



#### Study on

# Occupational Safety and Health (OSH) in the Tannery Sector: Case Study on BSCIC Tannery Industrial Estate

Presentation by

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## Special thanks to

- Bangladesh Tanners Association (BTA)
- Tannery Workers Union (TWU)
- DIFE
- All the KII respondents

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# 1. Introduction

## 1. Introduction

- □ Bangladesh's leather sector struggles to realise its export potential **despite abundant resources and favourable conditions**
- □ While the global leather goods market is **projected to reach \$624 billion by 2028,** Bangladesh's leather exports **declined by 1.74% in** FY2023, totalling **\$1.2 billion**
- □ The leather industry is classified as hazardous and high-risk under the National Plan of Action on OSH (2021–2030).
- ☐ Hazaribag tanneries caused severe health **issues for workers and nearby residents due to unsafe and congested** operations
- □ Tanneries were relocated from Hazaribag to the BSCIC tannery estate in Hemayetpur in 2017 to improve environmental and safety conditions
- □ A review of the **current OSH practices may contribute to understanding the effectiveness of implemented measures**, identifying existing gaps, and providing recommendations for improving workplace safety and health standards in the leather sector.
- □ Against this context, the study seeks to **conduct a review analysis focusing on the post-reallocation occupational safety and health (OSH) conditions** at the BSCIC tannery estate in Hemayetpur

2. Objectives

# 2. Objectives

The objectives of the study include the following-

- a) To specify the production process and OSH hazard in the **tannery industry to better understand** the possible risks;
- b) To review the field-level **scenario of the OSH standard in the Tannery estate**;
- c) Review activities that **have been undertaken by the public and private agencies pursuing** regular monitoring of the compliance standards;
- d) Construct policy recommendations that may help improve the existing occupational health and safety conditions.

## **Analytical frame**

# Occupational Health & Safety Dimensions

1. Structural Safety

Factory Location, Approved Layout, Load Capacity, Measurement for pillars, staircases, Position of Kitchen, and Machines

2. Fire Safety

Fire extinguishers and firefighting equipment, Fire alarm system, Emergency and evacuation plans, Fire drills, Escape routes mark

3. Electrical Safety

Electrical installation, Electrical insulations, Warning signs, Certified electricians, Emergency light

4. Machine Safety

Safety guards for machines with rotating or moving parts, Machine log, Generator (captive power) operation license

5. Work-Environmental Safety

Housekeeping, Drinking water facilities, Toilets, Smoking Zone, Noise level, Ventilation, Temperature

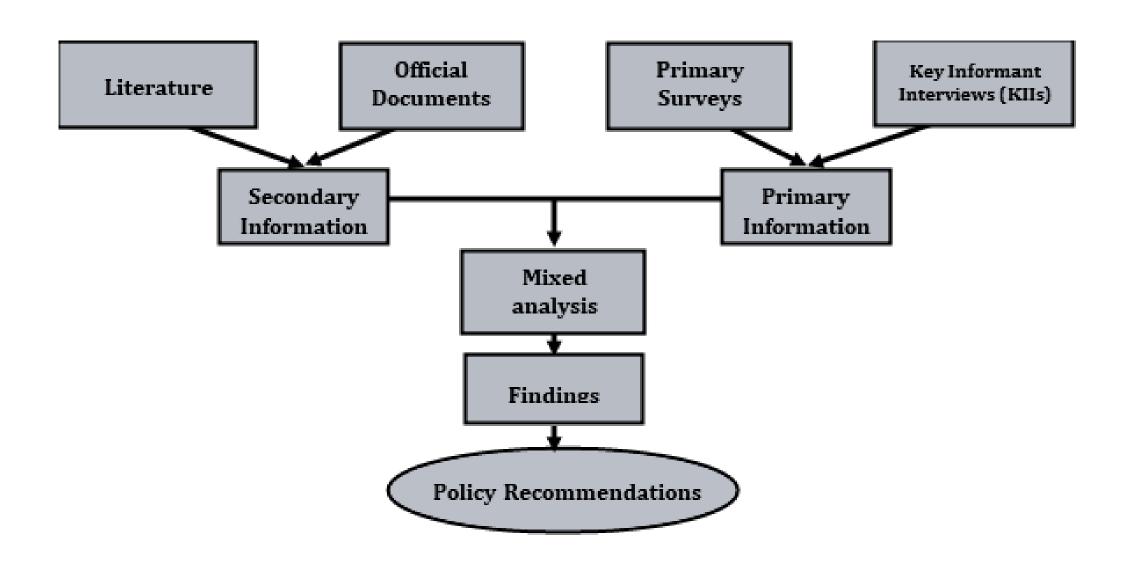
6. Chemical Safety

Inventory list. Safe Storage as per MSDS instruction, Secondary containment, Labeling, Warning phrase or symbol, Appropriate containers, Personal Protective Equipment (PPE)

