Environment, Health & Safety

Levi Strauss & Co. has prepared this Environment, Health and Safety (EHS) chapter to help our business partners meet our Social and Environmental Sustainability requirements. EHS requirements are no less important than meeting our quality standards or delivery time.

Importance of Meeting Requirements

One of our requirements for Health and Safety focuses on emergency preparedness. Several years ago, one of our factories in central Mexico installed additional emergency exits and conducted evacuation drills to comply with this requirement. Four months later, a massive earthquake occurred.

The factory's recent efforts to fulfill requirements ensured that its 800 employees were able to evacuate quickly and safely. As you can see, careful attention to meeting our requirements is critical to providing a safe and health working environment for your employees.

Using this Chapter

We have prepared this chapter to help you meet Levi Strauss & Co.'s EHS requirements, but we do not herein identify all circumstances which might constitute "findings" in a TOE Assessment. Rather, we address topics which are of particular importance. Each business partner must make a careful assessment of each of its workplaces to determine what measures to put in place to meet our requirements, and, of course, the requirements of the countries where it operates. To help our partners with this site-specific analysis, we not only include specific information in this Handbook, but we also identify where additional information may be found regarding each requirement.

Each of the EHS topics in this chapter is organized into four sections: Application, Purpose, Requirements, and Implementation of Requirements. **Please note that LS&Co. will hold its business partners accountable for those items identified as "Requirements" only.** The sections labeled "Implementation of Requirements" provide examples of ways to comply with the requirements. These sections close with a "Plan-Do-Check-Act" cycle, illustrating a sample strategy for implementing a specific EHS program — for example, emergency preparedness, electrical safety, etc. This strategy will help business partners integrate their EHS programs into an EHS management system.

Finally, we encourage our business partners to pay close attention to the documentation and record keeping requirements. LS&Co. assessors rely on written records to verify that business partners meet requirements such as: having established EHS procedures, conducting regular inspections, and training workers.

Application

This information applies to all factories covered by Sustainability for LS&Co., unless otherwise noted.

Environment Guidelines

Levi Strauss & Co.

Energy Management

Purpose

Good energy management can result in energy-related cost savings and a more reliable energy supply. By tracking and monitoring energy usage on a regular basis, a factory can identify areas for improvement and set targets for reducing energy consumption.

Requirements

CI Factory should track its energy consumption information according to the questions in Level 1 of the Higg Index Facility Environment Module, which includes:

- Quantity of energy consumed, per energy type (for example: electricity, natural gas, diesel fuel, solar, wind)
- Unit of measurement
- Method of measurement
- Frequency of measurement
- Start date and end date of energy measurement

CI Factory should maintain records of monthly energy usage for up to two years that may be made available upon request by an external auditor.

Recommendations

- Factory explores options for renewable energy such as on-site solar or wind energy.

Water Management

Purpose

Good water management can result in reduced regulatory, reputational, and scarcity risks for factories.

Requirements

CI Factory ust have a water meter to measure its regular water consumption. If a factory does not currently have a water meter, it should have one installed with outside expert guidance (see guidelines below).

CI Factory should track its water consumption information according to the questions in Level 1 of the Higg Index Facility Environment Module, which includes:

- How much water is consumed annually
- Water sources (for example: municipal source, groundwater well, lake, river, etc)
- Unit of measurement
- Method of measurement

CI Factory should maintain records of monthly water usage for up to two years that may be made available upon request by an external auditor.

Recommendations

- Factory explores options for water efficiency or water recycling in accordance with the LS&Co Recycle/Reuse program: http://www.levistrauss.com/wp-content/uploads/2014/02/LSCo-Water-Recycle-Reuse-Standard.pdf

Water Meter Guidance:

1. **Meter location**. Meter should be placed on the intake pipe entering the factory. Ideally, a second meter would be placed on the effluent (wastewater) pipe.
2. **Types of water meters**. For technical background on different water meter technologies, please refer to this guideline produced by Partnership for Cleaner Textile (PaCT): http://www.textilepact.net/pdf/water-metering-and-monitoring-in-cleaner-production-management-system.pdf
3. **Installation guidelines**. Although LS&Co is unable to provide technical installation assistance to vendors, please use the above document produced by Partnership for Cleaner Textile (PaCT) for basic guidance. Factory may need to consult with an outside expert for installing water meters.

