

AFIRM Factory Chemical Management Plan

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Factory Management

Put together a RSL Project Team

Assign:

- * Roles
- * Responsibilities



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RSL Strategy for Components and Suppliers



- Know your business
- Specifically include RSL compliance in the contract
- List vendors for components and suppliers
- List type of materials, components and source from each vendor listed above



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Understand your RSL Requirements

Describe your overall management strategy to minimize RSL risk

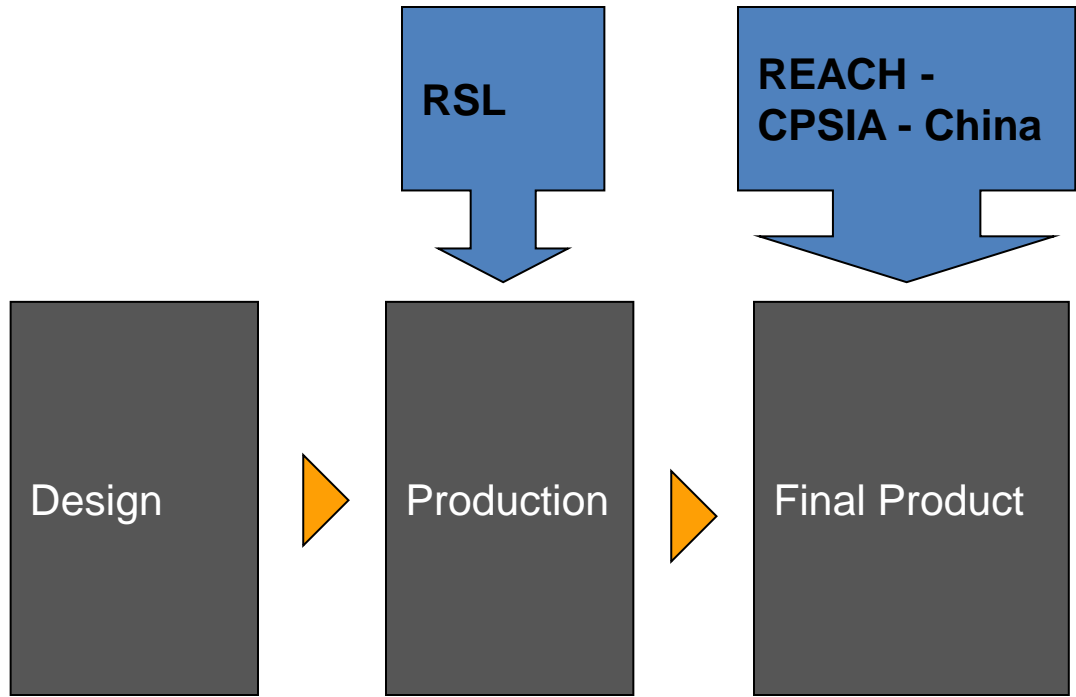
Focus on

- High Risk Materials
- High Risk colors





Legislation



Implementation - Sample Testing Approach



- Target high risk materials
- Prioritize Kids Products
- Prioritize Direct Skin Contact
- Randomly check anything
- Sample selection rules based on how a material is used
- Engage factory and vendor



Short Term Goals

Road
to
Success



- Identify RSL risk by material
- Set up the RSL risk control strategy
- Develop tracking report/system.
- All the RSL test results are reported to management on a seasonal basis.



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GOALS



*To get started,
you must have a destination.*

Long Term Goals

- Create an evaluation system to track vendor compliance. A score card could be established and implemented
- Use the result of evaluation for the future sourcing decisions
- Share the RSL database with vendors



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Vendor Management

- Describe your management strategy to minimize risk from vendors
 - Classify vendors by RSL risk
 - Define a low risk vendor
 - Define a high-risk vendor
 - Ensure that new vendors understand and meet the RSL