7. Other Factors

Safety training for management level and worker, Safety Committee, First aid box, Sickroom

Methodology

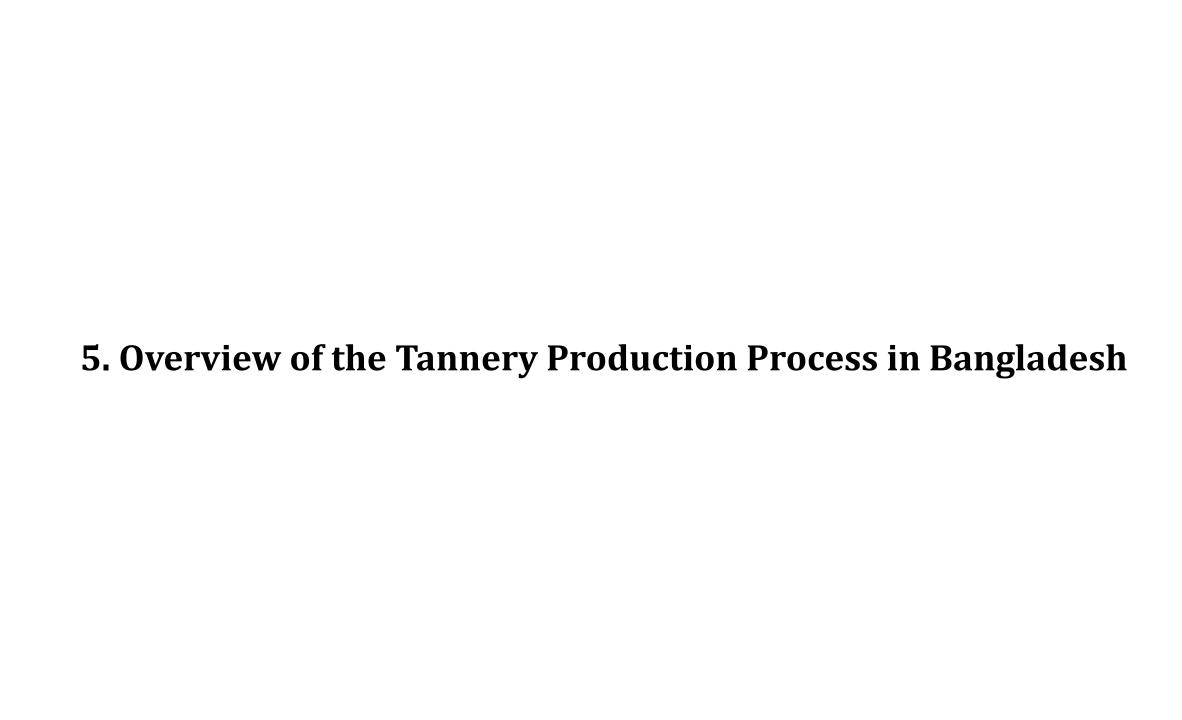


- ■A telephone interview conducted on 15 tannery workers;
- □ 5 key informant interviews
- □ Data from CPD Tannery Survey 2024 where 36 factories and 105 workers were surveyed
- ☐ Field visits to the estate;
- ☐ A review of literature and secondary data sources

# 4. Laws, Rules, and Regulations related to OSH concerning the Tannery Sector

# 4. Laws, Rules, and Regulations related to OSH concerning the Tannery Sector

| Key OSH Requirements  |
|---|
| <ul> <li>Development of comprehensive safety programs</li> </ul>  |
| <ul> <li>Safe use and management of chemicals</li> </ul>  |
| <ul> <li>Provision of Personal Protective Equipment (PPE)</li> <li>Fire exits and emergency preparedness</li> <li>Regular safety inspections</li> </ul> |
| Adequate ventilation and lighting   |
| <ul> <li>Preventive measures and risk management</li> <li>Worker training and education</li> <li>Risk assessments</li> </ul>                            |
| <ul><li>Proper chemical handling and disposal</li><li>Wastewater and solid waste management</li></ul>   |
| <ul> <li>Safe chemical management, proper labelling, and worker protection</li> <li>Implementation of worker health and safety practices</li> </ul>     |
| <ul> <li>Structured OSH management systems</li> <li>Worker involvement in safety planning</li> <li>Emergency preparedness and response plans</li> </ul> |
|   |