ZDHC Wastewater Requirements (formerly 'Global Effluent Requirements')

IA At a minimum, all existing and new suppliers must ensure that all effluents from all facilities producing for LS&Co. meet all applicable legal discharge requirements and comply in all respects with the ZDHC Wastewater Guidelines and the limits set forth in Appendix A Table 1 therein http://www.roadmaptozero.com/fileadmin/content_2016/ZDHC_Wastewater_Guidelines_Print.pdf.

CI Factories should ensure that all effluents from all facilities producing for LS&Co. comply in all respects with the ZDHC Wastewater Guidelines and the limits set forth in Appendix A Table 2 and Table 3 therein http://www.roadmaptozero.com/fileadmin/content_2016/ZDHC_Wastewater_Guidelines_Print.pdf.

Bio-solids Management

Purpose

Bio-solids are sewage sludge that has been treated to remove pollutants and disease-causing organisms; this material can be recycled, typically as a soil amendment, because of the plant nutrients it contains. The purpose of this section is to explain the requirements for managing the resulting bio-solids, in order to control environmental and health hazards.

Requirements

CI Bio-solids should be reused or disposed of at a facility with valid permits, which should be checked by factory personnel.

Implementation of Requirements

Training, Rules and Record Keeping

- Factories should keep written records about the disposal methods they use for bio-solids, including verification that receiving facilities have permits to use or dispose of bio-solids.

Hazard Assessment

- If factories treat domestic sewage on site, the resulting sewage sludge should be thickened, stabilized, conditioned, disinfected, dewatered, and made into bio-solids prior to transportation.
- Bio-solids should only be transported in a water-tight truck that has the proper permits.

Good practice: Bio-solids ready for transportation after proper bio- solids management processing (i.e., thickened, stabilized, conditioned, disinfected, and dewatered).

IA Bad Practice: This truck is not watertight and lacks the proper signage. It is unacceptable for bio-solid transport. Plastic lining is required to make watertight.

- Bio-solids should be reused, recycled, or disposed. Solutions for disposal of bio-solids include:
  - Mono-fill (a landfill that accepts only wastewater treatment plant bio-solids)

  - Designated disposal landfill
  - Land-filling with biogas recovery
  - Incineration
  - Agricultural purposes (e.g., fertilizer)
  - Silviculture
  - Composting
  - Cotton crust
  - Bricks
  - Ceramics
  - Other acceptable recycling programs

- If a factory is unable to achieve any of the above solutions, it should discuss its situation with the LS&Co. contact.

Example of a mono-fill: a sludge pit that is properly lined.

Preventing Storm Water Pollution

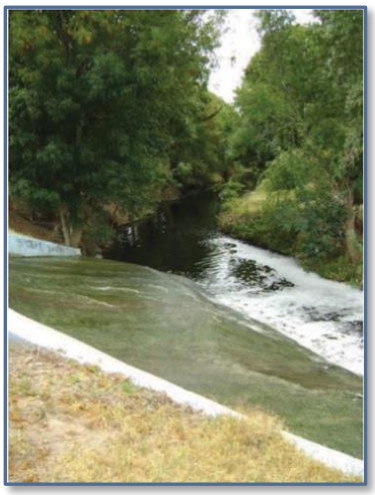
Purpose

Factory activities such as chemical storage, equipment handling, etc., can mix pollutants into rainstorm water that flows off the property and into bodies of water such as streams, rivers, ponds, oceans. This can harm the environment and create community health hazards. The purpose of this section is to describe the requirements for practices that can be used to minimize the amount of pollutants in storm water that flows off factory property.

Requirements

CI Factories should regularly inspect the exterior of buildings and surrounding parking areas, grounds, equipment, etc. to ensure that best management practices are used at the factory and are effective in controlling storm water pollution. Written records of these inspections should be kept by the factories.

CI Workers whose activities may cause pollutants to be mixed into storm water should be trained on the subject of storm water pollution; this training should emphasize the importance of using the best management practices.



Good practice: Paving at point of discharge helps prevent stream bank

Implementation of Requirements

Training, Rules and Record Keeping

- Factories should keep written records of the specific training provided to workers whose activities may cause pollutants to be mixed into storm water.
- Factories should have written records that include the inventory of potentially polluting materials (see "**Hazard Assessment**" section, below) and the periodic inspections.

