2010

Fair Labor Association
Independent External Monitoring Report

COMPANY: Jostens, Inc.
COUNTRY: United States
FACTORY CODE: 2200821138I
MONITOR: Accordia Global Compliance Group
AUDIT DATE: October 26 – 27, 2010
PRODUCTS: Diplomas, Diploma Covers, Yearbooks, Yearbook Covers
PROCESSES: Printing (Offset, Digital), Binding
NUMBER OF WORKERS: 218

For an explanation on how to read this report, please visit the FLA website here.

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*Denotes a Notable Feature

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Health and Safety: General Compliance Health and Safety

H&S.1 Employers shall comply with all local laws, regulations and procedures concerning health and safety. (S)

Noncompliance

Explanation: Monitor's inspection of facility found that a portable ladder was unsecured in one area of the factory (small break room). 29CFR1910.25-1910.27

Plan Of Action: Response:
[Factory name] Facility currently, and traditionally, has a ladder safety program in place. All ladders, when not in use, need to be chained and locked to the wall in the ladder rack. During the audit by Accordia Global Compliance Group on October 27, 2010, this location was displayed to the auditor and referenced many times when retrieving ladders to check emergency lighting for the audit. However, at the time of the audit, a ladder that was used earlier that day for painting walls was found in one of the break rooms and not on the ladder rack; consequently causing the violation of the policy and standard.

Correction:
The ladder was returned to the ladder rack and maintenance personnel were reminded of our program; the ladders are currently locked up for safe keeping. Our repair men and IT personnel use these ladders to perform work. It is the responsibility of these individuals to comply with the program in place. To validate that the program is followed as designed, the maintenance supervisor has a computer generated P/M once a month for checking and seeing if the program is being followed. This policy has been audited one time since the audit by Accordia Global Compliance Group and was found to be in good standing.

Deadline Date: 02/08/2011

Action Taken:

Plan Complete: Yes

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Plan Complete Date: 01/06/2011

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: Monitor's inspection and testing of the facility's emergency lighting system found that 5 out of 13 emergency lights are not in working order. Lights were out in various sections of the factory including the "Covers" plant (southwest and northwest corners), Bindery (east exit door and center of department) and Digital areas (west side near offices).

Plan Of Action: Response:
[Factory name] Facility has numerous emergency lights located throughout the facility. All but one of the emergency light fixtures is run on battery backup (the one in the main aisle of the facility is run on a very small natural gas generator). Traditionally, the emergency lighting system was on annual inspection to test operations and battery life. During the audit by Accordia Global Compliance Group on October 27, 2010, multiple lights were found to be not working; batteries had died and would not hold a charge. Upon review of the recorded preventative maintenance log, it was found that these systems were checked on the scheduled maintenance timeframe. Though there is no way to verify the accuracy of those reports at this time, the report of the preventative maintenance schedule recorded that these systems were operating during that time; it is believed that this report is accurate.

Correction:
Checking the emergency lighting system has been changed from an annual inspection to a semi-annual inspection.

Deadline Date: 02/08/2011

Action Taken:

Plan Complete: Yes

Plan Complete Date: 01/06/2011

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: Monitor's inspection of facility's maintenance department found an unsecured compressed gas (argon/co2) cylinder. NFPA 55, Standard for the Storage, Use, and Handling of Compressed and Liquefied Gases in Portable Cylinders.

Plan Of Action: Response:
[Factory name] Facility's Maintenance Department historically has had a compressed gas chain program only for full tanks. During the audit by Accordia Global Compliance Group on October 27, 2010, it was noted that there was a compressed gas tank not chained to prevent knocking the tank over. Upon investigation, it was found that the tank seen during the audit was an empty compressed gas tank and that the full tanks were chained as per our standard in a different location of the shop.

Correction:
Empty tanks are now chained as well. Our repairmen use these tanks to perform work. It is the responsibility of these individuals to comply with the program in place. To validate that the program is followed as designed, the maintenance supervisor has a computer generated P/M once a month for checking and seeing if the program is being followed.

