

Soft Goods Quality

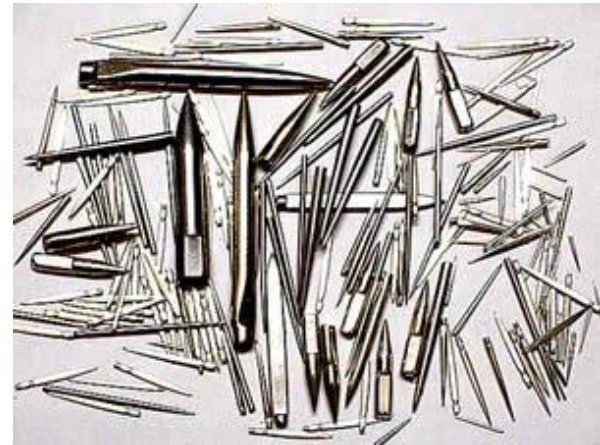
Needle & Metal Contamination Policy Guidelines Sept 2017



Needle & Metal Contamination Policy Sept 2017

Due to an increase in the number of incidents of broken needles for FY17 in childrens and infants garments, we have reviewed our policy of Broken Needles & Metal Contamination as follows.

- Suppliers should replace needles at regular intervals. The frequency of changing needles depends on the production output, type of fabric etc. Suppliers should determine required frequency of needle change through trials on the fabric prior to commencement of production.
- Needle damage to fabric and broken needles in production may be caused through sewing too fast, the use of blunt needles or the incorrect size needle for the fabric and thread.



Non-Compliance - Needle Holes/Needle damage

In the interest of our customers we have a no tolerance rule for needle damage or needle holes and will not accept goods under any circumstances. Suppliers need to be aware that any deliveries with holes or damage may result in order cancelations and that they will be liable for any costs incurred for checks or repairs.

Needle Control Policy

Manufacturers are required to ensure that garments are not contaminated with needles or needle fragments during garment manufacturing. The procedure and the actions taken should be in written form enabling the system to be independently audited.

It is therefore mandatory that a Needle Control Procedure is adopted by all manufacturers.

Procedural elements to be included in a “Needle Control Procedure” are:

- A designated individual/s to be responsible for issuing needles.
- Access to needles to be limited only to designated individual/s.
- New needles issued only on receipt of old needle.
- Sewing operators hold no spare needle/s.
- In the event of needle breakage, all pieces of the broken needle are to be retrieved from the garment, collected and all fragments assembled and attached to a record sheet to ensure that needle is complete.
- If the entire needle cannot be re-assembled and all fragments removed from the garment, the garment is to be destroyed.
- If all the needle parts cannot be found, then that area would need to be quarantined in an area of 2 mt sq and all garments checked. If the needle parts still cannot be found, then all garments from that area would need to be destroyed and not included in the final shipment. Checking of these garments can be done with hand metal detector.
- All incidents of broken needles are to be recorded and actions taken must be documented.
- Hand sewing repairs are to be included in the needle control procedure.

Recording Needle Replacement/Control:

Factories and suppliers can create their own layout but the records should include the following information:

1. Date
2. Machine details
3. Batch No - P/O/Style No.
4. Name of operator/Operators' signature
5. Supervisors' signature
6. All parts of the needle/broken needle

Broken Needle Replacement Record - Example

VIRTUAL BOTTOMS LTD
JAMGARA, ASHULIA, SAVAR, DHAKA

BROKEN NEEDLE RECORD

DATE	LINE NO	OPERATOR NAME	ID NO	MACHINE TYPE/NEEDLE NAME	STYLE NO	ALL PARTS OF NEEDLE	IF ANY PARTS OF A NEEDLE CAN'T BE FOUND PLS. ADVISE	OPERATOR SIGN
24-8-12	5	Sionu	809	P-m DP-18	4-1			
2	5	Babi	521	P-m DP-18	2			
2	S.V	Eliay	788	P-m DP-18	2			
2	5	Ab'saz	655	P-m DP-18	2			
2	5	Ab'saz	655	P-m DP-18	2			
2	4	Sathy	2373	P-m DP-18	4			
2	2	Asifhuil	3802	P-m DP-18	2			
2	I	Rahima	new	P-m DP-18	2			
2	I	Amrul	9320	P-m DP-18	2			
2	I	CuBiJ	new	P-m DP-18	2			
2	S	Sabay	816	P-m DP-18	2			
2	3	Amna	new	P-m DP-18	2			
2	6	Alchax	655	P-m DP-18	2			
2	6	Alchax	655	P-m DP-18	2			
2	6	Manabek	new	P-m DP-18	2			
2	5	Foodeg	783	P-m DP-18	4			
2	5	Amna	816	P-m DP-18	2			
2	5	Amna	816	P-m DP-18	2			

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H.R & COMPLIANCE

Example of Broken Needle Exchange



Metal Contamination (other than needles) Policy

Metal objects other than sewing needles can also pose a metal contamination concern. These objects include pins, staples, hand sewing needles, knitting machine needles, linking pins and other sharp objects used in garment manufacturing that can cause serious injury if they come into contact with the wearer.

Pins or staples should not be used at any point in the garment manufacturing process. This includes all stages of cutting, accessories collation, sewing lines, inspection and packing. Staples or pins must not be used on paperwork on the manufacturing floor.