Hazard Assessment

- Factories should create a list of the materials (other than clean water) that have the potential to come into contact with storm water and pollute it. These may include raw materials, fuels, solvents, detergents, finished products, fertilizers, pesticides, herbicides, and waste materials. Materials should be included in this list if they are used, stored, or transported in areas where they could contact rain as it falls or storm water on the ground.
- Factories should regularly inspect equipment, grounds and areas outside the factory to identify any conditions or practices that might pollute storm water and to assess if best management practices are effective in preventing pollution. Written records should be kept of these inspections.

Hazard Controls

- Storm water pollution is best prevented by using a standard set of practices, called "best management practices." These practices are listed below and have been included in the Appendix.

Best Management Practices

- Chemical / Raw Material Storage (in sheltered area, away from storm water drains—see the Chemical Management section)
- Housekeeping (regular removal of trash, orderly material storage to avoid spills, etc.)
- Preventive Maintenance (check equipment for spills, leaks; regularly clean out containment areas, etc.)
- Spill Prevention and Response (check material storage, wastewater piping, etc. for damage or leaks; keep an inventory of spill clean-up materials ready, etc.)
- Periodic Inspections (ongoing daily inspections of potential storm water contact areas, monthly inspections of areas, equipment, best management practices)
- Employee Education and Training
- Sediment and Erosion Control (paving, maintaining vegetation in unpaved areas, etc.
- Structural Improvements (installing roofs over exterior storage areas, installing containment areas, etc.)
- Documentation and Record Keeping (training, inspection, inventories)

Good practice: Empty barrels stored in sheltered area reduces risk of stormwater pollution.

Aboveground/Underground Storage

Purpose

Storage of petroleum products and hazardous materials in underground or aboveground tanks presents a risk of spilling or leaking the hazardous materials into the environment. The purpose of this section is to describe the best management practices for storage tanks in order to minimize this risk.

Requirements

CI Factories that operate aboveground or underground storage tank systems that contain petroleum products or hazardous materials should have a written plan for preventing spills or leaks to the environment. This plan should be kept on site and should be updated or improved whenever there is a change in factory operations, or if there has been a spill or leak of material to the environment. The plan should include at least the following:

- a current list of all aboveground and underground tanks that contain petroleum products and hazardous materials;
- procedures to prevent spills or leaks, including while doing routine tasks, such as transferring small amounts of material to smaller containers;
- procedures for monitoring aboveground or underground storage tank systems for leaks;
- testing of secondary containment systems for aboveground or underground storage tank systems, if present;
- an emergency response plan for an incident involving a spill or leak from a storage tank;
- inspection forms; and
- requirements for training workers.

CI Factory workers who have responsibility for the operation and/or maintenance of tank systems should be trained on best management practices for storage tanks. This training should be provided within 30 days of hire, and again each year after. A written record should be kept to show this training was completed.

CI Routine inspections should be conducted on storage tank systems, including site-owned, oil-filled power transformers.

CI A report form should be completed if a spill or leak occurs. This allows the factory to keep a written record of spills/ leaks and of the corrective actions taken to prevent future spills or leaks.

Implementation of Requirements

Hazard Assessment

- Factories should routinely inspect storage tank systems (tanks, containment, pipes, connections, etc.) to make sure they are intact and in good condition. A written record should be kept of these inspections. Completed inspection forms should be kept on file as part of the factory's operating records.

Hazard Controls

- Secondary containment should be provided for large storage containers and aboveground storage tank systems. The containment system should hold 110% of the contents of the largest tank.
- Underground storage tanks should be equipped with a leak- detection monitoring system. If feasible, underground storage tanks should also be equipped with a secondary containment system.

Waste Management

Purpose

The purpose of this chapter is to describe the requirements for making sure that wastes are safely transported, handled and disposed of.

Transporting Hazardous Materials

If they are not packaged and transported safely, hazardous materials may leak or spill and cause harm to factories, factory workers, transportation workers, communities in which we do business, and the environment. The purpose of this section is to describe the requirements for making sure that hazardous materials are transported safely to and from the factory.

Requirements for Transporting Hazardous Materials

IA Factories must prepare and follow written procedures to safely receive hazardous materials into the factory (e.g., from a chemical supplier) and ship hazardous materials/ wastes away from the factory.

IA Workers who ship or receive hazardous materials or hazardous wastes must be trained about the hazards associated with these materials and familiar with the factory's procedures.

