

Verification of the Corrective Action Plan for Huey Chuen (Cambodia) Corp. Ltd.

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1. Executive Summary

In February 2012 a Verification Investigation of the Huey Chuen Factory's Corrective Action plan was undertaken. This Corrective Action plan was based on prior assessments and recommendations given to the factory in response to fainting incidents which had occurred in April and July 2011. This Corrective Action Plan began to be implemented in June 2011.

There appeared to be a commitment from Management to improve the health and welfare of the workers in this factory.

Huey Chuen has started to correct some of the problems identified in the original investigation of May 2011 and in the factory's own assessments during the last six months of 2011 and early 2012.

These problems are clearly identified in the section "Background" of this Report and in the full report found on the Fair Labor Association website.

It would not be realistic to expect this factory to have corrected all the problems identified in such a short period of time, but the Huey Chuen factory has addressed many deficiencies and welfare issues which include:

- Chemical Storage improvements
- Vacuum extraction of chemicals
- Increased the number of fans
- Improved the housekeeping
- Built a canteen
- Provided breakfast in the form of bread to all workers
- Removed Toluene from the workplace
- Invited external providers to educate workers on HIV/AIDS and reproductive health issues
- Invited external providers to educate supervisors and management on the Labor law
- Invited external providers to educate foreign supervisors on supervisory skills and cultural norms in Cambodia
- Ensured a maximum of 2 hours overtime
- No overtime on Saturday
- All workers will have one day of rest a week
- Bonus payments including for accommodation and transport and for coming to work regularly. This ensures that most workers will have a minimum payment amount before any piece rate calculation or other bonuses and incentives are given
- Fire Safety drills

Huey Chuen's Correction Action Plan identifies areas where it will need to seek assistance from external providers.

This includes training for and monitoring of an Occupational Health and Safety Management System which will ensure that there is a more sustainable program for the health and safety of the workers in this factory. It also includes areas of ergonomics, chemical air quality testing and periodic environmental monitoring.

The investigator has identified many areas requiring corrective action by the Huey Chuen Factory. The risk ratings given to the areas of priority remain similar to those given in the previous report of May 2011. In some areas, improvements were identified. (Annex 1- Explanation of Risk Assessment).

The areas still classified as extreme risk and requiring urgent attention include:

- Setting up a systematic approach to health and safety through an Occupational Health and Safety Management System
- Electrical Safety
- Heavy machinery safety
- Machine Guarding
- Appropriate Personal Protective Equipment for prevention of chemical absorption

Areas classified as high risk and requiring attention include:

- Lighting
- Noise protection management
- Heat in some areas: the warehouse and in some areas of the main building
- Transportation to and from work
- Sanitation
- Contracts
- Consultation between workers, management and the unions
- Function of the Occupational Health and Safety Committee
- Sound Chemical Management including the workers' understanding of what chemicals they are using and the health hazards associated with these

Other issues classified as medium risk requiring attention include:

- The ventilation in the clinic
- The employment of full time doctors
- The provision of an adequate number of beds which are located in the main building or appropriate proximity to the workers
- Provision of individual drinking utensils
- Ensuring the safety and potability of the water regularly

It is essential to note that many of the workers identified had difficulties with literacy and numeracy so any instructions and skills education given to the workers will need to be mindful of this.

Huey Chuen factory will require ongoing assistance and support but it should be able to identify all hazards and perform appropriate risk assessments within the coming year.

The investigator recommends a revision of the Corrective Action Plan with realistic and achievable time frames. The person responsible for achieving these actions should be identified.

2. Background

An independent investigation of Huey Chuen (Cambodia) Corp Ltd was conducted in May 2011 as a result of a request from PUMA to the Fair Labor Association in response to allegations reported by Reuters on the 13th April 2011.

The investigation was carried out incorporating direct observation and testing, sighting and reviewing of appropriate documentation, job task analysis and risk assessment and individual and group interviews with a large number of stakeholders. A thorough review of the PUMA and FLA Codes of Conduct was undertaken. A review of all Cambodian Labor Laws and Prakas¹ was undertaken and relevant internationally recognized standards are referenced where the local standards were inadequate or nonexistent.

Findings from the investigation from May 2011 are mentioned below.

Non Compliance with Cambodian Labor Law, FLA and PUMA's Code of Conduct and internationally recognized standards

There were multiple breaches of the Cambodian Labor Law found in the May 2011 investigation. Some examples were the hours of work, number of consecutive days of work, multiple occupational health and safety issues including chemical storage and use, machine safety, clinic facilities, lighting, heat and welfare facilities. The Ministry of Labor and Vocational Training, Department of Labour Inspection agreed on the 21st April 2011 that the workers could do two hours over time per day and could work one Sunday but must have the next one off. They could work two Sundays in one month but not consecutively.

The Huey Chuen factory did not comply with the PUMA and FLA Codes of Conduct. There were multiple breaches noted including treatment of workers, hours of work and multiple occupational health and safety issues.

Huey Chuen did not comply with internationally recognized standards of practice. Some examples include hours of work, treatment of workers and multiple occupational health and safety issues relating to chemical safety, fire safety, electrical safety, heat, light and sanitation.

Many of the findings were consistent with those found in a PUMA audit of April/May 2011.

There were multiple noncompliance issues with the Cambodian Labor laws including hours of work and occupational health and safety issues.

There was also an indication that the overtime had been caused by a surge in orders from September 2010 onwards. It would appear there had been a failure by PUMA compliance and sourcing teams to check on the production capacity.

Conclusion

¹ A prakas is a proclamation. A proclamation is a ministerial or inter-ministerial decision signed by the relevant Minister(s). A proclamation must conform to the Constitution and to the law or sub-decree to which it refers.

There were multiple episodes of fainting in the factory.

There are multiple possible causes for this.

These included:

- Excessive working hours which are above those permitted by Cambodian Labor Law
- Hazardous chemical use and storage could be leading to excessive exposures for the workers
- Non compliance with recognized international occupational health and safety standards including heat, light, noise, sanitation hours of work and fatigue management
- Non compliance with PUMA's and FLA's Codes of Conduct which include issues of workplace bullying, excessive hours of work, poor sanitation, noise and light

Recommendations

There were multiple recommendations to be found throughout the report of May 2011.

The **priorities** for the Huey Chuen factory included:

- Implementation of a complete Occupational Health and Safety Management System
- Fire safety training
- Chemical management including storage, labelling, MSDS, training of workers and PPE
- Hours of work to comply with all laws and Codes of Conduct
- Training on how to effectively supervise
- Installation of a cooling system
- Ensuring electrical systems are safe and comply with international standards
- Ensuring that there are warning systems for all heavy machinery
- Personnel should be restricted from walking near moving heavy machinery or vehicles
- Effective consultation between workers and employers
- Discussion with PUMA about perceived and real pressures imposed on the factory to increase production

Other investigations were carried out after this May 2011 investigation and report. A further fainting incident occurred within this factory and subsequently 10 to 12 incidents in Cambodian garment factories occurred.

This has led to the postulation that there was a psychogenic component to these incidents. This should not detract from the underlying safety and health breaches.

The investigator was asked to talk about these incidents at the Buyers Forum held in September 2011 and organized by the ILO. There was a great deal of concern about the root causes of the fainting incidents.

The investigator was asked to compile all the findings from all investigations pertaining to the fainting incidents and present these at a forum organized by the ILO for Buyers, Unions, Factory owners and other interested stakeholders.

The workers were given a health bonus to ensure their nutritional status was improved. This came into effect in September 2011.

From these recommendations and those given from other subsequent investigations a Corrective Action Plan was written by the Huey Chuen factory.

This investigation is to verify the Corrective Action Plan and to make further suggestions as required.

3. Methodology

The verification of the Corrective Action Plan written by Huey Chuen Ltd was conducted in February 2012.

A full site assessment was conducted by the Occupational Health Physician and minor industrial hygiene testing was performed.

Photos and videos were taken for further verification.

Reports from the last six months from the Ministry of the Environment and Ministry of Labor and Vocational Training were sighted. These were translated from Khmer to English.

The payroll was sighted for the last few months as were the hygiene testing results, policies, contract and draft training plan.

Policies were sighted on the message boards and were given to the investigator. These policies are in Khmer, English and Chinese.

Interviews were conducted with senior management, management, a union representative and workers. These were conducted through a translator.

Workers were selected randomly. Both women and men were interviewed and workers were selected from all departments in the workplace. Workers were asked if they had been coached prior to the interview. This was denied.

Workers were informed that the interview was completely anonymous and that they were free to refuse to be interviewed. This would have no repercussions for them. They were also informed that the factory had a policy that for any worker who agreed to be interviewed there would also be no repercussions.

An update on the Footwear Industry has been obtained as per the Terms of Reference from ILO/BFC which shows:

- Better Factories Cambodia has a 2012 Footwear Plan
- There are now 45 shoe factories in Cambodia up from 25 in 2009
- The Royal Government of Cambodia has endorsed BFC's plans to assess the feasibility of expanding coverage to this growing manufacturing sector
- Several buyers and brands that place both footwear and apparel orders in Cambodia have requested BFC to expand its services.
- BFC will work with selected factories in the first exploratory year on a pilot footwear factory assessment program

4. Verification of each item

The “**Issues Identified**” are from the Huey Chuen Corrective Action plan and from the previous report written in May 2011. These are written in italics. Other additional issues which arose during this investigation are identified.

