Draft CAP Guidelines and Requirements

Kindly follow the guidelines as mentioned below during the preparation of CAP

- **Response -** Reference Number given in the reports for issues such as (E1, E2, E3, F1, F2 etc.)
- **CAP Date -** Date by when the remediation will be completed
- **Date CAP completed -** Date on which the remediation action for the issue have been completed
- **CAP -** Corrective Action Plan taken to remediate the issue. (Kindly write in details the proposed corrective action to remediate the issue highlighting the exact steps to be taken for remediating the issues in line with the LABS Standards)
- Detailed CAPsummary is provided as examples(Incorrect and correct format) in the next sheets for Fire, Electrical and Structural issues. Follow the guidelines mentioned under column **Gaps identified** for greater understanding
- Strictly adhere to the timelines of draft CAP submission. Delay in the process affects Factory ranking in the long run – 15 days from date of receipt of final assessment reports (Refer Sheet 2 and 3 for details on timelines and process)
- The draft CAP should be submitted as per the CAP template provided on FFC specific to your factory

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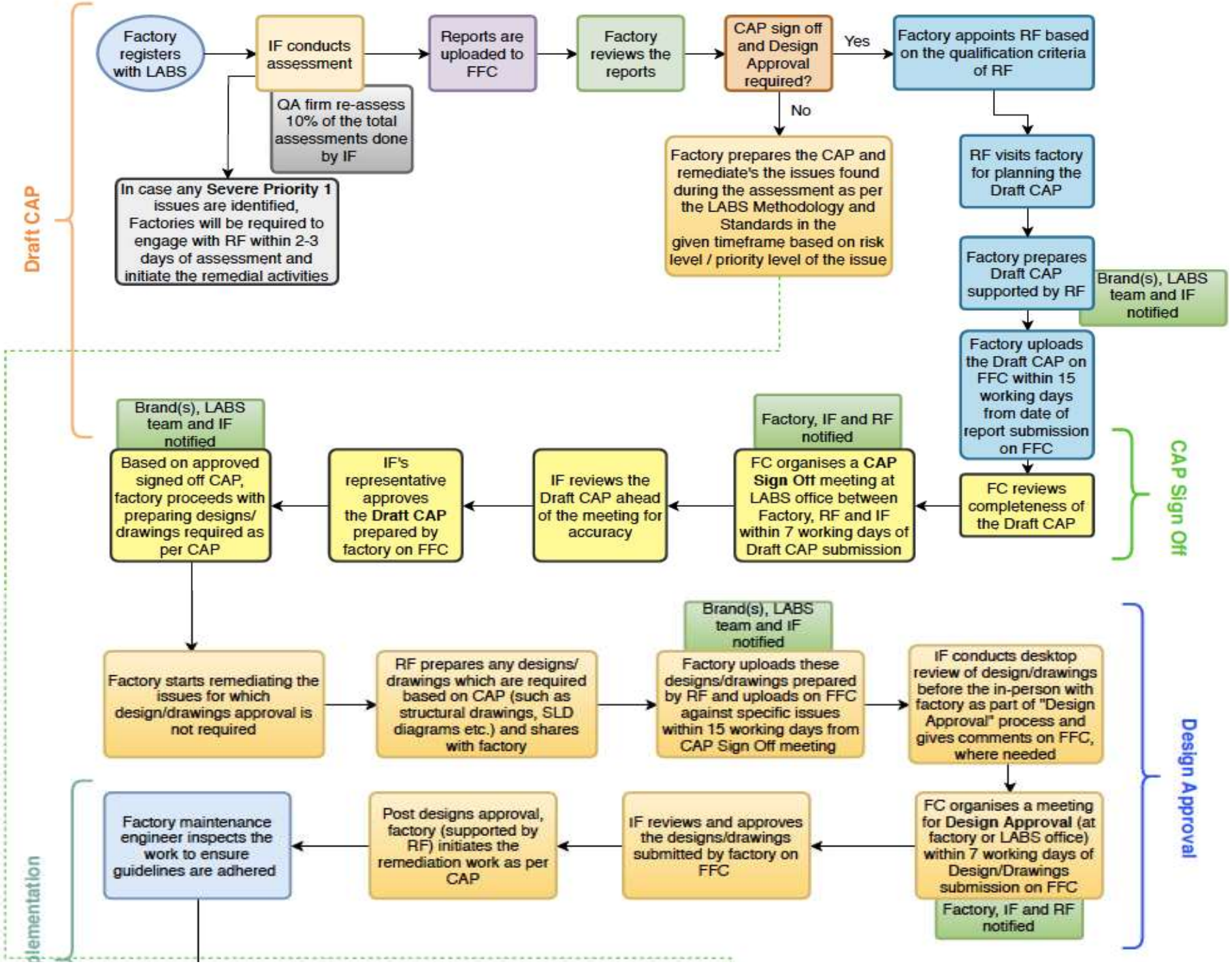
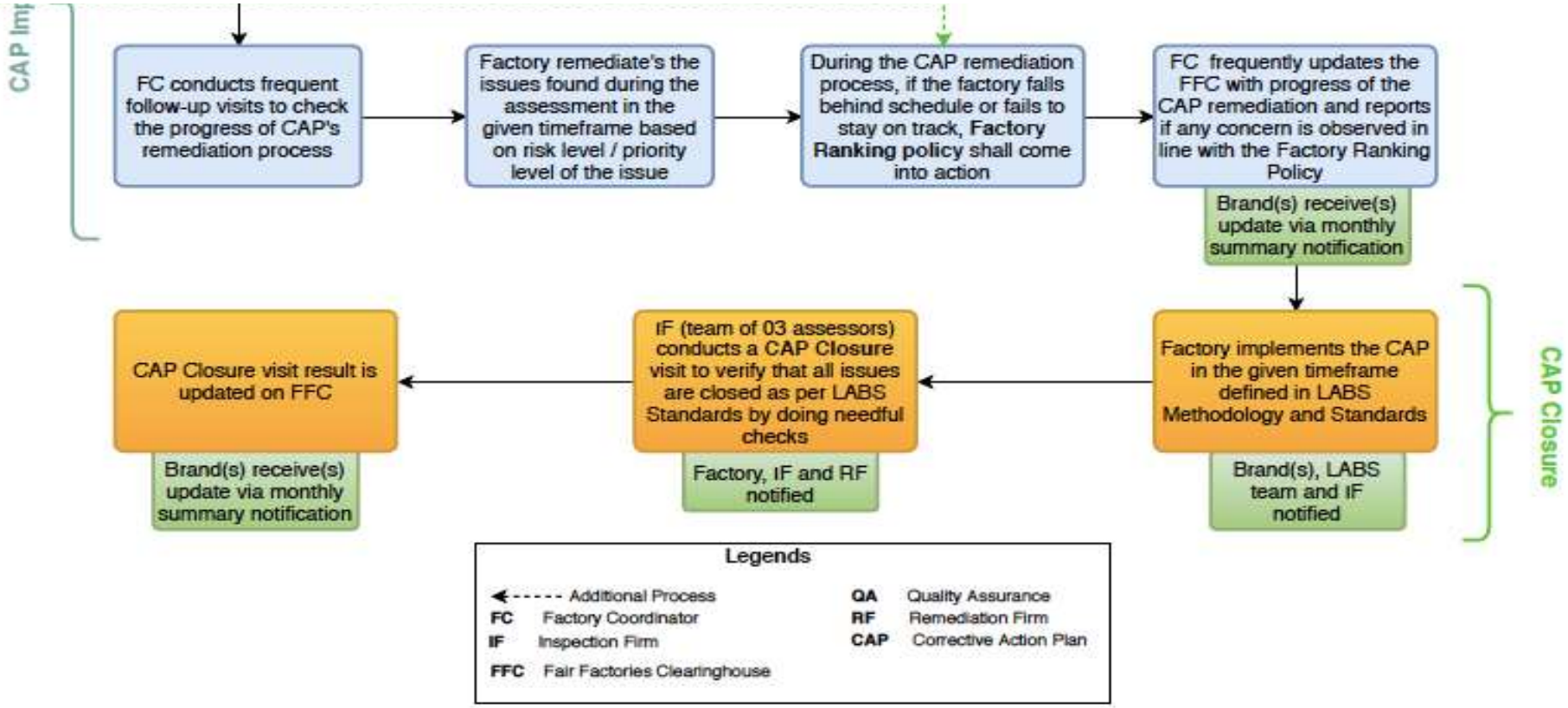
New CAP Remediation Process Flow




