

Metal Contamination Policy

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Version 1 Urban outfitters Metal Contamination
Policy

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Section A: An introduction to metal control

Why is metal control important?

Urban Outfitters, Inc. (UOI) has a responsibility to its customers to provide safe, high-quality products. This responsibility is drawn from both our company values and from European Union (EU) legislation.

EU law stipulates that poor quality and un-safe products sold in our stores could result in legal action against the company. The Consumer Protection Act 1987 makes it a criminal offence to supply consumer goods that fail to comply with general safety regulations (General Product Safety Regulations 1994). This means that any kind of contamination of our products which poses a risk to our customers' safety is unacceptable.

This guide identifies safe working practices and procedures for metal control to help you to eliminate the risk of metal contamination.

What areas does metal control cover?

- Needles
- Sewing machine
- Knitting machine
- Hand sewing
- Kimball gun needles
- Blades
- Knives
- Scissors
- Other tools for cutting

Any sharp instrument used during production and samples which can cause harm or is a serious safety risk.

All processes that require needles (including storage, issue, use and disposal) need precise control. These policies are not difficult to put in place but rely on clear instructions and the cooperation of all workers, supervisors and managers.

Scissors, knives and cutting blades

Scissors of all sizes are used in factories so they need to be used responsibly. Scissors must be securely attached to work stations or issued and collected at the beginning and end of each day.

Cutting room blades, needles and scissors, must be issued and collected at the beginning and end of each day.

Pins, staples, nails and metal components

All metal items used in a factory must be listed. This should include pins and staples as well as metal components that you might apply to garments during the manufacturing process. Some examples include: studs and rivets in denim, and buttons on garments.

Examples of situations where trims can provide a risk of metal contamination:

Brand labels which are attached with safety pins

Documents with staples

Sub-contracted processes: Embroidery and beading, where adequate controls are not established.

Small fasteners like snap fasteners can easily be dropped into pockets. Ensure your quality control inspection includes turning enclosed areas inside out to remove any loose items.

Pins should not be used. If there is any situation where you believe you need to use pins, please discuss with the relevant Technologist before proceeding.

What needs to be in place for an effective metal control policy?

Having an effective metal control policy requires a number of procedures to be established.

A procedure for replacing worn and broken needles: Clear documented procedures that cover all the processes, using all types of needles in your manufacturing sites – internal and external. Suggested procedures are provided in this document.

The control of metal tools and small component parts used in the production process: Clear documented procedures that cover all other areas of risk for metal contamination in your manufacturing sites – internal and external.

A metal detection procedure: Clear documented procedures for your methods of detecting metal contamination.

Training of all relevant employees: All workers in the manufacturing unit must be properly trained in order for the metal control policy to be effective.

All new staff must be trained on metal control procedures. It must be part of your induction training programme.

Management support and constant policing of the procedures:

A factory manager must be responsible for the implementation and maintenance of the metal contamination policy.

An effective metal control policy requires constant monitoring and checking. This can be done in a number of ways:

- Encouraging staff to report any sharp metal pieces found during cleaning
- Regular checks of the production areas on floors, work surfaces and drawers
- Check record sheets for accuracy or mistakes

All management must be fully committed to initiating these procedures - it is critical to establish them into everyday practice.

Metal control policy, must be incorporated into your own internal policies.

The injuries resulting from metal contamination can range from scratches and cuts to fatal injury to staff or customers . Therefore, your commitment to implement effective procedures in all manufacturing sites used for Urban Outfitters, Inc. production and maintaining these procedures to the highest standards regularly and with effective training is paramount.

Section B - Metal control procedures

Needle Control

This section provides procedures for a variety of situations involving sewing and knitting needles.

Sewing and Knitting Needle Control

This needle control policy covers the strict control of all needles to ensure that the only ones in use are for the manufacturing process and that the disposal of all worn or broken needles is carried out by authorised personnel.

The only needles allowed at work stations are those currently needed to operate the machine process.

No spare needles should be held at machine point.

New needles are kept in a locked location only to be accessed by trained, authorised personnel.

Worn and damaged needle replacement

Use a 'one in one out' needle recording system. A 'one in one out' system requires broken, bent and blunt needles to be accounted for and recorded before a new needle is issued

The record must be completed accurately so there is clear traceability. In addition, the record must detail any corrective action carried out to prevent the problem being repeated it.

