To: All SAAS Accredited Certification Bodies

Subject: Clarification to Emergency and Health & Safety Requirements in the SA8000 Standard

Background: After an extensive and deep look at the SA8000 certification system, policies and expectations, SAI has identified numerous revisions and changes to improve reliability and confidence in the current accreditation and certification methodology. Several key areas of improvement to the SA8000 system clarify performance criteria for fire safety, evacuation and training.

In clarification of existing requirements found in the SA8000 system, SAI has issued the following requirements that may go above and beyond current expectations. The Advisories and clarifications below specify performance criteria in auditing elements 3.1, 3.3 and 3.4 of SA8000:2008; they supplement what is already included in SAAS Procedure 200, element 2.8.

SA8000 applicant and certified companies shall be made aware of the requirements contained herein, before initial SA8000 certification and ongoing surveillance/recertification audits, and the requirements shall be included in audit obligations.

As per SA8000:2008:

3.1 The company shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to workers’ health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the workplace environment, and bearing in mind the prevailing knowledge of the industry and of any specific hazards.

3.3 The company shall provide to personnel on a regular basis effective health and safety instructions, including on-site instruction and, where needed, job-specific instructions. Such instructions shall be repeated for new and reassigned personnel and in cases where accidents have occurred.

3.4 The company shall establish systems to detect, avoid, or respond to potential threats to the health and safety of personnel. The company shall maintain written records of all accidents that occur in the workplace and in company-controlled residences and property.
Status: SAAS Procedure 200, clause 2.8., point i. is added and shall read:

As part of SA8000 audits, per SA8000 element, 3.4 to “detect, avoid or respond to potential threats”: the following shall be requirements at all SA8000-certified companies. Each on-site audit shall include an assessment of these requirements.

1. All SA8000-certified companies shall have procedures in place to establish, implement and maintain ongoing hazard identification. Workers shall be involved in the hazard identification process.

2. All SA8000-certified companies shall, as a result of their hazard identification, undertake a documented, effective emergency preparedness and response, and health and safety risk assessment with periodic ongoing and updated risk assessments. In addition to the basic health and safety risk assessment for the certified site, the risk assessment process shall also include geographic risks and threats, including seismic activities, flood, landslide and sabotage. Mitigation measures shall be based upon the likelihood of the threat and actions shall be appropriately taken.

3. All SA8000-certified companies shall produce a plan that determines the operations and activities associated with the identified occupational health and safety and industrial hazards and shall describe the controls necessary to manage these risks. The identification process shall include existing control measures and their adequacy. Risk control measures should be based upon risk categorization. The plan shall include a time frame for implementation with metrics to show progress. Immediate dangers shall be addressed within a short time-frame.

4. Ongoing and updated hazard identification and risk assessments shall be carried out by a person[s] with the necessary competency, skills and knowledge.

5. The hazard identification and risk assessments process shall include development of an emergency preparedness and response plan to take into account actions by all personnel related to fire and/or other emergencies (manmade and/or natural disasters); there shall be a clear definition of responsible persons to prevent, reduce and address any such emergency event.

6. All SA8000-certified companies shall have an emergency response team[s], with specific training, which is called upon to manage any emergency. An emergency response team shall be in place for all shifts and cover any dormitory in and out of working hours, where applicable.

7. Ongoing hazard identification, risk assessment, mitigation plan and corrective actions shall be reviewed at the company’s regular internal audit and management review. These documents shall be reviewed by the SA8000 auditor at every Stage 2 and recertification audit and modifications to the assessment and plan shall be reviewed at every on-site surveillance audit.

