

Implementation Agent



製衣業訓練局  
CLOTHING INDUSTRY TRAINING AUTHORITY

Organizer



香港製衣業總商會  
The Federation of Hong Kong  
Garment Manufacturers

Funded by SME Development Fund



工業貿易署  
Trade and Industry Department

# CASE STUDY

## CMS ASSESSMENT

### Disclaimer

“Any opinions, findings, conclusions or recommendation expressed in this material/event(or by member of the Project team) do not reflect the views of the Government of the Hong Kong Special Administrative Region, Trade and Industry Department of the Vetting Committee of the SME Development Fund”

# CMS Case Study:

- Case study about **FashionNIC Limited**
- **Background:** Clothing store and Fabric factory
- Faced with the ever-increasing demands for sustainable development, FashionNIC Ltd. is constantly improving their chemical management system.





# CMS Case Study:

- **Amy Lia**, as a General Manager in Safety & Quality Assurance Department of FashionNIC Limited, is a responsible person. She takes every action carefully and neatly.
- Amy Lia sets her own chemical inventory lists, chemical contingency planning & emergency plan has covered different situations.
- She focuses not on the operation of the factory and company, but also workers' health and safety.

## A.LIA NOTES:

### **Chemical Inventory Lists:**

CAS Number  
Hazardous type & code  
SDS availability  
Chemical Balance  
Date & Time  
FashionNic Factory  
Compliance of Brand MRSL & RSL  
Garment Lists  
Quality Tests  
Storage Area  
Product Name  
Monthly consumption and wastage quantity  
Monthly purchase quantity  
Fabrics Information  
Fashion Style  
Supplier Information  
Substance Name  
SDS availability  
Colour Mixture  
Expired Date  
Minimum storage quantity without permit

**CAUTION!!!**



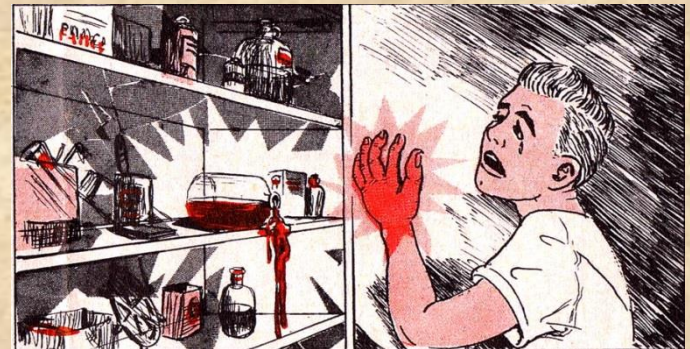
# CMS Case Study:

## ➤ Accident Happened:

Unfortunately, an accident happened in FashionNic Limited.

**Kinsman**, one of the workers in FashionNic fabric factory, his skin was burned severely by a chemical.

According to **Kim**, the factory leader, that was not the first time happened to Kinsman.



# Group Discussion:



- a. If you are an investigator for this accident, **please list out** the possible reasons that lead to this accident to happen. **Please also discuss** about Kinsman's attitude and the factory management problem.
  
- b. If you are the General Manager in Safety & Quality Assurance Department, **what will you propose** to the company to avoid this accident to happen?

# CMS Case Study (Suggested Answers)

a. If you are an investigator for this accident, please list out the possible reasons that lead to this accident to happen. Please also discuss about Kinsman's attitude and the factory management problem.

➤ **Employee's Attitude Problem:**

Employee thinks that using Personal Protective Equipment (PPE) is inconvenience

➤ **Factory Management Problem:**

1. The training content provided was inadequate.
2. The label of chemical was not clear.
3. The available PPEs were insufficient.



# CMS Case Study (Suggested Answer)

**b. If you are the General Manager in Safety & Quality Assurance Department, what will you propose to the company to avoid this accident to happen?**

➤ **Employee's Attitude Improvement :**

- Strengthen the training course: Nurture employee to have strong sense of safety when using chemicals.
- Carry out inspection of workshops regularly: Not only to ensure the staff have correct chemicals operation, but also to review the result of training course.

➤ **Management Improvement:**

- Review the existing training materials regularly.
- Review the acceptance system of chemicals regularly to ensure each chemical has a clear label.
- Ensure sufficient PPE should be first priority instead of expenses.