The “**Stated Corrective Actions**” which are also written in italics are taken directly from the Huey Chuen Corrective Action Plan November 2011.

The “**target date of completion**” is also from the Huey Chuen Corrective Action Plan.

4.1 Occupational Health and Safety Management System

Issues identified

There is no formal Occupational Health and Safety Management System (OHSMS) in place. No annual health and safety plan exists for the factory.

Stated Corrective Actions with target date of completion

The factory will reorganize the Occupational Health and Safety (OHS) team and assign a full time OHS Officer. The new OHS team will lead the in depth mapping of the OHS program in the factory with the approval and support of top management. Policies and procedures will be developed making sure that all OHS aspects are covered.

An external service provider will provide comprehensive training to the OHS team and help them developed a complete OHS Management System including its initial implementations.

15th July 2011 given as date of completion but the Corrective Action Plan also states this was not completed.

Investigation findings

Despite there being no formal OHSMS there are parts of this system in place. There is an OHS policy, there is a committee which was appointed not elected and there are some health protection and health promotion activities in place. The factory is now monitoring some hazards regularly and documentation of many of these issues were sighted. External service providers have been contacted and the factory is awaiting formal proposals from all parties.

An OHSMS should be seen as an ongoing process with several steps and time bound targets.

Recommendations

The issue of systematically planning, implementing, measuring and reviewing all the health protection and health promotion activities is an ongoing process. A formal OHS action plan should be written with a clear time frame and persons identified who are responsible.

Senior management is now acting as the safety officer. Higher education for some of these workers would be beneficial.

4.2 Policies

Issues identified

Multiple policies were not in place including an OHS policy.

Stated Corrective Actions with target date of completion

The factory will update and revise all policies covered by PUMA Code of Conduct with priority as below:

Non-Employment of Child Labor

Young/Juvenile Workers

Female and Pregnant Workers

Non-discrimination

Forced Labor

Harassment or Abuse

Freedom of Association

Grievance and Complaints

Contract Management

Compensation and Benefits Policy

Occupational Health & Safety

Environment Policy

Policy on payment of Social Insurance (National Social Security Fund, NSSF)

The factory will adopt a document format for each policy that includes the policy itself, procedures to implement the policy and responsible persons to implement the procedure.

The policies must be available in English, Khmer and Chinese.

Subsequent training must be provided for all employees including managers, supervisors and workers.

31st August 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

Most of the policies stated above are now written and are hanging on notice boards in every department. They are clearly written in Chinese, Khmer and English.

No worker interviewed understood or was aware of these policies. Most of the workers were poorly literate and could not read these documents. Workers stated they were too busy to read these documents.

The workers do not appear to have been consulted during the writing of these policies. It does not appear that training on these policies has been undertaken.

Recommendations

Training on these policies should be undertaken. Attention should be paid to literacy levels during this training.

Review of these policies should be planned and undertaken within two years.

4.3 Employer-Employee Consultation and Communication

Issues identified

There is no Occupational Health and Safety Committee.

Means of communication, complaints and grievances between workers and management do not ensure that the voices of every worker are heard. There are workers' complaints that were left unheard internally making workers resort to complaining via external channels (e.g. to PUMA Safe). There are workers' complaints which did not go through proper channels. Complaints and grievance procedures are not properly set up and monitored.

Resolution of issues usually takes a long time. The Union complained that the workers were not provided free medicine according to the prescription provided by the doctor.

The factory is mixing up the functions and activities of the Union and the Shop Stewards Committee. The existing Shop Stewards are appointed and are all members of the Union. Approximately 10% of the workers are not Union members. They have no adequate representation.

Stated Corrective Actions with target date of completion

The factory shall develop a proper and effective means of consultation and communication between workers and management. This shall be based on the complaints and grievance policies and procedures that will be developed by the management.

The factory will facilitate election of Shop Stewards after the term of the current team has lapsed. The factory will re-organize and strengthen the functions of the shop stewards committee as well as the Union. The management shall also ensure that workers who are non-Union members will have their own representative to whom they can air their complaints.

15th July 2011 is given as the date of completion for this action. The Corrective Action Plan also states that this is "improved and ongoing".

Investigation findings

The OHS committee was appointed not elected so true representation of worker issues may be in question.

The Assistant General Manager stated that the workers were free to talk to him any time. The workers who were asked this question stated they would be unable to do this. Encouraging workers to approach the senior management directly without going through proper channels may lead to difficulties ensuring all problems are addressed in an appropriate and timely manner.

Workers stated that if they had a problem they would talk to their line manager. If this was not possible they would seek out another line manager. A few workers identified there was a suggestion box but had never used this.

Recommendations

All workers in the factory should be represented fairly within the OHS committee.

Clear guidelines should be in place so that workers are appropriately represented and can easily air their grievances without fear of reprisal.

4.4 Contracts

Issues identified

The current format of the contract used by the factory does not include all the necessary details like the type of contract whether it is a Fixed Duration Contract or an Unspecified Duration Contract. It does not contain the nature or type of work, salary rate, benefits, effective date, rules and regulations, work schedule or other terms and conditions required by law.

Stated Corrective Actions with target date of completion

The factory created a new form of contract that includes the required details. The new contract format is already used with the new employees. There is about 100% coverage (3158 workers) of all workers.

The factory will continue to update the contract for all workers with the new format.

Explanation of the contract contents and terms and conditions will be included during orientation of new workers.

31st August 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

New workers are given the new contract which was given to the investigator in English. There is not 100% coverage of this contract for the new workers. Workers interviewed were unaware of their contract duration or the benefits. Most were unable to describe clearly their salary calculations from this contract.

Most workers were unaware they had a contract. Some workers felt they did not have a contract. There is not universal coverage of the new contract for all the workers as described in the action plan.

There is clear discrimination between male and female employees. New male workers are hired on two month Fixed Duration Contracts (FDC) which are renewed multiple times. Female workers are given Unspecified Duration Contracts (UDC) after their initial probation. A husband (the husband was interviewed) and wife were employed at the same time. She was given a UDC and he an FDC. Management stated that the men were more difficult to control. Giving them an FDC ensured they would do a good job. They will get a 5% bonus at the end of each contract.

The union representative stated the male workers liked this type of contract as it gave them flexibility and they liked receiving the 5% bonus. He did not comment on the loss of other benefits or job security or discrimination issues.

Recommendations

All workers should be aware of their contracts. They should be given copies of their contracts. For those who are poorly literate these should be explained clearly. Workers should all receive the same type of contract. All workers should be given the new contract.

After the initial probation all workers should be on UDC. A review of the workers contracts should be undertaken.

4.5 Disciplinary Action/ Internal Rules and Regulations

Issues identified

The internal rules and regulations have become outdated due to new legislation on minimum wage, attendance allowance and other labor law updates.

The list of offenses or infractions is not complete nor does it cover clearly all the possible offences. It does not clearly state the penalty for minor, medium and serious violations.

Stated Corrective Actions with target date of completion

The factory will update the internal rules and regulations to include additional items in the list of offenses.

All workers must be trained about the new internal rules and regulations. The internal rules and regulations must be also posted at the notice board as required by law.

31st August 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

Workers were asked about their knowledge on the internal rules and regulations.

A few identified that if they committed an offence they would be given a verbal warning first, then a written warning then dismissed.

Most required prompting for this question.

A few workers stated they knew that they would be instantly dismissed if they were caught stealing. The new workers interviewed were unaware of what was in the document.

The document is dated 2011 but still refers to the Ministry of Social Affairs Labor Vocational training and Youth Rehabilitation which does not exist as a Ministry.

According to HR the document has been amended.

Recommendations

Workers will need more time to have these policies discussed with them.

A full-day induction training should take place which accommodates the literacy level of all the workers.

The regulations should be posted in all areas of the workplace not just the main building.

4.6 Wages and Benefits Calculations

Issues identified

There are no clear written guidelines on wage and benefit calculations that include:

- *Basic wage*
- *Production-base or piece rate wage calculations*
- *Payment of overtime*

- *Payment of attendance allowance*
- *Guidelines and regulations for NSSF (local social insurance scheme)*

Stated Corrective Actions with target date of completion

The factory has finished the procedures and guidelines for the calculation of wages and compensation. Date finished - March 2011.

These guidelines shall be communicated to all workers through regular training. The training will be done on a staggered basis until all workers are trained.

Update salary and wages calculations based on new minimum wage as well as the new law on attendance allowance and other updates on the local labor law.

The Corrective Action Plan states that all training was completed by the 15th September 2011.

Investigation findings

None of the Khmer workers interviewed could describe how their salary was calculated apart from the union representative. The workers could state what the base salary was and that they received benefits for health, accommodation and transport and regular attendance. Some of the workers knew they would receive a bonus if they remained at the factory for multiple years assuming they had an unlimited duration contract.

