INITIAL FIRE ASSESSMENT REPORT (FAR)

Factory Name:	**That's It Sports Wear Ltd**
Address:	**147-148 East Narasinghpur Ashulia, Savar Ashulia, Savar Dhaka Bangladesh**
Assessor:	**CCRD**
Date:	**20 May 2014**

Introduction to the Report

The following report contains a site profile and summary of non-conformities identified during an onsite assessment commissioned by the Alliance for Bangladesh Worker Safety (Alliance) and conducted by a third-party Qualified Assessment Firm (QAF). The assessment was conducted against the Alliance for Bangladesh Worker Safety Assessment Protocols (APs) and Fire Safety and Structural Integrity Standard, which is harmonized with the factory assessment guidelines developed by Bangladesh University of Engineering and Technology (BUET) for the Bangladesh National Tripartite Plan of Action (NTPA). The goal of the Alliance process is to provide clear and practical technical requirements by which Bangladeshi Ready Made Garment (RMG) Factories producing for Alliance members may be consistently and fairly evaluated for fire, structural, and electrical safety in a non-duplicative manner. Each assessment will prompt action plans that will be used by RMG factories to systematically and sustainably improve safety conditions for garment workers. Beyond tracking and reporting on action steps taken in a transparent manner, the Alliance organization and its members will seek to further support factory improvements through technical assistance, training, implementation support for functional Worker Committees, and in some cases financial assistance and wage support for workers if factories are closed for remediation.

The contents of the report do not constitute a guarantee of compliance with the applicable laws, the Alliance Standard or the absolute or continued safety against fire, electrical and/or structural integrity issues that may lead to injury or loss of life. The report is designed to provide a non-exhaustive summary of risk issues, based on a limited sampling and duration of time onsite by the named QAF. Neither the QAF nor the Alliance can certify or guarantee the quality, outcome, or effectiveness of actions taken in response to the report.

For more information and report feedback please go to: www.bangladeshworkersafety.org.

GENERAL INFORMATION

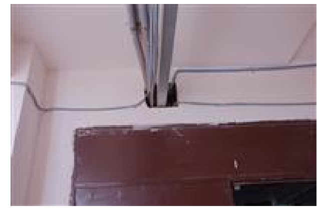
General Information	
Factory Name:	That's It Sports Wear Ltd
Address:	147-148 East Narasinghpur Ashulia, Savar Ashulia, Savar Dhaka Bangladesh
Country:	Bangladesh
Province:	Dhaka
City:	Ashulia, Savar
Zip Code:	1341
Audit Duration:	
Re-Audit:	Re-Audit After 0 Months
Draft Report Date:	June 25, 2014
Final Report Date:	June 30, 2014
Are all Action Items From Previous Assessment Completed?:	N/A
Buildings in Complex:	3 main factory buildings: That's It Sports Wear (TISWL), Apparel Gallery Ltd (AGL), New Construction; 8 ancillary buildings.
Is the building(s) owned or rented by the Factory:	Owned
Number of Building Levels (Stories):	That's It Sports Wear: 10; Apparel Gallery Ltd: 7 + basement
Approximate Building Area (SF):	TISWL: 470862 SF, AGL: 276000 SF.
Date of Building Construction:	TISWL: 2003; AGL: 2008; NC: 2014
Date of Last Building Renovation/Addition:	unknown
Ancillary Structures in Complex:	Dining Hall/Printing, Generator/Boiler, Offices, Embroidery, Childcare, Security, Storage sheds
Approximate Ancillary Structures Area (SF):	unknown

Number of Occupants:	20,000 total in compound. Apparels Gallery: 5200
Number of Ancillary Levels (Stories):	1
Occupancy Type:	Sewing Factory, G2
Construction Type:	Reinforced Concrete
Height of Highest Occupied Floor Level Above Grade:	TISWL: 95 ft; AGL: 81 ft