CAP Imp
FC conducts frequent follow-up visits to check the progress of CAP's remediation process
Factory remediate's the issues found during the assessment in the given timeframe based on risk level / priority level of the issue
During the CAP remediation process, if the factory falls behind schedule or fails to stay on track, Factory Ranking policy shall come into action
FC frequently updates the FFC with progress of the CAP remediation and reports if any concern is observed in line with the Factory Ranking Policy
Brand(s) receive(s) update via monthly summary notification
Factory implements the CAP in the given timeframe defined in LABS Methodology and Standards
Brand(s), LABS team and IF notified
IF (team of 03 assessors) conducts a CAP Closure visit to verify that all issues are closed as per LABS Standards by doing needful checks
Factory, IF and RF notified
CAP Closure visit result is updated on FFC
Brand(s) receive(s) update via monthly summary notification
CAP Closure
Legends
Additional Process
FC Factory Coordinator
IF Inspection Firm
FFC Fair Factories Clearinghouse
QA Quality Assurance
RF Remediation Firm
CAP Corrective Action Plan

Draft CAP Guidelines- Electrical Safety

Details Of Issue Found	CAP Priority	Recommended Action by IF	Incorrect CAP	Correct CAP	Gaps identified
No Protective Earth (PE) connection for: 1. ventilation motors at building A 2. compressor at generator room #2 of building C 3. ventilation panel and motors at building E	EP2	According to LABS Standards 10.25.2.2 and 10.32.1, motors and metal frame should be connected to Earth	The factory will install grounding for all equipment. Factory CR staff has reminded the construction team and maintenance team of the requirement. - CR team will pay attention to it when conducting the internal roving.	Factory will check all motors and panels and make sure PE connections will be performed according to LABS Standards 10.25.2.2 and 10.32.1. Also, will ensure to select proper capacity /rating of the grounding conductor according to LABS Standards 10.33.2.5. The detail of additional equipment will be submitted to IF for review and approval before implementing. The remediation action will be recorded with RF confirmation (if any) for further checking.	~ The technical specifications of additional equipment submitted ~ LABS Standard referred ~ Remediation records ~ RF's confirmation (if any)
small cable connected to big MCB/MCCB at: 1. power cable 2mm2 of chiller connected to MCCB 75A at Footbet area of building F 2. cable 2mm2 connected to MCCB 32A inside PA01 panel at 2nd floor of Main Office	EP2	According to LABS Standard 10.15.6.2, 10.27.1 and 10.29, appropriate protection shall be provided to avoid any overheat on the cable	The factory will install additional MCCB and ensure the electrical wire connect properly to MCCB The maintenance team and construction team will check again all electrical cabinets. They will ensure all equipment will be properly connected.	Factory will check and make sure that:- separated circuit shall be provided- proper protection between MCB/MCCB/overload devices and cables/conductors. According to LABS Standard 10.15.6.2, 10.27.1 and 10.29Example: in this case, cable 2mm2 should be used with MCB/MCCB 10-15A The detail of additional equipment will be submitted to IF for review and approval before implementing. The remediation action will be recorded with RF confirmation (if any) for further checking.	~The technical specifications of additional equipment submitted ~ LABS Standard referred ~ Remediation records ~ RF's confirmation (if any)
High temperature of 71.8^{o}C and 72.3^{o}C were observed inside panel at sole stitching area of building B	EP1	According to LABS Standards 10.38.2.2, factory should check and find root cause to fix it	The factory will check and find root cause to fix it by December.25.2019	Factory will carry out root cause analysis for the high temperature. Will check and mention 1) any wrong selection of wire to the load 2) wrong selection of breaker to the load / wire. 3) Any loose connection 4) Any faulty in the breaker (MCCB/MCB). After completion of the root cause analysis will carry out Thermographic scanning to ensure temperature is within the limit as per the LABS standard 10.38.2.2. Thermographic inspection shall be performed periodically for all electrical equipment. The remediation action will be recorded with RF confirmation (if any) for further checking.	~Solution provided post root cause analysis ~LABS Standard referred ~Remediation records ~RF's confirmation (if any)
No oil soak pit of Transformers was observed	EP3	According to LABS Standards 10.7.7, soak pit should be provided for transformers having large oil content (more than 600 liters)	Factory will set up the oil soak pit properly. Factory maintenance team will check periodically to ensure the practice is maintained effectively	Factory will contact local power company and install the soak pit for the transformers with the suitable volume according to LABS Standards 10.7.7. RF will prepare drawings and relevant legal documents (if any) then submit to IF for review and approval before implementing. The remediation action will be recorded with RF confirmation for further checking.	~Drawing/Design submitted ~LABS Standard referred ~Remediation records ~RF's confirmation (if any)

