

# Corporate Social Responsibility: Looking at EHS and Sustainability Issues Outside the Box

Matt Conway, CHMM, CSP

14<sup>th</sup> Annual Gatekeeper Regulatory Roundup

# Traditional EHS Role



# Traditional EHS Role

Regulations  
Applicability  
Task Management  
Permit Management  
KPI / Metrics  
Sarbanes-Oxley

Air, Title V  
GHG  
Water  
Waste  
Fugitives /  
LDAR  
SARA 313 TRI  
Data Acquisition

MSDS  
Management  
MSDS  
Authoring  
Labels  
Chemical  
Inventory  
SARA 311, 312  
Tier II

Industrial  
Hygiene  
Occupational  
Injury & Illness  
Case  
Management  
Medical  
Surveillance  
Behavior  
Based Safety

Management  
Of Change  
Process Hazard  
Analysis  
Incident Mgt /  
Management  
Risk  
Assessment  
Emergency  
Management

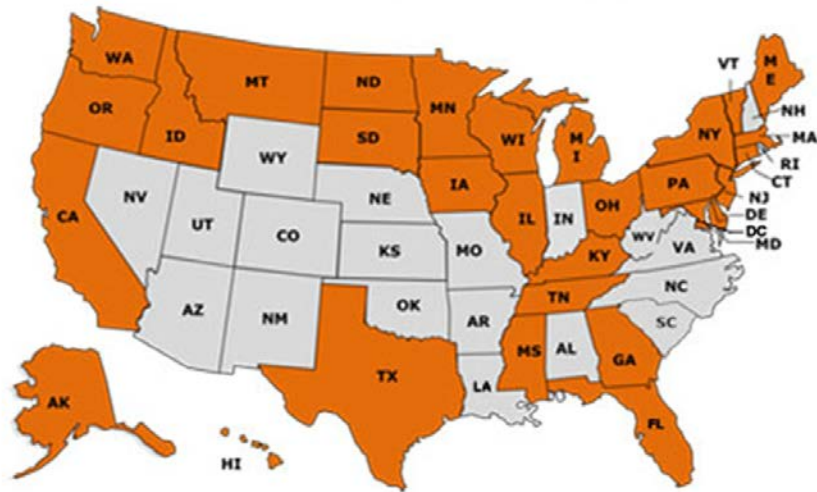
# Sustainability



# New Challenges



States Introducing Toxics Legislation in 2011



The Consumer Product Safety Improvement Act of 2008 (CPSIA)

# New Challenges



  
THE UK  
**MODERN SLAVERY ACT**  
2015

## California Prop 65 Warning:

The following products contain chemicals known to the State of California to cause cancer, birth defects, or other reproductive harm: belts, shoes, jewelry, handbags, all products with metal, plastic, zippers, vinyl, and buttons.



# New Challenges



# New Challenges

Published April 8th, 2013

## Colleges cut ties with Adidas amid labor violations

By Anthony Cave  
@Anthony\_Cave  
USA TODAY Collegiate Correspondent



Wearing the Final Four logo was a first in 20 for the Michigan Wolverines this past week. But it's another one embroidered on the plays uniforms that bothers sophomore Maya Meno: the three-stripe Adidas logo.

Menlo, a public policy major, is part of a group of about 15 students fighting to get Michigan to terminate its apparel contract, the largest in the



## How Nike Solved Its Sweatshop Problem

MAX NISEN MAY 9, 2013, 10:00 PM 36,874 4  
Recommend 136 Share 25 Tweet 145 Email More

It wasn't that long ago that Nike was being shamed in public for its labor practices to the point where it badly tarnished the company's image and hurt sales.

The recent factory collapse in Bangladesh was a



U.S. Customs and  
Border Protection



# Are these new challenges EHS Issues?



- Leather Tanning
- Cr(III) may oxidize to Cr(IV)

<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2883401/>



“  
If you haven't identified slavery  
in your supply chain,  
it is likely that you are not looking  
in the right places  
”

<https://www.drapersonline.com/business-operations/can-the-modern-slavery-act-solve-fashions-ethical-crisis/7018407.article>

# Corporate Social Responsibility

Corporate social responsibility is the continuing commitment by businesses to behave ethically and contribute to economic development while improving the quality of life of the workforce and their families as well as of the local community and society at large.

