environmental Protection Act 1997 (16) & (6) (k), FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.2, HSE.4 and HSE.9)

Recommendations for Immediate Action

1. Cease the practice of burning solid waste and clean the solid waste – hazardous and non-hazardous – dumped around factory buildings –hazardous and nonhazardous-
2. Provide spill kits in the chemical warehouse area.
3. Repair the domestic wastewater pipe.
4. Provide a secondary container for the diesel tank.
5. Clean oil and soil contamination in the motorbike parking area and around the factory.
6. Prevent the compressors and air tanks from discharging oil-contaminated water.
7. Ensure all solid waste handlers have a valid license.
8. Collect and properly store solid waste in designated areas.
9. Remove electrical waste from the open environment. Train the maintenance team to put the electrical waste in the designated area.
10. Conduct a training needs assessment to identify training opportunities for CSR and HR staff (e.g. auditing, communication, international standards, environmental protection) and provide where necessary.
11. Improve existing internal audit procedure to ensure that it includes all necessary guidance on, at a minimum: (a) Root Cause Analysis of the findings, (b) Necessary trainings and/or qualifications required for internal assessors, (c) Frequency and type of HQ and factory level assessments, and (d) CAP preparation and implementation
12. Implement a system to ensure that policies and procedures are reviewed on a periodic basis.
13. Revise the Environmental Protection policies and procedures to include a clause on the protection of workers who allege environmental violations.
14. Ensure that any updates to procedures are reflected in guidelines for implementation and monitoring.
15. Improve the training for the Health, Safety & Environment Committee and empower the Committee with responsibility over key issues.

VERIFICATION RESULT

Finding Status

Partially Remediated

Remediation Details

1. Finding Status (Remediated)

Explanation: There were no solid waste burning activities observed and the factory has prohibited this action.

2. Finding Status (Partially Remediated)

Explanation: Although some improvements have been made by management to eliminate this issue, including better labeling of the solid waste area and training for staff involved in waste handling and storage processes, there is still some hazardous and non-hazardous waste around the factory building. [HSE.1]

Root Causes: Internal monitoring doesn't cover environmental issues in a comprehensive manner. Although labels and training raised awareness, workers are bypassing rules to catch up with factory waste flow. The factory is sharing same waste storage area with a sister company within the same premises.

3. Finding Status (Remediated)

Explanation: The factory provided a spill kit in the chemical warehouse area.

4. Finding Status (Partially Remediated)

Explanation: Although some improvements have been made by management to eliminate this issue, including better labeling of the solid waste area and training for staff involved in waste handling and storage processes, there is still some hazardous and non-hazardous waste around the factory building. [HSE.1]

Root Causes: Internal monitoring doesn't cover environmental issues in a comprehensive manner. Although labels and training raised awareness, workers are bypassing rules to catch up with factory waste flow. The factory is sharing same waste storage area with a sister

company within the same premises.

5. Finding Status (Remediated)

Explanation: Sewer pipe replaced; no leakages observed.

6. Finding Status (Remediated)

Explanation: Secondary containment provided to diesel tank.

7. Finding Status (Remediated)

Explanation: All electrical waste stored in designated waste area; no outside storage of electrical waste.

8. Finding Status (Remediated)

Explanation: No oil contamination on the concrete floor of the motorbike parking area.

9. Finding Status (Remediated)

Explanation: No soil contamination observed in the areas surrounding the waste storage areas.

10. Finding Status (Partially Remediated)

Explanation: Although there have been some efforts to collect oil-contaminated water separately, 50% of the compressors and air tanks checked still have this problem and oil contaminated water is being directly discharged. [HSE.1]

Root Causes: Internal monitoring doesn't cover environmental issues in a comprehensive manner.

11. Finding Status (Remediated)

Explanation: All solid waste handlers have valid licenses.

12. Finding Status (Remediated)

Explanation: Management revised the procedures to include protections for workers who allege environmental violations.

Local Law or Code Requirement

Environmental Protection Act 1997 (16) & (6) (k), FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1)

Recommendations for Immediate Action

1. Clean the solid hazardous and non-hazardous waste dumped around factory buildings.
2. Cease direct discharge of oil-contaminated water from the compressors and air tanks.

PREVIOUS FINDING NO.11

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation

The factory does not communicate the policies and procedures and their updates for the following Employment Functions to the general workforce: Wages & Benefits, Termination & Retrenchment, Grievance System, Environmental Protection, and Health & Safety.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.16, ER.25, ER.27, and ER.32; Compensation Benchmark C.17)

Recommendations for Immediate Action

1. Provide trainings to workers and management representatives on the communication aspect of the FLA Code and benchmark requirements.

VERIFICATION RESULT

Finding Status

Remediated

Remediation Details

1. Finding Status (Remediated)

Explanation: The factory policy and procedures are posted in different sections of the factory. Orientation training content has improved as it includes all Employment Functions: Wages & Benefits, Termination & Retrenchment, Grievance System, Environmental Protection, and Health & Safety.

PREVIOUS FINDING NO.12

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

The factory does not provide specific training for supervisors on the following employment functions: Recruitment, Hiring and Personnel Development; Termination and Retrenchment, Wages and Benefits, Hours of Work, Grievance System, Workplace Conduct & Discipline, Industrial Relations and Health and Safety, Environmental Protection. Moreover, no ongoing training is provided to the workers on Wages and Benefits or industrial Relations.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.15)

Recommendations for Immediate Action

1. Organize supervisor trainings on all FLA Code and benchmark requirements.

VERIFICATION RESULT

Finding Status

Remediated

Remediation Details

1. Finding Status (Remediated)

Explanation: Factory management prepared and delivered a specific training for the supervisors. This training covered all relevant FLA code elements.

New Findings and Action Plans

NEW FINDING NO.1

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. In 2018, twelve workers in the production department received monthly wages lower than the minimum wage defined for their skill levels. [C.2]

Local Law or Code Requirement

Punjab Wages Board Declared Minimum Wages for 2018; FLA Workplace Code (Compensation Benchmark C.2)

Recommendations for Immediate Action

Ensure all skilled workers receive wages aligned to their skill levels, and retroactively pay workers who received less than their skill level wages in 2018. The assessment team identified 12 workers.

NEW FINDING NO.2

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. Safety interlocks of freight elevator were not operational. [HSE.13]
2. Some shelves in the raw material and finished goods warehouses collapsed and had been fixed with ropes. Some shelves are seriously bent and seem ready to collapse. [HSE.13]

Local Law or Code Requirement

FLA Workplace Code (Health, Safety, and Environment Benchmark HSE.13)

Recommendations for Immediate Action

<!--[endif]-->Activate freight elevator safety interlocks and implement a system

2. Repair all shelves in the material and finished goods sections. Label all shelves with maximum storage limits.