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1 The term “company” is defined in the SA8000:2008 as “The entirety of any organisation or business entity responsible for implementing the requirements of this standard, including all personnel employed by the company.” In the context of this Advisory, it shall be understood to apply to all SA8000-certified workplaces.
8. Indicators/evidence of implementation of an effective hazard identification, risk assessment and mitigation plan for emergency action, fire safety and evacuation shall include:
   a. Emergency evacuation routes that are: clearly marked, continuously unobstructed, and well lit with emergency lighting with backup power. Exterior doors and doors to exit hallways and staircases must open in the direction of travel and be readily opened from inside by any worker without the use of keys or tools.
   b. One or more designated and marked external assembly points in an area safely away from where fire operations might occur. The assembly areas shall be spacious enough to accommodate all personnel present.
   c. A fully operational early warning and evacuation alarm that can be heard and seen throughout the workplace, that is regularly tested and maintained (with associated records required as evidence), and is connected to a backup power system. In buildings where a workplace is housed with other companies, an independent fire alarm system is recommended for each floor.
   d. Fully operational firefighting equipment in place which meets the requirements of fire risk and fire class, maintained and unobstructed, clearly marked, accessible and easy to use. Employees shall be trained on the safe use of all of the fire equipment (with associated records required as evidence).
   e. A system to regularly inspect, test and maintain an operational automatic fire and smoke detection alarm with backup power.
   f. A system of precautions to prevent ignition of fires from sources of heat, open flames, electrical sparking, hot surfaces, welding, smoking, heat or sparks. Combustible material removed by adequate housekeeping measures. Hazardous material stored and handled in a safe way.
   g. A system to train all employees in emergency evacuation, fire prevention and use of firefighting equipment.
   h. Appropriate documentary evidence for verification by the CB auditor. Such documents include:
      i. Localized hazard identification and risk assessment document with specific requirements applicable for each site (in a multi-site company).
      ii. Incident registers.
      iii. Reportable accident registers.
      iv. Medical records.
      v. Concerns expressed by personnel.
      vi. Reports from health and safety and worker representatives.
      vii. Internal audit and management review verification/reporting/corrective action plans with respect to health and safety.

9. CBs shall issue CARs against the client’s health and safety management system based upon the indicators identified above. CARs issued shall include the evidence/indicators leading to the observed management system failure.

10. Select indicators listed above are detailed further in the Guidance section of this Advisory and additional clarifications will also be provided in an updated online Guidance resource developed by SAI.

11. When reading the information above, guidance can be derived from OHSAS18002:2008.
Status: SAAS Procedure 200, clause 2.8., point j. is added and shall read:

As part of SA8000 audits per SA8000 element, 3.1 to “take effective steps to prevent potential accidents and injury to workers’ health”: the following shall be requirements at all SA8000-certified companies:

1. All exterior doors and doors to exit hallways and staircases must open in the direction of travel and be readily opened from inside by any worker without the use of keys or tools. Exterior doors should have push bar operation or equivalent for easy exit in case of an emergency.

2. All floors and buildings, including dormitories, shall have a secondary exit, preferably an external emergency escape route. The use of window fire exits is not acceptable as a viable fire exit.

3. The use of an emergency escape route shall not endanger personnel. Personnel shall walk out of the premises and not have to use ropes or chutes or similar apparatus.

4. Exit routes shall have emergency lighting and be marked with signs, with at least one easily seen from any area within the facility.

5. The full width of aisles, exits and staircases shall be kept clear of storage and other obstructions at all times. All exits shall be unblocked and lead in unblocked paths to the exterior of the building. Emergency exit routes shall lead to designated, marked, safe assembly points.

6. Any barred windows shall have an internal mechanism for emergency release and be readily opened from the inside without the use of keys or tools.

7. Creche/child care facilities should be on the ground floor and preferably in a separate non-industrial building.

8. Every work area shall have an audible and high intensity alarm system to alert workers of an emergency. This alarm shall be connected to a backup power system at all times. The audible sound of any alarm shall be significantly different from that of any start/finish of work or break-time sounder.

9. In the case where companies use biometric time and attendance systems, the company shall be able to print out in real time a list of who is on site to enable an accurate head count to be performed.

10. At a minimum, the CB SA8000 auditor shall witness a fire drill at every Stage 2 and Recertification Audit, at any unannounced audit, and one time per year.

11. These elements [1-10 above] shall be reviewed by the SA8000 auditor at every on-site audit including announced and unannounced audits, by checking the mechanisms, doors and routes, and through worker interviews to confirm ongoing compliance.
Status: SAAS Procedure 200, clause 2.8., point k. is added and shall read:

As part of SA8000 audits per SA8000 element, 3.3 “the company shall provide to personnel on a regular basis effective health and safety instructions”: the following shall be requirements at all SA8000-certified companies:

1. Personnel in every SA8000 certified company shall be trained to recognize hazards and emergencies and empowered to take appropriate personal action.

2. Certified companies shall employ a system whereby all personnel are trained in hazard identification within or around the facility upon induction, with refresher training every 6 months thereafter. At minimum, this induction training shall include awareness training for all personnel on emergency preparedness, evacuation and basic use of fire extinguishers. Additional training shall be provided to a designated emergency response team on advanced techniques, with the frequency dependent upon the hazards identified.