Broken needles

When a needle breaks, the operation must be stopped and the supervisor informed.

All the needle pieces must be located and checked against a whole needle to make sure all the pieces have been found.

The pieces must be immediately attached to the record sheet with clear adhesive tape and fully recorded with all information.

A new needle may only be issued when it is confirmed that all the needle pieces are found.

If all needle pieces cannot be found then the product being worked on and any other work in close proximity must be placed into a bag or box and taken to the isolation area for further checking.

The workplace must be checked with a hand-held metal detector or magnet before work restarts. The hand-held detector must be calibrated and operating correctly, using the 1.2mm test piece before being used.

Check for the missing needle pieces in the isolation area. If found, all the pieces are to be recorded on the record sheet as normal. If not found, the products must be placed in a polythene bag and deposited in the secure reject box ready for disposal later.

When the workplace is confirmed as *clear*, then a new needle can be issued – the policy must be *'one needle out, one needle in.'*

Record sheets should be kept for a minimum of one year.

use for ALL needles for full traceability

1 supervisor per shift to be solely responsible for issuing needles and updating the record.

URBAN OUTFITTERS

USED NEEDLE RECORD – ONE IN ONE OUT SYSTEM

SUPERVISOR NAME: ESTELLE ROBERTS

FIX NEEDLE BOX HERE



one sheet of the used needle record is used for one complete box of needles

NEEDLE TYPE : size 9
MACHINE TYPE : overlockinG
NO. NEEDLES IN BOX : 30
COMPLETE NEEDLE LENGTH IN MM : 3mm
SHOW NEEDLE LENGTH IN BOX BELOW – ADD CLEAR STRAIGHT LINE

complete all needle details in case the box goes missing

this is important to verify all parts have been found

DATE	STYLE NUMBER	OPERATOR	MACHINE NO.	SEWING OPERATION	TAPE ALL FOUND PARTS	COMPLETE? Y/N	ACTION TAKEN	SUPERVISOR SIGNATURE
19.8.13	377042	32	14	OVERLOCKING		✓	ADJUSTED SETTING	<i>Estelle Roberts</i>
19.8.13	379001	37	3	"		✓	RUNT	<i>Estelle Roberts</i>

this number must identify the garment on the machine at the time it can be the style number, or the PO number. Colour of garment can be added.

essential for full tracability and follow up action plan

ensure needle parts are well secured

essential to ensure there is no machine, fabric, or operative issue that may re-occur

accurately drawn vertical lines showing full needle length makes for easy checking

Other Situations

Machine maintenance

Machine operators must remove all needles from the area in and around machines. Machines that are not in use must also be cleared of needles.

Embroidery

Machine embroidery embellishment must be controlled in the same way as main production processes, whether within your factory or at a sub-contracted specialist unit. Ensure the same procedure is applied and regularly monitored.

Kimball gun needles

Kimball gun needles need to be controlled and disposed of in the same way as worn and broken sewing machine needles.

Sample room

The same needle procedures should be implemented in sample rooms.

Hand Sewing Needle Control

The issue of hand sewing needles is just as important as control of machine needles.

Hand sewing needles are to be issued to necessary workers and logged in a record book. At the end of the work session, or day, the issued hand needles must be returned and accounted for.

Hand sewing needles are not to be used as a tool: e.g. removing fabric flaws. Alternative tools must be provided, such as a quick unpick. The issue of such tools should be logged and returned at the end of each working period.

Metal tools and trims

This section covers some of the other metal items in a production environment that are a potential safety risk. This is not a comprehensive list as you may have specialist equipment that is not covered in this document. Ensure that you make a risk assessment of your particular working environment and that you put controls in place that cover all potential problem areas or processes.

Blades and knives, scissors and snips

Knives, blades, scissors and snips can be used in every area of the factory from cutting rooms to warehouses. For example: A knife that is lost in a shipping carton can result in a bad injury for someone working in the receiving warehouse.