IA Factories shall only use permitted transporters that have a record of operating safely and complying with transportation laws and best management practices.

IA Factories shall provide information to transporters about the physical, chemical, and environmental hazards of hazardous materials and hazardous wastes they ship off site.

IA Factories that transport hazardous materials/wastes using owned or leased vehicles (e.g., to another facility for storage or to a treatment facility) must also have specific procedures to safely transport hazardous materials. These procedures must comply with federal, state, provincial, and/or local laws and regulations governing transporters, and with best management practices.

IA Factories must keep written records of employee training and must keep copies of transporter permits and licenses and hazardous material/waste shipping documents.

Implementation of Requirements

Training, Rules and Record Keeping

- Factories should be familiar with the laws governing the shipment of hazardous materials off site.
- Factories should train all workers who ship and/or receive hazardous materials, initially and on an annual basis. The training should cover the hazards of these materials, as well as the factory's procedures for safely transporting hazardous materials.
- Written training records should be kept and made available to Assessors upon request. These records should show that all employees who are responsible for shipping or receiving hazardous materials:
  - Have been identified and trained
  - Understand the hazards associated with these materials
  - Are knowledgeable about the legal and regulatory requirements that apply to shipping and receiving hazardous materials
  - Understand the company's procedures for safely receiving hazardous materials into the factory and shipping hazardous materials and hazardous wastes away from the factory
- Factories should be familiar with the laws governing the shipment of hazardous materials off site.
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- Written training records should be kept and made available to Assessors upon request. These records should show that all employees who are responsible for shipping or receiving hazardous materials:
  - Have been identified and trained
  - Understand the hazards associated with these materials
  - Are knowledgeable about the legal and regulatory requirements that apply to shipping and receiving hazardous materials
  - Understand the company's procedures for safely receiving hazardous materials into the factory and shipping hazardous materials and hazardous wastes away from the factory

Good Practice: A hazardous materials transport truck with appropriate placards and signs.

Hazard Controls

- Factories should establish and enforce written procedures for loading and unloading hazardous materials which include, at a minimum:
  - Specific instructions to be given to transporters about routing, parking, and delivery of hazardous materials
  - Practices for safely loading/unloading hazardous materials
  - Sign-off and receipt of hazardous materials/waste shipping documents

- Factories should prepare written procedures for the delivery of bulk materials (such as fuel oil) that include specific measures to prevent over-filling and to respond to an emergency event such as a spill or release.
- Factories should identify and select only qualified, permitted transporters with a record of operating safely and obeying transportation laws and best management practices. Factories should maintain a current copy of the transporter permit(s) on file and make these records available to the Assessors.
- Factories should periodically audit their transporters' safety performance and verify that transporters maintain the required permits and licenses.
- Factories should provide written hazard information for transporters carrying hazardous materials from the factory to allow them to (a) select the correct tank and equipment, (b) post the proper warnings signs on the vehicle, and (c) instruct the driver on necessary safety measures, including actions to take in case of emergency.
- Factories should identify and provide transporters with the telephone number of a specialist who is knowledgeable about hazardous materials transportation emergencies and is available to provide transporters with advice on a 24-hour per day, 7-day-a-week basis. An example of such a specialist is the Chemical Transportation Emergency Center, known as "Chemtrec," which is based in the United States, but provides services in many regions of the world.

Further Information

- See the Appendix.
- For information on Chemtrec: https://www.chemtrec.com/about-chemtrec
- See the Hazardous Waste section.

Transporting Hazardous Materials

Hazardous wastes that are disposed of improperly can pollute the air, land, groundwater, and waterways; harming the environment and threatening community health. It is important that any amount of hazardous waste be managed properly to avoid contaminating the environment. The purpose of this section is to describe how factories should properly manage hazardous wastes.

Definition

A “hazardous waste” is a “solid waste” which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may: (a) pose a significant or potential hazard to human health or the environment when improperly treated, stored or disposed of, or otherwise mismanaged; or (b) cause or contribute to an increase in mortality, or an increase in irreversible or incapacitating illness.

A "solid waste" is defined as any material that is no longer useful or that is discarded by being disposed of, burned or incinerated, recycled or that is considered "waste-like." A “solid waste” can physically be a solid, liquid, semi-solid, or container of gaseous material.