The World Business Council for Sustainable Development

CSR is a concept with many definitions and practices. The way it is understood and implemented differs greatly for each company and country. Moreover, CSR is a very broad concept that addresses many and various topics such as human rights, corporate governance, health and safety, environmental effects, working conditions and contribution to economic development. Whatever the definition is, the purpose of CSR is to drive change towards sustainability.

Corporate social responsibility is nothing but maximizing the value of your company over a long period of time, because in the long term, social and environmental issues become financial issues.

Lars Sorenson – Novo Nordisk

Financial Times

# TRIPLE BOTTOM- LINE CONCEPTS OF CSR

- **ECONOMIC RESPONSIBILITY (PROFIT).**
- **SOCIAL RESPONSIBILITY (PEOPLE).**
- **ENVIRONMENTAL RESPONSIBILITY ( PLANET).**

# Does CSR fit?



## Environmental Health & Safety Department



# CSR Program

- Legal Compliance
- Child Labor
- Forced Labor
- Environment (includes chemical use)
- Health and Safety
- Wages and Benefits
- Nondiscrimination
- Hours of Work
- Harassment
- Association
- Anti-Corruption



## Guidance

- Resources to support supplier development and implementation of the Code of Conduct



Responsible Sourcing Manual



Restricted Substances Manual

## Risk Assessment

- Verify T1 and nominated T2 supplier locations
- Establish baseline information
- Map risk – products, country, orders, payments, etc.



Supplier Self-Assessment Questionnaire



Supplier Information and Risk Map

# CODE OF CONDUCT

Commitment to legal, social and ethical standards of production and operational excellence.

## Improvements

- Corrective action plans
- Improvement projects
- Collaboration opportunities



Axions

## Checking

- Verify self-assessment information
- Audit conformance with Code of Conduct/Other Requirements
- Evaluate on-going workplace health and safety



Audit Guidelines



Audit Checklist



Vendor Safety Walkthrough Checklist and Reports



Health and Safety Reporting Guidelines

## Reporting

- Identify and track performance



Audit Grading Guideline



Audit Report

Consistently Meets/Exceeds Expectations
Non-Critical Findings
Critical and/or Zero Tolerance Findings