The Monday morning 30 minute meeting held for all workers mentioned the wage calculation. Not one worker interviewed after this meeting could describe what was said and most did not remember that this was mentioned.

Recommendations

Workers need to have their wages and salary calculations clearly described to them. This procedure should take place in small groups with attention being paid to those who are poorly numerate and literate.

4.7 Hours of Work/Days of Work

Issues identified

The factory frequently works on Sunday/rest day. In some cases, there is only 1 rest day in a month.

Overtime in the factory averages 4 hours a day. In some cases during peak or high production season Overtime reached up to 6 hours a day.

Excessive amounts of overtime have been well documented.

Stated Corrective Actions with target date of completion

Factory will ensure that working hours will not exceed 60 hours per week and strictly observe rest day for workers. This will be done by making sure that production orders will not go beyond the production capacity that would entail longer production hours.

The factory will make a policy of:

- *No work on Sunday or rest day*
- *No overtime on Saturday*

The factory will limit overtime to 2 hours a day in compliance with Local Law or total working hours of 60 hours a week. PUMA sourcing department will work closely with the factory management to realize this objective.

31st August 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

Two hours overtime was the maximum amount per day both recorded and mentioned by workers. No overtime was reported on Saturday and no work was reported on Sunday. Some workers had not done any overtime for a few months. The orders were reported to be less than for last year.

Recommendations

Continual review of the orders and overtime is needed to ensure this is maintained.

4.8 Training

Issues identified

Workers' training is the most important part of the remediation plan. Most local workers have very low educational levels and lack basic life skills specifically in the areas of safety, sanitation and hygiene. This was especially noted for workers who have migrated from the provinces. Intensive training needs to be provided not only on occupational health and safety, company regulations but also life skills. The factory management was made to understand this situation and was advised not only to focus the training on work skills, productivity and quality.

The factory provides only a limited briefing for new workers before they start work. There is no proper training program for new and existing workers including the supervisors.

There is insufficient time provided for the orientation of new workers to cover all necessary topics such as company policies, rules and regulations, compensation and benefits, occupational health and safety and job skills.

There is no adequate training venue to hold significant number of workers. Briefing of new workers is done in front of administration in an open uncovered area.

Stated Corrective Actions with target date of completion

The factory shall provide adequate training and allot adequate time for the induction or orientation training for new workers. The factory shall arrange refresher training for all existing workers. An adequate training venue must also be provided by the management. (The canteen can also be used as venue for training of workers.).

The management shall make an annual training plan covering all necessary topics in the areas of HR/Administration, Wages and Benefits, Policies & Procedures, Occupational Health and Safety and Environmental issues.

The training must also incorporate training of the trainers when arranged with external consultants. For example HIV/AIDS training conducted by RHAC, the Cambodian Labor Law training and the Supervisory Skills training conducted by ILO/BFC and the planned OHS Management System training.

Workers have a Monday morning meeting in the forecourt.

*30th July 2011 was given as the date of completion in the Corrective Action Plan.
The Corrective Action Plan also states that this is "improved and ongoing".*

Investigation findings

Messages are given to workers every Monday morning between 0700 and 0730.

The workers were standing in lines. The investigator watched quite a few workers unable to stand still in these lines listening to the messages. One worker appeared to almost faint. She was obviously dizzy and needed to squat and hold the ground.

Nine messages were read out both in Chinese and Khmer.

Of the workers interviewed after this on the following three days including immediately after the meeting not one worker could remember more than three messages. Many required prompting to remember two and most remembered one for example they should work hard. One worker stated that the wages and salaries had been discussed but could not remember more than that. Workers remembered that they should only take one piece of bread.

Of the six workers who attended the two day Labor Law course only 5 completed this.

An ad hoc discussion of this training revealed poor understanding of the Labor Law, Prakas and the implementation of these laws and regulations. While measurements of noise for example are performed this has not been translated into corrective action. The Prakas on noise appears poorly understood.

Only one Khmer worker interviewed had attended any training. This was the HIV/AIDS training given by RHAC. The worker was unable to state what she had learnt from this training and was unaware that she was a peer educator. Further discussion and prompting revealed she was too shy to discuss this so would probably not be an effective peer educator.

Many workers did state they had heard there was training but had not participated in this.

The communication to Khmer workers appears improved. A few workers expressed their concern about the manner in which supervisors spoke to them.

A draft training plan has been written.

Recommendations

Further training will be required for the workers. The training plan will need to be robustly written and rolled out.

Training needs to be undertaken appropriate to the workers' abilities.

Delivering messages in a militaristic style is not consistent with good health promotion practice. Enlisting the help from health promotion experts perhaps from the National Institute of Public Health to ensure that simple messages are remembered may be beneficial. Only one or two messages should be given and the workers should not be left standing still for long periods of time.

4.9 HIV/AIDS committee

Issues identified

The Labor Inspector Report requirement was that the factory needs to create an HIV/AIDS Committee and provide training for them as well.

Stated Corrective Actions with target date of completion

An HIV/AIDS committee has already been created and is registered with the appropriate government authority.

Reproductive Health Association of Cambodia (RHAC) will conduct ToT training. RHAC will continue to guide the trained workers as they train other employees. The factory will organize the schedule with RHAC.

RHAC will continue to train and meet with the peer educators.

10th August 2011 was given as the date of completion in the Corrective Action Plan. The Corrective Action Plan also states that this is "improved and ongoing".

Investigation findings

These trainings will be continued into 2012 so the date of completion is not in 2011.

Recommendations

There should be continuous training on HIV/AIDS and reproductive health. This will require evaluation in six months.

The number of trainings undertaken, the number of people trained as well and the understanding of these issues by the workers should be assessed within the next six months. Further training on life skills could be incorporated into this training.

Trainers should be aware of the workers' limited numeracy and literacy skills.

4.10 Clinic and First Aid Facilities

4.10.1 Medical Facility

Issues identified

The clinic bed area has poor ventilation with no outside window or air conditioning. The temperature in the clinic is not fit for storage of medicine. An air conditioner is available but not turned on or used. The clinic is very small and does not comply with the Prakas requirements.

There are only 4 beds for patients to lie down. The law requires at least 20 beds if more than 1,000 workers.

Stated Corrective Actions with target date of completion

The factory will ensure that temperature and room conditions in the clinic fit the needs of the patients as well as for storage of medicine.

The clinic has two rooms. One is for women (15 beds) and one for men (5 beds). The factory will provide more beds and ensure clean mattresses and bed covers.

30th June 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

The air conditioning was not in use when the clinic was visited.

The area where the beds are located does not have sufficient ventilation. Six beds for women and four beds for men are located within the main building. A walk of approximately 10-15 minutes and up two flights of stairs is needed to reach the additional beds. The investigator was told by the health assistant that as the beds were big so two people could be accommodated on one bed.

Recommendations

An area within the main building should be located to ensure the patients could be treated and managed in a timely and safe manner.

Sufficient ventilation for all areas of the clinic should be provided.

4.10.2 Medical and Nursing Staff

Issues identified

There is no doctor with appropriate formal qualifications as required by the Prakas. There is one Medical Assistant and one nurse. The Medical Assistant leaves work at 1600 and the nurse at 1800.

Stated Corrective Actions with target date of completion

There is one doctor and two nurses who are duly licensed under Cambodian authority. Both nurses are full time. An additional nurse will be hired by the management.

15th July 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

The factory has hired one doctor who works three days a week for three hours a day. There is a health assistant who has told management he is a doctor but his Diploma clearly states he is a health assistant. There is a Diploma for the one doctor who has been hired.

There are two nurses. No formal documentation of these workers was sighted.

The employment of one part time doctor only does not comply with the law.

Recommendations

A full time doctor is required.

4.10.3 Medicines and Equipment

Issues identified

There are only 9 first aid boxes.

Stated Corrective Actions with target date of completion

The factory will install additional first aid boxes. 4 boxes per floor in the Stitching and Assembly area 1 box in the printing area, 2 boxes in the Cutting area, 2 boxes in the Materials Warehouse, 1 box in

the Finished goods area bringing the total first aid stations to 14 boxes. Responsible first aid personnel assigned in each work area should monitor the contents and replenish the kits as necessary.

30th June 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

Management has stated there were to be 14 boxes but only 3 additional boxes have been placed. The people responsible have their photograph placed next to the box.

Recommendations

This will be an ongoing issue to ensure the boxes are replenished and maintained. A review of the contents of each of these boxes should be undertaken to ensure that adequate and timely first aid can be delivered.

4.10.4 Clinical Records

Issues identified

Clinic information is available including monthly summaries of consultations and health complaints but the data is not reported or analysed at the management level to properly address the health status of the workers.

Stated Corrective Actions with target date of completion

The factory will maintain a weekly report of clinic cases. The data will be analysed and the factory will take immediate and necessary action as to the results of this weekly data.

The health staff in the factory will record the number of workers who present to the clinic. A weekly summary of this information will be analysed to check on the health status of the workers in the factory.

The health staff shall also keep accident records in their file.

The factory will maintain a weekly log of the number of visits to the clinic and types of complaints. The clinic staff shall also keep individual records of each patient's visit, diagnosis, and medication dispensed.