HAZARDOUS WASTES ARE GENERALLY CATEGORIZED AS FOLLOWS:

Ignitable hazardous wastes, with a flashpoint of 140° F (60° C).

Corrosive hazardous wastes, including strong acids and bases.

Reactive hazardous wastes, which include wastes that are normally unstable, react violently with water, or generate toxic gases when exposed to water or other materials.

Toxic hazardous wastes, which contain certain substances determined to be harmful at or in excess of certain concentrations. Some of those substances include lead, arsenic, and mercury.

COMMON TYPES OF HAZARDOUS WASTE

Examples of hazardous waste include:

- Spent chemicals, such as bleach, solvent-based paint, flammable solvents, and caustic cleaners
- Used oil and un-drained oil filters
- Used batteries
- Used fluorescent / high-intensity-discharge lamps
- Electronic equipment (such as computers)

- Electrical equipment containing polychlorinated biphenyls (PCBs)
- Ballasts (PCB and Non-PCB)
- Pesticides
- Medical Waste (e.g., sharps such as hypodermic needles)

Requirements for Hazardous Waste Management

IA Factories shall identify and track the types and amounts of hazardous wastes they generate as a result of production and business activities.

IA Factories shall manage all hazardous wastes in a way that minimizes the possibility of exposing workers and contaminating the environment (air, land or water).

IA Factories shall treat, recycle, or dispose of all hazardous wastes they generate by using a permitted hazardous waste contractor or recycler, whenever feasible.

IA Factories shall audit hazardous waste recycling, treatment, or disposal facilities to ensure the facilities and the methods they use are appropriate and adequate before sending any wastes to them. Audits must be kept on file for review, upon request, by Assessors.

IA Factories shall dispose of hazardous waste that cannot be treated or recycled at a secure, permitted landfill designated for hazardous waste disposal which has no access to the general public or any unauthorized personnel.

IA Factories may not dispose of hazardous wastes in a nonhazardous waste landfill, solid waste landfill, or local "dump."

IA Factories may not co-mingle or mix hazardous and nonhazardous wastes (see picture).

IA Factories shall recycle, treat or incinerate liquid hazardous wastes; liquid wastes may not be disposed of in a landfill.

IA Factories shall dispose of dry chemical bags by incineration; these wastes may not be disposed of in a landfill.

Bad Practice: Co-mingling or mixing of hazardous and non- hazardous wastes

IA Factories shall develop and implement a written procedure for managing empty hazardous waste containers to prevent exposing employees to harm and contaminating the environment. Empty containers may not be given to the public or employees for personal use.

IA All employees who handle hazardous wastes shall be trained to avoid personal injury, prevent spills and releases, and make sure hazardous wastes are disposed of safely. Training records shall be maintained by the factory and made available to Assessors.

IA Factories shall develop and implement a written emergency plan that includes procedures to be followed if there is a spill or other event that releases hazardous waste from its container.

IA Hazardous waste "manifests" or other equivalent shipping documents shall be used with every hazardous waste shipment to an off-site location. Shipping documents used for hazardous wastes shall contain, at a minimum, the following information:

- Factory name and address
- Name, address, and phone number of the transporter and the designated recycling, treatment or disposal (destination) facility
- Description of each waste stream transported off-site for disposal

Shipping documents must be signed by factory personnel who have been trained on the hazardous waste shipping and documentation requirements.

IA Factory personnel shall track all waste shipments to verify that the shipments were received by the designated facility.

IA Waste disposal records shall be kept by the factory for at least three years (or longer, if required by local authorities).

IA Electrical equipment that may contain polychlorinated biphenyls (PCBs), such as transformers, regulators, capacitors, etc., shall be labeled and managed as PCB-contaminated equipment

CI In areas where permitted hazardous waste treatment, recycling, or disposal facilities are not readily available, factories shall consider on-site treatment by incineration, provided the incinerator is equipped with air pollution control equipment and is permitted by applicable federal, state, provincial, and/or local authorities.

CI Factories shall take steps to reduce hazardous waste (e.g., by using non-hazardous materials such as citrus based solvents and non-toxic cleaners). Factories shall work to improve current procedures and technologies for hazardous waste reduction, treatment, recycling, and disposal.