# Guidance

**adidas**  
GROUP

Environmental Guidelines



**Timberland** 

**WORKPLACE QUALITY  
STANDARDS GUIDE**



**Guidelines for Implementing the  
Code of Conduct**

*Version 2  
Global Business Alliances*



**PING**

**RESTRICTED SUBSTANCE  
MANUAL**

# Risk Assessment

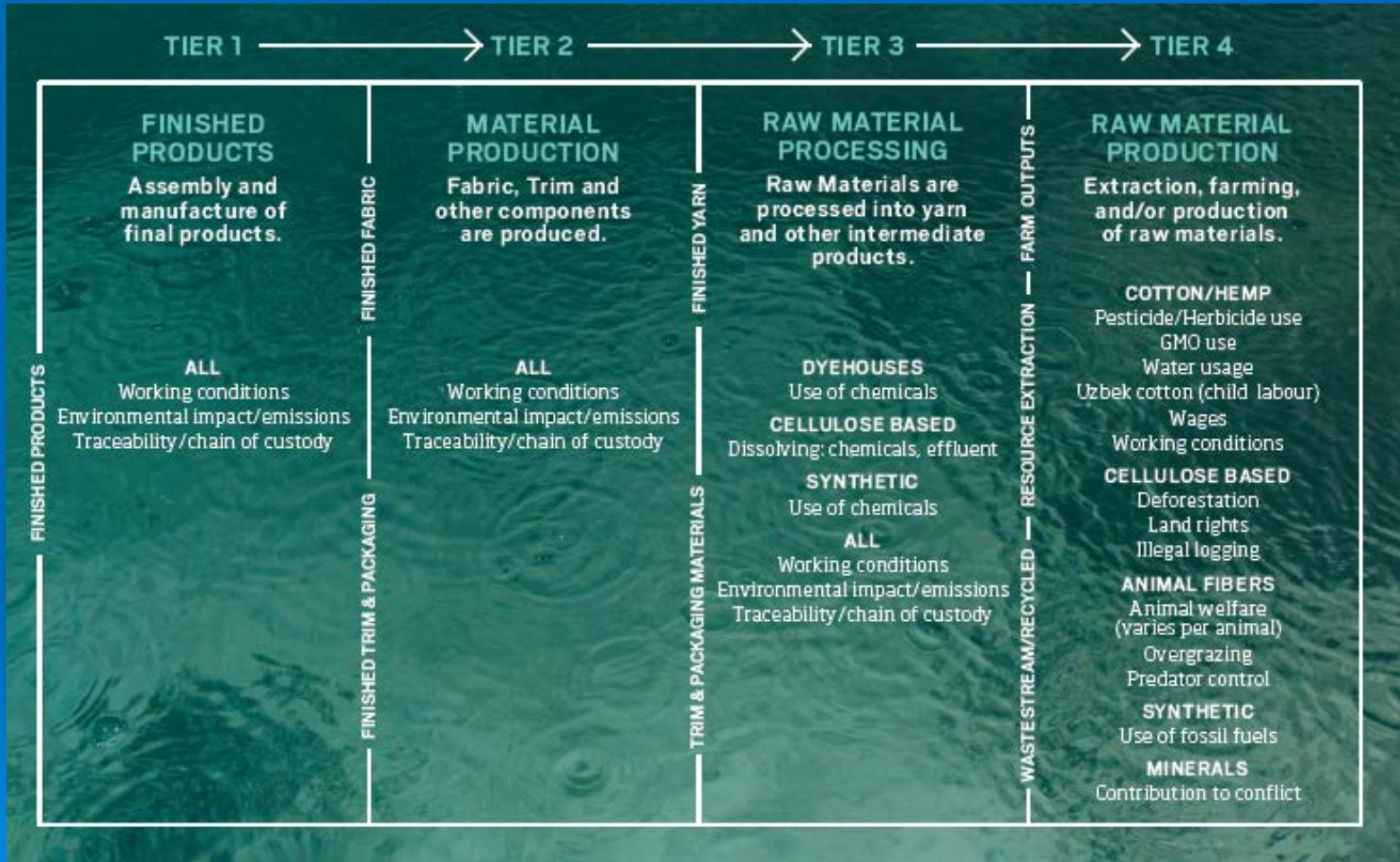


- Country
- Industry
- Product Type
- Accounts Payable
- Volume of Production
- Self Assessment



2017 Supplier Payment History	2016 Supplier Payment History	2015 Supplier Payment History	Collegiate Supplier	2017 Country Rank (State Dept. TIP Report)	2015 Country Rank (State Dept. TIP Report)
A	A	A	N	Tier 3	Tier 2 Watch List
C	F	D	N	Tier 3	Tier 2 Watch List
			N	Tier 3	Tier 2 Watch List



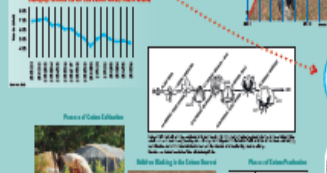


COTTON PRODUCTION



COTTON PRODUCTION IN TURKEY

Province/Year	2015	2014	2013	2012	2011	2010	2009	2008	2007
Adana	110,000	110,000	110,000	110,000	110,000	110,000	110,000	110,000	110,000
Antalya	110,000	110,000	110,000	110,000	110,000	110,000	110,000	110,000	110,000
... (other provinces) ...	...	...	...	...	...	...	...	...	...



**AGRICULTURAL BASIS CONDITIONS**

Production of cotton in Turkey is highly dependent on agricultural basis conditions. The main factors affecting cotton production are soil quality, water availability, and climate. The cotton production in Turkey is concentrated in the Mediterranean and Aegean regions.

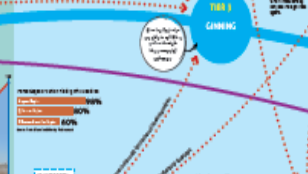
GINNING

DEVELOPMENT OF SPINNING SPINDLES

Region	2015	2014	2013	2012	2011	2010	2009	2008	2007
Marmara Region	19%	19%	19%	19%	19%	19%	19%	19%	19%
Aegean Region	18%	18%	18%	18%	18%	18%	18%	18%	18%
Mediterranean Region	28%	28%	28%	28%	28%	28%	28%	28%	28%
E. Aegean Region	52%	52%	52%	52%	52%	52%	52%	52%	52%

DEVELOPMENT OF SPINNING SPINDLES (continued)

Year	2015	2014	2013	2012	2011	2010	2009	2008	2007
2015	1,200,000	1,200,000	1,200,000	1,200,000	1,200,000	1,200,000	1,200,000	1,200,000	1,200,000
2014	1,200,000	1,200,000	1,200,000	1,200,000	1,200,000	1,200,000	1,200,000	1,200,000	1,200,000



**AGRICULTURAL BASIS CONDITIONS (continued)**

The cotton production in Turkey is highly dependent on agricultural basis conditions. The main factors affecting cotton production are soil quality, water availability, and climate. The cotton production in Turkey is concentrated in the Mediterranean and Aegean regions.