# CMS Step by Step Assessment

← → ↻ 🏠 不安全 | chemicals.cita.org.hk/?lang=en

Chemical Management System (CMS) for Clothing & Textile Industry English Username Password Log In

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## CMS

E-learning Platform for Clothing & Textile Industry  
Develop your own Chemical Management System

**Ready to evaluate CMS**

### Chemical Management System

NGOs and Green Groups have raised concerns on usage of hazardous chemicals in clothing and textile industries. Governments and fashion brands have therefore identified hazardous chemicals as restricted substances and imposed regulations on restricting to use these chemicals during manufacturing processes. We aim to help SME

Read More

Click in for Assessment



# FashionNic Limited's Score

71



# Action Plan Report

## 2. Assessment Results

| Site Information |                      |
|------------------|----------------------|
| Site Name        | FashionNIC Limited   |
| Assessment Date  | 6/15/2017 6:25:57 PM |

| Overview of Score |     |
|-------------------|-----|
| Full Mark         | 100 |
| Overall Score     | 71  |
| Grading           | B   |

| Performance of Chemical Management System |       |
|---|-------|
| Category                                  | Score |
| Procedure                                 | 25    |
| Documentation                             | 32    |
| Training and Review                       | 14    |

\*Grading Guidance

| Grading | Score  | Interpretation                                   |
|---------|--------|--|
| A       | 86-100 | Comprehensive system                             |
| B       | 51-85  | Good system required minor improvement           |
| C       | 26-50  | Moderate system required significant improvement |
| D       | 0-25   | Inadequate system                                |

# Implementation Manual

## 1 Commitments to Chemical Management System (CMS)

- 1.1 Define the scope
- 1.2 Determine the level of chemical risk
- 1.3 Set up chemical policy
- 1.4 Organization chart

## 2 Risk Assessment

- 2.1 Identification of Risk Evaluation
- 2.2 Determination and Evaluation of Control Measures
- 2.3 Process for Conducting a Risk Assessment