# 5. Overview of the Tannery Production Process in Bangladesh

| The tanning process in Bangladesh involves three main stages: tanning, re-tanning (or drying/pre-finishing), and finishing.  |
|--|
| ☐ Each stage produces intermediate products like <b>wet blue, crust leather, and finished leather,</b> which are essential to the leather supply chain.  |
| Tanning Stage  |
| ☐ This is the first <b>step where raw hides and skins (RHS) are converted into a stable material called wet blue</b> leather.  |
| ☐ The process uses a variety of chemicals, especially <b>chromium salts, to prevent decomposition</b> and improve the durability of the hides.   |
| □ <u>Machines Required:</u> Drum for soaking and tanning, Fleshing machine (to remove excess flesh and fat), Shaving machine (to thin the hides), Splitting machine (to split hides into layers) (UNIDO, 2012)                     |
| ☐ <u>Chemicals Required:</u> Chromium salts (e.g., chromium sulfate), Lime (for dehairing), Sodium sulfide (to remove hair) Sodium chloride (salt for preservation), Enzymes (for bating, softening the leather) (Choudhury, 2000) |
|  |

## 5. Overview of the Tannery Production Process in Bangladesh

#### Re-Tanning/Drying/Pre-Finishing Stage

In this stage, additional value is added to the wet blue to produce crust leather, which is semi-finished.

This process involves more precise chemical treatments to achieve specific qualities based on customer demands.

- *Machines Required:* Drum for re-tanning, Drying tunnels or vacuum dryers, Staking machine (to soften the leather), Buffing machine (to smooth and polish the leather surface)
- *Chemicals Required:* Vegetable tannins or synthetic tannins (for re-tanning), Dyes (for colouring), Fatliquors (to lubricate and soften the leather), Fillers (to fill imperfections in the hide) (Heidemann, 1993)

#### **Finishing Stage**

This final stage involves processing crust leather into finished leather. Here, treatments are applied to give the leather its final appearance and characteristics, such as smoothness, colour, and texture.

- <u>Machines Required:</u> Roller coaster or spray booth (for applying finishing chemicals), Ironing machine (to smooth the surface), Embossing machine (for texture or pattern), Measuring machine (to measure finished leather for quality control) (Sundar et al., 2011)
- *Chemicals Required:* Topcoat (to protect and seal the surface), Pigments (for colour enhancement), Lacquers and polyurethane finishes (for gloss or matte finish), Waterproofing agents (Choudhury, 2000)

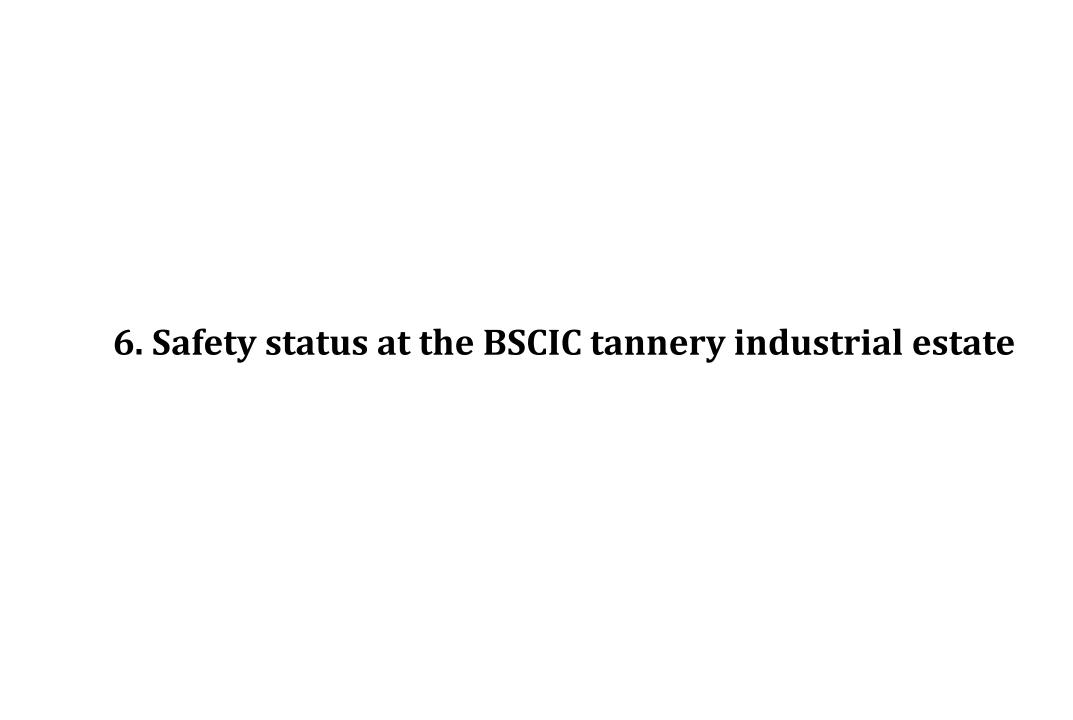


Table: Type of activities surveyed workers involved in their work

| Activities                   | % of workers |
|------------------------------|--------------|
| Managing chemical            | 39.1         |
| Operating machine            | 53.3         |
| Lifting heavy materials      | 38.1         |
| Manual handling of materials | 6.7          |