THREAD PRODUCTION

**THREAD PRODUCTION COMPANY**

The thread production process involves spinning cotton fibers into threads. This process is highly dependent on the quality of the cotton and the spinning technology used. The thread production companies in Turkey are highly competitive and produce high-quality threads for the textile industry.



**AGRICULTURAL BASIS CONDITIONS (continued)**

The cotton production in Turkey is highly dependent on agricultural basis conditions. The main factors affecting cotton production are soil quality, water availability, and climate. The cotton production in Turkey is concentrated in the Mediterranean and Aegean regions.



**AGRICULTURAL BASIS CONDITIONS (continued)**

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FABRIC PRODUCTION

**FABRIC PRODUCTION COMPANY**

The fabric production process involves weaving threads into fabrics. This process is highly dependent on the quality of the threads and the weaving technology used. The fabric production companies in Turkey are highly competitive and produce high-quality fabrics for the textile industry.



**AGRICULTURAL BASIS CONDITIONS (continued)**

The cotton production in Turkey is highly dependent on agricultural basis conditions. The main factors affecting cotton production are soil quality, water availability, and climate. The cotton production in Turkey is concentrated in the Mediterranean and Aegean regions.



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READY-TO-WEAR



**READY-TO-WEAR COMPANY**

The ready-to-wear production process involves cutting and sewing fabric into garments. This process is highly dependent on the quality of the fabric and the sewing technology used. The ready-to-wear companies in Turkey are highly competitive and produce high-quality garments for the textile industry.

**AGRICULTURAL BASIS CONDITIONS (continued)**

The cotton production in Turkey is highly dependent on agricultural basis conditions. The main factors affecting cotton production are soil quality, water availability, and climate. The cotton production in Turkey is concentrated in the Mediterranean and Aegean regions.



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FOREIGN BRANDS AND THE CONSUMER

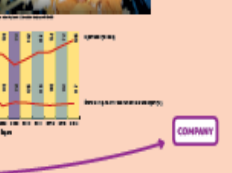
**FOREIGN BRANDS AND THE CONSUMER**

The foreign brands and the consumer market in Turkey are highly competitive and growing. The foreign brands are highly popular among the Turkish consumers, and the consumer market is highly diverse. The foreign brands are highly competitive and produce high-quality products for the Turkish market.



**AGRICULTURAL BASIS CONDITIONS (continued)**

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**AGRICULTURAL BASIS CONDITIONS (continued)**

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# Checking



## 1.1. Purpose of the Responsible Sourcing Audit Guidelines

The Guidelines describe the general procedures used by auditors for conducting Responsible Sourcing audits and rules for evaluation and reporting in order to ensure that audit results are comparable among CSL partners to the greatest extent possible.



Item	Checklist	Y	N	N/A	Comment
1	<b>Management Practice</b>				
1.2	Are emergency plans and response procedures for fire accident in place?				
1.3	Are emergency plans and response procedures for earthquake in place?				
1.4	Are emergency plans and response procedures for explosion in place?				
1.5	Are emergency plans and response procedures for hazardous chemical leakage in place?				

# Reporting

- Zero Tolerance
- Critical
- Non-Critical
- Information Only

<b>3, Executive Summary</b>
<b>Current EHS and Social Performance</b> <input type="checkbox"/> Red <input type="checkbox"/> Yellow <input type="checkbox"/> Green
<b>Development Potential</b> <input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High
<b>Brief Explanation:</b>