## 3 Chemical storage and handling

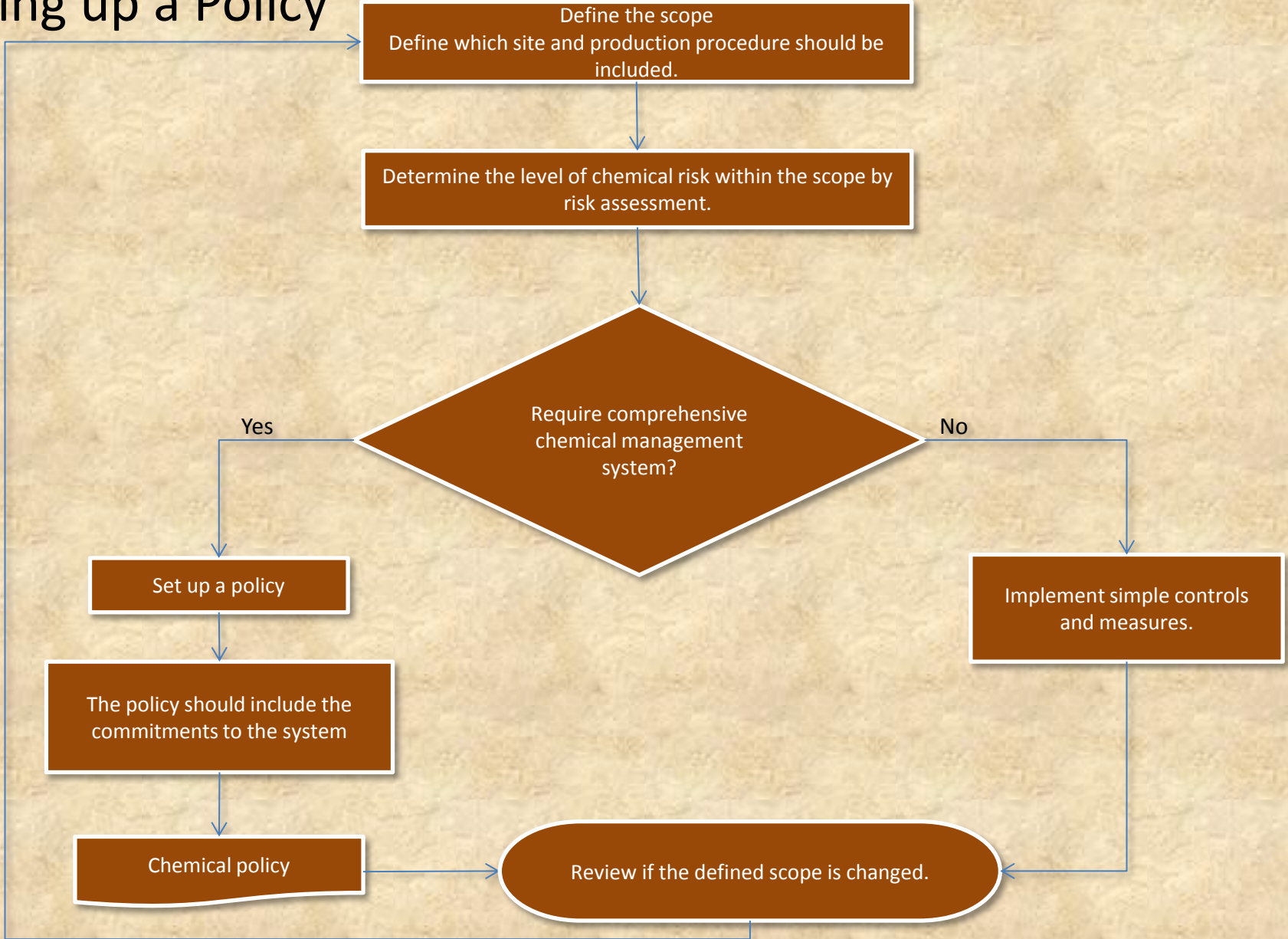
### 3.1 Health and safety measures

- 3.1.1 Written Instructions on Chemical Use
- 3.1.2 Instructions on Chemical Storage
- 3.1.3 Measures to Control Exposure
- 3.1.4 Measures for Maintenance and Housekeeping
- 3.1.5 Measures for Proper Waste Collection, Handling, Storage and Disposal
- 3.1.6 PPE, eye washer and shower in workshop
- 3.1.7 Proper labelling for chemical storage and handling area