Source: CPD Tannery Survey 2024

| Chemical | Safety |
|----------|--------|
|----------|--------|

| ☐ Chemica | l safety | is a significar | it concern | at the | Hemayetpur | <b>Tannery</b> | Estate, | as ove | r <b>200</b> | chemicals | are | utilised |
|-----------|----------|-----------------|------------|--------|------------|----------------|---------|--------|--------------|-----------|-----|----------|
| through   | out the  | tanning proc    | ess.       |        |            |                |         |        |              |           |     |          |

- ☐ Many workers were observed handling these chemicals during the **rawhide-to-crust** phase without wearing any Personal Protective Equipment (PPE), such as boots or masks.
- □ Only a few workers **had polythene sheets** wrapped around **their waists**, which they claimed were to protect their clothes from getting wet.
- ☐ When asked if this was a recommended safety measure by factory managers, workers indicated that **it was a personal choice, driven** by a desire to keep their clothing clean rather than a concern for chemical exposure.
- ☐ This situation **reflects a troubling priority among workers, who** appear more focused on **the visibility of their clothing** rather than the potential risks posed by the chemicals.
- ☐ Literature indicates that the substances used in this industry can **cause slow poisoning**, **with effects that may not be immediately apparent** (World Health Organization, 2016).
- □ Notably, a significant percentage of workers reported **allergies (64.8%) and respiratory diseases (41.9%),** which may be linked to exposure to hazardous chemicals in the workplace.
- □ Additionally, **skin diseases were reported by 27.6% of workers**, while **eye diseases affected 32.4%** and chronic headaches **were experienced by 21.9% of the workers**.

|  | The <b>storage</b> | of ch | nemicals | raises | further | safety | concerns. |
|--|--------------------|-------|----------|--------|---------|--------|-----------|
|--|--------------------|-------|----------|--------|---------|--------|-----------|

- ☐ Chemicals were **found scattered in** drums throughout the factory, with most lacking proper and transparent labelling
- □ Although a **designated storage area exists under an office room**, the disorganised storage practices pose additional risks to worker safety

**Table: Prevalent Health Issues Among Workers** 

| Diseases                 | % of workers |
|--------------------------|--------------|
| Skin disease             | 27.6         |
| Gastrointestinal disease | 4.8          |
| Cardiovascular disease   | 1.9          |
| Eye disease              | 32.4         |
| Chronic headache         | 21.9         |
| Allergies                | 64.8         |
| Respiratory disease      | 41.9         |

Source: CPD Tannery Survey 2024

### Structural Safety

| According to officials, <b>significant improvements</b> in safety standards were observed in the tannery industry following the relocation from Hazaribag to the Hemayetpur tannery estate.   |
|---|
| $\square$ One of the key advancements <b>was in structural</b> safety, owing to the <b>planned layout</b> of the new estate.  |
| ☐ Plots were allocated <b>according to production needs</b> , allowing <b>for open spaces between factories</b> .   |
| ☐ This design not only provided <b>better airflow and work environments</b> but also created <b>safe evacuation zones</b> in case of emergencies such as fires or earthquakes.  |
| Additionally, the wider roads between the factories improved accessibility for emergency services, contributing to<br>overall safety.   |
| As per the Bangladesh National Building Code (BNBC), <b>specific fire safety measures for industrial buildings</b> , also apply to the Hemayetpur Tannery Estate.   |
| □ While most of the larger factories complied with important safety regulations such as -segregated zones for different production processes, <b>open rooftops</b> , <b>specific zones</b> for placing boilers outside the factory and well-placed emergency exits, smaller tanneries are struggling to meet these codes, particularly in <b>terms of building fire-resistant infrastructure and maintaining adequate fire exits.</b> |
| ☐ When interviewed, smaller factory owners <b>reported struggling to operate at full capacity due to the relocation process</b> associated with high costs and time.  |

