



2011

## FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING REPORT

**COMPANY:** Justin Brands  
**COUNTRY:** United States  
**FACTORY CODE:** 13300821344J  
**MONITOR:** Accordia Global Compliance  
**AUDIT DATE:** November 2, 2011  
**PRODUCTS:** Western Boots  
**PROCESSES:** Cutting, Pre-Fit, Fitting,  
Lasting, Bottoming, Finishing  
**NUMBER OF WORKERS:** 229



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**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:** 1. There are no Workplace Standards posted in the factory.

2. On May 26, 2011, facility provided training sessions to the workers including FLA awareness. However, workers did not have knowledge, awareness or comprehension of the code of conduct (COC) based on interviews.

**Plan Of Action:** FLA Workplace COC is to be posted in prominent places throughout the factory. This COC will be in English and Spanish, the language spoken by employees and managers in the factory. All new employees will be made aware of the FLA and provided an explanation of the Workplace COC during their new hire orientation. Reminders about the COC will be provided at employee training meetings held throughout the year.

**Deadline Date:** 12/31/2012

**Action Taken:** FLA Workplace COC has been posted in the factory. To ensure new hires are provided an explanation of the FLA Workplace COC, it has been added to the new hire orientation checklist. Checklist sent to FLA for review.

**Plan Complete:** Yes

**Plan Complete Date:** 01/27/2012



## 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:** 1. There are no emergency lights in the laser machine room. There is at least 1 worker in the room operating the laser machine.

2. Last emergency drill was conducted on April 30, 2010.

**Plan Of Action:** An emergency light is to be installed in the laser machine room. Emergency drills are scheduled to be conducted twice a year.

**Deadline Date:** 01/24/2012

**Action Taken:** An emergency light has been installed in the laser machine room. (Photo sent to FLA for review.) An emergency drill was conducted January 24, 2012. The next drill is scheduled to take place on or around July 24, 2012.

**Plan Complete:** Yes

**Plan Complete Date:** 01/24/2012

### 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:** There is only 1 eye wash station on the production floor; it is not in close proximity to all areas where chemicals are in use.

Legal reference: OSHA regulation: Medical Services and First Aid (29CFR 1910.151)

**Plan Of Action:** Eye wash stations are to be installed and maintained throughout the factory area.

**Deadline Date:** 01/27/2012

**Action Taken:** In addition to the eye wash station on the production floor, the eye wash station in the warehouse has been activated for use. Also, 8 portable eye wash stations have been installed throughout the facility. Photos sent to FLA for review.

**Plan Complete:** Yes

**Plan Complete Date:** 01/27/2012

### 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:** Company provides personal protective equipment (PPE) to all workers. However, workers were observed handling chemicals without appropriate PPE.

Legal reference: OSHA regulation: (29CFR 1910.132)

**Plan Of Action:** PPE continues to be provided to all workers. The importance of using this equipment will be emphasized to all workers through the use of a training video shown to all employees annually in August. To further emphasize the importance of using PPE, employees will be asked to participate in role-playing scenarios during these training sessions.

**Deadline Date:** 01/27/2012

**Action Taken:** The use of PPE has been emphasized to all workers. Department supervisors have been instructed to monitor the use of PPE and to take corrective action for noncompliance.

**Plan Complete:** Yes

**Plan Complete Date:** 01/27/2012



### **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:** MSDS were not found at the respective areas of usage, but are kept in the warehouse office. Although there are workers who do not speak English, all MSDS were printed in English,

**Plan Of Action:** In addition to the MSDS sheets maintained in the warehouse office, copies will be placed in the work areas where chemicals are utilized. Upon the purchase of new chemical materials, the suppliers will be asked to provide MSDS sheets in Spanish, as well as the normal English versions.

**Deadline Date:** 07/31/2012

**Action Taken:** MSDS sheets have been placed in each work area that handles respective chemicals.

**Plan Complete:** No

**Plan Complete Date:** 01/27/2012



## 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:** 80% of sewing machines were found without guards. Pulley guards are exposed, creating a hazard for the workers operating the machines.

**Plan Of Action:** As the sewing machines currently in use in the factory are old and are no longer available, guards will be fabricated and installed on these sewing machines. The Maintenance Supervisor will maintain a log of sewing machines in use with an indication whether or not a guard is properly installed. The Maintenance Supervisor will conduct monthly inspections to determine if all guards are in place.

**Deadline Date:** 01/27/2012

**Action Taken:** Guards for the sewing machines have been fabricated out of sheet metal and have been installed on the sewing machines. Photos sent to FLA for review. A log of all sewing machines in use has been created and is annotated if a guard has been installed. The Maintenance Supervisor will conduct monthly inspections to determine if the guards are properly installed. A copy of this log has been sent to the FLA for review.

**Plan Complete:** Yes

**Plan Complete Date:** 01/27/2012

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