

Summary Report:

**INDEPENDENT ASSESSMENT
OF GILDAN ACTIVEWEAR'S ERGONOMICS PROGRAM IN HONDURAS**

On February 8, 2011, the Collective of Honduran Women (Colectiva de Mujeres Hondureñas, CODEMUH) filed a Third Party Complaint with the FLA with respect to facilities in Honduras owned and operated by Gildan Activewear (“Gildan”). The complaint alleged health and safety issues due to work management, ergonomic design of workstations at the facilities, and atypical work schedules. According to the complainant, the health and safety issues also have ramifications for workers with respect to compensation, harassment or abuse and discrimination. On March 4, 2011, the FLA accepted the complaint for review at Step 2 of the Third Party Complaint process.¹ The FLA requested that Gildan investigate the allegations within 45 days and report to the FLA accordingly.

Gildan provided a report on the allegations on May 20, 2011. In addition to a comprehensive explanation of policies and procedures, Gildan also provided extensive documentation setting out and evaluating the company’s ergonomics policies and procedures in Honduras, including consultancy reports from the Ergonomics Center at North Carolina State University.

In order to ascertain the suitability and sustainability of the Ergonomics Program at Gildan in Honduras, specifically at the San Miguel and Rio Nance No. 3 plants, the FLA engaged ergonomics experts Dr. Lylliam López Narváez and Dr. Luis Blanco.² The two experts visited Honduras in November 2011 and completed their report in December 2011.

Independent Assessment

Terms of Reference

Using as a base the report provided by Gildan to the FLA, the terms of reference of the assessment by Dr. López Narváez and Dr. Blanco were to:

1. Review and evaluate Gildan’s ergonomics policies, procedures, training, disclosure, and

¹ 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>.

² 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.

worker involvement considering that the work schedule at the facilities follows the 4 x 4³ work schedule.

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 Gildan to ergonomics 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 consultancy project by the Ergonomics Institute of North Carolina State University (NCSU). In particular whether: a) NCSU's project scope and activities are appropriate; b) its recommendations and corrective actions are, or will be, effective in reduction ergonomic hazards and worker injuries on site; and c) there are any occupational safety and health issues or worker concerns that have not been recognized or adequately addressed by the NCSU project.
6. Review and evaluate studies regarding ergonomics at the facilities conducted by outside parties, including allegations by CODEMUH.
7. Observe work conditions, work processes, product flow and plant organization, evaluate if gaps in implementation exist, and 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 Gildan 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 documents at both plants.* Ergonomics Program policies and components, ergonomic evaluations of workstations, change control report, training materials, training completion report, report disclosing ergonomics activities, record of main causes of consultations for musculoskeletal disorders, reports of resources assigned to the Ergonomics Program, and report of the investigation conducted by CODEMUH.

³ 4 x 4 shifts are structured where the workdays are 12-hours per day for four days, and the following four days are days off.

2. *Met with relevant stakeholders.* Honduras Department of Labor, the Honduras Social Security Institute (IHSS), CODEMUH, Ergonomics Center at North Carolina State University, medical personnel from the plant's clinics, and Gildan representatives.
3. *Observed work processes.* Identified risk of musculoskeletal injury present in each workstation, and improvement measures and implementation gaps that exist. This was conducted at different stages in the process, from when raw materials are received through the packaging of finished products for export.
4. *Interviewed workers.* A survey was conducted with a total of 98 workers at the two factories; 58 workers from San Miguel plant, and 40 workers from the Hosiery Rio Nance #3 plant.
5. *Crosschecked and reviewed information from different sources.* Compared all information gathered such that reported results are clear and consistent.