### Machine Safety

| ☐ Machine safety is another <b>critical area requiring improvement</b> at the Hemayetpur Tannery Estate.   |  |  |  |  |  |
|--|--|--|--|--|--|
| ☐ While new machinery has been <b>introduced for high-quality leather processing</b> , the associated safety equipment is often inadequate.  |  |  |  |  |  |
| ☐ Many machines <b>remain unguarded</b> , exposing workers to potential injuries.  |  |  |  |  |  |
| According to the International Labour Organization (ILO), unguarded machinery significantly increases the risk of workplace accidents, which can result in serious injuries or fatalities (ILO, 2018). |  |  |  |  |  |
| ☐ Although <b>larger factories typically display safety manuals</b> for operating machinery, this practice is not consistently followed in <b>medium and small factories</b> .                         |  |  |  |  |  |
| ☐ Oftentimes the <b>safety protocols are written in English</b> ; as a result, workers are unable to comprehend.   |  |  |  |  |  |
| ☐ In larger facilities, a <b>specific individual with an engineering background</b> is often hired to oversee machine safety.  |  |  |  |  |  |
| ☐ Furthermore, these factories demonstrate <b>a habit of record-keeping</b> , including documentation of regular maintenance and safety checks for machinery.  |  |  |  |  |  |
| ☐ However, such practices are <b>notably absent in smaller factories</b> .   |  |  |  |  |  |

| Fire and Ele | ectrical | Safety |
|--------------|----------|--------|
|--------------|----------|--------|

| Fire and Electrical Safety  |
|---|
| □ Fire safety at the Hemayetpur Tannery Estate <b>has improved in certain aspects, especially for larger factories</b> tha comply with structural safety regulations, yet it still falls short of meeting the standards required by the Bangladesh Labour Act 2006 (BLA). |
| ☐ Under the BLA, factories <b>must provide adequate fire safety measures, including clearly marked exits</b> , sufficien firefighting equipment, and regular fire drills.   |
| ☐ Compliance with these laws is stronger in larger tanneries at the estate, which have made progress in providing two way staircases, fire exits, and open spaces that serve as evacuation points during emergencies.   |
| ☐ However, many smaller tanneries are failing to <b>fully comply with these legal requirements</b> .  |
| □ Due to the financial burden of relocation and the high costs of maintaining operational capacity, smaller factories often lack the funds to invest in necessary fire safety equipment such as extinguishers, fire alarms, and sprinkles systems.                        |
| ☐ This puts workers at increased <b>risk, especially in industries like tanning where hazardous chemicals are regularly</b> used and <b>have a higher risk for fire-related accidents</b> .   |
| ☐ In case of electrical safety, <b>a lack of proper insulation for electrical wires and the presence of unplanned switchboards</b> and wiring connections is observed even in large factories.  |
| ☐ Factories do not check <b>for electrical malfunction unless any problem arises in the electricity supply</b> .  |

☐ Without quick access to **firefighting resources**, the consequences of fire hazards can be devastating

☐ Currently, workers are responsible for **cleaning these areas only** 

☐ This reactive approach to housekeeping is **insufficient** for

to clog the drainage systems.

maintaining a safe and healthy workplace.

when they become overly cluttered or when wastewater begins

| ☐ Most of them have yet <b>to establish and implement a systematic</b> insulation and wiring.                    | <b>process</b> for the regular in | spection of electrical      |
|--|-----------------------------------|-----------------------------|
| □ Polli Biddut supplies electricity to the estate and is mandated to<br>to ensure an uninterrupted power supply. | conduct annual electrical         | <b>certification</b> checks |
| lacktriangle Unfortunately, <b>Polli Biddut rarely visits</b> the factories to perform the                       | ese necessary inspections.        |                             |
| ☐ The lack of a fully operational fire station on-site at the estate is in case of fire emergencies.             | s another critical gap, dela      | <b>ying</b> response times  |
| Housekeeping   |                                   |                             |
| ☐ Housekeeping practices at the Hemayetpur Tannery Estate are  | Table: Status of Working          | g Environment               |
| notably inadequate, characterised by persistent issues such as wet   | <b>Working Condition</b>          | % of workers                |
| floors, damp raw hides stored in open spaces, and solid waste being dumped in temporary yards.                   | Tolerate high levels of           | 79.1                        |
| ☐ These conditions contribute to <b>strong odours throughout</b> the factory, affecting even the office areas.   | Work in hot and humid             | 72.4                        |
| 7 Currently workers are responsible for cleaning these areas only  | conditions                        |                             |

Source: CPD Tannery Survey 2024

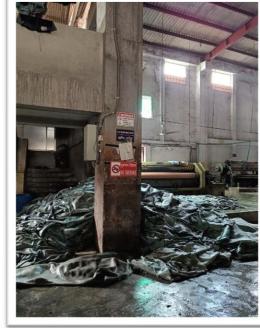
#### Lighting, Ventilation and Noise management

| ☐ Most tanneries in the Hemayetpur Tannery Estate have reported adequate lighting systems, contributing to a safer working environment.  |
|--|
| ☐ Given that the estate is situated in open spaces and most factories are either single or, in rare cases, two stories there is a notable trend toward utilising natural sunlight within the factories.          |
| ☐ This not only enhances safety but also <b>promotes</b> energy savings, reducing operational costs.   |
| ☐ The estate generally showcased a good ventilation system.  |
| ☐ However, given the humid nature of our climate and the raw hides inside the factories, workers perceive the condition of ventilation to be unfavourable and unpleasant odours persist throughout the facility. |
| ☐ A significant <b>79.1% of workers reported tolerating high levels of noise</b> , while <b>72.4<mark>% indicated that they work in hot and humid conditions.</mark></b>   |
| ☐ The fact that a majority of workers are exposed to high noise levels underscores the need for effective noise management strategies.   |

