



Summary Report:

INDEPENDENT ASSESSMENT OF HANESBRANDS' ERGONOMICS PROGRAM IN HONDURAS

On November 30, 2010, the Collective of Honduran Women (Colectiva de Mujeres Hondureñas, CODEMUH) filed a Third Party Complaint with the FLA regarding facilities in Honduras owned and operated by Hanesbrands Inc. (“Hanesbrands”). The Complainant alleged health and safety issues resulting from the ergonomic design of workstations, compounded by the 4 x 3 work schedule¹ and high production goals. The Complainant also alleged harassment or abuse and discrimination against workers who were relocated within the factory because of work-related injuries. On March 4, 2011, the FLA accepted the complaint for review at Step 2 of the Third Party Complaint process.² The FLA requested that Hanesbrands investigate the allegations within 45 days and report to the FLA accordingly.

Hanesbrands provided a response to the allegations on May 26, 2011, elaborating on recent efforts to enhance its Ergonomics Program. The company reported it had already made significant investments in time and financial resources to enhancing the ergonomics programs of the Honduran facilities, including the engagement of the Ergonomics Institute of the University of North Carolina (UNC) to evaluate the overall ergonomics program in Hanesbrands' Honduras facilities, as well as a number of one-time and ongoing trainings for workers and management, and a new chair replacement plan for workstations.³

In order to determine the efficacy and sustainability of Hanesbrands' Ergonomics Program in Honduras – specifically at the H54 and H1 plants – the FLA engaged ergonomics experts Dr. Lylliam López Narváez and Dr. Luis Blanco.⁴ The experts visited Honduras in August 2012 and completed their report in September 2012.

¹ 4 x 3 work schedule entails a workweek that consists of 4 workdays followed by three days of rest.

² Step 2: Informing the Company or Licensee – The Executive Director will inform the company that a complaint has been filed against it and provide the company with the information supplied by the complainant. The FLA will also provide a preliminary indication as to which Workplace Standards are potentially non-compliant. The company then has up to 45 days either to request that the process go directly to Step 3 or to investigate the alleged noncompliance internally. More information about the steps involved in a Third Party Complaint investigation are described in the FLA Charter available on the FLA Web site at: <http://www.fairlabor.org/mission-charter>.

³ According to Hanesbrands, it replaced some 600 operator chairs with ergonomically improved chairs at its Choloma facility in 2012.

⁴ Dr. López Narváez and Dr. Blanco are associated with the Research Center on Health, Labor and the Environment (Centro de Investigación en Salud, Trabajo y Ambiente, CISTA) of the Universidad Autónoma Nacional, in León, Nicaragua. Dr. López Narváez is Coordinator of the Ergonomics Unit within CISTA and Dr. Blanco is the Director of CISTA.

Independent Assessment

Terms of Reference

Dr. López Narváez and Dr. Blanco conducted their assessment of the Hanesbrands facilities pursuant to the following terms of reference:

1. Review and evaluate Hanesbrands' policies, procedures, training, communications and worker involvement regarding ergonomics, considering the 4 x 3 work schedule at the facility.
2. Review the organizational structure with respect to how the ergonomics program fits within management structure, reporting relationships, industrial relations, and worker grievance processes.
3. Review capacity building activities with regard to ergonomics, including content and number of sessions involving management and workers, frequency of delivery, effectiveness, and so on.
4. Review the level of resources assigned by Hanesbrands to ergonomics issues in its facilities in Honduras, including the number and job titles of staff, allocation of equipment, and the dollar value of overall expenditures related to ergonomics.
5. Review and evaluate the scope, content and on-site activities of the ongoing consultancy project being carried out by the Ergonomics Institute of the University of North Carolina (UNC). In particular whether: a) the UNC project's scope and activities are appropriate; b) its recommendations and corrective actions are, or will be, effective in reducing ergonomic hazards and worker injuries on site; and c) there are any occupational health issues or worker concerns that have not been recognized or adequately addressed by the UNC project.
6. Review and evaluate studies regarding ergonomics at the facilities by outside parties, including allegations by CODEMUH.
7. Observe workstations, work processes, product flow and plant organization to evaluate if gaps in implementation exist and to identify additional ergonomic issues not addressed.
8. Interview key managers, line supervisors, and production floor workers on site about ergonomic hazards, controls, and reporting mechanisms in the plant. A random sample of workers at the factory should be interviewed; off-site interviews with workers may also be conducted if the assessor deems this to be essential to obtain truthful information from workers.
9. Prior to starting the assessment, prepare a plan of activities so that Hanesbrands is aware of the time that will be spent at their facilities and can ensure that the appropriate personnel are available.