Implementation of Requirements

Training, Rules and Record Keeping

- Factories should be familiar with local laws and regulations governing the management of hazardous waste and comply with all applicable requirements, as well as with best management practices.
- Workers who handle hazardous wastes should receive training on the following topics:
  - How to avoid personal injury when handling chemicals and wastes;
  - Waste container and labeling requirements;
  - Proper storage and handling procedures to prevent spills and releases;
  - Weekly hazardous waste storage area inspections;
  - Approved disposal methods for each type of waste stream;
  - Filling out hazardous waste manifests or other equivalent shipping documentation;
  - Waste loading procedures (if performed by factory personnel);
  - Spill response and clean-up.
- Workers who are responsible for "containing" a spill (e.g., placing absorbent material around a spill to keep it from flowing off the property) or cleaning up a spill shall be trained on spill clean-up procedures, including how to protect themselves from contacting the spilled wastes.
- If the factory has made arrangements with a qualified contractor(s) to clean up hazardous waste spills, employees should be trained to know what size spill they are allowed to clean up (e.g., one gallon or less if the waste is not extremely hazardous) and how to contain larger spills before the spill response contractor arrives.
- Factories should maintain written records of the following:
  - Personnel Training
  - Emergency Plans
  - Manifests or other shipping documentation
  - Waste Tracking (written verification from the designated treatment, recycling or disposal facility that the waste shipment was received and the waste was managed according to instructions)
- Audits of hazardous waste treatment, recycling, or disposal facilities to verify that they are qualified and have all the necessary permits.
- Documentation showing any factory efforts to reduce waste generation.

Hazard Assessment

- Factories should identify the types and amounts of hazardous wastes generated as a result of production and business activities, and determine the waste disposal method for each waste stream.
- Factories should use hazardous waste identification records to (1) evaluate options for reducing or eliminating wastes and (2) track the factory's progress in reducing waste.
- Factories should audit hazardous waste recycling, treatment, or disposal facilities before sending hazardous wastes to them. This audit should determine if the facility:
  - is secure from public access (i.e., fenced, gated);
  - manages wastes responsibly;
  - has all the required permits;
  - complies with its permit conditions, including keeping records on file; and

– has the financial ability to pay for a spill clean-up or the closing down of its site.

Hazard Controls

Good Practice: Secure controlled landfill with guarded access and fenced perimeter

- Factories should establish written waste disposal procedures that include, at a minimum, the following specific requirements:
  - Hazardous wastes must be identified, placed in proper containers, labeled, stored in specially designated areas, secure from unauthorized entry, and disposed of in a manner that minimizes harm to human health and the environment.
  - Hazardous wastes shall only be handled by trained personnel.
  - Hazardous wastes must never be disposed of in a nonhazardous waste landfill, solid waste landfill, or local "dump."
  - Hazardous wastes must never be co-mingled or mixed with non-hazardous waste. [If regular trash is mixed with hazardous waste, the entire waste must be managed as hazardous waste, resulting in unnecessary hazardous waste generation, higher disposal costs, and increased risk to factory employees and the surrounding community.]
  - Used oil must not be thrown in the trash, discarded to land, or mismanaged in a way that could cause it to enter waterways or the groundwater system or cause harm to human health or the environment. Used oils shall instead be recycled or reprocessed and used, for example, in furnaces for heat or in power plants to generate electricity.
  - Medical waste (including any waste contaminated with blood and human tissue) shall be collected in marked "Medical Waste" containers/bags. Sharps, such as contaminated sewing needles or hypodermic needles, shall be collected in containers marked as "Medical Waste Sharps" to prevent injury to those who handle the waste.
  - Hazardous wastes that pose a unique hazard if they are not completely destroyed, such as discarded dry chemical bags, shall be incinerated and not disposed of in a landfill.
  - Empty hazardous material containers must be managed in a way that prevents a risk to human health and the environment. (See the best management practices for empty containers below.) Empty containers must never be given to the public or to employees for their personal use.
- All hazardous wastes should be placed in containers that are in good condition and are compatible with their contents (e.g., acid or caustic wastes must not be stored in metal drums, as they will corrode the metal). Containers should be covered except when workers are transferring hazardous waste into them.
- Hazardous waste containers should be labeled with the words, "HAZARDOUS WASTE," the name of the waste (e.g., the chemical name), and the hazardous properties (such as flammable or caustic).