☐ Additionally, working in hot and humid conditions can lead **to discomfort and health risks associated** with heat, making it essential for the estate to consider measures to improve thermal comfort for its workforce.































#### **Workload**

- □ Occupational Safety and Health (OSH) is closely linked **to work hours, as longer working hours can** lead to increased fatigue and stress, significantly impairing workers' health and safety.
- □ Prolonged shifts are associated with a higher **risk of accidents, musculoskeletal disorders, and mental health issues**, as evidenced by research indicating that excessive working hours contribute to burnout and decreased productivity (Ala-Mursula et al., 2006; van der Hulst, 2003).

**Table: Overview of Daily Workload and Hours** 

| Working Days    | Freq. | Per cent          |
|-----------------|-------|-------------------|
| 6               | 62    | 59                |
| <u></u>         | 43    | <mark>41</mark>   |
| Total           | 105   | 100               |
| Daily work Hour | Freq. | Per cent          |
| 8               | 40    | 38.1              |
| 9               | 25    | <mark>23.8</mark> |
| 10              | 26    | <mark>24.8</mark> |
| 11              | 1     | 1                 |
| 12              | 13    | <mark>12.4</mark> |
| Total           | 105   | 100               |

Source: CPD Tannery Survey 2024

#### Workers benefit

- ☐ The most commonly provided benefit is workplace accident compensation, with 48.6% of workers entitled to it, highlighting the acknowledgement of safety concerns within the industry
- □ Canteen facilities (29.5%) and rationing (20.0%) also appear relatively common, reflecting the need to support workers during their shifts
- ☐ In contrast, health insurance is the least provided benefit, with only 5.7% of workers entitled to it, suggesting significant gaps in healthcare coverage for employee
- □ On the other hand, the average **health cost increased significantly** from **583.3 Taka in 2022 to 751.2** Taka in 2023, **representing a 29% rise**
- ☐ The maximum health cost also increased substantially, from **4500 Taka to 8000 Taka**, indicating that some workers may face considerable healthcare expenses
- ☐ Interestingly, the minimum health cost remained **unchanged at 100, suggesting a baseline level of healthcare** expenditure that does not vary among workers

Table: Type of Health-related Benefits and Monthly Health Cost of Worker

| Type of Benefits                 | Entitled (% of workers) |
|----------------------------------|-------------------------|
| Health Insurance                 | 5.7                     |
| Tiffin allowance (during duty)   | 14.3                    |
| Canteen facilities               | 29.5                    |
| Rationing                        | 20.0                    |
| Workplace accidents compensation | 48.6                    |
| Dedicated uniform                | 20.0                    |
| Appointment letters              | 12.4                    |

Source: CPD Tannery Survey 2024

Table: Monthly Medical Cost of Workers

| Monthly Health Cost | 2022  | 2023  |
|---------------------|-------|-------|
| Average Health Cost | 583.3 | 751.2 |
| Maximum Cost        | 4500  | 8000  |
| Minimum Cost        | 100   | 100   |

Source: CPD Tannery Survey 2024

| Despite a substantial percentage of workers facing increasing health costs—both average and maximum—only a small proportion (5.7%) are entitled to health insurance.                |
|---|
| This gap indicates a <b>potential vulnerability for workers, as rising health costs could</b> lead to financial strain, particularly for those without adequate insurance coverage. |
| ☐ Moreover, while compensation for <b>workplace accidents is relatively high (48.6%)</b> , it primarily addresses post-incident needs rather than preventive health measures.       |
| The low entitlement to health insurance, coupled with rising healthcare costs, suggests that workers may not be adequately protected against health-related financial burdens.      |
| In addition to this, despite occupying a significant area in Hemayetpur, the estate lacks a designated medical or   |
| <mark>sick room for workers.</mark>   |
| Additionally, there are no canteen facilities nearby, forcing many workers to rely on snacks from nearby tea  |
| stalls or to skip meals altogether, as the nearest restaurants are located far outside the estate   |
|   |