During review of documents periodical testing and inspection record for generator set, low voltage switch gear & compressor was not available. However, facility was maintaining daily checking inspection report which is not as per the LABS standard.	EP3	Ensure periodical testing and inspection of electrical equipment and maintain the records available all the time at site. In accordance with 10.38.2 of LABS standard.	The factory will check and ensure electrical equipment shall be inspected, tested, and maintained periodic	Factory will consult third party consulting firm to complete the testing and inspection of electrical equipment as per the LABS standard 10.38.2. Also, will ensure to develop preventive maintenance program to keep up all the electrical equipment in good working condition as per supplier guidelines. The remediation action will be recorded with RF confirmation (if any) for further checking.	~LABS Standard referred ~Manufacturer records verified and submitted ~Remediation records ~RF's confirmation (if any)
No Single Line Diagram was available for review	EP4	According to LABS Standards 10.22, SLD should be available for review	Factory will make the single line diagram for electricity system. Factory compliance team will monthly check records and keeping document practice to ensure all documents are kept available	Factory will consult third party consulting firm to complete the Single Line Diagram for electrical system as per the LABS standard 10.22.3. The SLD will be submitted to IF for review and approval. The remediation action will be recorded with RF confirmation (if any) for further checking.	~Drawing/Design submitted ~LABS Standard referred ~Remediation records ~RF's confirmation (if any)