27th June 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

The health data is collected in a non-standardized format which makes analysis of the workers illnesses and injuries very difficult. There is a large number of cases classified as 'other' which appears to include things like eye and ear problems.

Recommendations

The simple classification systems used and recognized worldwide would be more useful to assess possible health issues.

4.10.5 Calling an Ambulance

Issues identified

Only the administration staff can call an ambulance.

Stated Corrective Actions with target date of completion

The factory will develop an emergency response procedure and an emergency response team will be created. The emergency response team shall have representatives from each department including medical personal and other OHS team members. This will be properly developed during the comprehensive OHS training program.

For immediate action, department head or supervisors shall be informed of emergency numbers for emergency medical attention and other emergencies like fire.

30th June 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

The emergency numbers are posted on the notice boards only. An emergency response plan should be considered a high priority.

Recommendations

The numbers for calling an ambulance should be posted in areas where all workers can clearly see them.

An emergency response team should be identified and appropriately trained as a matter of urgency.

4.11 Annual Medical Check-up for all workers

Issues identified

The factory has not provided regular health checks for workers.

Stated Corrective Actions with target date of completion

The factory will contact a local hospital to inquire about the available health/medical checkup facilities.

The factory will provide annual medical checkup for all workers.

15th August 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

All workers were examined within three days in 2011. The workers had blood tests and had a cursory physical examination. More than 2500 workers were seen by a minimal number of doctors and nurses.

Workers were not fully informed about the outcome of these investigations. Consent was not obtained prior to the investigations and there appears to be no privacy or confidentiality in the process.

Workers are now having their temperature checked every day.
One worker who was interviewed felt very sick but was too afraid to tell the supervisor as she feared she would lose money.

Recommendations

All workers should be informed about the medical examination with consent obtained. They should be examined fully in a private location. Workers should also be informed about the results of their examination and their blood tests. Appropriate follow up should be given.
A full analysis of the results should help to inform future health programs.

4.12 Fire Safety

Issues identified

*No specific fire safety plan is in place. No available documentation was available.
No fire drill or training has been undertaken since 2009.
The manager said that the drills were conducted by a private company but this had not taken place since 2009 as they were too busy.
It is unclear now how long it takes to get all the workers out of the building but in 2009 it was 200 seconds.
Dangerous goods are incorrectly stored.
No evacuation plan was documented.
No emergency shutdown procedure is in place.*

Stated Corrective Actions with target date of completion

The factory has stated in the Corrective Action plan that it has posted an emergency evacuation plan at every production section.

The factory will develop a proper fire safety plan and procedures that includes fire safety training and a regular fire drill.

The Corrective Action Plan states that regular fire and emergency drills are scheduled for the rest of the year and will be included in the annual OHS plan.

Warehouse staff shall ensure that no flammable materials are stored in materials warehouse or no flammable chemicals are stored together with fabrics, leather and other primary combustible materials.

The chemical warehouse will be maintained and properly organized. The chemical room will also be provided with adequate firefighting equipment, emergency facilities such as first aid kits, emergency eyewash, internationally recognized temperature monitoring and improved ventilation.

The warehouse workers have ensured that all dangerous goods/materials and flammable items are stored safely. Factory has stated in the Corrective Action Plan that this is improved.

The Corrective Action plan states that the OHS Committee developed a procedure for emergency shutdown.

30th June 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

Fire drills have taken place. The first fire drill took place on the 4th June 2011. The second fire drill took place on 17th Dec 2011. According to the senior management every department has started to conduct fire safety training. Most workers interviewed said they had participated in this training. All but one worker stated their names had not been signed off. One worker said her card was swiped. All workers were timed to be out in 202 seconds. There was an area with clear signage in three languages identifying a muster area at the back of the main building. There did not appear to be enough of these muster areas or signs for all the workers.

The workers mainly said they ran out to the front.

The workers reported that this training had been conducted in a safe and coordinated manner so that they did not feel scared. They did not feel there was any chaos or panic.

No evidence of emergency shutdown procedures was sighted.

Recommendations

Ensure that all workers and visitors are accounted for in an emergency fire drill.

Ongoing practice and training of emergency fire procedures is required.

A fire safety plan should be in place.

Fire safety wardens should be identified. These people should have ongoing responsibility for fire safety and marking off the names of people in their area.

4.13 Chemical Safety

4.13.1 Organic Solvents and Isocyanates

Issues identified

Multiple hazardous chemicals are in use throughout the factory including organic solvents and isocyanates.

Toluene has been identified throughout the 2nd floor.

The toluene is 4% of the total amount of solvent.

The testing showed less than 50ppm but was present.

Testing was difficult as the investigators could not get close to the workers due to the excessive fumes in some areas.

Areas with poor ventilation were the most difficult to test.

Stated Corrective Actions with target date of completion

MSDS's have been reviewed, and discussions held with chemical suppliers. According to the most recent versions of the MSDS available from the supplier, toluene is not listed as an ingredient

The Ministry of Environment (Department of Pollution Control) conducted VOC testing on the 13th and 14th July 2011.

30th June 2011 was given as the date of completion in the Corrective Action Plan. The Corrective Plan also states that this is "improved and ongoing".

Investigation findings

The chemical labelled 348 from Greco which had previously been identified as containing toluene appears to still be in use. The label on the cans of this material clearly states this is toluene free. Testing of this compound on the 2nd floor with a Dräger Accuro Pump and toluene 50/a tubes revealed no toluene present.

The MSDS are available for the chemicals. Multiple chemical labels were identified as not containing toluene.

The Ministry of Environment has conducted total VOC testing. The report does not state how many samples were taken nor which volatile organic compounds are in use or are an issue.

Badge testing which is used to assess the amount of volatile organic compound inhaled by individual workers will be required. This does not account for the absorption and ingestion of the organic solvents.

No testing has been done on isocyanates.

Recommendations

Ongoing vigilance is required to ensure the least toxic chemicals are used.

The MSDS could be reviewed as some are inadequate i.e. they simply state 'adhesive' or 'solvent' but do not clearly state what is in this product.

Badge testing for organic solvents and specific testing for isocyanates is required.

Good hygiene practices and the use of appropriate gloves will ensure the workers are not absorbing or ingesting these compounds.

4.13.2 Vacuum extraction

Issues identified

Vacuum extraction was not working.

Stated Corrective Actions with target date of completion

The factory will apply appropriate engineering controls by inspecting and maintaining all ventilation and extraction hoods to minimize if not totally remove VOC contaminated air in the production areas. Education/awareness training on chemical hazards will be provided to the workers and line leaders & production supervisors will ensure that workers are wearing the correct PPE all the time.

15th August 2011 was given as the date of completion in the Corrective Action Plan.

The Corrective Action Plan also states that this is "improved and ongoing".

Investigation findings

It appeared that vacuum extraction was working. The rate of extraction was not formally tested. An increase in the number of fans was noted.

Although smell is not an indication of ppm of organic solvents this was greatly improved from the last assessment.

Recommendations

Formal testing of the organic solvents and isocyanates will determine if the vacuum extraction is adequate.

4.13.3 Personal Protective Equipment for Chemical Safety

Issues identified

The workers are wearing inappropriate personal protective equipment.

Workers were unaware of the hazards of the chemicals.

When the fans were off the chemical fumes were very strong and caused eye burning and watering coughing, respiratory irritation, severe nausea and headache for the investigators.

Inadequate PPE was provided for workers handling chemicals at the storage and dispensing rooms. A PPE cabinet must be provided to keep them clean.

Stated Corrective Actions with target date of completion

The factory will apply proper engineering controls by inspecting and maintaining all ventilation and extraction hoods to minimize, if not totally remove, VOC contaminated air in the production areas.

Education/awareness training on chemical hazards will be provided to the workers and line leaders.

Production supervisors will ensure that workers are wearing the correct PPE all the time.

15th August 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

Appropriate gloves were provided to some workers but not to all. When the workers had the correct glove this was only on one hand. Only the first two workers of the line were wearing these gloves. The others were wearing inappropriate cotton gloves. The workers did not clearly understand the reason they were wearing the gloves. One worker knew he had holes in his glove but did not inform anyone for this to be replaced.

Recommendations

Appropriate testing of the compounds which are found in the factory should be undertaken.

The level of chemical in the air should be identified. Control measures should be put in place first using engineering controls for example vacuum extraction, increased ventilation.

If the workers still require personal protective equipment the correct mask should be given not an inappropriate one.

Appropriate gloves should be given to all workers.

A full PPE program should be undertaken. The workers do not know why they are wearing these gloves and masks and do not fully understand the health consequences of these chemicals. Workers who are pregnant or breastfeeding should not be in contact with these chemicals.

4.13.4 Chemical Storage

Issues identified

Storage of chemicals does not comply with internationally recognized safe standards.

No ventilation in storage area.

Temperature has been recorded at 37⁰C.

No firefighting equipment within room, no alarms, no warning systems.

Tins of chemicals damaged and could be potentially leaking.

Acids and Solvents stored together.

