



2010

FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING REPORT

COMPANY: C. C. Creations Ltd., University
Co-op

COUNTRY: USA

FACTORY CODE: 112008247075I

MONITOR: Accordia

AUDIT DATE: November 2 - 3, 2010

PRODUCTS: T-Shirts, Jackets, Sweatpants,
Shorts

PROCESSE: Screen Printing, Embroidery

NUMBER OF WORKERS: 71



CONTENTS:

Code Awareness:	3
Health and Safety: Evacuation Requirements and Procedure	4
Health and Safety: Safety Equipment and First Aid Training	5
Health and Safety: Personal Protective Equipment	7
Health and Safety: Chemical Management and Training	8
Health and Safety: Material Safety Data Sheets/Worker Access and Awareness	9
Health and Safety: Ventilation/Electrical/Facility Installation and Maintenance	10
Health and Safety: Machinery Maintenance and Worker Training	11

Code Awareness:

GEN.2 Ensure that all Company factories as well as contractors and suppliers inform their employees about the workplace standards orally and through the posting of standards in a prominent place (in the local languages spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.

Noncompliance

Explanation: Company has not informed their employees, as well as employees of contractors and suppliers' factories, about the workplace standards orally. [Factory name] has not undertaken any efforts to inform employees of the standards on a regular basis.

Plan Of Action: [Factory name] currently holds monthly employee meetings to discuss current business, upcoming events, company announcements and to recognize the "Employee of the Month." Beginning in January 2011, a segment of one meeting per quarter will be designated to discuss workplace standards and [Factory name's] commitment to them. Emphasis will be placed on the location of posted standards, as well as on new developments and available lines of communication for reporting issues or voicing concerns. General discussion and updates on workplace standards to be included in the employee meeting scheduled the week of February 7, 2011.

Deadline Date: 02/11/2011

Action Taken: Training sessions were held with all employees on January 27, 2011 to discuss [Factory name's] ongoing commitment to workplace standards. Fire extinguisher/Material Safety Data Sheet (MSDS) trainings were specifically targeted in these sessions. General discussion and updates on workplace standards to be included in the employee meeting scheduled the week of February 7, 2011.

Plan Complete: No

Plan Complete Date:

Health and Safety: Evacuation Requirements and Procedure

H&S.9 All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, the installation and maintenance of an employee alarm and emergency lighting systems, ensuring aisles/exits are not blocked and that workers are not blocked within their workstations, employee education, evacuation procedures, etc.) shall be complied with. Workers shall be trained in evacuation procedures. Alarm systems shall be regularly tested and evacuation drills shall be undertaken at least annually. (S)

Noncompliance

Explanation: During the employee interview process it was determined that:

- a) Workers have not been trained in evacuation procedures;
- b) No fire drills have been conducted at the facility.

**Plan Of
Action:**

a) An evacuation/fire drill will be performed in mid-January 2011 to coincide with annual riser/sprinkler system inspection. Alarms are sounded as part of this test. Evacuation drill will be discussed with managers in the early January meeting, to review evacuation routes, the employee check-off process and designated meeting places.

b) An annual evacuation/fire drill will be performed in the first quarter of each year going forward.

*See "Fire Prevention Action Plan" for visual of evacuation routes posted throughout facility.

In addition, a quarterly inspection of all backup emergency lights (operation/batteries) and lighted exit signs will be performed. Individual responsible for performing inspections: [Employee name], ([Factory name] Maintenance Supervisor)

**Deadline
Date:**

01/28/2011

**Action
Taken:**

Batteries replaced in all backup emergency lights on November 2, 2010. Maintenance performed by: [Employee name], ([Factory name] Maintenance Supervisor) Emergency evacuation drill performed on January 21, 2011.

*See "[Factory name] Emergency Evacuation Evaluation" document.

**Plan
Complete:**

No

Plan
Complete
Date:

Health and Safety: Safety Equipment and First Aid Training

H&S.10 All safety and medical equipment (such as fire fighting equipment, first aid kits, etc.) shall be available in sufficient numbers throughout the factory, maintained and stocked as prescribed and easily accessible to workers. A sufficient number of workers shall be trained in first aid and fire fighting techniques. (S)

Noncompliance

Explanation: During the employee interview process, inspection of the facility, and management interview it was determined that:

- a) There are no workers trained in first aid and fire fighting techniques.
- b) First aid kit is located in the warehouse manager's office; however, additional first aid kits shall be available in sufficient numbers throughout the factory, maintained and stocked as prescribed and easily accessible to workers.

Plan Of Action: a) CPR/First aid training is scheduled for December 21, 2010. Individuals from key areas of facility have been chosen to participate. Names of individuals, "Medical Emergency First Response Team," are listed on page 8 of the "Emergency Action Plan." Fire extinguisher training to be administered by [City name] Fire Dept/Marshall. Supporting documents for group training of existing employees to follow completion of training, with documents added to personnel files. All new employees will be required to complete this training as a part of pre-employment orientation.

*See "Emergency Action Plan" for further details.

*See "[Factory name] Fire Extinguisher Training Acknowledgement."

b) Additional first aid kits to be placed in accessible areas of the production floor and monitored/resupplied on monthly basis by contracted safety company. Safety company responsible for monitoring and/or resupplying first aid kits is [Company name]. (Shown in attached "First Aid Station" photo.)

Deadline Date: 01/31/2011

Action Taken: a) CPR/First aid training for “Medical Emergency First Response Team” has been completed.