ASSESSMENT FINDINGS

Fire Protection Construction

Question:	Are openings and penetrations through rated walls and/or assemblies protected?
Priority Level:	High
Non-Compliance Level:	3
Description:	Wall penetrations are not protected with firestop systems.
Source of Findings:	Photograph: (1) open wall penetration; (2) penetrations on wall at 3rd floor
Suggested Plan of Action:	Install listed firestop systems at every penetration through fire rated walls and assemblies.
Suggested Deadline Date:	31 Dec 2014
Standard:	Includes doors, windows, ducts, piping, etc. Reference Alliance Standards Part 4 Section 4.6 Opening Protectives and Section 4.7 Penetrations



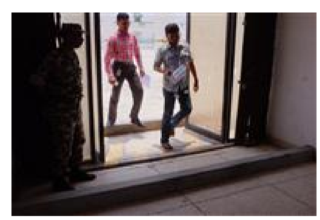
Question:	Is each floor separated with a fire-resistive rated construction barrier?
Priority Level:	High
Non-Compliance Level:	3
Description:	Floor penetrations are not protected with firestop systems.
Source of Findings:	Photograph: Penetrations not protected in AGL
Suggested Plan of Action:	Install listed firestop systems at every penetration through floors.
Suggested Deadline Date:	31 Dec 2014
Standard:	Reference Alliance Standards Part 4 Section 4.5 Separation

Question:	Are shafts provided with the minimum fire-resistance rating?
Priority Level:	High
Non-Compliance Level:	3
Description:	There is an elevator shaft with unprotected openings in Apparel Gallery.
Source of Findings:	Photograph: Elevator opening to production floor
Suggested Plan of	Provide fire-resistive rated opening doors in accordance with Alliance

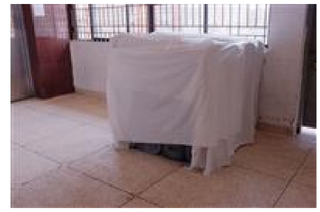
Action:	Standard.
Suggested Deadline Date:	31 Dec 2014
Standard:	Reference Alliance Standards Part 4 Section 4.5.7.1 through 4.5.7.3
Question:	Are exit enclosures provided with fire-resistive rated construction barriers?
Priority Level:	High
Non-Compliance Level:	2
Description:	Stairs are equipped with doors. Doors are unlabeled, unlisted and unapproved. Stairs are not separated from elevator machine rooms.
Source of Findings:	Visual Assessment: factory visit
Suggested Plan of Action:	Protect all egress stairs with a shaft enclosure including 2-hour fire-rated construction. Install fire doors at the stairs that are listed, labeled and approved. Door hardware shall be part of the listed door system and shall include panic hardware, automatic closing and latching.
Suggested Deadline Date:	31 Dec 2014
Standard:	Reference Alliance Standards Part 4 Section 4.5 Separation
Question:	Are separations between hazards provided with fire-resistive rated construction barriers.
Priority Level:	Medium
Non-Compliance Level:	3
Description:	Storage areas and hazardous areas are open to rest of building.
Source of Findings:	Visual Assessment: Separations not provided
Suggested Plan of Action:	Provide fire-resistive rated construction barriers between hazard types in accordance with Alliance Standard Sections 3.4.2 and 4.5. Consult a qualified fire protection engineer to design the required rated construction barrier.
Suggested Deadline Date:	31 Dec 2014
Standard:	Reference Alliance Standards Part 4 Section 4.5 Separation
Question:	Certificates of Occupancy for each building have been issued and are on file.
Priority Level:	Low
Non-Compliance Level:	1
Description:	No Certificates of occupancy was available during visit.