Draft CAP Guidelines- Fire Safety

Details Of Issue Found	CAP Priority	Recommended Action by IF	Incorrect CAP	Correct CAP	Gaps identified
Escape path not clear of temporary obstacles at escape path Building A- 2nd floor and Building D- 1st floor were observed during audit.	FP1	Ensure pathways on exit routes clear of all temporary storage and other obstacles in accordance with Cl. 6.3.9 of the Labs Standard.	Factory will remove all the obstacles on the exit routes	Factory will remove all the obstacles on the exit routes in accordance with Cl. 6.3.9 of the LABS Standard. The remediation action will be recorded for further checking. Also, factory will always ensure to keep emergency pathways free from obstacles	~LABS Standard referred ~Remediation records ~Safe working plans
Locking devices have been found on exit door at chemical warehouse building.	FP1	Replace lock, inside locking mechanisms that allow easy opening from inside without the use of a key in accordance with Cl. 6.1 and 6.9 of the LABS Standard.	The factory will renovate the door and install a push bar on the emergency exit door.	Factory will replace locks, inside locking mechanisms by acceptable locking mechanisms on the exit doors in accordance with 6.9.4 of the LABS Standard. The new equipment's certification will be submitted to IF for review and approval. The remediation action will be recorded with RF confirmation (if any) for further checking	~Specifications of materials used and installed to be provided ~LABS Standard referred ~Remediation records ~RF's confirmation (if any)
The total width of exit doors at Building A 1st floor, Building D,1st floor Building E, 1st floor were not insufficient	FP2	Total width of exit doors should meet LABS standar requirement Cl.6.5	The factory will discuss with the construction team about where we can allocate additional doors in the workshop A, D, E. - The factory will follow the LABS requirements from now on when we review the width of the exit doors.	Factory will add the exit doors to meet total width of exit doors according to Cl 6.5 of the LABS standard. The detail plan of the additional exit doors (widths, locations or external staircase) will be submitted to IF for design review and approval before implementing. The remediation action will be recorded with RF confirmation (if any) for further checking.	~Solution provided ~Updated layout submitted if there is any change ~Specifications of materials used and installed to be provided ~LABS Standard referred ~Remediation records ~RF's confirmation (if any)
Inadequate detector coverage had been observed during audit: Smoke detector were not installed inside accessory rooms at 1st floor Building A.	FP2	Provide detectors to all enclosed areas to ensure compliance with Cl.5.9 of the LABS Standard and Cl.4 TCVN 5738-2001	The factory will check and ensure provide detectors to all enclosed areas by Jan,06.2020	Factory will install detectors in according to LABS Cl.5.9 and TCVN 5738-2001 Cl.4. The design drawings with relevant legal documents (if any) will be submitted to IF for review and approval before implementing. The remediation action will be recorded with RF confirmation (if any) for further checking.	~Layout submitted ~Equipment's certification submitted ~LABS Standard referred ~Remediation records ~RF's confirmation (if any)
The corridor outside of the QA rooms in Factory #2 at the southwest corner had the dead end with the travel distance around 28m, with only half of the path covered with sprinklers.	FP2	According to the LABS standard Cl 6.7, the max travel distance allowed for the dead end in the general industrial area would be 15m, with or without the sprinkler covered. The option could be get another exit along the corridor, which should be safe for evacuation.	[Immediate Action] Factory will set up more the exit route properly. [Preventive Action Plan] Factory HSE team will check all areas to set up the exit route properly based on LABS standard.	Factory will adjust the escape paths to reduce travel distance in according to LABS standard Cl.6.7. The new evacuation map will be submitted to IF for review and approval before implementing. The remediation action will be recorded with RF confirmation (if any) for further checking.	~Updated layout submitted if there is any change ~LABS Standard referred ~Remediation records ~RF's confirmation (if any)
Finished goods storage area, machine store, accessory warehouse area located at main factory building lacked fire rated separation from the production area.	FP2	Separate storage areas from adjacent areas by means of 1-hour fire rated construction in accordance with Cl. 3.10 and 3.11 of the LABS Standard.	The factory will setup separate storage areas from adjacent areas by means of 1-hour fire rated construction as LABS requirement.	Factory will provide fire rated separation between storage and production areas in according to LABS Cl.3.10; 3.11. RF will prepare drawings and relevant legal documents (if any) then submit to IF for review and approval before implementing. The remediation action will be recorded with RF confirmation for further checking.	~Drawings/design submitted ~Material's certification submitted ~LABS Standard referred ~Remediation records ~RF's confirmation
It was observed that interior floor or ceiling finishes of accessory storage area and left over goods area do not comply with the requirements of Cl. 6.3.2 of the LABS Standard.	FP2	False ceilings to be removed and replaced with finish meeting the fire spread characteristic requirements of Cl. 6.3.2 of the LABS Standard.	The factory will research and find 3rd party as LABS requirement with The interior floor, wall and ceiling finishes should comply with the requirements of NFPA 101 (2015) Table A.10.2.2. The below classifications are in accordance with the tests defined in ASTM E 84 or ANSI/UL 723	Factory will replace the false ceilings by finishes ceiling in according to LABS Cl.6.3.2. Factory/RF will prepare drawings and relevant legal documents(if any) then submit to IF for review and approval before implementing. The remediation action will be recorded with RF confirmation (if any) for further checking.	~Drawings/design submitted ~Material's certification submitted ~LABS Standard referred ~Remediation records ~RF's confirmation