### 3.2 Training

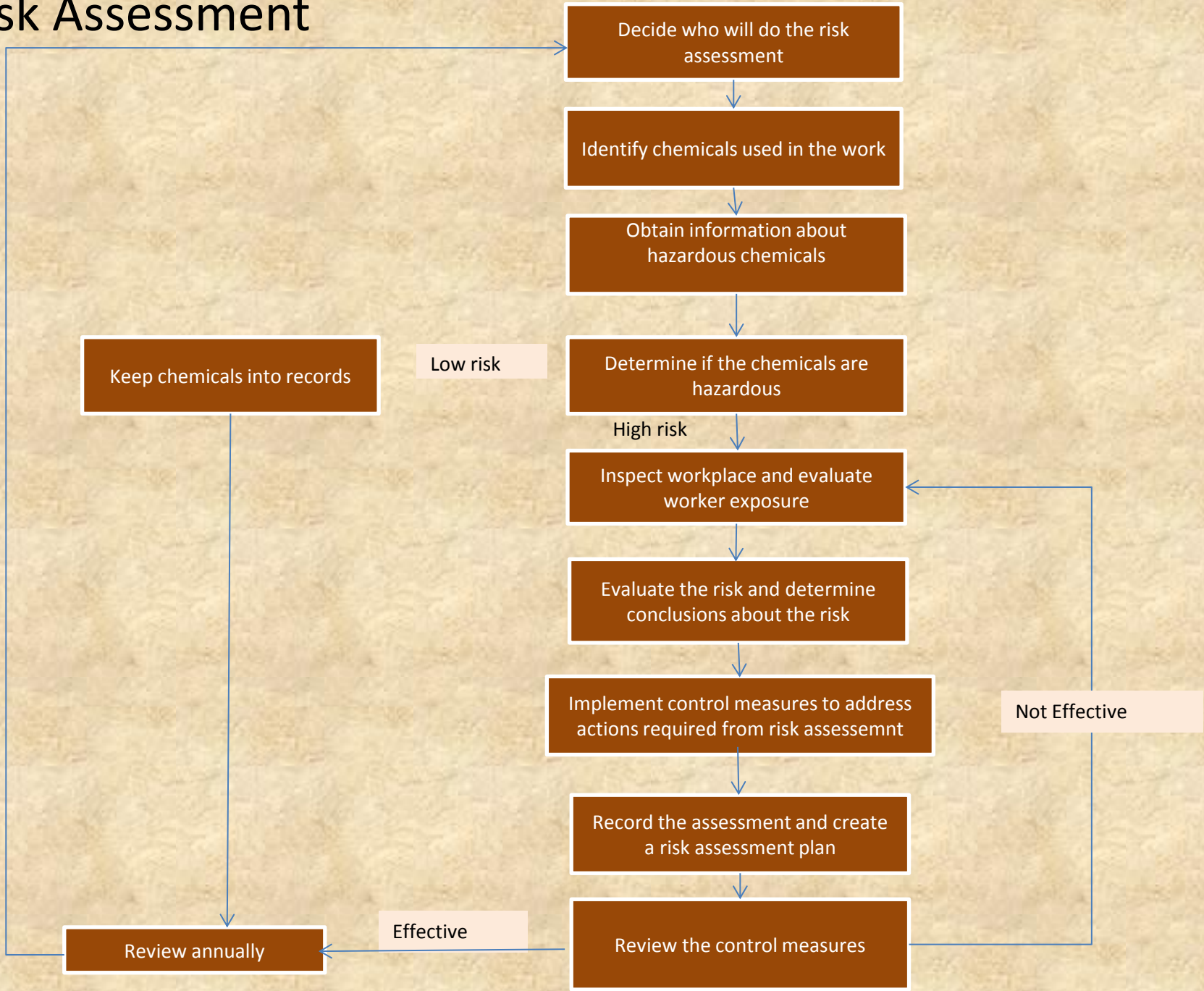


# Setting up a Policy





# Risk Assessment





# Risk Assessment Template

Table 3 Risk assessment template

| Activity                                  | Person Involved          | Risk                                      | Risk Level | Personal Protective Equipment (PPE) | Action to be taken  | Action Date | Action By  |
|---|--------------------------|---|------------|-------------------------------------|---|-------------|------------|
| E.g. Pouring NaOH solution from bulk tank | Employees in Workshop #2 | Splashing that leads to skin or eye burns | Very high  | face shield, gloves                 | 1. Eliminating the action of pouring<br>2. Restructuring the process. | Immediate   | Management |
|   |                          |   |            |                                     |   |             |            |