3. Certified companies shall conduct fire extinguishing and emergency evacuation drills including all floors and areas of the building, at a minimum, every 6 months.

4. Documented evidence of the training and drills shall be maintained, with evacuation times recorded.

5. As part of the SA8000 audit: auditors shall witness, annually, a fire drill to assess the evacuation readiness and training of personnel in those countries in the “highest risk” category as defined in SAAS Procedure 200, Advisory 16.

6. These elements shall be reviewed by the SA8000 auditor at every on-site audit, including announced and unannounced audits, through records review and the worker interviews process to confirm ongoing compliance.
Status: SAAS Procedure 200, clause 2.8., point l. is added and shall read:

As part of SA8000 audits per SA8000 element, 3.1 “the company shall provide a safe and healthy workplace environment”: the following shall be requirements at all SA8000-certified companies:

1. Certified companies shall maintain the following records:
   a. A valid fire inspection certificate where required by law.
   b. A valid construction approval where required by law.
   c. A valid building safety inspection certificate.
   d. A valid legal incorporation.
   e. Documentation of fire drills and fire fighter training.
   f. Documentation of a valid evaluation of automated fire safety systems (fire detection, smoke detection, alarm, fixed or mobile extinguisher systems).
   g. Up to date plan of emergency exits and routes.
   h. Evacuation plans posted at regular intervals around the facility [in the language[s] of the worker] clearly showing ‘You are here’
   i. Layout plans of fire detection and protection equipment, emergency lighting and first aid box locations.
   j. Signage at suitable locations around the facility for first aiders, fire wardens, emergency response team and the manager in charge of health and safety.

2. These elements shall be reviewed by the SA8000 auditor at the initial certification audit. Ongoing on-site audits, including announced and unannounced audits, shall also review element 1.e and 1.f above, through records review. The SA8000 auditor shall be responsible for verifying these documents are valid and that the issuing body exists and is qualified to issue the certificates/documents.
Effective Date: This Advisory shall be effective April 30, 2013. This form must be signed, dated, and returned to SAAS upon your receipt, no later than May 15, 2013.

Implementation: As the information found in this Advisory is clarifications of performance criteria and not new requirements:

1. All SAAS-accredited CBs are required to incorporate and implement this Advisory into their internal procedures governing SA8000 audits prior to June 1, 2013.
2. Assessments of clients to these requirements shall be at the next on-site audit prior to August 1, 2013. If an on-site audit is not scheduled prior to August 1, 2013, clients shall have an interim on-site visit to confirm compliance.
3. CBs may choose to show compliance by certified clients if they can show evidence of effective review of these requirements from previous on-site audits.
4. SA8000-certified organizations not conforming to this requirement as of August 1, 2013 shall receive major non-conformities. Certified companies shall be given 30 days from the issue of the NC to comply with the requirements. An on-site audit shall be required to close the major CAR.
5. If the certified company does not comply with these requirements within 1 month of issuing the major non-conformity, SA8000-certified companies shall be suspended.
6. If SA8000-certified companies do not meet this requirement by October 1, 2013, the SA8000 certificate shall be withdrawn.
7. As of August 1, 2013, all new SA8000 applicants shall be required to conform to this requirement in order to qualify for certification.
**Guidance:** Indicators for an Effective Risk Assessment and Mitigation Plan for Health and Safety in SA8000 (Note: this Guidance will be incorporated in SAI’s Guidance Document for SA8000)

a) All SA8000-certified companies are to have undertaken a documented, hazard identification, emergency preparedness and response, health and safety risk assessment with periodic ongoing and updated risk assessments. In addition to the basic health and safety risk assessment for the certified site, the process will also include the geographic risks and threats, including seismic activities, flood, landslide and sabotage. Mitigation measures are to be based upon the likelihood of threat and actions will be appropriately taken.

b) Ongoing and updated hazard identification and risk assessments are to be carried out by a team with the necessary competency, skills and knowledge. This process should also include workers representatives.

c) Evidence of designated competent individuals to assure emergency preparedness and response are to be maintained. Their actions should ensure:

1. Emergency exits and escape routes are completely unobstructed.
2. Firefighting equipment is clearly marked, unobstructed and in serviceable condition. This equipment will be clearly marked and have instructions for use in the language[s] of the workforce pasted adjacent to it.
3. Potential sources of heat and fuel are controlled.
4. Automatic fire detection, alarms, and systems are operational.