- Hazardous wastes should be stored in assigned areas with secondary containment (a container or physical structure that surrounds the primary container and serves to hold any liquids that may leak from the primary container).
- Assigned hazardous waste storage areas shall be:
  - located indoors, if possible (outdoor areas shall be completely enclosed, such as a shed);
  - locked to prevent unauthorized individuals from entering;
  - labeled with warning signs, such as: "WARNING— HAZARDOUS WASTE"; and
  - properly ventilated.
- Incompatible wastes should be segregated (e.g., incompatible wastes stored in a common area must have separate secondary containment structures to prevent mixing of incompatible waste streams).
- Authorized and trained factory workers should inspect assigned hazardous waste storage areas each week to make sure containers are in good condition and the requirements for hazardous waste are being met. [See Appendix for a sample "Hazardous Waste Storage Area Weekly Inspection Checklist".]
- Spill control equipment should be kept in the assigned hazardous waste storage areas and inspected routinely to make sure adequate supplies are on hand in the event of a spill or release.
- The factory should develop and implement a written hazardous waste emergency plan to be followed if there is a spill or other event that releases hazardous waste from its container. [See Appendix for a sample "Hazardous Waste Emergency Plan."]
- Emergency phone numbers (such as the numbers for the clean- up contractor and for local authorities who respond to fires or chemical spill emergencies) should be posted next to the telephone in the hazardous waste storage area. [See the Appendix for sample "Emergency Procedures" to post.]
- Factories that treat wastes on site by incineration should do all of the following:
  - equip the incinerator with air pollution control equipment;
  - obtain all necessary permits from federal, state, provincial, and/or local authorities;
  - comply with all permit conditions associated with the incineration unit; and
  - dispose of incineration wastes at a permitted, secure hazardous waste landfill.
- The factory should establish a procedure for managing empty hazardous material containers to prevent them from being misused for personal purposes. The procedure shall address the following requirements:
  - Empty all chemical containers as much as possible.
  - If feasible, return empty containers to the original suppliers for recycling or re-use.

IA Incompatible wastes stored in a common area must have separate secondary containment structures to prevent mixing of incompatible waste streams.

- If it is not feasible to return empty containers to the original supplier, use the following best management practices:
    - Triple-rinse containers that formerly held substances that that may be disposed of to the sewer or to the on- site treatment plant (such as water-based detergents). Once containers are clean and dry, they may be recycled as nonhazardous solid waste.
    - Make sure that chemical solvent or flammable material containers (that cannot be triple-rinsed because of sewer and/or on-site treatment plant restrictions) are drained completely dry. Factory personnel should poke holes in the plastic containers so they may never be re-used.
    - Containers with residual chemicals shall be disposed of as hazardous waste.

Solid Waste Management

"Solid waste" is a term that includes municipal wastes (general trash), debris, liquid industrial wastes, special wastes such as used oil and medical waste, and hazardous wastes. The benefits of reducing the volume of solid waste generated at a factory include a positive effect on the environment, an economic advantage to the factory and better community relations. The purpose of this section is to describe the requirements for managing and reducing the volume of solid waste generated by factories.

Requirements for Solid Waste Management

IA Factories shall return surplus LS&Co. branded tags, buttons, and zippers to LS&CO, unless specifically instructed by LS&Co. to destroy them. These items may NOT be disposed of in a landfill, thrown in the general trash, or buried on site. Where factories are instructed to destroy these materials, they shall obtain and keep a "certificate of destruction" for the materials from the facility that destroys them.

IA Factories shall identify the local requirements (if any) for recycling containers and manage them accordingly (e.g., separate glass, plastic, and aluminum). Factories shall use permitted recycling facilities (e.g., glass, plastics, metals recyclers, or municipal waste disposal facilities that have a recycling program), wherever feasible.

IA Hazardous wastes—including medical waste and used oil— shall meet the requirements of the Hazardous Waste section and must never be mixed with general waste.

CI Factories shall create and implement a program to reduce the amount of solid waste they create, increase reuse or recycling of materials, and properly manage, store and dispose of all wastes. The program shall include setting waste reduction goals.

CI Used metal items such as scissors, metal carts, blades, sewing machine needles, etc. shall not be disposed of in a landfill, but instead recycled.

CI If there are no permitted recycling facilities in their vicinity, factories shall consider and investigate the use of local vendors or merchants who will accept non-hazardous recyclable materials.