| 7. Performance of Monitoring and Regulatory Authority |
|---|
|   |

### 7. Performance of Monitoring and Regulatory Authority

#### **Department of Inspection for Factories and Establishments (DIFE):**

- □ DIFE is responsible for inspecting factories to ensure compliance with labour laws, including national and international OSH standards
  □ In the tannery estate, **DIFE's role is crucial in monitoring working conditions, checking for the use of protective equipment,** and ensuring that machinery and facilities adhere to safety norms
  - ☐ However, despite being one of the major industries in Bangladesh, there is no reporting of accidents, injuries or several inspections in DIFE's annual report of an inspection report
  - ☐ Where the segregated data **on inspection should have been publicly displayed on their website LIMA**, there is just an overall summary given on a website that shows over the last 5 years, **there has been a total of 26 inspections in the Tannery** industry
- □ However, **recently a specific checklist for inspecting tannery factories** has been formulated with the help of GIZ, where the Ministry of Labour and Employment (MoLE) is playing the role of partner ministry and DIFE is working as the implementing agency.
- ☐ As per **DIFE official, the checklist is already included in their** training manuals and LIMA

Table: Number of inspections by DIFE

| Location | Total Inspection<br>out of 170<br>Factories | Number of<br>non-<br>compliance |
|----------|---|---------------------------------|
| Gazipur  | 3   | 7                               |
| Dhaka    | 21  | 2107                            |
| Jessore  | 2   | 174                             |

Source: LIMA Website

## 7. Performance of Monitoring and Regulatory Authority

| M | inistry of Labour and Employment (MoLE)   |
|---|---|
|   | MoLE formulates labour policies, including OSH regulations, and plays a key role in implementing these across |
|   | tannery estate.   |

☐ It provides oversight to ensure that employers are adhering to the legal frameworks that protect workers' safety and health.

the

☐ Despite these efforts, there are **gaps in enforcement and inconsistent application of policies in different industries**.

#### Fire Service and Civil Defense (FSCD)

- □ FSCD is responsible for fire safety regulations and emergency preparedness in industrial areas, including the tannery estate. Regular fire drills, inspections of fire-fighting equipment, and fire safety training are part of their mandate.
- ☐ While FSCD conducts these activities, the frequency of drills and the adequacy of fire safety measures are often questioned, leading to vulnerabilities in emergency preparedness.
- ☐ There is also an **absence of a fire station near the estate**.

#### Office of the Chief Inspector of Boilers

- ☐ This office is responsible for inspecting and certifying industrial boilers, which are used extensively in the tanning process.
- ☐ Regular inspections are essential for preventing boiler-related accidents.
- ☐ However, the frequency and **thoroughness of these inspections remain areas of concern**.

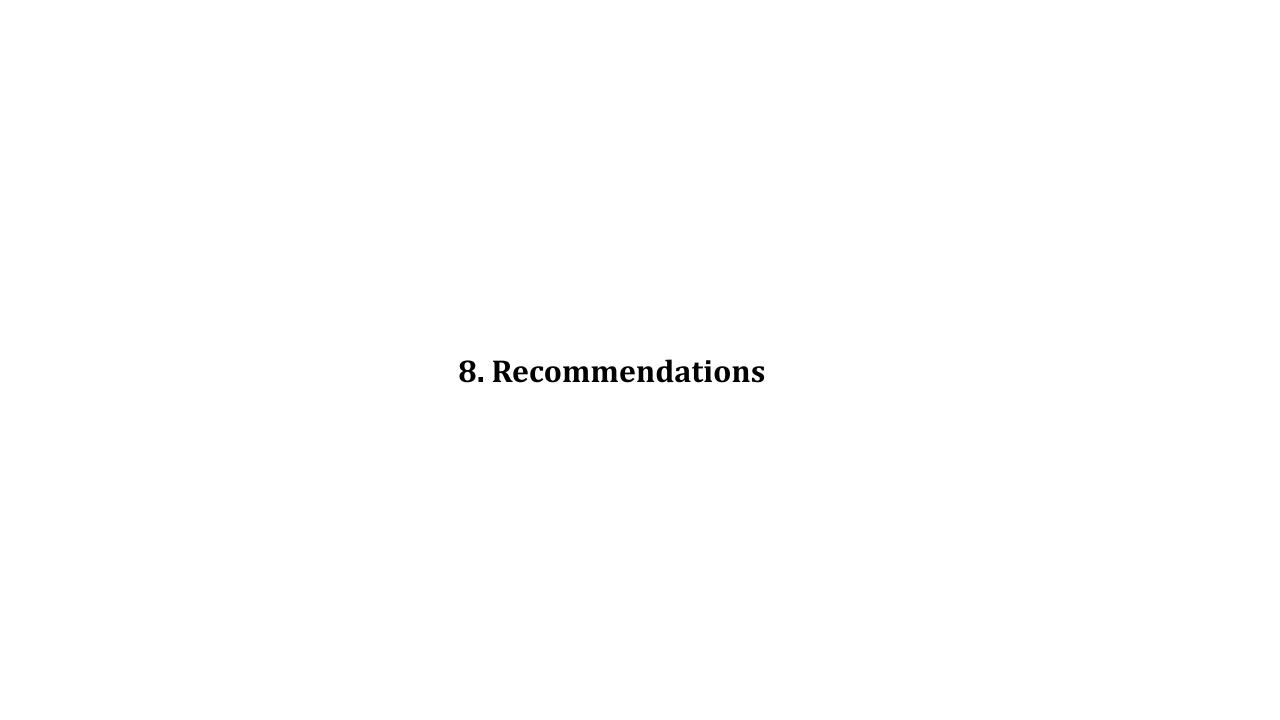
#### Polli Biddut (Rural Electrification Board)