# Improvements



# Restricted Substances – What?

## TEXTILES: Stop the chemical overdose!

October 2013  
Authors: Madeline Cobbing  
Elisabeth Ruffenago

A report by WECF



**PERIODIC TABLE OF THE ELEMENTS**  
http://www.kj-gate.de/periodic/

GROUP	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
PERIOD 1	1 H 1.0079 HYDROGEN																	2 He 4.0026 HELIUM
PERIOD 2	3 Li 6.941 LITHIUM	4 Be 9.0122 BERYLLIUM											5 B 10.811 BORON	6 C 12.011 CARBON	7 N 14.007 NITROGEN	8 O 15.999 OXYGEN	9 F 18.998 FLUORINE	10 Ne 20.180 NEON
PERIOD 3	11 Na 22.990 SODIUM	12 Mg 24.305 MAGNESIUM											13 Al 26.982 ALUMINUM	14 Si 28.086 SILICON	15 P 30.974 PHOSPHORUS	16 S 32.065 SULFUR	17 Cl 35.453 CHLORINE	18 Ar 39.948 ARGON
PERIOD 4	19 K 39.098 POTASSIUM	20 Ca 40.078 CALCIUM	21 Sc 44.956 SCANDIUM	22 Ti 47.867 TITANIUM	23 V 50.942 VANADIUM	24 Cr 51.996 CHROMIUM	25 Mn 54.938 MANGANESE	26 Fe 55.845 IRON	27 Co 58.933 COBALT	28 Ni 58.693 NICKEL	29 Cu 63.546 COPPER	30 Zn 65.39 ZINC	31 Ga 69.723 GALLIUM	32 Ge 72.64 GERMANIUM	33 As 74.922 ARSENIC	34 Se 78.96 SELENIUM	35 Br 79.904 BROMINE	36 Kr 83.80 KRYPTON
PERIOD 5	37 Rb 85.468 RUBIDIUM	38 Sr 87.62 STRONTIUM	39 Y 88.906 YTRBIUM	40 Zr 91.224 ZIRCONIUM	41 Nb 92.906 NIOBIUM	42 Mo 95.94 MOLYBDENUM	43 Tc 98.906 TECHNETIUM	44 Ru 101.07 RHODIUM	45 Rh 106.42 RHODIUM	46 Pd 106.42 PALLADIUM	47 Ag 107.87 SILVER	48 Cd 112.41 CADMIUM	49 In 114.82 INDIUM	50 Sn 118.71 TIN	51 Sb 121.76 ANTIMONY	52 Te 127.60 TELLURIUM	53 I 126.90 IODINE	54 Xe 131.29 XENON
PERIOD 6	55 Cs 132.91 CAESIUM	56 Ba 137.33 BARIUM	57 La-Lu 138.905 LANTHANIDES	58 Hf 178.49 HAFNIUM	59 Ta 180.95 TANTALUM	60 W 183.84 WOLYBIUM	61 Re 186.21 RHENIUM	62 Os 190.23 OSMIUM	63 Ir 192.22 IRIDIUM	64 Pt 195.08 PLATINUM	65 Au 196.97 GOLD	66 Hg 200.59 MERCURY	67 Tl 204.38 THALLIUM	68 Pb 207.2 LEAD	69 Bi 208.98 BISMUTH	70 Po 209 POLONIUM	71 At 210 ASTATINE	72 Rn 222 RADON
PERIOD 7	87 Fr 223 FRANCIUM	88 Ra 226 RADIUM	89-103 Ac-Lr 227 ACTINIDES	104 Rf 261 RUFORDIUM	105 Db 262 DUBNIUM	106 Sg 263 SEABORGIUM	107 Bh 264 BOHRIUM	108 Hs 265 HASSIUM	109 Mt 266 MEITNERIUM	110 Ds 267 DUBNIUM	111 Uu 268 UNUNUNIUM	112 Uub 269 UNUNBIUM	113 Uuq 270 UNUNTRIUM	114 Uuq 271 UNUNQUADIUM	115 Uuq 272 UNUNPENTIUM	116 Uuq 273 UNUNHEXIUM	117 Uuq 274 UNUNSEPTIUM	118 Uuq 275 UNUNOCTIUM

**LEGEND:**  
 Metal: Blue, Semimetal: Orange, Nonmetal: Green, Alkali metal: Yellow, Alkaline earth metal: Light blue, Transition metals: Grey, Lanthanide: Purple, Actinide: Red.  
 Chalcogens element: Yellow, Halogens element: Green, Noble gases: Light blue.  
 STANDARD STATE (25 °C, 101 kPa):  
 Ng - gas, Fe - solid, Li - liquid, Syn - synthetic.

**LANTHANIDE:**  
 57 La (138.91), 58 Ce (140.12), 59 Pr (140.91), 60 Nd (144.24), 61 Pm (144.91), 62 Sm (150.36), 63 Eu (151.96), 64 Gd (157.25), 65 Tb (158.93), 66 Dy (162.50), 67 Ho (164.93), 68 Er (167.26), 69 Tm (168.93), 70 Yb (173.04), 71 Lu (174.97).