|   |                          |   |            |                                     |   |             |            |
|   |                          |   |            |                                     |   |             |            |
|   |                          |   |            |                                     |   |             |            |
|   |                          |   |            |                                     |   |             |            |
|   |                          |   |            |                                     |   |             |            |
|   |                          |   |            |                                     |   |             |            |

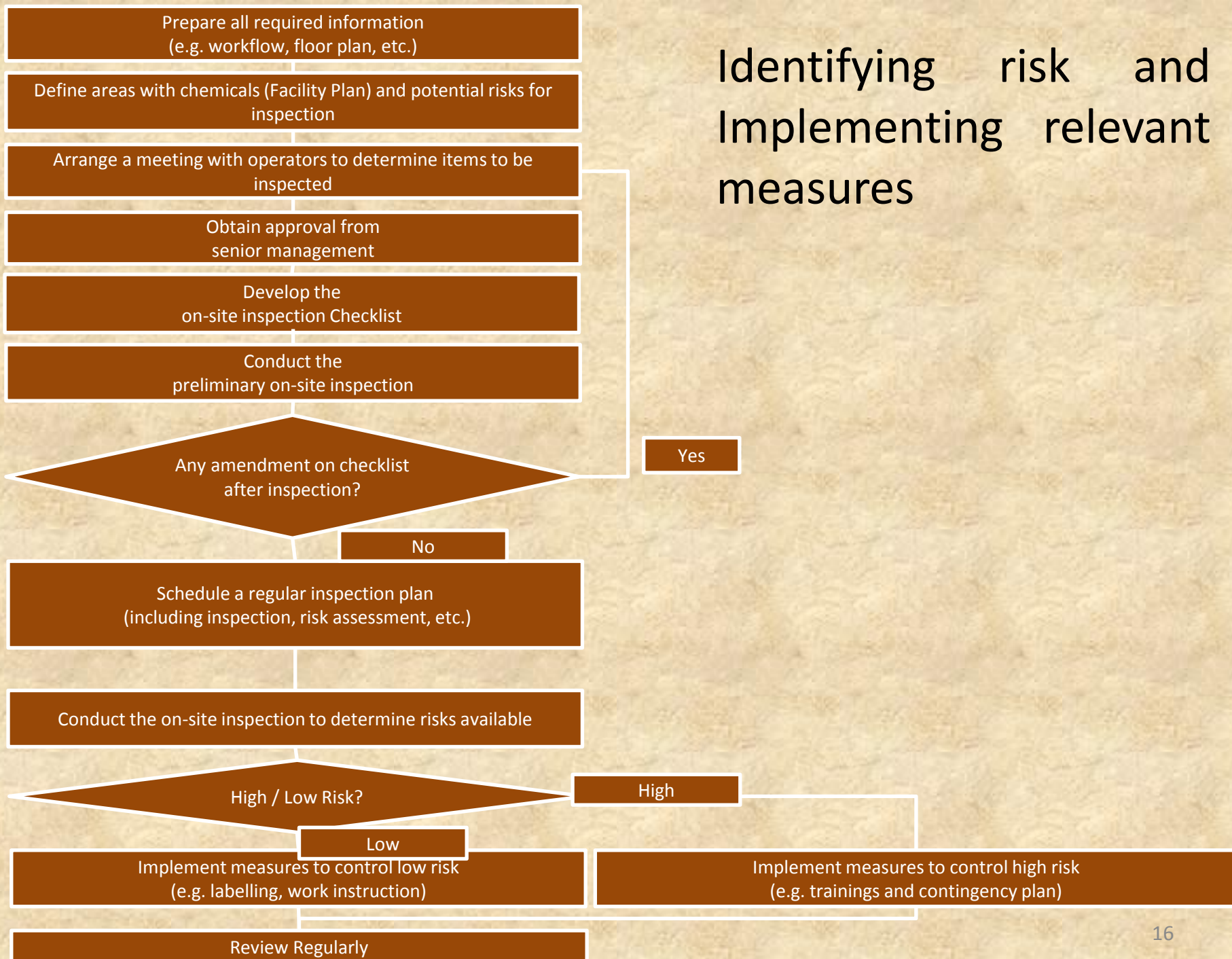
Assessed by: (Name) \_\_\_\_\_ (Job Title) \_\_\_\_\_