Deadline Date: 02/08/2011

Action Taken:

Plan Complete: Yes

Plan Complete Date: 01/06/2011

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: Monitor found through document inspection that MSDS for a silicone spray (Sprayway) was not included in the MSDS binder.

Plan Of Action: Response:
[Factory name] Facility has, what we consider, a strong MSDS program. Every department has a binder with MSDS of all the known chemicals in that department. There is a master binder located in the maintenance office that has all the MSDS for all chemicals in the facility. During the audit by Accordia Global Compliance Group on October 27, 2010, we checked a number of different chemicals in the Cover Plant. Upon review, one chemical's MSDS, Sprayway silicone spray, was not found in the local MSDS binder for that department. However, this MSDS was present in the master binder located in the maintenance shop.

Correction:
A copy of the proper MSDS was placed in the Cover Plant silkscreen department's MSDS binder.

Deadline Date: 02/08/2011

Action Taken:

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Plan Complete: Yes

Plan Complete Date: 01/06/2011

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: Monitor's inspection of 5 electrical service panels found that 2 did not have circuit breakers labeled. One panel is located at the southwest wall of the Covers department; the second panel was located at the diploma printing machine nearest the entry door from the Covers department.

Plan Of Action: Response:
[Factory name] Facility has numerous electrical panels located throughout the facility to supply electrical power to lights, machines, and outlets. During the audit by Accordia Global Compliance Group on October 27, 2010, it was found that 2 electrical panels were not completely labeled. As was disclosed during the audit, 1 of the 2 panels was very recently incorporated to supply power for equipment and was installed shortly before the audit. The second panel found only had a few breakers labeled.

Correction:
The 2 panels were checked by our maintenance department and properly labeled. We have also started checking the other panels in the plant for proper labeling. The audit process that was put into place after the last FLA audit to address proper labeling of electrical panels included an annual audit of consistency, when we perform our annual electrical heat load thermal scanning throughout the facility. We traditionally spend 1-2 days with an outside vendor walking them through the facility and opening all panels to check for any wear on electrical components. We have added to that audit the validation of proper labeling of all panels. If any panels are found not to be accurate and currently labeled, a list is to be generated, a W/O will be submitted, and the on-staff electricians will respond and correct the issue(s).

Deadline Date:	02/08/2011
Action Taken:	
Plan Complete:	Yes
Plan Complete Date:	01/06/2011

Health and Safety: Proper Use of Machinery

H&S.19 Employers shall only use positive incentives (risk awareness training, demonstration of proper use, awards, bonuses, etc.) to ensure workers use machinery, equipment and tools properly and safely. Workers shall not suffer any negative consequences for refusing to work with machinery, equipment or tools that are not properly guarded or reasonably considered unsafe. (P)

Notable Feature

Explanation: The company performs "Job Safety Analysis" along with resources provided by their workers' compensation carrier [Carrier's name] where they video record workers performing job tasks and analyze the safety issues (risks) that are posed by the job task. The company reviews the video with workers to identify hazards such as "pinch-point," moving parts, chemical exposure and proper use of machine guards. The worker and the company work on improvements in job tasks, machinery operation and engineered safety devices based on the analysis.

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Health and Safety: Medical Facilities

H&S.21 Medical facilities shall be established and maintained in factories as required by applicable laws. Medical staff shall be fully licensed and recognized under applicable local rules and regulations. An appropriate number of medical staff shall be on duty during all working hours, including any type of overtime, as required under local law. An appropriate stock of medical supplies shall be maintained at all times. Medicines of which the expiration date has passed must be replaced immediately and disposed of in a safe manner. (P)

Notable Feature

Explanation: Facility trains "first responders" for emergency medical care on an annual basis. Legal requirement is to train every three years.

Health and Safety: Other - Health and Safety

Other

Notable Feature

Explanation: Safety practices and awareness of Health and Safety issues has resulted in the company having gone 754 days without a "loss time" accident. Also, workers are awarded with "paid time off" for every 30 days that go by without an accident.