Assessment Report Findings

The report by Dr. López Narváez and Dr. Blanco sets out a number of findings⁴, including:

- The company's organizational structure is a sound platform for the implementation of the components and elements of the Ergonomics Program, and it allows for a cascading approach. The structure supports coordination and communication of information to reach workers at all levels – the main actors to develop the Ergonomics Program – and to improve working conditions and reduce musculoskeletal injuries.
- Training has been provided to members of the Ergonomics Committee but not to many production workers. While production workers have heard of the Ergonomics Program, they are unclear of what it consists of, what the main ergonomic risks are, and do not know whether improvements have been made to their workstation. The information has not reached production workers and there is no active worker participation.
- The Ergonomics Program includes different methods of sharing information regarding ergonomics. However, it is essential to follow-up with production workers to ensure that they understand the information.
- A clear weakness in the implementation of every process in the Ergonomics Program is little or no participation of production workers in the various planned activities. The majority of workers ignore the changes that have been performed on workstations.
- During the observation of work processes, experts noted that the majority if not all workers worked in a static and uncomfortable/forced seated position without adjusting their chairs (San Miguel plant); and in static and uncomfortable/forced standing positions for long periods of time, conducting repetitive movements of the upper extremities (Hosiery Rio Nance #3).
- The ergonomic evaluations are not systemic and only use a single instrument for evaluation.

Assessment Recommendations and Gildan's Corrective Action Plan

The experts' report contained a number of recommendations aimed at closing the gaps in some elements of the Ergonomics Program at both plants. The experts' recommendations and corresponding corrective action plan developed by Gildan are as follows:

⁴ The assessment report is available in English and Spanish at www.fairlabor.org/reports/gildan-ergonomics-honduras.

1. **Training.** In order for training and information regarding ergonomics issues to reach production workers directly, create a group of facilitators or an Occupational Health Brigade. Participants can be selected from mid-level management or may include those who are responsible for workstations and trained on ergonomics and occupational health. These individuals in turn could: a) train other workers in small groups; b) assist in developing strategies for disclosing information to workers and following up with workers once they are trained with regard to issues such as proper work techniques, adoption of correct posture, and proper use of adjustable chairs, among others; and c) provide a channel for workers to suggest changes and communicate ergonomic risks or problems identified within their workstations and in the activities they perform.

Corrective Action Plan:

Gildan will integrate Occupational Health Brigades in each of its plants in Honduras. Participants will receive training in teaching methods and skills in Occupational Health. In addition, a description of the specific functions of the brigade will be prepared to ensure its effectiveness.

Timelines:

- Occupational Health Brigade in Gildan San Miguel integrated in September 2012 (completed)
 - Brigades at the other facilities were integrated in October 2012 (completed)
2. **Worker Participation.** Accelerate the incorporation of production workers into the different phases and implementation activities of the Ergonomics Program; ensure that production workers are represented in the Ergonomics Committee; and ensure that they participate in the ergonomic evaluations and in the development of proposals for changes in workstations.

Corrective Action Plan:

Gildan direct employees will integrate the existing Ergonomic Committee to participate actively in their duties and responsibilities.

Timelines:

- Participate in monthly meetings of the Committee: June 2012 (completed)
 - Training in evaluation methods: June 2012 - September 2012 (completed)
 - Participate in the evaluation of workstations - See item below
 - Participate in ergonomic outreach activities on Ergonomic Day - November 2012 (The activity was completed in two facilities). Ergonomic Awareness Day is planned for implementation on a yearly basis.
3. **Integral Care of Worker Health.** Plant doctors that care for workers should have a formal education in Occupational Medicine in order to provide integral care of workers that goes beyond recognizing common ailments. The Back School Program should be aimed at preventing back problems among healthy workers rather than focusing exclusively on workers that have symptoms or a diagnosed back disorder. Emphasis should be placed on early diagnosis and proper management of work-related musculoskeletal injuries.

Recommended activities include: a) training company doctors in occupational medicine to provide comprehensive care to employees; b) continually updating doctors in ergonomics

courses; c) involving healthy employees in Schools for Back Health to prevent back injuries, not just employees with symptoms or diagnoses illnesses; and d) developing a schedule of activities and actions to prevent back problems in healthy employees.

Corrective Action Plan:

Gildan currently has 17 doctors in its plants in Honduras and Nicaragua; six of them are trained in Occupational Health. Additionally, Gildan has trained an additional seven physicians on this subject matter; training concluded in October 2012. The remaining four doctors will be trained by October 2013. The Schools for Back Health began on May 28, 2012. Currently attending are employees with care needs due to back conditions; in a second stage, they will incorporate healthy employees for prevention purposes.