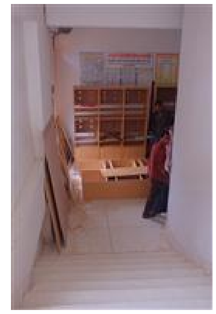
Source of Findings:	Document Review: No document provided
Suggested Plan of Action:	Certificates of Occupancy for each building and ancillary structures should be issued by the respective authority such as RAJUK, Local Government agency, etc.
Suggested Deadline Date:	15 Nov 2014
Standard:	Are certificates of occupancy provided for each building or ancillary structure?
Fire Protection Systems	
Question:	Is the building protected by an automatic sprinkler system?
Priority Level:	High
Non-Compliance Level:	2
Description:	A sprinkler system was being installed at the time of assessment. Drawings reviewed on site indicated that the sprinkler system was not designed per NFPA 13. No design criteria was included.
Source of Findings:	Visual Assessment: Automatic sprinklers not provided
Suggested Plan of Action:	Provide automatic sprinkler protection throughout the facility. The installation of sprinkler protection should be conducted in phases. The first phase would be to protect all storage areas. Prior to installation, the system should be properly designed by a qualified fire protection engineer and plans should be submitted to the Alliance for review.
Suggested Deadline Date:	31 Dec 2014
Standard:	Reference Alliance Standards Part 3 Section 3.5.3 Existing Buildings, Part 5 Section 5.3 Automatic Sprinkler Systems and Section 6.13 Travel Distance
Question:	Does the building have a Standpipe System?
Priority Level:	High
Non-Compliance Level:	2
Description:	A standpipe system was being installed at the time of assessment. Drawings reviewed on site indicated that the standpipe system was not designed per NFPA 14. No design criteria was included.
Source of Findings:	Visual Assessment: Standpipe under construction
Suggested Plan of Action:	Comply with NFPA 14 standards for design and installation of Class I standpipe systems. Submit plans and calculations for review and approval before installation.
Suggested Deadline Date:	31 Dec 2014

Standard:	Does the building have a standpipe system installed where required. Alliance Standard Part 5 Section 5.4.2	
Question:	Does the building have a fire pump?	
Priority Level:	High	
Non-Compliance Level:	2	
Description:	A fire pump was being installed at the time of assessment. Drawings reviewed on site indicated that the fire pump was not designed per NFPA 20. No hydraulic calculations had been performed.	
Source of Findings:	Visual Assessment: Pump under construction	
Suggested Plan of Action:	Comply with NFPA 20 standards for design and installation of fire pumps. Submit plans and calculations for review and approval before installation.	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standard Part 5 Fire Protection Systems	
Question:	Are notification and initiation devices for the fire alarm system installed at required locations based on occupancy type?	
Priority Level:	High	
Non-Compliance Level:	2	
Description:	A manual fire alarm system was installed. A smoke detection system was being installed during the assessment. Visual notification was insufficient.	
Source of Findings:	Visual Assessment: Non automatic fire alarm	
Suggested Plan of Action:	Install fire alarm system per NFPA 72. Include pull stations at all entrances to exit stairs. Install strobes and horns for complete coverage on all floors. Install smoke detectors that are part of the fire alarms system in locations required by Alliance standards.	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Pull stations at egress points, smoke detectors in air handling equipment, visual and audible devices spaced appropriately based on occupancy type. Reference NFPA 72	
Question:	Is the fire alarm and detection system monitored by a central station monitoring service or directly connected to the Fire Service and Civil Defense?	
Priority Level:	Medium	
Non-Compliance Level:	3	
Description:	No central reporting system was installed.	

Source of Findings:	Visual Assessment: No central fire alarm reporting	
Suggested Plan of Action:	Arrange for direct connection of the fire alarm and detection system to a central station monitoring service or the Fire Service and Civil Defense. Assign a person to contact the fire department in the event of fire alarm activation until this connection is set up. Locate an annunciator to alert this person in a constantly attended location (such as a fire control room).	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standard Part 5 Section 5.7.5 Monitoring	
Means of Egress		
Question:	Exterior exit stairs are separated from the building with the required rating. The rating of the exterior wall shall extend 3.05 m (10 ft) beyond the ends of the stair structure.	
Priority Level:	High	
Non-Compliance Level:	3	
Description:	Windows and louvers from the building create exposures to the exterior exit stairs.	
Source of Findings:	Photograph: The exit stair is not separated by required rating of fire resistance barrier.	
Suggested Plan of Action:	Provide required fire rated construction 10 ft beyond the ends of the exterior stairs. Enclose any openings (windows, etc.) with required fire rated construction within that 10 ft wall section.	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standard Part 6 Section 6.3.1.2. Three stories or less 1-hr rating. Four stories of more 2-hr rating	
Question:	Means of egress are free from impediments, obstructions, and stored materials.	
Priority Level:	High	
Non-Compliance Level:	2	