Stated Corrective Actions with target date of completion

The chemical warehouse will be maintained and properly organized. The chemical room will also be provided with adequate firefighting equipment, emergency facilities like first aid kit, fire alarm, emergency eyewash, as well as proper temperature and ventilation.

Procedures on chemical storage and handling will be developed. Stacking of chemicals will be restricted to ensure allowable safe limits. Shelves will be installed. First in first out inventory system will be implemented to ensure regular and proper movement of chemical stocks and avoid expiration of chemicals.

Production staff will be regularly advised on proper safe stacking and arrangement of materials. Warning and safety signs shall be posted as visible reminders to all workers and staff in material storage areas.

30th June 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

The chemical storage area has been improved and is now monitored more carefully.

An eyewash and shower are nearby. The area has containment in case of spillage.

The boxes and containers are not stored above shoulder height.

Temperature monitoring is in place. The temperature appears around 32-33⁰C. This was with the door opened. There is improved ventilation.

All MSDS were sighted and were available in each area.

Recommendations

Drums in the chemical storage area weighed 134kg, 177kg, and 185 kg. They were lifted into the warehouse by two workers as the containment and small area prevents the use of the mechanical lifter. The workers are lifting more than their own body weight.

If it is possible to buy these chemicals in quantities that are lighter to be lifted this would prevent the possibility of musculoskeletal injuries to the workers.

4.13.5 Material Safety Data Sheets

Issues identified

Not all chemicals have MSDS in the storage areas and areas where chemicals are used. MSDS should also be made available in the local languages.

Stated Corrective Actions with target date of completion

The factory will make a complete list of chemicals that they use to create a checklist of MSDS and see clearly that all chemicals have MSDS.

The factory will contact the chemical suppliers to provide the missing MSDS and make them available in Chinese, Khmer and English.

The factory will make the MSDS available in storage areas and areas where chemicals are used.

The factory will check all MSDS and ask the chemical suppliers to update and send the new MSDS.

30th June 2011 was given as the date of completion in the Corrective Action Plan.

The Corrective Action Plan also states that this is “improved and ongoing”.

Investigation findings

There has been considerable improvement in this area.

Workers have not been educated on the chemicals and are still unaware of what they are using.

Recommendations

Further training is required for all workers on the use of chemicals.

A full and ongoing Chemical Management program is required.

4.13.6 Chemical Labelling

Issues identified

Poor or incorrect labelling of chemicals was found throughout the factory.

There was inadequate labelling of chemicals with some chemical containers sighted with no label.

There is inadequate signage about the safe use of chemicals.

Stated Corrective Actions with target date of completion

All chemical containers will be labelled with the name of the chemical, purpose, usage of chemicals (e.g. primer, adhesive, thinner) and primary hazards. MSDS will be made available at the work-stations where chemicals are used. Supervisors and line leaders will ensure that all chemicals are properly labelled all the time.

30th June 2011 was given as the date of completion in the Corrective Action Plan.

The Corrective Action Plan also states that this is “improved and ongoing”.

Investigation findings

Not all containers are properly labelled or found in the correct containers as stated in the corrective action plan.

Recommendations

All containers should be properly labelled according to the internationally recognized Global Harmonization System and the Prakas on Chemical Labelling.

All workers should understand the meaning of these labels. A number is insufficient as a label as is merely writing 'glue'.

4.13.7 Secondary Chemical Containment

Issues identified

Not all liquid chemicals have secondary containment in the main storage area and dispensing rooms.

Stated Corrective Actions with target date of completion

Factory will provide secondary containment for all liquid chemicals as spill control measures.

30th June 2011 was given as the date of completion in the Corrective Action Plan. The Corrective Action Plan also states that this is "improved and ongoing".

Investigation findings

Secondary containments areas are in place.

Recommendations

Continual review of chemical containment and storage is required.

4.13.8 Emergency showers and eyewash facilities

Issues identified

Not enough emergency eyewash and shower facilities.

Stated Corrective Actions with target date of completion

Factory will install emergency eyewash and shower facilities near the areas where chemicals are stored, dispensed or used.

30th June 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

A shower and eyewash is located directly outside the chemical storage area. A shower and eyewash is located on the second floor.

Recommendations

Ensure that the emergency shower and eyewash facilities are clean and in good working order.

4.14 Personal Protective Equipment

Issues identified

The workers are wearing inappropriate personal protective equipment.

Workers were unaware of the hazards of the chemicals.

When the fans were off the chemical fumes were very strong and caused eye burning and watering coughing, respiratory irritation, severe nausea and headache for the investigators.

Inadequate PPE provided for workers handling chemicals; at the storage and dispensing rooms, a PPE cabinet must be provided to keep them clean.

Inappropriate PPE or no protection is seen throughout the factory.

Appropriate testing to identify and assess the levels of dust, fumes and particulate matter is not carried out. This type of testing is not available in Cambodia.

Stated Corrective Actions with target date of completion

The factory will provide PPE to workers where necessary and improve the usage of this through on-going education.

30th June 2011 was given as the date of completion in the Corrective Action Plan.

The Corrective Action Plan also states that this is "improved and ongoing".

Investigation findings

Inadequate and inappropriate PPE has been provided to workers purporting to protect them from chemical absorption and noise.

Workers are wearing the head scarf as a fashion accessory with their long hair down and able to become entangled in the machinery and dip into the chemicals.

Workers are wearing jewellery such as bangles which can also become entangled in the machinery.

Recommendations

Internationally recognized testing of all chemicals in the workplace is required for Management to understand what is the most appropriate control measure for protection of the workers.

Appropriate supply and monitoring of the use of PPE is required through a full PPE program. This program should include education, signage, adequate and appropriate supply of the required PPE as well as ongoing monitoring and review of the program.

4.15 Workplace Environmental Monitoring

4.15.1 Heat

Issues identified

The ambient temperature was measured throughout the factory using a thermometer. A Wet Bulb Globe Temperature (WBGT) measuring device was not used. This would have accounted for humidity and wind speed.

The 1st, 2nd and 5th floors had a large number of fans. There were also direct fans on some workers to dilute the chemical concentration in the air.

The temperature measured varied from 30^o C to 37^o C. In some areas closer to the machines workers were exposed to temperatures up to 40^o C.

The chemical storage areas registered 37^o C to 43^o C.

The city electricity supply stopped during the investigation. The generators came on and powered the machines to work but not the fans. The heat levels and fumes rose very quickly.

Stated Corrective Actions with target date of completion

The factory will conduct temperature and airflow monitoring on a regular basis by hiring external service providers to make sure that proper measurements are done. Every section on the production floor will be monitored as necessary and non-compliance with standard conditions will be rectified. Rectifications will be carried out as required. Additional ventilation systems will be installed when necessary.

15th July 2011 was given as the date of completion in the Corrective Action Plan.

The Corrective Action Plan also states that this is "improved and ongoing".

Investigation findings

More fans have been installed. Improved ventilation has been noted. Monitoring is being carried out throughout the factory. There are still areas that require attention especially near hot machines and in the warehouse. The temperatures measured varied from 29^o C to 32^o C for ambient temperature with up to 60% humidity measured. The WBGT was between 26^o C and 28^o C

Workers did not report feeling uncomfortably hot in the main building but they did say the warehouse was very difficult to work in due to the heat.

Recommendations

The warehouse has large fans already installed on the back wall. There is a form of insulation which does not appear to be useful. The temperature in the warehouse will need controlling with a cooling system to ensure workers do not suffer from heat stress. The workers in the quality control area in the warehouse have a cooling system installed.

4.15.2 Noise

Issues identified

Multiple areas identified as over 85dBA.

Workers were haphazardly given hearing protection but this was only used intermittently or as investigator approached.

Workers were working longer than 8 hours a day and 5 days a week and thus exposed to excessive noise above permissible levels.

Noise from the emergency generators was measured at 94-95 dBA. Workers are walking past this area freely. There is no signage for any worker entering this area to wear hearing protection.

Stated Corrective Actions with target date of completion

The factory will check machines and all sources of excessive noise and apply engineering control accordingly. Where engineering controls are inadequate, personal protective equipment for example ear plugs, will be provided to workers.

Factory must include noise as part of the grid-level risk assessment done area by area. Both engineering and process controls need to be set up and PPE must remain the last resort.

The factory OHS team will monitor and ensure that workers will not be exposed beyond allowable noise level and duration.

The factory will restrict unauthorized access around the generator area. Workers in the area shall be provided with appropriate hearing protection.

15th July 2011 was given as the date of completion in the Corrective Action Plan.

The Corrective Action Plan also states that this is "improved and ongoing".

Investigation findings

The noise in multiple areas has again been identified as over 85dBA. This assessment has been done by different investigators including the factory itself, the government agencies and the investigator.

Workers were haphazardly given hearing protection but this was only used intermittently or as the investigator approached. Workers who were working on a noisy machine were wearing the hearing protection while the workers standing immediately next to her were not despite being exposed to the same level of noise.

Workers were working longer than 8 hours a day and 5 days a week and thus exposed to excessive noise above permissible levels.

Noise from the emergency generators was measured at 94-97 dBA. Workers are walking past this area freely. There is no signage for any worker entering this area to wear hearing protection.