These procedures must operate in all areas of garment construction including embroidery, appliqué and any outsourced sewing operations. All procedures must be documented, dated and available for inspection if requested.

Metal Detection Policy

(includes ALL apparel; infants, childrens, mens, womens, sleepwear, underwear & manchester)

A "Needle Control Policy" should be complimented by metal detector scanning of garments providing additional security against contamination.

The following elements should be considered:

1. Metal detection should be carried out preferably at the latest stage of production.
2. All garments prior to final finishing are to be processed through a Tunnel Type Metal Detector. Hand held type detectors may also be used to compliment Tunnel Type Needle Detectors but not in place of the Tunnel Type Needle Detector. The Tunnel Metal detector must be the only entrance for the flow of garments to the final packing area.
3. Metal detection equipment must be calibrated daily to ensure correct sensitivity to metal. Daily calibrations are to be recorded and documentation available for auditing purposes.
4. Detecting sensitivity should be compatible with the product e.g. 1.0mm iron ball in apparel manufacture is the industry standard.
5. Garments that have passed the metal detection scanning then proceed for finishing in a room which is isolated from the other manufacturing areas. Garments which fail the metal detection scan must be completely quarantined in a red disposal box which is placed OUTSIDE the isolated packing room.
6. The packing room must have restricted entry and log in records are to be maintained with regards to accessibility.
7. Metal detection operators must be appointed and visible identification of them is required to be displayed.

Example of Appointed Metal Detection Operators



Example of Red Disposal Box outside final packing area



Other metal objects that may pose a safety threat

Snippers



Eyelets or Domes



Kimble Gun



Utility Knife



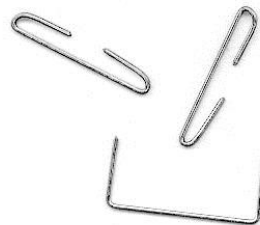
Pins



Pins



Staples



Safety Pins



If a factory operates a Needle detector/Metal detector, the use of this machine should not replace a needle control policy; it should be used to complement the needle policy.

Metal detectors are to be calibrated as follows:

- the beginning of each shift
- after any stoppage in the production line
- after maintenance.
- every 2 hours

Non-Compliance - Needle or Metal in garments

In the interests of our customer safety it is The Warehouse policy, that all Apparel, Sewn Accessories, all Manchester are Needle/Metal free.

Suppliers need to be aware that non-compliance may result in product recall or withdraw from store and that they will be liable for any costs incurred for checks or repairs.

If a needle or part of needle is found in a single item, the following actions may be taken:

1. Product may be withdrawn from store - all stock of the style currently in all stores may be removed immediately from sale.
2. All Distribution Centre stock will be quarantined.
3. All costs will be claimed from supplier.
4. Offending suppliers/factories will be recorded and may result in black listing for future orders.
5. Repeated offences from the same supplier will result in a monetary fine of up to \$5000

FY17 Examples of Needle Issues & Metal Contamination



Hand sewing needle attached to cuff of girls pyjama top (Aug)



Broken point of machine needle attached at hem of boys trunk (July)



Broken point of machine needle found in underarm seam of infants bodysuit (May)



Unidentified blade found in pocket of mens cargo short (April)

Example of Customer Complaint via Social Media

This can have a negative impact on our brand reputation and in turn reduces the level of trust for our customers. Customers will often use Social Media, such as Facebook to voice their concerns which can turn into a full blown media frenzy.

Metal domes detached from infants bodysuit due to incorrect application



Aug 26th, 6:38pm

Hi. I am very frustrated and want to know how/who to take a serious complaint to the warehouse or disney baby. ... i bought this for my son 6wks ago put it on because it finally fits him... size 1 (he is 8mths old) this is what happened..... all domes on one side including the spikey bits that are tiny that broke off too... i was mortified to find 1 in his hand.... lucky i found all the peices... this is what i have left of them... after carrying them round all day so i could take pictures....

Examples of Customer Complaints via Customer Services Call Centre



Subject: STOCK INCIDENT - Needle found in boys underwear

Product Barcode (if applicable): 9400988275772 - Basics Brand Boys' Trunk 3 Pack

Description:

Hi

I bought some boys basics underpants a month or so ago. Recently my son complained something was hurting his leg and he had a red mark on his leg, but we couldn't work out what it was from. Yesterday I was folding washing and brushed against a pair from the pack and hurt my hand. When I looked closely, I found a needle was still attached by thread to the underpants and was inside the seam. We are not happy at all.

Subject: Message - Needle in shorts

Product Barcode (if applicable): 9400070812205 - A'nD Lace Trim Shorts

Description: Hi Warehouse

Just found a needle inside the seam of these shorts my daughter got for Christmas. When pulling them down the needle has scratched her leg pretty deep (and a filthy looking needle at that!) Needless to say we are not impressed. You might want to remove these from your shelves as i'd hate for this to happen to anyone else

Conclusion

It is in the best interests of all TWL Suppliers to make changes to their manufacturing processes **with immediate effect** if they do not currently comply to these requirements.

Non-compliance will result in order cancellations.

Offending suppliers/factories are kept on record and any repeat offences will result in black listing for future orders.