d) The hazard analysis and risk assessment process are to include development of an emergency preparedness and response plan to take into account actions by all personnel related to fire and/or other emergencies (manmade and/or natural disasters) with a clear definition of responsible persons to prevent, reduce and address any such emergency event.

e) All SA8000-certified companies are to produce a mitigation plan that determines the operations and activities associated with the identified occupational health and safety and industrial hazards and is to describe the controls necessary to manage these risks. The identification process is to include existing control measures and their adequacy.

f) The plan is to include a time frame for implementation with metrics to show progress. Immediate dangers are to be addressed within a short time frame.

g) Ongoing hazard identification, risk assessment, mitigation plan and corrective actions are to be reviewed at the company’s documented regular internal audit and management review.

h) Indicators/evidence of implementation of an effective risk assessment and mitigation plan for emergency action, fire safety and evacuation include:

1. Emergency evacuation routes that are: clearly marked, continuously unobstructed, well lit with emergency lighting with backup power.
2. Exterior doors and doors to exit hallways and staircases open in the direction of travel and can be readily opened from the inside by any worker without the use of keys or tools.
3. One or more designated and marked external assembly points in an area safely away from where fire operations might occur.
   i. Emergency exit leading to open areas and pathways.
   ii. Clear indications/signs for evacuation to emergency assembly area.
   iii. An emergency assembly area of sufficient size to accommodate the full number of employees and other personnel who may reasonably be on site.
   iv. A sufficient number of emergency exits for the building structure and number of employees and other personnel who may reasonably be on site.

4. A fully operational early warning and evacuation alarm that can be heard and/or seen throughout the workplace, that is regularly tested and maintained with a backup power system.
   i. Audible and operational fire alarms.
   ii. Audible, visible and operable smoke alarms.
   iii. The number of alarms, at minimum, meets legal requirements.

5. Fully operational firefighting equipment in place, maintained and unobstructed, which meets the requirements of fire risk and fire class, is clearly marked, accessible and easy to use. Personnel are trained on the basic use of fire extinguishers with advanced training to emergency responders on all of the fire equipment.
   i. Adequate, connected and pressurized water supply for fire hydrant system and any sprinkler system on the premises.
   ii. Proper access for fire department vehicles.
   iii. Adequate number and type of firefighting equipment and portable fire extinguishers in place, maintained and unobstructed, clearly marked, accessible and easy to use on every floor.
   iv. Fire extinguishers to meet the class of fire and ignition source at its respective location.
   v. The number and type of firefighting equipment, at minimum, meets legal requirements.

6. A system to regularly inspect, test and maintain an operational automatic early warning fire and smoke detection alarm with backup power.
   i. Emergency lights.
   ii. Portable fire extinguishers and firefighting equipment with pressurized water system.
   iii. Unlocked fire hose cabinets.
   iv. Sufficient and accessible fire extinguishers for building structure and type of work done on premises.

7. A system of precautions to prevent ignition of fires from sources of heat, open flames, electrical sparking, hot surfaces, welding, smoking, heat or sparks. Uncontrolled combustible material removed by adequate housekeeping and decontamination measures. Hazardous material stored and handled in a safe way.
   i. Clean workplaces, free from dirt, dust and cigarettes.
   ii. Flammable and hazardous materials properly stocked and kept away from ignition sources.
iii. Safe electrical wiring.
iv. Gas sensors around gas-using and processing equipment.

8. A system to train all employees in emergency evacuation, fire prevention and use of firefighting equipment. Certified companies will employ a system whereby all personnel are trained in risk factors within or around the facility upon induction with refresher training every 6 months thereafter.
   i. Emergency evacuation training will include full evacuation drills where all personnel are evacuated and accounted for at the external assembly point.
   ii. Training will include designation of a group of trained personnel (fire wardens) who intervene, when safe to do so, to support the evacuation of co-workers and take fire prevention and fighting action, as appropriate.
      1. This training will include emphasis on the elimination of sources of ignition and heat.
      2. It will also include training on the selection and use of fire extinguishers with an emphasis on when to use an extinguisher (based on the hazards in the respective work areas) and when to evacuate.
   iii. Adequate ongoing training for all personnel will include evacuation and the use of personal protective equipment. Adequate continuous training for fire wardens will also include firefighting techniques, special hazards, and leadership training.
   iv. Evacuation and fire drills should be overseen by an external party, such as the fire authority, for timely and effective personnel evacuation.
   v. Documented evidence of the training and evacuation drills will be maintained, with evacuation times recorded.