- All new and used cutting blades for band knives and straight knives must be kept in a locked cupboard with access only by the cutting room supervisor.
- Records must be kept of new blades in stock, issued blades and returned blades so that every blade is accounted for.
- Under NO circumstances can old blades be turned into knives for use in the production area.
- Old blades must be disposed of responsibly on a regular basis.
- Where knives are needed to open containers, these should have a retractable blade, be numbered and stored at the end of each day in a secure cupboard.
- Small scissors and snips must be tied to work stations – this applies to ALL areas used for cutting, sewing, inspection, pressing, warehouse, etc.
- Large scissors in the cutting room and sample room are to be numbered and stored in a secure cupboard at the end of each working day. The supervisor responsible for scissors must check all have been returned.



Pins and staples

Pins and staples must not be used anywhere in the production area, including the sample room. Tape and magnets should be used to attach notices to notice boards. Documents issued into the production areas must not use staples or paperclips to affix samples or extra pages. Tape is a possible solution. Trims (such as rolls of lace) that are secured with pins should be removed before being sent to the production area. Ask suppliers to use alternative methods wherever possible.

Small metal component parts

Rivets, snap poppers, studs and metal buttons need to be controlled in the production area so that loose ones cannot become trapped in pockets or other enclosed parts of the garment. Where it is not possible to automatically feed these items during the attaching process, then work areas must be set up to contain these small metal parts.

- Work benches with raised sides to prevent small metal components from dropping onto the floor.
- The issue of trims in smaller manageable containers can help prevent accidental loss of these small sharp metal trims.
- Poppers (snap fasteners) used in the production of baby garments are very high risk and needs careful control.

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Section D: Detection

Metal Detection

Metal detection is part of the overall Metal Control Policy and must not be viewed as a replacement for an effective needle control policy.

Adult clothing, such as outer wear, blouses, shirts, trousers, etc. are not mandatory but if you have a metal detector then it is good practice to use this for all production.

When used on adult lingerie and underwear, adult nightwear and adult swimwear the metal detector should include the following features:

- A conveyor belt type detector where the garment passes through an aperture of no more than 127mm in height.
- The conveyor automatically stops and sounds an alarm when metal is detected.
- The metal detector can detect ferrous metal of 1.2mm.
- The machine must be located away from other sources with magnetic fields such as clutch break mechanisms in sewing machines and ceiling fans. Ideally this should be recommended by the machine supplier.
- The position of the detector must allow a direct flow of all products through the machine so that no garments miss this important checking stage. Ideally the metal detection area should be in a separate area between final QC and Packing. No childrens garments or garments requiring metal detection should pass directly to Packing.
- The machine should only be operated by trained personnel, ideally trained by the machine supplier.
- The metal detection machine should be serviced by the machine supplier every 6 months.

Metal Detection Procedure

Calibration

Metal detection machines are sensitive instruments and need daily calibration when in use

The machine should be calibrated when switched on and then at least 4 times per day.

A 1.2mm test piece provided by the machine supplier should be used to test if the machine is detecting correctly. It should be fed through 3 times at the left side, centre and right side of the conveyor belt.

If the test piece is not detected then the service engineer must be called in to fix it.

If the calibration is successful then the machine can be used for production checking.

Each daily calibration must be recorded on a record sheet



Metal detection in production

- Garments should be packed wherever possible and put on the conveyor one at a time.
- When successfully passed through the detector, each item can be packed into cartons but should be kept in the quarantine area until the next successful calibration. Only then can the goods be released for shipping. If the detector fails the next calibration then the goods in the quarantine area will need to go through again when the machine is fixed.
- Any item which fails the metal detection should be taken to a designated inspection area and checked. When the metal piece is found, the garment can be re-checked and only put to stock if it successfully passes through the detector.
- If the metal piece is not found then the item must be cut up and placed in the secure reject box.
- A separate record must be kept of metal detection failure - an example is provided in the Section E.
- Record sheets should be kept for a minimum of one year.

REMEMBER

Metal detection is part of the control policy and not a replacement for good needle control practices



Section E - Prevention

Training

All workers must receive training on a regular basis to understand the importance of sharps controls.

All workers must understand the action required when a needle breaks or a sharp tool goes missing. Training is to be included in all new workers' inductions, and refresher training is to take place on an annual basis as a minimum.

Maintaining Awareness

Reminders should be visible around the factory highlighting the metal contamination and safety policy.

Pictorial reminders of best practice should be visible, as outlined