Draft CAP Guidelines- Structural Safety

Details Of Issue Found	CAP Priority	Recommended Action by IF	Incorrect CAP	Correct CAP	Gaps identified
Uncontrolled load on any mezzanines, second floors. No allowable load plan posted at place in the factory.	SP3	Factory to appoint Structural Engineer to produce safe load plans for all mezzanine, second floors, giving consideration to floor capacity and column capacity. Factory to actively manage floor loading. Refer to Clause 8.8 to 8.10 of the LABS Standard.	The Safe Load Plan for each suspended floor and roof will be permanently and conspicuously posted on that floor and roof access point.	Factory will appoint a Structural Engineer to analyze the existing structure of Mezzanine, floors to determine the allowable load. The Safe load plans will be prepared by RF according to LABS standard 8.10 and it shall include the items described in section 8.21.5.4. Safe load plans will be submitted to IF for review and approval before post on the floor and roof access point. The factory will assign a load manager to control the load not higher than the allowable one. The remediation action will be recorded with RF confirmation (if any) for further checking.	~Solution provided ~Safe load plan submitted ~LABS Standard referred ~Remediation records ~RF's confirmation (if any)
Excessive deflection was observed on the canopy of the Canteen due to the insufficient capacity of the supported cantilever.	SP2	Factory to appoint Structural Engineer to study the defected structure and propose the proper remedial measures if required refer to clause 8.5 of the LABS Standard.	Factory will keep monitoring about structure safety using internal check list and if there's any problem(such as crack, slope), will contact 3rd party to arrange additional building safety inspection.	Factory will appoint a Structural Engineer to analyze the defected structure according to LABS 8.5. The required design confirmation and structural documentation will be submitted to IF for review and approval. The remediation action will be recorded with RF confirmation (if any) for further checking.	~Solution provided ~Structural documentation submitted ~LABS Standard referred ~Remediation records ~RF's confirmation (if any)
Corrosion on steel frames was observed at many places in the Factory: On many steel frames of the Canteen; On steel frames of the Motorbike Shed; On the canopy roofs, linked roofs outside of building A; On steel frames of the Water Tower.	SP3	Factory to appoint Structural Engineer to survey all the corrosion in the factory and propose the remedial measures properly according to clause 8.5 of the LABS Standard. The maintenance work needs to be carried out frequently. Refer to clause 8.27 of the LABS Standard.	Factory will survey all the corrosion in the factory and find the remedial	Factory will appoint a Structure Engineer to survey all the corrosion in the factory according to LABS 8.5. The survey report and remediation plan will be submitted to IF for review and approval. The maintenance work needs to be carried out frequently. Refer to clause 8.27 of the LABS Standard. The remediation action will be recorded with RF confirmation (if any) for further checking.	~Solution provided ~Survey report and remediation plan submitted ~LABS Standard referred ~Remediation records ~RF's confirmation (if any)
Non-engineer additional roof in front of building F. There was no lateral bracing, its columns were not connected firmly to steel frames of the Parking.	SP3	Factory to appoint Structural Engineer to analyse the stability of the additional roof then propose the proper remedial measures if needed refer to clause 8.5 of the LABS standard.	The factory adds beams and firmly connects with the steel structure of the parking in front of F Building The structural engineer will analyze the stability of the additional roof. Then he will propose remedial measures if needed.	Factory will appoint a Structural Engineer to analyze the stability of the structure according to LABS standard 8.5. The required design confirmation and structural documentation will be submitted to IF for review and approval. The remediation action will be recorded with RF confirmation (if any) for further checking.	~Structural documentation submitted ~LABS Standard referred ~Remediation records ~RF's confirmation (if any)
Cracks were observed periphery of the main building, near entrance of document storage area and near the entrance of warehouse and fabric storage area.	SP3	Factory to appoint structural engineer to find the root cause of cracks and to provide recommendation accordingly and remediation to be taken to prevent water ingress. (refer clause 8.5 of LABS standards)	We have a quality of construction works certificate check by 3rd party assure all cracks do not effect to building safety.	Factory will appoint a Structure Engineer to survey all the cracks in the factory according to LABS 8.5. The survey report and remediation plan will be submitted to IF for review and approval. The remediation action will be recorded with RF confirmation (if any) for further checking.	~Solution provided ~Survey report and remediation plan submitted ~LABS Standard referred ~Remediation records ~RF's confirmation (if any)