Methodology

In conducting their assessment, the experts:

1. *Reviewed relevant documents.* Ergonomics program policies and components; ergonomic evaluations of workstations; evaluation and change control reports; training completion report; disclosure of ergonomics activities report; records of main causes for

musculoskeletal disorder consultations; reports of resources assigned to the Ergonomics Program.

2. *Observed work processes.* Identified risk of musculoskeletal injury present in each workstation, and improvement measures and implementation gaps that exist. The visit to the factories' facilities was conducted with Hanesbrands management representatives who described the processes and improvements already implemented.
3. *Interviewed relevant stakeholders.* Interviews were conducted with the Secretariat of Labor and Social Security (IHSS) officials; CODEMUH representatives; key individuals from the Ergonomics Center at the University of North Carolina; medical personnel from the plants' clinics; representatives from PROCINCO Foundation, the training arm of the Honduras Maquiladora Association; and Hanesbrands representatives, including local management.
4. *Survey to workers.* A survey was conducted with a total of 105 randomly selected workers, and two focus groups were conducted with current and former workers.
5. *Crosschecked and reviewed information from different sources.* Compared all information gathered such that reported results are clear and consistent.

Assessment Report Findings⁵

1. 95 percent of workers expressed having knowledge of the Ergonomics Program and 97 percent reported that they had received training. However, one in five workers did not recall the content of the ergonomics trainings or found it unhelpful, and many reported not knowing that workers were represented on the Ergonomics Committee.
2. More than 50 percent of workers reported pain resulting from job execution. Workers described a range of musculoskeletal issues including neck pain, tendinitis, chronic lower back pain and lumbar hernia among others. A number of ergonomic risks related to this pain were identified, such as repetitive motion, chairs with inadequate support or in disrepair, confined and cluttered workspaces, missing ergonomic mats, worktable height, worker posture and inadequate machinery. Additionally, workers consistently identified high production rates as a key problem.
3. Some workers asserted they do not take the 10-minute rest given in the morning, the 30-minute lunch break, or time to go the restroom.
4. Though Hanesbrands currently employs one doctor for the two production facilities, this appears to be insufficient to meet the demand for medical attention. Workers are often unable to see either the doctor – who is too busy – or the Social Security Institute, which requires a referral from the already-too-busy doctor. Additionally, the current staff doctor does not have ergonomics expertise.

⁵ The assessment report is available in English and Spanish at www.fairlabor.org/reports/hanesbrands-ergonomics-honduras.

5. The Ministry of Labor states that the 4 x 3 work schedules – which include workdays longer than eight hours – are legal because they are agreed to by each worker, prior to employment.
6. Hanesbrands offers a range of communication channels to workers, including direct reporting to supervisors, the General Manager’s open door policy, and a human resources hotline to the United States headquarters. However, workers report feeling that much of their feedback is ignored.
7. Training is provided at all levels – middle management, supervisors and afterwards to each and every unit.

Assessment Recommendations and Hanesbrands’ Corrective Action Plan

The experts’ report contained a number of cogent discussion items and subsequent recommendations aimed at remediating gaps in the Ergonomics Program as evaluated at both facilities. The experts’ recommendations and corresponding action plan developed by Hanesbrands are as follows:

1. Training
 - The occupational health and safety training should be directed not only to increase workers’ knowledge, but also to sensitize them to be responsible for their own health.
 - Trainings should put into consideration the risk factors specific to the work where the worker is/will be located.
 - To ensure greater impact and empowerment, it is necessary to conduct a continuous education program during the year, incorporating the best aspects of the management structure and utilizing different learning techniques.

Corrective Action Plan

- Trainings specifically related to ergonomics have been added to the training calendar, which address the subjects in the recommendation. Training materials will be developed according to the recommendations and implemented in 2013 as part of the continuous education program.
 - Supervisors were provided instruction during a formal training on ergonomics in October, along with management and staff. Supervisors will continue to develop skills in ergonomics, specifically on the methods for facilitating ergonomics for their teams as part of the continuous education effort. They will be required to lead ergonomics for their teams. A structured supervisor development program encompassing all the responsibilities of this position is in development.
2. Worker Involvement
 - It is necessary for workers to know their representatives in the Committee. This would help to improve the interaction between management and workers and between the committee and workers.

- To achieve greater worker involvement, the workers who participate in the Ergonomics Committee need to have defined roles and functions.

Corrective Action Plan

- Expand Hanesbrands' written program to include details for improving worker involvement in multiple areas of the ergonomics program.
- Ergonomics committee membership to include more hourly employees. The goal is have each job area represented with hourly employees as members. The specific roles will be defined for the members and other employees will be involved in the evaluation and change of their specific workstations.

3. Ergonomic Evaluations

- There is a need to conduct continuous ergonomic evaluations and develop a program for the prevention of musculoskeletal disorders.
- To reduce the risk of musculoskeletal disorders, workstations need to be systematically evaluated and incorporate the participation of workers. This is seen as a key measure for preventative medical actions.
- Involvement of workers in evaluations will help them better understand the reason for proposed changes.
- Stretching exercises are a good strategy for controlling muscular fatigue; an evaluation on increasing the frequency should be considered.