Workers who were loading and unloading boxes were exposed to the generator noise.

Recommendations

A full noise protection program should be commenced as a matter of urgency. Some of these workers are continuously being exposed to high levels of noise.

The workers do not fully understand why they need to use PPE. These levels of noise do not comply with the Prakas on Noise.

4.15.3 Light

Issues identified

Inadequate lighting was measured throughout the factory.

Lux levels were below those required by the Cambodian Prakas on Lighting 484 December 2003.

Lux levels in some areas were as low as 30 Lux.

Flicker was identified with the sun through the moving fan.

The sun produced a degree of glare on the workers which would have made the work more difficult.

Inadequate lighting leads to a greater potential for poor quality, accidents and eye strain of the workers.

Stated Corrective Actions with target date of completion

The factory will conduct illumination monitoring in every section of the production area where necessary. Illumination will be adjusted as per results of measurement and in accordance with

standard illumination requirements. External services will be hired to make sure that measurements are properly done. Staff will be trained by external providers so they will be able to conduct this testing.

1st July 2011 was given as the date of completion in the Corrective Action Plan. The Corrective Action Plan also states that this is "improved and ongoing".

Investigation findings

Conflicting results from differing assessors have been sighted. While the Ministry of Labor and the Ministry of Environment has assessed all areas to be adequate the investigator identified multiple machines where the worker was sewing with light levels less than 200 Lux. This does not comply with the Prakas.

The results from the factory's own assessment show inadequate levels of lighting. The factory has stated this has been properly conducted but it would appear there are deficiencies in this assessment. A full lighting assessment of all areas has not been carried out. The ground floor appeared to have adequate lighting especially where checking was occurring. However the sewing areas consistently revealed inadequate Lux levels.

Recommendations

A full light assessment should be undertaken by a competent and trained external provider. The factory will require training on how to do such an assessment. Training should be undertaken for the factory to ensure appropriate working and legally compliant lighting levels.

4.16 Electrical Safety

Issues identified

*It was difficult to assess if all electricians were suitably qualified.
There was no licensed electrician for electrical maintenance.
Some workers had suffered electric shocks.
Loose wires were identified. Many missing covers for electrical panels were identified and exposed wiring was found in the production area.*

Stated Corrective Actions with target date of completion

The factory will apply for a license for electrical personnel and maintenance workers with the Cambodian authority. The factory must certify at least the main electrical person in-charge and his assistant. The management must ensure that all electrical personnel are qualified either through verification of education or skills certification requirement with the proper authorities. Routine inspection and maintenance will be conducted to make sure that all electric hazards are eliminated. This includes exposed wiring, open switch boxes and terminals and signage on all energized electrical panels.

30th June 2011 was given as the date of completion in the Corrective Action Plan. The Corrective Action Plan also states that this is "improved".

Investigation findings

Certification of an electrician was sighted.

There was scant evidence however that changes had been made.

Exposed wires were directly placed in the electric sockets. Covers were still not in place on the circuit breakers.

Wires were tangled in a very haphazard way.

Electric shocks are still reported in the clinic.

The area around the largest generator in the factory appears to be used as a storage area. This area should be clear and clean.

Recommendations

The review of all electrical equipment and wiring should be undertaken by a competent authority as a matter of urgency.

4.17 Machine Guarding

Issues identified

Some machines were not fitted with appropriate guards.

Some machines were adequately guarded but there were some machines which could injure workers severely.

Injuries have been reported.

Some needle guards were not in place.

Some belts on machines could easily catch the workers' hair which consistently was not tied up.

Stated Corrective Actions with target date of completion

Mention has been made concerning lock out tag out but not other machinery guards.

15th August 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

There is no stated action for guards on sewing machines to be in place and regularly checked.

The clinic has reported that a needle is going through a worker's finger two to three times a month.

Recommendations

A competent full time maintenance person should be checking that all moving parts are appropriately guarded. All needles should be guarded.

4.18 Engineering Maintenance

Issues identified

Lock out/tag out and hot work permit procedures not yet implemented in the factory.

One Chinese worker appears to be trained although no formal qualifications were sighted.

Management explained that the 'engineer' did the electrical and engineering work. The other workers had been trained by this one person.

All workers can easily pass by the smaller generators.

Stated Corrective Actions with target date of completion

The factory will develop and implement the lock out/tag out and hot work permit procedures to ensure that accidents related to electrical maintenance and fire will be prevented. Lock out/tag out ensures that machines under repair are not energized while hot work permit system ensures that adequate workers will be ready to respond to any fire arising from hot work (e.g. welding jobs, work involving open flame, metal grinding, etc.) activities.

An identification sticker will be put on every machine and equipment that needs regular maintenance and inspections and checklist of maintenance and inspection will be created accordingly.

Pressure vessel testing has already been already done.

15th August 2011 was given as the date of completion in the Corrective Action Plan.

The Corrective Action Plan also states that this is "improved".

Investigation findings

Not every machine had a maintenance sticker on it.

There is no regular and ongoing maintenance schedule for all the machines.

The maintenance area was very messy with electrical wires directly placed in the sockets.

There is no written maintenance schedule.

Recommendations

A fully competent and licensed engineer should be employed to ensure all machines are regularly checked and safe.

4.19 Warehouse

Issues identified

Workers are continually lifting boxes above their heads.

Loads can easily fall.

Ambient temperature in warehouse was recorded in some areas at 32 degrees.

Boxes are moving down the chute rapidly. There is no cordon to prevent workers being injured by the boxes.

Second Floor of the storage area for raw materials is unstable and workers can easily fall through.

Stated Corrective Actions with target date of completion

No corrective action

Investigation findings

Some areas had a WBGT of 26⁰C while other areas which had poorer air circulation had WBGT of 27-28⁰C. The outside temperature was less than 30⁰C.

The temperature in the warehouse has been reported as extremely hot by the workers.

Second Floor of storage area for raw materials is unstable and workers can still fall through.

Recommendations

A cooling system may be needed here.

The area where the boxes come down the chute should be cordoned off and signposted.

The boxes should not be stacked above shoulder height.

Stabilize the second floor of the raw material storage area or cease to use this.

4.20 Loading and Unloading

Issues identified

Unloading and loading took place at the back of the bigger 5 storey building.

There was no signage to protect workers from being hit by trucks and forklift trucks.

Injuries have been reported in this area.

Workers were walking freely near the moving forklift truck.

Stated Corrective Actions with target date of completion

Necessary safety signs will be installed around the loading bay area. Signs and markings on the pavement will be put to restrict access to workers who are not working in the area.

Factory should develop a movement and materials loading protocol that covers not just signage and restricted access for workers, but also covers visitors and all vehicular movement/parking within the facility.

30th June 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

One small sign was identified. This is inadequate.

Workers were free to walk anywhere in the loading bay area.

Recommendations

Appropriate signage should be in place. The area should be cordoned off to prevent unauthorized personnel entering this area.

4.21 Driving Forklift trucks

Issues identified

The forklift truck was driven where people were freely walking.

Forklift truck was driven at speed and in a careless manner.

Stated Corrective Actions with target date of completion

Nil stated

Investigation findings

This should be addressed as a matter of urgency. Areas where forklift trucks are driven should be cordoned off from walkways.

Recommendations

A full assessment of heavy machinery and vehicles should be undertaken. There appears to be no vehicle control in the compound. Trucks, cars and forklifts are freely moving where many workers are walking.

4.22 Housekeeping

Issues identified

Many aisles in the whole production area are obstructed and materials are not orderly organized. Some walkways and potential exits were blocked with materials.

Rubbish and goods were thrown on the ground around the area of the dangerous goods.

Boxes are stored at height in some places and can fall.

Stated Corrective Actions with target date of completion

The factory is continuously improving the implementation of its 5S program. (Although this is generally known as 5S, the factory is using 8S).

Unnecessary materials will be removed while in-process materials will be kept in an organized manner at the workstations.

The factory will do a major general cleaning of the production area during low production period in August to get rid of dust and stubborn dirt sticking to the walls, windows and machine surfaces.

15th August 2011 was given as the date of completion in the Corrective Action Plan.

The Corrective Action Plan also states that this is "improved and ongoing".

Investigation findings

There was a marked improvement in the housekeeping in the factory.

The walkways appeared clear. The storage areas appeared to have clear exit and entrance paths.

The load of materials appeared reduced.

The workers also commented on this when asked what changes they had noticed in the factory in the last six months.

Recommendations

There are still areas where the storage and hygiene could be improved for example the chemical storage areas in the main building.

4.23 Ergonomics

Issues identified

Multiple ergonomic issues were identified throughout the factory.

Workers were sitting on the floor.

Workers were sitting on square wooden stools with no back rest.

Workers were sitting very close to each other.

There were multiple slip and trip hazards.

There were multiple vibration hazards.

Boxes were stacked poorly and could fall easily.

This does not comply with the Prakas.

Workers were lifting the lasts which mostly weighed more than one kg multiple times a minute with a twisting motion to place them on the conveyer belt.

Stated Corrective Actions with target date of completion

The factory will contact and hire external service providers to provide training on ergonomics as well as consultation on how to improve the ergonomics situation in the factory.