*See attached “[Factory name] First Aid Training Certification.”

b) The first of two first aid kits placed in accessible areas of production floor on November 22, 2010. Basic first aid instruction posted with first aid kit. (Shown in attached “First Aid Station” photo.)

c) Training sessions were held with all employees on January 27, 2011 to discuss [Factory name’s] ongoing commitment to workplace standards. Fire extinguisher/MSDS training were specifically targeted in these sessions.

*See “[Factory name] Fire Extinguisher_MSDS Training Certificate” attached.

** The standards and training videos used in these sessions have been obtained and will be incorporated into all new employee orientations.

d) Second of two first aid kits on production floor installed on January 21, 2011.

Plan Complete: No

Plan Complete Date:

Health and Safety: Personal Protective Equipment

H&S.11 Workers shall be provided with effective and all necessary personal protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to health and safety hazards, including medical waste. (S)

Noncompliance

Explanation: During the inspection of the facility, it was found that there are two eye wash stations on the production floor; however, they are not in close proximity to the chemical storage and chemical dispensing areas.

Plan Of Action: Place portable eye wash stations at the point of chemical dispensing.

Deadline Date: 12/08/2010

Action Taken: Two portable eye wash stations have been placed at the point of chemical dispensing, bringing the total number of stations in the facility to five.

*See "[Factory name] Portable Eye Wash Stations" photos.

Plan Complete: Yes

Plan Complete Date: 12/08/2010

Health and Safety: Chemical Management and Training

H&S.13 All chemicals and hazardous substances shall be properly labeled and stored in accordance with applicable laws. Labels shall be placed in the local language and the language(s) spoken by workers, if different from the local language. Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances. (S)

Noncompliance

Explanation: During the employee interview process and management interview, it was determined that workers have not received training concerning the hazards, the risks and the safe use of chemicals and other hazardous substances.

Plan Of Action: Train employees to understand MSDS and chemical risks pertaining to their job responsibilities. Training to include personal protection data and health/first aid data. Existing production personnel will participate in MSDS training and will be required to sign acknowledgement of training for personnel files. In addition, all new production employees will be required to participate in the same training as a part of their pre-employment orientation.

*See attached "[Factory name] MSDS and Chemical Use Acknowledgement."

Deadline Date: 01/31/2011

Action Taken: Training sessions were held with all employees on January 27, 2011 to discuss [Factory name's] ongoing commitment to workplace standards. Fire extinguisher/MSDS training were specifically targeted in these sessions.

*See "[Factory name's] Fire Extinguisher_MSDS Training Certificate" attached.

** The standards and training videos used in these sessions have been obtained and will be incorporated into all new employee orientations.

Plan Complete: No

Plan Complete Date:

Health and Safety: Material Safety Data Sheets/Worker Access and Awareness

H&S.14 Material Safety Data Sheets (MSDS) for all chemicals used in the factory must be available at the usage and storage sites of the chemicals, in the local language and the language(s) spoken by workers, if different from the local language. Workers shall have free access to MSDS. (P)

Noncompliance

Explanation: During the inspection of the facility it was found that MSDS for all chemicals used in the factory are posted in two areas of the facility (front and back of the production floor); however, MSDS are not available at the usage and storage sites of the chemicals.

Plan Of Action: Post all related MSDS at the point of chemical dispensing to increase the awareness of risks associated with the chemicals used in related job descriptions.

Deadline Date: 12/08/2010

Action Taken: MSDS have been placed at points of chemical dispensing. Two master sets of MSDS books remain posted at front and back of facility, located by employee time clocks.

*See attached "[Factory name's] MSDS Posting" photos.

** Standards and training videos have been obtained and will be incorporated into all new employee orientations.

Plan Complete: Yes

Plan Complete Date: 12/08/2010

Health and Safety: Ventilation/Electrical/Facility Installation and Maintenance

H&S.17 All necessary ventilation, plumbing, electrical, noise and lighting services shall be installed and maintained to conform to applicable laws and in such a manner as to prevent or minimize hazardous conditions to workers in the facility. (S)

Noncompliance

Explanation: During the inspection of heat transfer area, an electrical panel was found without a cover, with wiring exposed.

Plan Of Action: Maintain policy that all electrical panels are secured at all times unless authorized personnel are present. All panels, if removed for work in progress, are to be replaced before left unattended. This is to ensure the safety of all workers.

Individuals responsible for policy implementation and enforcement:
[Employee name,] VP of Warehouse Operations
[Employee name,] Safety Director

Deadline Date: 11/02/2010

Action Taken: Panel has since been replaced and policy has been reinforced with maintenance department supervisor.

*See attached electrical panel photo. [Employee name] (VP of Warehouse Operations) and newly appointed Safety Director, [Employee name], will be responsible for policy implementation/enforcement.

Plan Complete: Yes

Plan Complete Date: 12/01/2010

Health and Safety: Machinery Maintenance and Worker Training

H&S.18 All production machinery, equipment and tools shall be regularly maintained and properly guarded. Workers shall receive training in the proper use and safe operation of machinery, equipment and tools they use. Employers shall ensure safety instructions are either displayed/posted near all machinery or are readily accessible to the workers. (S)

Noncompliance

Explanation: During the employee interview process, inspection of the facility, document review and management interview, it was determined that two out of six workers operating forklifts are not certified and have not received formal training in the proper use and safe operation of the equipment. These workers are in the process of getting trained and will receive certification before the end of the year.

Plan Of Action: Complete certification for two operators not authorized for forklift operation.

Deadline Date: 12/08/2010

Action Taken: Certification for two additional operators completed on December 8, 2010.
*See attached "[Factory name] Forklift Training Certification" document.

Plan Complete: Yes

Plan Complete Date: 12/08/2010