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Chemical Testing

- The best way to manage the RSL is to be knowledgeable about product chemistry



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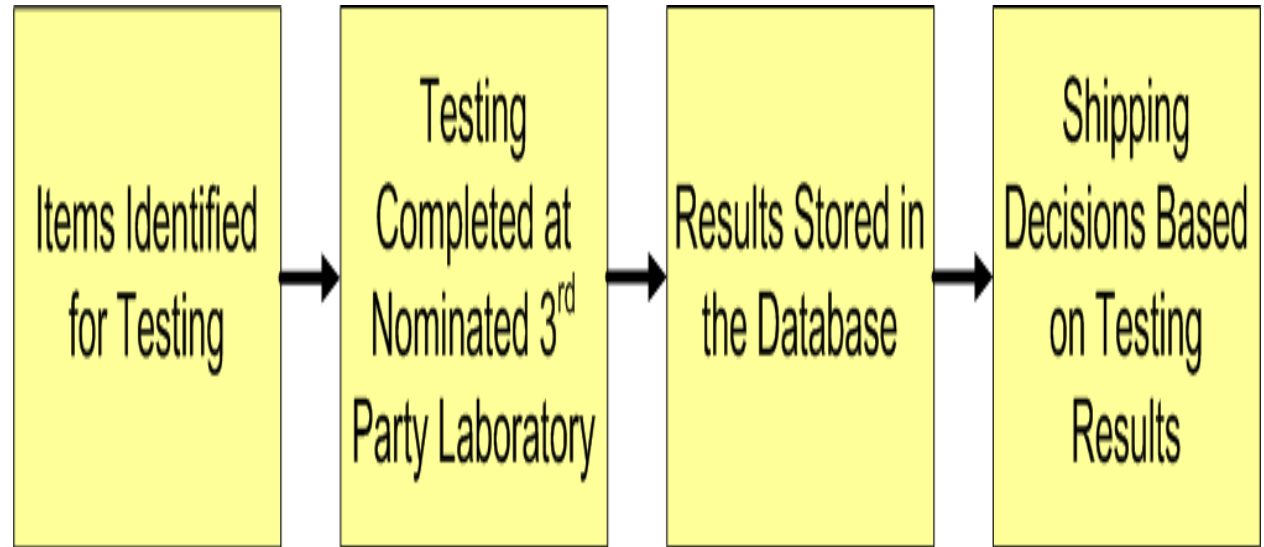
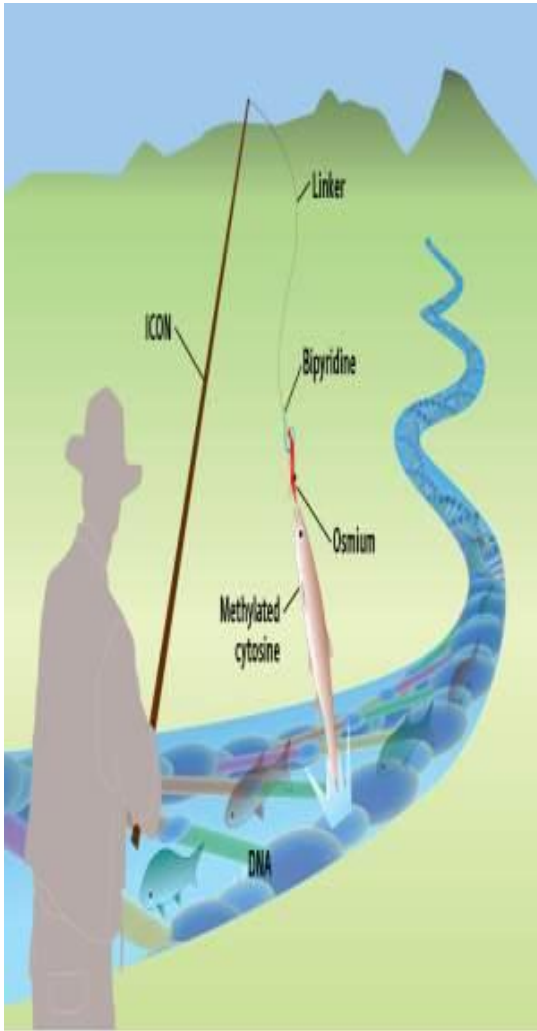
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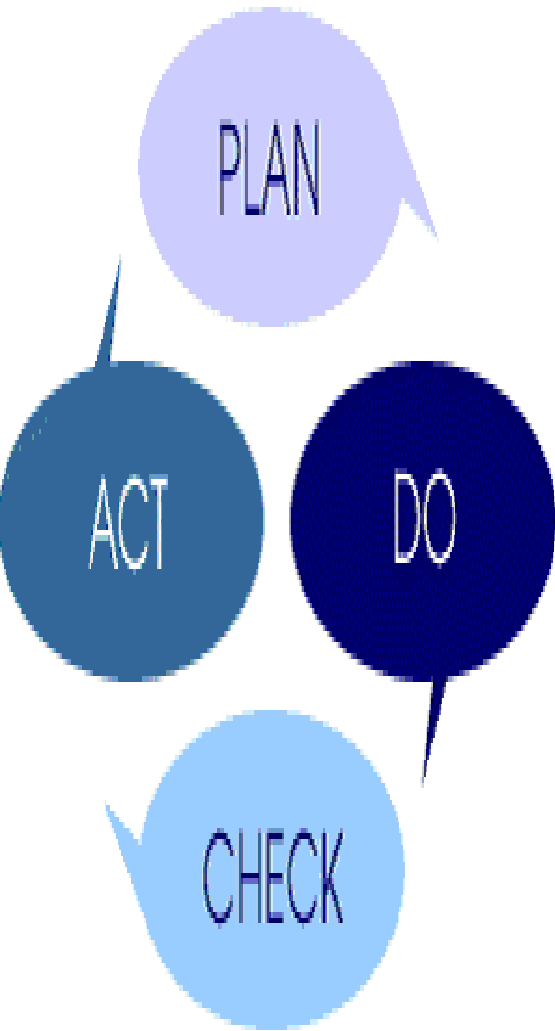
Build Knowledge