Description:	There was temporary storage of rolled fabric in front of the elevator on the stair landing. Thresholds were installed at the roof doors. Sliding gates included tracks that posed a tripping hazard. Potted plants and security desks are located on stair landings. Furniture was being assembles on a stair landing, blocking egress.
Source of Findings:	Photograph: (1) Thresholds; (2) Fabric stored; (3) Furniture assembly
Suggested Plan of Action:	Remove all storage from egress paths and stairs. Install compliant ramps instead of thresholds. Remove sliding gates and tracks, and any other impediments or foreign objects from the stairs.
Suggested Deadline Date:	31 Dec 2014
Standard:	Alliance Standard Part 6 Section 6.3.8 Impediments to means of egress and Section 6.3.9 Reliability



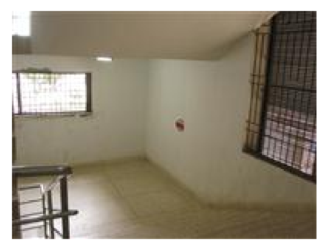


Question:	Doors are not locked in the direction of egress under any conditions. All hasps, locks, slide bolts, and other locking devices have been removed where required.
Priority Level:	High
Non-Compliance Level:	2
Description:	Gates were chained and locked open.
Source of Findings:	Photograph: Gate with lock in front of new swinging doors
Suggested Plan of Action:	Remove all chains, hasps, locks, sliding doors and roll up doors.
Suggested Deadline Date:	31 Dec 2014
Standard:	Alliance Standards Part 6 Section 6.8 Doors and Gates

Question:	Doors along the path of egress have a minimum width of 0.8 m (32 in) and have required ratings.
Priority Level:	High
Non-Compliance Level:	2
Description:	Stairs are equipped with doors. Doors are unlabeled, unlisted and unapproved. Many of the existing door closers are broken. No coordinators are installed on double doors.
Source of Findings:	Photograph: Doors are unlabeled, unlisted and unapproved. This door was tied open, blocked by an uneven floor, and blocked by an existing gate.
Suggested Plan of Action:	Install fire doors at the stairs that are listed, labeled and approved. Door hardware shall be part of the listed door system and shall include panic hardware, automatic closing with coordinators and latching.

Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standard Part 6 Section 6.5.6 Minimum Widths. Increased occupant loads will require a door width greater than 0.8 m.	
Question:	All doors in a means of egress are of the side-hinged swinging type.	
Priority Level:	High	
Non-Compliance Level:	2	
Description:	Sliding gates and roll up doors are installed.	
Source of Findings:	Photograph: sliding gates are installed in addition to the swinging non-rated doors., Visual Assessment: factory visit	
Suggested Plan of Action:	Remove all sliding and rolling doors and associated hardware.	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standards Part 6 Section 6.8 Doors and Gates	
Question:	Aisles are provided with the minimum unobstructed clear width of 0.9 m (36 in) based on occupant loads.	
Priority Level:	High	
Non-Compliance Level:	1	
Description:	There were a few aisles that were less than 36 inches wide. TISWL inspection area was clogged with packed goods.	
Source of Findings:	Visual Assessment: Clogged aisles	
Suggested Plan of Action:	Create and maintain clear aisles for egress that are at least 36 inches wide.	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Higher occupancy loads will require a greater width to accommodate the increased load. Alliance Standard Part 6 Section 6.5 Egress Width	
Question:	Stairwells are not utilized as storage spaces.	
Priority Level:	High	
Non-Compliance Level:	1	
Description:	Some fabric was stored on a stair landing. Electrical panels were installed in the stairwells.	
Source of Findings:	Photograph: Electrical panels in the stair.	