**ACTINIDE:**  
 89 Ac (227), 90 Th (232.04), 91 Pa (231.04), 92 U (238.03), 93 Np (237), 94 Pu (244), 95 Am (243), 96 Cm (247), 97 Bk (247), 98 Cf (251), 99 Es (252), 100 Fm (257), 101 Md (258), 102 No (259), 103 Lr (262).



### Unsafe substance

Dangerous levels of cadmium are reportedly being used in children's jewelry imported from China.

- What is cadmium?**
- Soft, white metal, occurs naturally in soil
- Why is it bad?**
- Known to cause cancer; can hinder brain development in young children

- Where is it used?**
- In rechargeable batteries, pigments, electroplating and plastic
  - It's cheap, shiny, strong and malleable at low temperature

Source: Los Alamos National Lab

EEH  
European Environment and  
Health Initiative



Women in Europe for a Common Future | WECF

Graph: Melina Vingling © 2010 MCT

# Restricted Substances – Where?



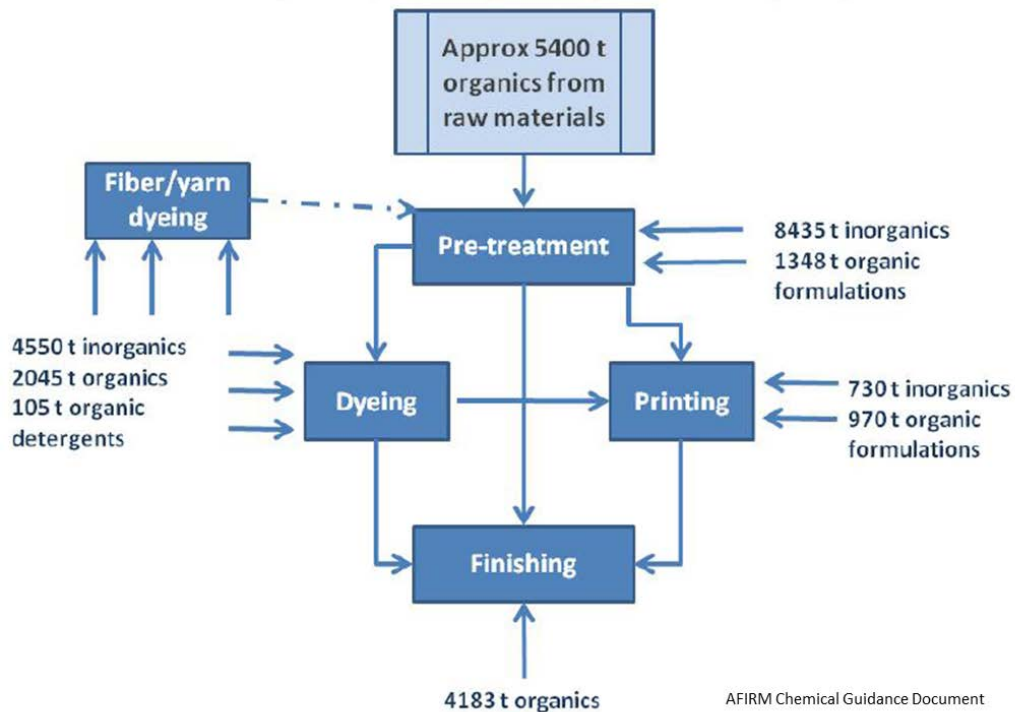
- Hat Shaping
- Formaldehyde

<http://www.afirm-group.com/presentations/2007/Frazier%202007%201.pdf>

# Restricted Substances – How?

Figure 1.3: Basic Scheme of Inputs to Textile Finishing Industry (Austria)

Total inputs: 28,000 tons/year (organics and inorganics)





# Restricted Substances - Control

Miscellaneous		
CAS Number	Chemical Name/Color Index Name	Restriction /Maximum Limit on Final Product or Tested Component
50-00-0	Formaldehyde 0-36 months old	Not Detected (detection limit is 16 mg/kg) (textiles)
	>36 months old (with direct skin contact)	75 ppm (detection limit is 16 mg/kg) (textiles)
	>36 months old (no direct skin contact)	300 ppm (detection limit is 16 mg/kg) (textiles)