Timelines:

- Training of all physicians - October 2013
- Inclusion of healthy employees in Schools for Back Health - January 2013 (ongoing)

4. **Ergonomic Evaluation.** Ergonomic evaluations of all workstations should be conducted, rather than conducting them when requested by workers or in workstations where musculoskeletal problems are recognized or diagnosed. Due to the large number of workstations at both plants, it is important to develop a work plan for the performance of the ergonomic evaluations, utilizing multiple evaluation tools, with a schedule and well-defined goals.

Recommended activities include: a) developing a work plan for conducting ergonomic evaluations in the company, using multiple assessment tools, including a timetable and clear goals; and b) training several employees in ergonomics to comply with the evaluations work plan.

Corrective Action Plan:

All Gildan facilities have a list of workstations as part of the Ergonomics Program and have made specific ergonomic assessments that have resulted in the implementation of control measures to reduce the risk of injuries at workstations. Evaluations are conducted by members of the Ergonomics Committee, who have been trained by the Ergonomics Center at the North Carolina State University. The remaining workstations will be assessed according to the following schedule:

- September 2012: 50 percent of the remaining workstations (completed)
- March 2013: 75 percent of the remaining workstations (completed)
- September 2013: 100 percent of the remaining workstations

Anthropometric Study: Simultaneously, Gildan is developing the first anthropometric characterization in the Central American region together with the National University of Honduras (UNAH), through the Physiology Department, Faculty of Medical Sciences. This kind of study, widely used in developed countries, will provide measurements and proportions of the human body of the Honduran population. This study, first in the region, will allow Gildan and the industry in Central America to work in the future with industrial manufacturers so that machines and workstations can be designed according to the measurements of the population.

5. **Surveillance System for Musculoskeletal Disorders.** The company has HR personnel at both plants, and an electronic record keeping system for recording musculoskeletal disorders. Simple tools should be developed to collect information from workers and to track the progress of investigations of their cases. Sources include the doctors that care for workers, the workers themselves, mid-level supervisors, and the planned Occupational Health Brigade.

Corrective Action Plan:

This recommendation has been addressed, as Gildan clinics in Honduras register all patients that request services in the Medical Visits Electronic Registration System. Health data entered into the system enables the doctor to generate statistics for monitoring all types of illnesses, including musculoskeletal, to conduct research and to promote preventive activities. This system allows doctors to:

- Conduct specific clinical management for the evolution of the cases
- Perform workstation analysis of all cases
- Provide statistics and trends regarding injuries to the Ergonomics Committee

6. **Production Targets and Pauses.** It is important to correctly manage the time assigned to worker pauses during production. Due to the need to achieve a production goal, the workers perform activities at a high rate without pause between cycles. This causes muscle fatigue, resulting in injury. For these reasons, an evaluation of work times is required as well as the establishment of rest periods. One alternative for implementing pauses is to reduce the number of pieces in the bundles given to workers. This will compel workers to pause to get the next bundle of pieces, giving rest to the muscular group involved in the repetitive movement.

Corrective Action Plan:

Work times are determined by the Engineering Department using a system of predetermined movements used widely in the sewing industry. The system evaluates all movements required to perform the sewing operation in order to determine the cycle time. Additional time is added to each cycle to consider employee personal time, fatigue and machine downtime. Gildan believes that its work methods have been developed with an engineering approach taking into consideration its employees' capabilities and limitations.

Gildan sewing facilities have implemented five pauses during the day: two ergonomic exercise routines, two 15-minute breaks, and a thirty-minute lunch period. Gildan is currently developing a new ergonomic exercise routine customized for similar workstations working with experts from the Physical Medicine and Rehabilitation Center of the Honduran Social Security Institute to improve the effectiveness of rest periods.

Timeline:

- New ergonomic exercises – training for middle management (completed)
- Full implementation – end of July 2013

Conclusion

The Third Party Complaint filed by CODEMUH raised the important issue of ergonomics at textile and apparel factories in Honduras that affect workers, and in particular the issue of the 4 x 4 work schedules. The independent assessment of the Ergonomics Program at Gildan's facilities

in Honduras provided clarity as to the comprehensiveness of the program and the gaps and limitations within its implementation. It also included a number of recommendations for strengthening the program, which have been adopted by Gildan 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 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 Gildan facilities in Honduras.