Signature: \_\_\_\_\_

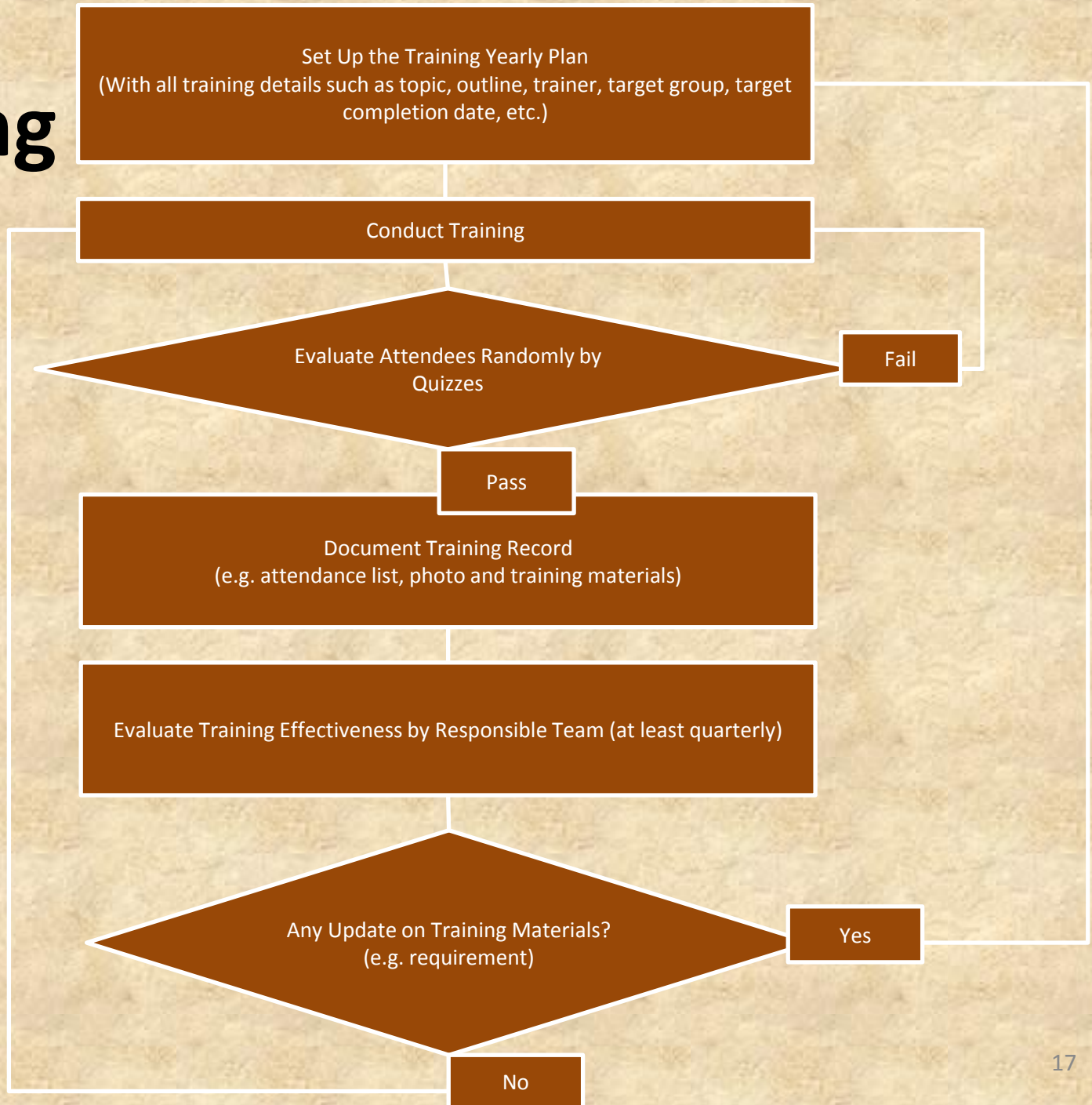
Assessment Date: \_\_\_\_\_

\*This template is for illustrative purposes only. Competent persons undertaking chemical risk assessments may amend this template to suit site-specific work activities.

# Identifying risk and Implementing relevant measures



# Training





# Training Content

| Training Contents    |   |
|----------------------|---|
| Operational Level    | <b>Basic knowledge:</b> <ul style="list-style-type: none"> <li>- Chemical hazards</li> <li>- Potential risks to health</li> </ul>   |
|                      | <b>Daily Safety Practices<sup>38</sup>:</b> <ul style="list-style-type: none"> <li>- Standard Operating Procedures (SOP) regarding safe chemical handling</li> <li>- Preventive environmental and work safety controls in place</li> <li>- Proper use of engineering controls</li> <li>- Proper use of PPEs (e.g. goggles and face shields to prevent eye and skin contact; and protective clothing to prevent skin contact with chemicals)</li> <li>- Selecting appropriate gloves and removing gloves to avoid skin contact with chemicals</li> <li>- Proper hand washing</li> <li>- Proper way to safely clean up spills</li> <li>- How to report hazard</li> <li>- What to do during emergency</li> </ul> |
|                      | <b>Regulatory:</b> <ul style="list-style-type: none"> <li>- A training process should be provided to relevant staff about the knowledgeable of legal requirements associated with chemicals in the manufacturer's inventory.<sup>39</sup></li> </ul>  |
|                      | <b>Training from Brands / Retailers</b> <ul style="list-style-type: none"> <li>- Engage in these training opportunities provided from brands / retailers (for example, education on their Restricted Substance List (RSL)/ Substances of Concern List (SoCL) for better compliance to the chemical requirements.<sup>40</sup></li> </ul>  |
| Top Management Level | <b>Basic knowledge:</b> <ul style="list-style-type: none"> <li>- Chemical hazards</li> <li>- Potential risks to health</li> </ul>   |
|                      | <b>Chemical management in manufacturer:</b> <ul style="list-style-type: none"> <li>- Trained to understand their roles in managing chemicals in organization</li> <li>- Be informed of information about the hazards and risks related to the existing chemical inventory, the organizational improvement goals and the human and financial resource required for CMS implementation.<sup>44</sup></li> </ul>   |

Table 5-6 Training content for different employees.

# Other Useful Information

**Summary of  
Regulations**

**On-Site  
Checking  
Sheet**

**Chemical  
Inventory  
Template**

**Disposal List  
Template**

**Drill Record**

**Reference  
Information  
for RSL and  
MRSL**

# Conclusion

## Updated Training Courses

-Revise New Knowledge: (i) Basic Chemical Knowledge (ii) Daily Safety Practices

-Chemical Management Regulations and Requirement



## Sufficient Safety Equipment

-Personal Protective Equipment (PPE)

-Safety & Health Measures



## Regular Training Courses

-At least once per year with evaluation

-Licensed Safety Trainer