CI Factories shall evaluate their procedures and technologies for managing solid waste each year and update these, when necessary, to improve the program and/or achieve goals.

Implementation of Requirements

Training, Rules and Record Keeping

- The factory's solid waste program should be guided by the principle of REDUCE, REUSE, and RECYCLE. Workers should be encouraged to participate in the program to help the factory save resources and money.
- Factories should adhere to the suggested disposal methods for common types of solid wastes, listed below. More detailed information about how to reduce waste is included in the Appendix.

LS&Co. Brand Materials

Buttons, zippers, or tags may never be thrown in the trash or disposed of in a landfill. Factories shall return all buttons, zippers, and tags to LS&Co., unless specifically instructed by LS&Co. to destroy these items by incinerating zippers and shredding tags.

Whenever factories destroy LS&Co. branded buttons, zippers, and/or tags (instead of returning them to LS&Co.), factories shall obtain a "certificate of destruction" from the designated facility for each waste load sent off-site for incineration (buttons and/ or zippers) or shredding (tags). Certificates of destruction should be maintained on file by the factory and made available to Assessors for review.

Factory Equipment

Factory equipment includes any electrical device or machine used in the process of producing apparel, such as a sewing machine and/or a cutting machine, as well as computer and other electronic equipment. When equipment is no longer in useful condition, the factory should reuse or recycle the internal components, wherever feasible, rather than simply disposing of the entire machine in a landfill.

Caution: Some equipment may contain hazardous materials, such as mercury or polychlorinated biphenyls (PCBs). All equipment containing hazardous materials, such as mercury or PCBs, shall be removed and then properly managed as hazardous waste. (See the Hazardous Waste section for details.)

Food

There are many methods of reducing the solid waste created by the factory's food service. Examples include buying food supplies frequently ("just-in-time buying") to make sure the food does not spoil; and using washable and reusable dishes, cutlery and linen. Food waste shall be collected and provided to a composting facility.

Office Supplies

Every effort shall be made to recycle all office paper. Most types of paper are recyclable, including computer printout (colored or blank), white ledger, colored ledger, manila folders, pamphlets, brochures, phone books and newspapers. Examples of paper that cannot be recycled are paper with food contamination and blueprints.

Plastic Covering
Plastic coverings should be collected and recycled, wherever feasible. The plastic is low-density polyethylene (LDPE) and can be reprocessed to agricultural film, shopping bags and/or packaging film.

Material Waste
Factories should minimize the amount of lost material. Material that is unused or damaged can be reused and/or recycled for other purposes. Scraps can be used for cleaning tasks—wiping down machines, for example. Scraps can also be collected and sold or given to a company to be used as stuffing for cushions and pillows. Unused material can be used as padding for carpet underlay, mattress padding and the molded padding used in the automotive industry.

IA Bad Practice: Hazardous waste shall never be disposed of at a landfill with uncontrolled access. Hazardous waste landfills must be secured to prevent scavengers.

Thread and Cones
Factories should use all thread in production and avoid having it go to waste. Thread cones should be returned to the supplier or manufacturer for reuse.

Cardboard Boxes
Cardboard should be properly recycled. Recycled cardboard is used to manufacture new boxes, paper tubes, cans and drums, gypsum wall and many other products.

Wooden Crates and Pallets
Broken wooden crates and pallets can be reused or recycled. Wherever possible, used pallets should be returned to the vendor to be repaired and reused. If pallets are broken and uncontaminated, they may be recycled by a composting company for use as mulch.

Glass/Plastic/Aluminum Containers
Glass, plastic, and aluminum containers should be recycled, wherever feasible. Factories should identify the local requirements (if any) for recycling these containers and manage them accordingly (e.g., separate glass, plastic, and aluminum).

Containers that formerly held hazardous materials should be managed as hazardous waste (see the Hazardous Waste section for details).

Hazardous Waste
Examples of hazardous wastes include: spent chemicals such as bleaching materials, solvent-based paint, flammable solvents and caustic cleaners; used oil; spent batteries, ballasts, and fluorescent/high-intensity discharge lamps; medical wastes, and pesticides.

Hazardous waste shall never be disposed of with general waste. All hazardous waste shall be managed according to the requirements of the Hazardous Waste section.

IA Bad Practice: Construction waste, garbage, chemicals, and discharge from pipe all commingling in one pond. All waste must now be treated as hazardous.