



2011

FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING REPORT

COMPANY: Deluxe Corporation
COUNTRY: United States
FACTORY CODE: 570082550J
MONITOR: Margarita Chiriboga
AUDIT DATE: September 12, 2011
PRODUCTS: Leather Goods
PROCESSES: Design, Cutting, Sewing,
Packing, Shipping, Receiving
NUMBER OF WORKERS: 80

FLA Comment: This report was submitted to the FLA and the FLA-affiliated company by the accredited independent external monitor. Despite deadline reminders and extensions for submission of a corrective action plan, the FLA has not received a plan to address the 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 and reviewed by the FLA.



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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 facility walkthrough, observed that 2 fire extinguishers (1 in lunch room, 1 in print room) are without the proper sign.

Legal reference: OSHA Standard 29 CFR Section 1910.157. Portable Fire Extinguishers (c) (1). The employer shall provide portable fire extinguishers and shall mount, locate and identify them so that they are readily accessible to employees without subjecting the employees to possible injury.

**Plan Of
Action:**

**Deadline
Date:**

**Action
Taken:**

Plan Complete: No

**Plan Complete
Date:**

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 facility walkthrough, observed that 55-gallon drums containing oils and solvents were not stored using a secondary container.

Legal reference: EPA refers to need for secondary containment in Subpart I, Use and Management of Containers (40 CFR 264.175), which covers portable storage containers, such as 55-gallon drums. A base must underlie the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until collected material is detected and removed. Containment system must have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater.

**Plan Of
Action:**

**Deadline
Date:**

**Action
Taken:**

Plan Complete: No

**Plan Complete
Date:**



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 facility walkthrough, observed that 10 sewing machines did not have needle guards and 10 sewing machines were missing belt guards.

Legal reference: OSHA Standard CFR 1910.212(a)(1). One or more methods of machine guarding shall be provided to protect the operator and other employees in the machine area from hazards, such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks. Examples of guarding methods are: barrier guards, two-hand tripping devices, electronic safety devices, etc.

**Plan Of
Action:**

**Deadline
Date:**

**Action
Taken:**

Plan Complete: No

**Plan Complete
Date:**

Health and Safety: Other - Health and Safety

Other

Noncompliance

Explanation: During facility walkthrough, noted that racks located in warehouse used for storing materials are not bolted to floor. Although there is no specific regulation requiring all racks to be bolted to the ground, facility is at risk of serious injuries if a forklift accidentally hits one of the racks. Though racks do not necessarily tip over, materials or boxes might slide, falling on employees. Citation below addresses "Secure Storage."

Legal reference: OSHA Standard 29 CFR Section 1910.176(b) Secure Storage. Storage of material shall not create a hazard. Bags, containers, bundles, etc., stored in tiers shall be stacked, blocked, interlocked and limited in height so that they are stable and secure against sliding or collapse.

**Plan Of
Action:**

**Deadline
Date:**

**Action
Taken:**

Plan Complete: No

**Plan Complete
Date:**