- Understand the process and chemicals involved in the manufacture of the components, for example by checking the MSDS
- Use the RSL risk identification database
- Test components prior to confirmation

Testing Approach



Corrective Action



- The cause(s) of individual failures can be varied
- Root cause analysis (PDCA) should determine how to best reduce risk of RSL violation
- A Failure Resolution Form should be used as a tool for tracking

Non-compliance under production

- Stop production
- Replace with complying materials
- Destroy non-compliant materials
- Vendor to reimburse on all losses



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Data Management



- Access to RSL data throughout the supply chain is a key component in management strategy for the RSL

Checking list:

- Have a database for all testing data
- Send RSL data for management review on a regular basis
- Identify suppliers with repeated failures and stop the PO

Tracking Time Table



| Progress | Target date | Finish date |
|---|-------------|-------------|
| Complete RSL Plan and present to factory management | 01/20/2013 | |
| Discuss and train RSL Plan with vendors | 02/20/2013 | |
| Set up the RSL Action Plan Schedule | 04/20/2013 | |
| Prepare material for RSL testing | 05/20/2013 | |
| Finish RSL testing | 06/20/2013 | |
| Review RSL data trend with vendors | 07/20/2013 | |
| Review and revise RSL plan for continuous improvement | 08/20/2013 | |



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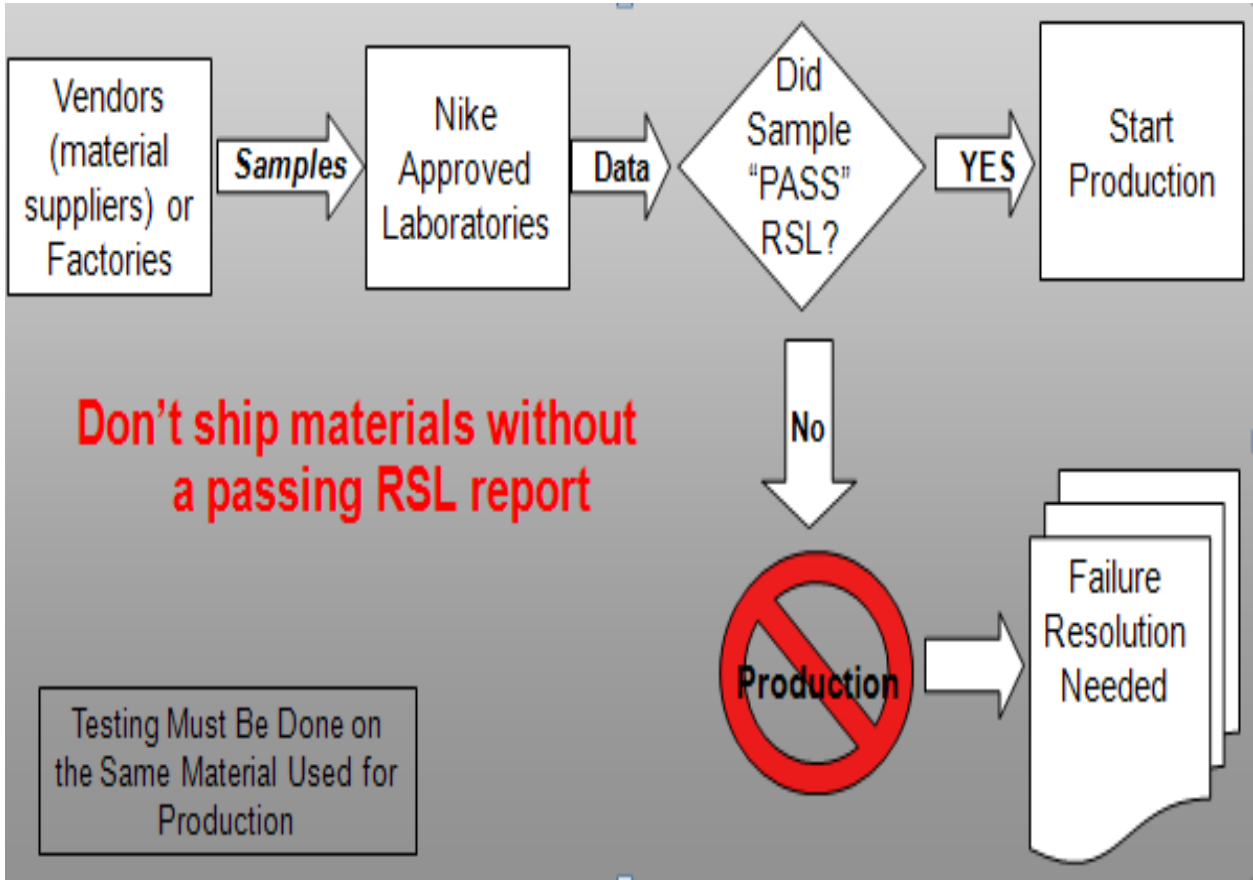
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Implementation



Thank You