Suggested Plan of Action:	Remove all temporary and permanent storage from the stairs. Remove electrical panels and locate them in rated electrical rooms. Remove all foreign objects and equipment from the means of egress.	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standard Part 13 Section 13.9 Safety Inspections	
Question:	Occupant loads are posted for every assembly and production floor in a conspicuous space near the main point of egress.	
Priority Level:	Medium	
Non-Compliance Level:	3	
Description:	No occupant load signs are posted.	
Source of Findings:	Visual Assessment: No signage provided	
Suggested Plan of Action:	Post the occupant load for all assembly and production floor areas in a conspicuous space near the main exit or exit access doorway for the space.	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standards Part 6 Section 6.4.4 Posting of Occupant Load	
Question:	Every door in a stair enclosure serving more than 5 stories is provided with re-entry unless it meets the requirements of Alliance Standards Part 6 Section 6.8.3.1.	
Priority Level:	Medium	
Non-Compliance Level:	3	
Description:	Re-entry hardware is not installed.	
Source of Findings:	Visual Assessment: Re-entry not provided	
Suggested Plan of Action:	Install approved, labeled, listed fire doors with approved hardware. Provide re-entry to floor levels from the stairwells according to the standard.	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standards Part 6 Section 6.8 Doors and Gates	
Question:	Ramps do not have a running slope greater than 1 in 8 (12.5 percent) and have handrails on both sides of the ramp.	
Priority Level:	Medium	
Non-Compliance Level:	3	

Description:	AGL: There are excessively steep ramps in the washing area used for exiting. No handrail is installed. TISWL: ground floor exit includes steep ramp with threshold at the top of the ramp.	
Source of Findings:	Photograph: ramp in the washing area used for exiting.	
Suggested Plan of Action:	Replace steep ramps with compliant ramps of 1:8 or replace with compliant stairs. Install handrails on both sides.	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standard Part 6 Section 10 Ramps	
Question:	All occupied roofs are provided with parapets or guards with a minimum height of 1067 mm (42 in.).	
Priority Level:	Medium	
Non-Compliance Level:	2	
Description:	Parapets are mostly there but there are gaps where the height does not meet 42 in.	
Source of Findings:	Photograph: Roof parapet	
Suggested Plan of Action:	Provide parapets or guards with a minimum height of 1067 mm (42 in.) for all occupiable roof areas in accordance with Alliance Standard Section 6.12.	
Suggested Deadline Date:	31 Oct 2014	
Standard:	Alliance Standard Part 6 Section 12 Handrails and Guards	
Question:	Handrails are provided on both sides of each stairway. Intermediate handrails are provided when the stair width exceeds 2.2 m (87 in.). Handrails are not mounted lower than 760 mm (30 in.) or higher than 1100 mm (44 in.).	
Priority Level:	Medium	
Non-Compliance Level:	2	
Description:	Handrails were installed on the inside only. No handrails were installed at some discharge steps. In Apparel Gallery, there are several stairs that exceed 2.2 m (87 in.).	
Source of Findings:	Photograph: Stairwell in Apparel Gallery	
Suggested Plan of Action:	Provide handrails on both sides of each stairway. Intermediate handrails shall be provided when the stair width exceeds 2.2 m (87 in.). Mount handrails at a height between 30 in. and 44 in.	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standard Part 6 Section 6.9 Stairs and 6.12 Handrails and Guards	