15th August 2011 was given as the date of completion in the Corrective Action Plan.

The Corrective Action Plan also states that this is "improved and ongoing".

Investigation findings

Although the action plan states that this is improved and ongoing they also state that this will be included in the OHSMS training which has not started.

No improvements are noted.

Multiple ergonomic issues were identified throughout the factory.

Workers were sitting on the floor.

Workers were sitting on square wooden stools with no back rest.

Workers were sitting/standing very close to each other.

There were slip and trip hazards for example in the toilet area where the floor is continuously wet and outside this area which is also wet.

There were multiple vibration hazards.

Boxes were stacked poorly and could fall easily.

This does not comply with the Prakas.

Workers were lifting the lasts which mostly weighed more than one kg multiple times a minute with a twisting motion to place them on the conveyer belt.

Recommendations

A full ergonomics program is required here. Attention to lifting, twisting, seating, workstation design, stacking, bending and slip trip hazards is required.

4.24 Welfare Facilities

4.24.1 Water and drinking utensils

Problem identified

Drinking water is only provided in one area on each floor.

The drinking water on the ground floor does not appear to be hygienic. This would need testing as it is dripping through a tube not a tap.

No individual drinking utensils are provided.

Stated Corrective Actions with target date of completion

Additional drinking water stations will be installed. Proper control and procedures shall be observed to ensure that water will not be contaminated during transport and refilling.

The drinking water is supplied through the government supply lines. Regular tests are being done to check the potability of the water. Test result of the sample taken after the fainting incident showed that the water is potable and showed negative results for coliform and other harmful microorganisms.

*The Corrective Action Plan states that this action has been completed.
The Corrective Action Plan also states that this is “improved and ongoing”.*

Investigation findings

Although the action plan states this issue is completed the workers are still drinking from the same utensils. Many have brought their own bottles to work to avoid having to use the utensils which are tied to the water supply. In the warehouse there is only one cup for all workers.

Recommendations

People interviewed outside the factory state they buy or boil their water and do not drink directly from the Phnom Penh water supply.
If the water is used from the town supply it will require regular testing.
Individual utensils for drinking should be provided to all workers with appropriate hygiene education.

4.24.2 Toilets

Issues identified

*These toilets are not in a satisfactory hygienic condition.
There was no soap provided.
Lighting was only turned on when the manager noticed the investigator was taking pictures.
There are insufficient numbers of toilets according to the Prakas.*

Stated Corrective Actions with target date of completion

*The factory has already added additional toilets. This complies with legal requirements (i.e. 1 toilet for every 70 people if more than 1,000 workers are employed).
The factory has assigned cleaners to maintain sanitation and hygiene in the toilets. The factory will also train and educate workers on the proper sanitation and hygienic way of using the toilet.
Lighting is normally switched on when there are people inside. The factory was also advised to install glass windows to capture natural light in the toilet areas.*

*The Corrective Action Plan states that this action has been completed.
The Corrective Action Plan also states that this is “improved and ongoing”.*

Investigation findings

The investigator found some of the toilets to be unhygienic. They were cleaner in the morning. A cleaner who was interviewed stated she cleaned the toilets more than nine times a day. Most workers felt the toilets were smelly and dirty. Almost all the workers stated that soap was only provided when there was a visitor. The cleaner stated this as well.

The investigator approached the toilets early and the lighting was immediately switched on. The floor of the toilet area was muddy and wet. There was no lid on any of the rubbish bins in the cubicles. They were filled with unsanitary materials.

Recommendations

The hygiene of the toilets and provision of soap should be addressed as a matter of urgency. Workers will also need education on hygiene and keeping the toilets in a clean manner.

4.24.3 Canteen

Issues identified

*The factory still has not provided dining facility for workers.
There was no appropriate rest area provided.*

Stated Corrective Actions with target date of completion

*The factory management is in discussion with the property owner where a canteen can be installed. The factory is proposing to the owner to allow them to use the idle parking and open space area to build the canteen. The canteen will also serve as the resting area for workers after lunch. Workers can rest for about 30 minutes after taking their lunch.
Factory must ensure that safe construction practices will be monitored and enforced during the building procedure as part of the course of subcontractor monitoring.*

The Corrective Action Plan states that this action has been completed.

Investigation findings

There is a canteen with televisions in place. Many of the workers use this area to eat their lunch. There is an attempt to separate waste into three garbage bins but this is poorly understood by the workers.

Recommendations

This space is heavily used at lunchtime. The area needs more thorough cleaning. The area around will require hosing and scrubbing as it is very dirty. The balcony above this area also requires cleaning. There are a large number of flies due to the dirt.

4.24.4 Provision for pregnant or breastfeeding women

Issues identified

*No worker brings her baby to work to breastfeed.
Workers are given 1 hour a day to breastfeed.
There is no facility to store breast milk.
There is no suitable area to express breast milk.
Three months maternity leave is given.
If the women wished to breastfeed they would be given one hour off a day to do this.*

*There is no childcare facility or any clean safe area to breastfeed a child.
There appears to be no provision to provide appropriate ergonomically sound workstations for pregnant women.*

Pregnant women are doing excessive overtime and are exposed to teratogenic or fetogenic chemicals.

Maternity leave is only paid after the worker returns.

All workers were given one day off a month for an antenatal check.

The day will be taken from holiday leave.

Stated Corrective Actions with target date of completion

A nursing or breastfeeding room is available at the building behind the 6-storey building. As per legal requirements, the factory must provide 1 hour breastfeeding time to nursing mothers every day. The factory policy provides 30 minutes breastfeeding once in the morning and another 30 minutes in the afternoon.

The policy should also clearly state the following:

- *The factory will maintain the nursing room clean and fit to its purpose
A lactation room must be supplied with potable drinking water (for the lactating mothers), comfortable seating and a refrigerator for storage of breast milk*
- *The location of the room must not be so far away that workers spend 15 minutes to get to the facility from their workstation*
- *Factory must maintain a register of all workers who are pregnant and have come from maternity leave and ensure that these workers are aware of the available lactation facilities*
- *Factory must include education on safe breastfeeding practices as part of the H&S training*
- *Nursing rooms must have properly trained personnel who can care for infants while the workers are at their workstation*
- *Lactating workers must NOT be assigned to any area where they can be exposed to chemicals, as most solvents/glues used in production are teratogenic in nature and can be absorbed into breast milk*
- *Ergonomics workstation will be provided to pregnant women*
- *As per factory policy, pregnant women are also assigned to light work and away from any workstations that may be harmful to them and their baby*

The Corrective Action Plan states that this action has been completed.

Investigation findings

Although this has been stated as completed there has been no change since the last assessment. No woman brings her baby or child to work. No woman breastfeeds at work. Women are given 30 minutes in the morning and 30 minutes in the afternoon to breastfeed. These women go home early before lunch and before work finishes. The breastfeeding women stated they used powdered milk when they were away from home.

The child care facility and the area for breastfeeding is still located at the back which is about a 15 minute walk from their work stations. It is also doubling as the clinic so the new beds are found here.

There appears to be no provision for appropriate ergonomically sound workstations for pregnant women.

All workers were given one day off a month for an antenatal check.

The day will now not be taken from holiday leave.
Pregnant women are not doing overtime.

Recommendations

The recommendations are the same as those stated in the factory's own action plan.

4.24.5 Lockers

Issues identified

No lockers are available.

Stated Corrective Actions with target date of completion

The factory will discuss with top management about the provision of lockers

*15th August 2011 was given as the date of completion in the Corrective Action Plan.
The Corrective Action Plan also states that this is "in progress".*

Investigation findings

Although the date of 15th August 2011 is stated as the completion date only shelves are provided for the Khmer workers at present. There is no place secure to store personal possessions. Workers need to keep their money with them.

Recommendations

Lockers should be provided.

4.24.6 Nutrition

Issues identified

*Workers are not provided with adequate meals when on overtime.
Food bought by workers from the outside stalls does not appear to be adequate or hygienic.*

Stated Corrective Actions with target date of completion

The factory paid the workers every day when they work overtime in compliance with legal requirements.

The Corrective Action Plan states this has been "done".

Investigation findings

A complete nutritious breakfast is not provided. Bread is provided some days with sugar and some days without. Management stated that this also contained butter but the workers interviewed stated they had never seen this. Not all the workers ate the bread but it did appear that the majority of workers were eating breakfast either at home or they took the bread.

The lunch carts were not monitored and the food appeared extremely unhygienic with flies on most of the food photographed.

The food cart owners immediately outside the factory put their dirty masks on when the investigator approached.

No seller was wearing gloves. There were open pots of food which were sitting in the sun and there were pots of food where the workers could dip their hand in to take garnish.

The workers did not appear as thin or tired as they had at the last assessment. They appeared more energetic and less listless.

The reduced overtime and the supply of bread may be a contributor to the workers' well being.

Recommendations

Hygienic nutritious food should be provided to all workers.

4.25 Auxiliary Staff

4.25.1 Guards

Issues identified

The guards are working up to 13 hour shifts 7 days a week. Some of the guards also would have worked the 24 hours shifts previously discussed. They are on duty when the workers are working. The guards are paid by the factory but employed by the private company. Fatigue is very dangerous and can lead to accidents, mistakes, and poor judgement.