Photo of the Submitted Sample



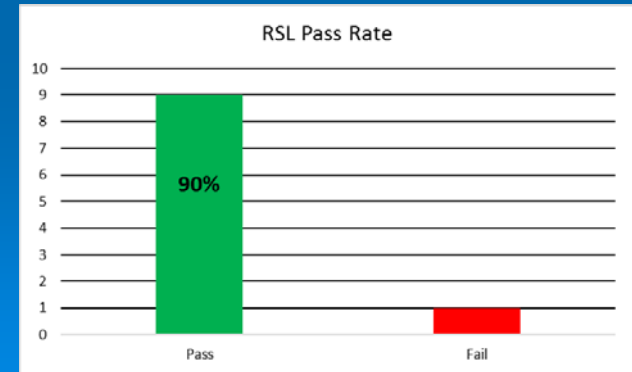
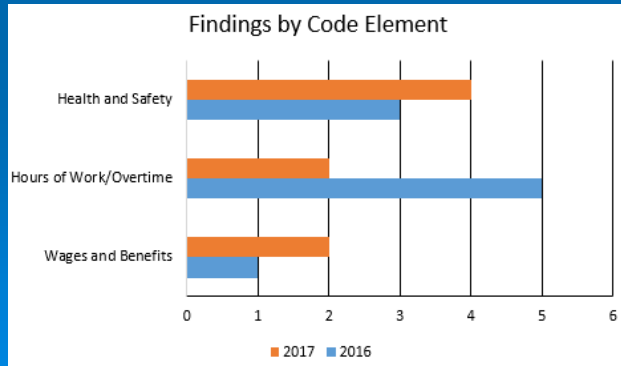
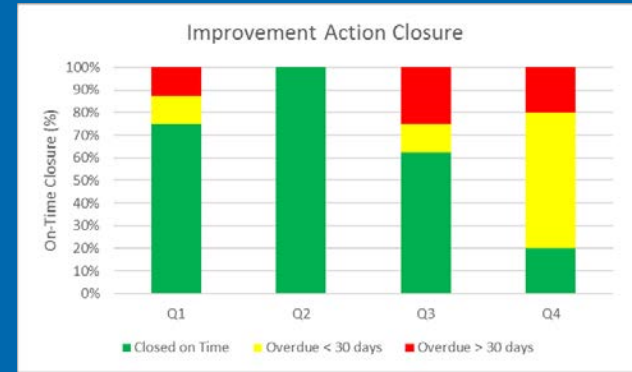
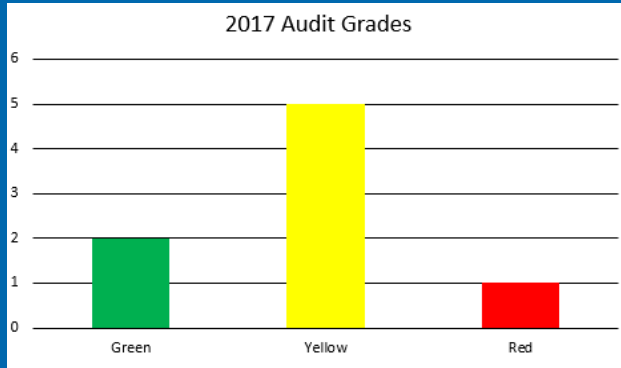
## SUMMARY OF TEST RESULTS

TEST REQUESTED	CONCLUSION
NONYLPHENOL AND NONYLPHENOL ETHOXYLATES CONTENT	PASS
FORMALDEHYDE	PASS
DIMETHYL FUMARATE CONTENT	PASS
AZO DYES	PASS
DISPERSE DYES	PASS