Question:	All paths of egress are provided with compliant means of illumination.	
Priority Level:	Medium	
Non-Compliance Level:	1	
Description:	Some emergency lights were installed and they were on emergency power.	
Source of Findings:	Visual Assessment: Not all aisles have minimum emergency exit lighting	
Suggested Plan of Action:	Install emergency lighting for all paths of egress. Illumination needs to be a minimum of 10 lux for all corridors, exit doors and stairways. Illumination for aisles needs to be a minimum of 2.5 lux.	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standards Part 6 Section 6.7 Egress Illumination and Part 10 Section 10.12 Illumination of Exit Signs and Means Of Escape	
Question:	Illuminated exit signs are placed at entrances to exits and along the path of egress anywhere the continuation of egress is not obvious or there is a change in the direction of the path of travel.	
Priority Level:	Medium	
Non-Compliance Level:	1	
Description:	Lighted exit signs were installed only at the exits.	
Source of Findings:	Visual Assessment: Exit signs only at exit doors	
Suggested Plan of Action:	Provide continuously illuminated exit signs. Signs shall be placed at all required exits and along egress paths, especially where there is a change in direction for the path of travel.	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standard Part 6 Section 6.11 Exit Signs	
Question:	Changes in elevation of walking surfaces do not exceed 6.35 mm (1/4 in) unless provided with a beveled slope of 1 in 2 that does not exceed 12.7 mm (1/2 in).	
Priority Level:	Medium	
Non-Compliance Level:	1	
Description:	There are gates and uneven steps at most of the exit discharges for the stairs.	
Source of Findings:	Photograph: Gate threshold	
Suggested Plan of Action:	Remove all gates and other items that create a tripping hazard in the means of egress.	

Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standard Part 6 Section 6.3.4 Walking Surfaces	
Question:	Stair treads are of nominal uniformity.	
Priority Level:	Medium	
Non-Compliance Level:	1	
Description:	Some of the stairs are chipped.	
Source of Findings:	Visual Assessment: factory visit	
Suggested Plan of Action:	Repair broken stair treads.	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standards Part 6 Section 6.9 Stairs. Any tread height exceeding more than 50% of the adjacent tread heights or 75 mm (3 in.), whichever is less, shall be modified to be within this tolerance	
Question:	Stair designation signs are provided at each floor entrance from the stair to the floor in English and Bengali. Signs indicate the name of the stair and the floor level. Signs are posted adjacent to the door.	
Priority Level:	Low	
Non-Compliance Level:	3	
Description:	Stair designation signs are not provided.	
Source of Findings:	Visual Assessment: factory visit	
Suggested Plan of Action:	Install signage adjacent to each stair door indicating the stair name and the floor level in both English and Bengali.	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standard Part 6 Section 6.9 Stairs	
Fire Safety Programs		
Question:	Storage areas underneath the cutting tables are clear of combustibles.	
Priority Level:	Medium	
Non-Compliance Level:	3	
Description:	Combustibles are stored under the tables.	
Source of Findings:	Visual Assessment: Storage under tables	

Suggested Plan of Action:	Remove all storage from under cutting tables and similar obstructions.
Suggested Deadline Date:	31 Dec 2014
Standard:	Alliance Standard Part 17 Section 13.7.2 Cutting tables.
Question:	Are there additional areas of non-compliance to report?
Priority Level:	Medium
Non-Compliance Level:	3
Description:	Several of the stairs have angular exposures back to the building.
Source of Findings:	Visual Assessment: Angular exposure to stairs
Suggested Plan of Action:	Fill in the openings on the stairs or 10-ft. of the exterior exposed wall with fire resistive rated construction. Consult a qualified fire protection engineer to design the required rated construction barrier.
Suggested Deadline Date:	31 Dec 2014
Standard:	Not Applicable
Question:	A written housekeeping policy is established and enforced.
Priority Level:	Low
Non-Compliance Level:	1
Description:	A written policy was in effect but not in accordance with Alliance Standard.
Source of Findings:	Document Review: Incomplete policy
Suggested Plan of Action:	Establish written corporate and plant policies on housekeeping to ensure scheduled cleaning for floor, wall, ceiling, supply and return air ventilation systems. Promptly reschedule skipped cleanings. Provide a documented line of authority for authorizing a cleaning delay and rescheduling.
Suggested Deadline Date:	31 Dec 2014
Standard:	Alliance Standards Part 13 Section 13.6 Housekeeping
Question:	A hot-work permit program has been established.
Priority Level:	Low
Non-Compliance Level:	1
Description:	No hot work policy was provided for review.

Source of Findings:	Document Review: No document provided	
Suggested Plan of Action:	Develop a hot work permit program. The program must comply with the requirements of NFPA 51B.	
Suggested Deadline Date:	31 Dec 2014	
Standard:	Alliance Standards Part 13 Section 13.4 Hot Work Permit and NFPA 51B	