Stated Corrective Actions with target date of completion

Management of Huey Chuen will make sure that the guards don't work excessive hours which could lead to fatigue.

15th July 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

The guards are contracted externally. They are still working 12 hour shifts and 7 days a week.

Recommendations

The guards' hours of work should be monitored and reduced to no more than 60 hours a week. They should have a compulsory day off.

This remains a safety concern.

Fatigue is very dangerous and can lead to accidents, mistakes, and poor judgement.

4.25.2 Cleaners

Issues identified

Cleaners have designated areas that they are required to keep clean. There is no formal documentation of their job description. No PPE is provided. The cleaners are cleaning and polishing

with no signage with cords dragging on ground posing a trip hazard.

Stated Corrective Actions with target date of completion

The signing of new contract format that has complete details including job description will include the cleaners. The cleaners will be provided necessary PPE and they will be trained on safety precautions.

15th July 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

Some cleaners interviewed were wearing boots and gloves. Most were not. Cleaners were picking up rubbish from the ground without gloves.

One cleaner stated she felt very uncomfortable wearing the gloves and boots.

The contract issues remain as before with workers lacking knowledge about their contracts.

They were not doing excessive overtime.

The workers had been with the company for many years.

Recommendations

Personal protective equipment is essential for these workers. They are working in very unhygienic conditions. The cleaners are also exposed to a great deal of water and may develop skin disorders from wet work. A full education program to encourage the wearing of boots and gloves should be undertaken. It is important to ensure they understand the hazards they are facing touching the rubbish and toilet areas.

4.26 Transportation to and From Work

Issues identified

Workers travel long distances standing in the back of an open truck.

Workers are unaware of safety issues.

Major accidents have occurred killing workers on way to work.

Stated Corrective Actions with target date of completion

The factory will avoid working long overtime so that workers may be able to leave home early and not during nighttime when the accident risk is higher.

The factory will educate workers on safety not only during working hours but in their everyday living as well. This will be included during the RHAC training.

15th August 2011 was given as the date of completion in the Corrective Action Plan.

Investigation findings

This action did not address the issue of workers standing for long periods of time in the back of trucks.

Workers should be safely transported sitting down.

One worker had paid for a truck where she could sit. Her salary was more than most.

One of the health messages given at the Monday morning meeting was to remind workers to tell their driver to slow down if they thought he was driving too fast.

Recommendations

The provision of safe transportation to and from work should be seen as part of the factory's responsibility. The National Social Security Fund states that travel to and from work is still considered part of the working day.

5. Summary

Huey Chuen has started to correct some of the problems identified in the original assessments as well as their own assessments during the last six months of 2011 and early 2012. There appears to be a commitment from management to improve the health and welfare of the workers in this factory.

Improving Occupational Health and Safety should be seen as an ongoing process of improvement which is based on good communication and on consultation between the workers and management. The Occupational Health and Safety Committee is the appropriate committee for improving safety and health in the workplace. It should be representative of all the workplace and workers should be able to bring not only health and safety concerns here but also other grievances. The HIV/AIDS Committee can be part of this Committee.

It is recognized that it would not be possible for this factory to have corrected all the problems identified in such a short period of time.

Members of the Occupational Health and Safety Committee require specific Occupational Health and Safety training. This should be seen as essential to a functioning Occupational Health and Safety Management System.

The action plan identifies areas where they will need to seek assistance from external providers. This includes training and monitoring of an Occupational Health and Safety Management System which will incorporate such things as training and implementation of risk assessments throughout the factory. The systematic approach to Occupational Health and Safety management will ensure there is a more sustainable approach to the health and safety of the workers in this factory.

There were still many areas identified as requiring corrective action.

The risk ratings given to the areas of priority remain similar to those given in the previous report of May 2011. In some areas, improvements were identified. (Annex 1- Explanation of Risk Assessment).

The areas still classified as extreme risk and requiring urgent attention include:

- Setting up a systematic approach to health and safety through an Occupational Health and Safety Management System
- Electrical Safety
- Heavy machinery safety
- Machine Guarding
- Appropriate Personal Protective Equipment for prevention of chemical absorption

Areas classified as high risk and requiring attention include:

- Lighting
- Noise protection management
- Heat in some areas: the warehouse and in some areas of the main building
- Transportation to and from work
- Sanitation
- Contracts
- Consultation between workers, management and the unions

- Function of the Occupational Health and Safety Committee
- Sound Chemical Management including the workers' understanding of what chemicals they are using and the health hazards associated with these

Other issues classified as medium risk requiring attention include:

- The ventilation in the clinic
- The employment of full time doctors
- The provision of an adequate number of beds which are located in the main building or appropriate proximity to the workers
- Provision of individual drinking utensils
- Ensuring the safety and potability of the water regularly

Huey Chuen factory will require ongoing assistance and support to build its own capacity but it should be able to identify hazards and perform appropriate risk assessments within the coming year.

6. Annex 1

6.1 Explanation of Risk Assessment

A hazard is anything (including work practices or procedures) that has the potential to harm the health or safety of a person.

A hazard is any source of potential damage, harm or adverse health effects on something or someone under certain conditions at work.

A hazard can cause harm or adverse effects (to individuals as health effects or to organizations as property or equipment losses).

A common way to classify hazards is by category:

Biological	bacteria, viruses, insects, plants, birds, animals, and humans
Chemical	depends on the physical, chemical and toxic properties of the chemical
Ergonomic	repetitive movements, improper set up of workstation, lifting procedures
Physical	UV radiation, heat, noise
Psychosocial	stress, violence, long work hours, lack of education
Mechanical	slipping/tripping hazards, inappropriate or inadequate machine guarding, equipment malfunctions or breakdowns, tools
Electrical	wiring frayed and not correctly placed, overloaded socket outlets

6.1.1 What is risk?

Risk is the possibility or probability that a person will be harmed or will experience an adverse health effect if exposed to a hazard (it may also apply to situations with property or equipment loss) together with an indication of how serious the harm could be.

Risk equals severity of the injury or illness multiplied by the likelihood of this occurring.

6.1.2 What is an adverse health effect?

A general definition of adverse health effect is “any change in body function or the structures of cells that can lead to disease or health problems”.

Adverse health effects include:

- bodily injury
- disease

- change in the way the body functions, grows, or develops
- effects on a developing foetus (teratogenic effects, foetotoxic effects)
- effects on children, grandchildren (inheritable genetic effects)
- decrease in life span
- change in mental condition resulting from stress, traumatic experiences, exposure to solvents

6.1.3 What is a risk assessment?

Risk assessment is the process whereby one:

- identifies the hazards
- analyses or evaluates the risk associated with that hazard and
- determines appropriate ways to eliminate or control the hazard

Table 2.1.1. Risk Ranking Table to Classify Worker Scenarios Based on Likelihood and Consequence

Likelihood	Consequences				
	Insignificant 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
A. Almost certain	L	M	E	E	E
B. Likely	L	M	H	E	E
C. Moderate	L	M	H	E	E
D. Unlikely	L	L	M	H	E
E. Rare	L	L	M	H	H

Legend
E: extreme risk; immediate action required
H: high risk; senior management attention needed
M: moderate risk; management responsibility should be specified
L: low risk; manage by routine procedures

IFC Occupational Health and Safety Guidelines (4)

7. References

1. Reuters <http://uk.reuters.com/article/2011/04/13/cambodia-fainting-puma-idUKL3E7FA03E20110413> accessed 5th May 2011
2. PUMA Safe Handbook of Environmental Standards http://images.puma.com/BLOG_CONTENT/puma_safe/2009-08_handbook_Environmental.pdf accessed 5th May 2011
3. PUMA Safe Handbook for Occupational Health and Safety http://safe.puma.com/us/en/wp-content/uploads/2010-10-handbook_OHS.pdf accessed 5th May 2011
4. [http://www.ifc.org/ifcext/sustainability.nsf/AttachmentsByTitle/gui_EHSGuidelines2007_GeneralEHS_2/\\$FILE/2+Occupational+Health+and+Safety.pdf](http://www.ifc.org/ifcext/sustainability.nsf/AttachmentsByTitle/gui_EHSGuidelines2007_GeneralEHS_2/$FILE/2+Occupational+Health+and+Safety.pdf) accessed 5th May 2011

8. Acronyms

ACGIH	American College Industrial Hygienists
FDC	Fixed Duration Contracts
FLA	Fair Labor Association
HIV/AIDS	Human Immunodeficiency Virus/ Acquired Immunodeficiency Disease Syndrome
IFC	International Finance Corporation
ILO BFC	International Labour Organization Better Factories Cambodia
MSDS	Material Safety Data Sheets
NSSF	National Social Security Fund
OHS	Occupational Health and Safety
OHSMS	Occupational Health and Safety Management System
PPE	Personal Protection Equipment
RHAC	Reproductive Health Association of Cambodia
UDC	Unspecified Duration Contract
VOC	Volatile Organic Compounds
WBGT	Wet Bulb Globe Thermometer