Corrective Action Plan

- Proactive evaluations are being done and there are plans to complete evaluations for all jobs using the Ergonomics Center of North Carolina's program. The ECNC Job Prioritization tool along with the Screening Tool will be utilized to prioritize and then analyze each job type. Additional tools will be used to conduct further analysis for select cases. The ECNC set of tools provide for documented change proposals and these will be used for all changes requiring infrastructure or methods improvement.
- It is part of the plan for 2013 to utilize hourly employees, supervisors and instructors to complete all evaluations.
- All recommendations for change or method changes based on ergonomic evaluations will utilize the participation of the effected hourly employees and other employees who perform the same task.
- A chair and workstation maintenance program will be established and employees will be involved in the audit/inspection process. The plant will establish and maintain a budget to provide financial resources to properly maintain and repair/replace equipment. Employees will be given specific instruction on the correct use and management of chairs and workstations. This will be reviewed with employees at least quarterly or whenever observation indicates a deficiency in understanding.

4. Medical Attention

- There is evidence of 31 cases of workers with confirmed diagnosis of musculoskeletal disorder out of 2,116 employees in the plant. These workers should be removed from their current positions and relocated to other positions. All have been relocated at least once.
- Medical assistance is an important pillar for the development of a prevention program but workers are clearly dissatisfied, in particular with the attention they receive from the doctor; the poor access and flow of the consultation when they are sick; and the available appointment space per work unit.
- The doctor does not have training in occupational health, ergonomics or occupational medicine. The doctor does not participate in the Ergonomics Committee, and does not tour the plant.
- It is recommended that two company doctors are present during the workday.
- Implement an oversight system.

Corrective Action Plan

- Hanesbrands will continue to ensure that all doctors are provided with and use the medical protocols and guidance issued by NIOSH (National Institutes of Occupational Safety and Health). These protocols have been used in Hanesbrands facilities for many years, and it have had success in early intervention and treatment for MSD's. Hanesbrands will strengthen the physician's understanding and use of these protocols.
- The doctor is actively participating on the Ergonomics Committee.
- The procedure for early reporting is communicated to all employees at the time of hire and annually during retraining. A review of the medical interventions will be part of the quarterly corporate assessment to continue to ensure a comprehensive approach to proactive ergonomics.

5. Production Goals and Work Schedule

- A study is necessary to establish the workers' physical ability to recover versus repetition required of them from their work. In this way, this will help to ensure that the production goal is not contributing to muscular fatigue above the micro-traumas caused by the work, consequently diminishing injuries for workers.

Corrective Action Plan

- Hanesbrands has built rest, recovery, and other expected downtime – including the production goals – into its planning, so that there are micro breaks throughout the production day. Hanesbrands will continue to ensure that its industrial engineering experts are linked to the development of standards and goal setting for each specific operation.
- Hanesbrands will continue to evaluate expanding the exercise rest breaks to help with recovery. Employees have always had the freedom to take their breaks including bathroom breaks without any adverse consequences. It will actively seek ways to reinforce that employees take and enjoy all the breaks scheduled into their work day.

- The current work schedule is being reviewed related to the 4 x 3, although 95 percent of employees have indicated that they are in favor of this schedule for a number of reasons, primarily to enjoy more time with their families.

Conclusion

In the Third Party Complaint, CODEMUH raised the important issue of ergonomics at textile and apparel factories in Honduras that affect workers, and in particular the issue of 4 x 3 work schedules. The independent assessment of the Ergonomics Program at Hanesbrands' facilities in Honduras provided clarity as to the comprehensiveness of the program, but also identified gaps and limitations within its implementation. It also included a number of recommendations for strengthening the program that have been adopted by Hanesbrands in its action plan.

The FLA would like to emphasize the importance of workers' participation and ownership in the implementation of an ergonomics program to ensure its effectiveness. This is fully aligned with the complainant's perspective of the importance of workers participation in the design, implementation and evaluation of ergonomics policies and practices to guarantee confidence in the activities and on their effectiveness to evaluate and prevent ergonomic risk. The FLA urges Hanesbrands to improve the framework within which medical assistance is provided to workers to allow for better flow, access and timely treatment of workers. Hanesbrands has committed to continue to improve the ergonomics program at its Honduran facilities.

The FLA considers this Third Party Complaint closed and intends to continue to engage with CODEMUH outside of the Third Party Complaint framework to review the findings and conclusions of the experts' reports as well as the adequacy of the remediation plans to discuss practical and sustainable approaches to preventing workplace injuries at Hanesbrands' facilities in Honduras.