# Metrics/KPIs

Examples

Not Real Data



# Example CSR Programs: Clean Water Initiatives

**Planet Water Foundation Apparel Sector Collaborations**

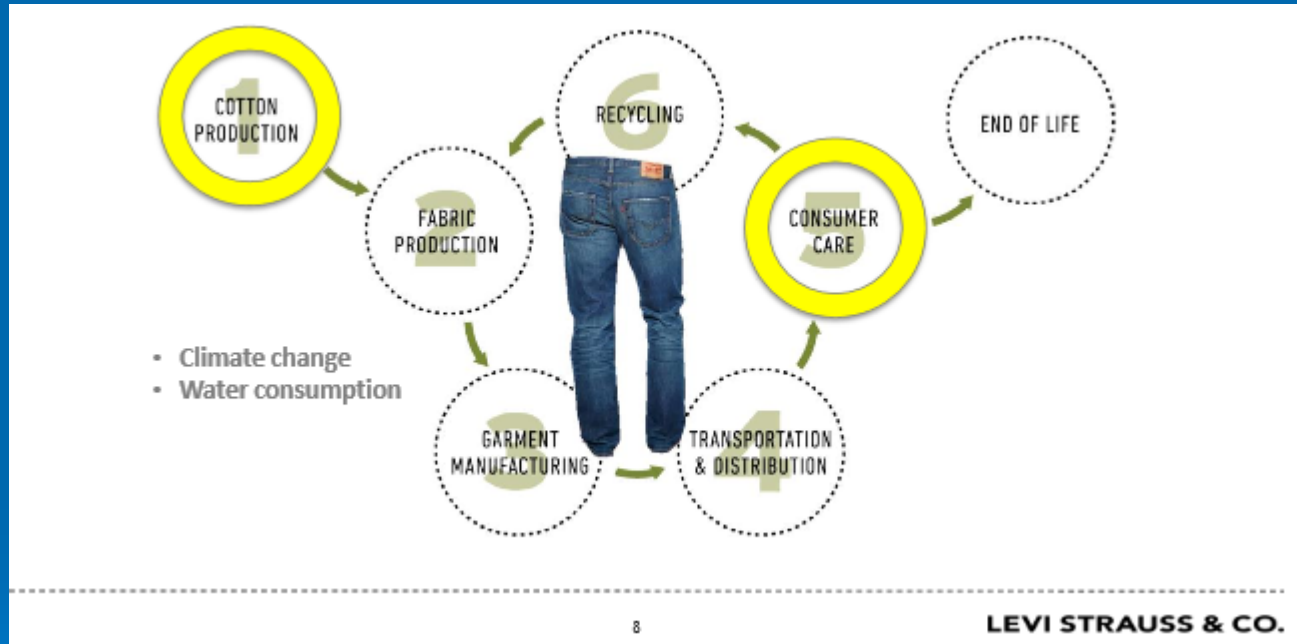


Volunteer Engagement	Project Communications	Supply Chain Involvement
<p>Involvement of up to 10 volunteers for team building activity</p> <p>Hands-on and engaging with opportunity to interact with community</p>	<p>Communications across our networks</p> <p>Photos, videos, and other materials provided to support our partners' communications to internal and external stakeholders</p>	<p>Participation in site selection process</p> <p>Opportunities for cost sharing</p> <p>Engagement in deployment, volunteering, and communications</p>
	<p>find us on <a href="#">facebook</a></p> <p>follow us <a href="#">twitter</a></p> 	

 **Planet Water** Foundation

**CSR Partnerships**

# Example CSR Programs: Cotton



By 2020, 100% of our cotton will be from sustainable sources:  
– 95% BCI, 5% certified organic and recycled cotton

# Example CSR Programs: Factory Wastewater

Share

## ZDHC Releases Wastewater Guidelines to Coordinate Industry Efforts & Eliminate Hazardous Chemicals

11/25/2016

The ZDHC Programme, a collaboration of 22 leading brands, 13 value chain affiliates and 7 associates, today releases its Wastewater Guidelines, a unified expectation on wastewater quality for the entire textile and footwear industry.





THANK YOU

Matt Conway, CHMM, CSP



## MATTHEW CONWAY, CHMM, CSP

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- Matt Conway is the Director of Environmental Health Safety and Compliance for PING, Inc.
- He has degrees from Long Island University and Arizona State University and has worked in the profession since 1994.
- Matt's work responsibilities include PING's EHS programs, corporate social responsibility initiatives, product stewardship, and other company compliance requirements.
- Matt holds leadership positions with the Arizona Environmental Strategic Alliance and the Arizona Manufacturers Council Air Quality subcommittee.
- For many organizations, corporate social responsibility and product stewardship functions are being aligned under the EHS umbrella. While these issues may not seem to be "traditional" EHS or Sustainability programs, there is more similarity than may meet the eye.
- Global regulations are increasingly focusing on chemical substances and their use in consumer products. Green consumerism and consumer awareness is rising. Companies and brands are expanding their sales and their supply chains throughout the world.
- This presentation looks at these issues and presents a real-world example of how they do "fit" within the "traditional" EHS and/or Sustainability world.