- □ Polli Biddut provides electricity to the tannery estate and ensures that electrical safety standards are maintained.
- ☐ Its role involves inspecting electrical systems and ensuring that any hazards are promptly addressed.
- ☐ Despite its commitments in documents to **inspect electrical wiring, electrical safety remains a critical issue**.

## 7. Performance of Monitoring and Regulatory Authority

#### Private Sector Engagement in Enhancing OSH Practices

| In addition to public sector institutions, private sector <b>associations play a vital role in promoting OSH</b> standards within the tannery estate.  |
|--|
| □ Key organizations include: Bangladesh Tanners Association (BTA), Leather Goods and Footwear Manufacturers and Exporters Association of Bangladesh (LFMEAB), and Bangladesh Finished Leather, Leathergoods, and Footwear Exporters Association (BFLLFEA). |
| ☐ These associations often work alongside <b>public agencies to enhance compliance and raise awareness abou</b> workplace safety.  |
| ☐ The organisations generally set up <b>requirements for their membership approvals where some OSH standards</b> are also included.  |
| ☐ To become a member, the factories must comply with these requirements.   |
| ☐ In addition, these <b>associations work to improve industry standards by providing</b> training to the management and workers.   |
| ☐ The trainers are often selected through collaboration with government bodies, and international partnerships.  |
| □ Although the employers' <b>associations play a significant role in raising awareness,</b> their initiatives often face challenges, particularly with smaller factories.  |
| ☐ These factories are often unwilling to be part of any association and <b>sometimes rent their factories to 3<sup>rd</sup> parties for operating in seasonal demand.</b>  |



#### Related to Laws, Rules, and Regulations

- □ Bangladesh has a robust framework of legal documents to safeguard worker safety, such as the Bangladesh Labour Act 2006 and the National OSH Policy 2013. However, the major challenge lies in weak enforcement.
  - The government must **establish stricter monitoring mechanisms and increase penalties** for non-compliance to ensure factory owners fully adhere to safety regulations.
  - New legal provisions should be developed to address specific needs, such as the management of hazardous chemicals like chromium, which pose significant health risks. **These provisions must be clear, actionable, and designed to** protect both workers and the environment.

#### **BSCIC**

- ☐ The Bangladesh Small and Cottage Industries Corporation (BSCIC) must ensure that **sufficient infrastructure** and support services are available at the Hemayetpur Estate.
  - This includes providing emergency medical services, proper waste management systems, and access to clean water for all workers.
- □ BSCIC should conduct regular **audits of factory operations to assess compliance with OSH standards**, providing constructive feedback and support where necessary.
  - Furthermore, BSCIC must collaborate with local healthcare providers to ensure workers have access to comprehensive health services, including accident insurance and preventive healthcare, fostering a safer and healthier work environment.

#### **Factory Owners**

- □ Each factory in the BSCIC Hemayetpur Estate should be required to implement a comprehensive OSH management system, focusing on regular risk assessments, emergency preparedness, and stringent chemical safety management practices.
  - Factories must **conduct periodic safety training for workers**, especially those exposed to hazardous substances.
  - The use of **Personal Protective Equipment (PPE)**, such **as gloves, goggles, and respiratory masks,** should be compulsory, and proper handling protocols for chemicals and machinery must be strictly enforced.
  - Additionally, regular health screenings for workers must be mandatory to detect early signs of occupational illnesses, ensuring their well-being is consistently prioritized.

#### For Improving Management's Capacity/Quality

- ☐ Management should play a proactive role in the consistent implementation of OSH standards. Management level must undergo **continuous training focused on leadership** in safety practices, risk mitigation, and compliance with OSH laws.
  - They must be held accountable for the overall safety **conditions in their facilities, and a culture of transparency and** continuous improvement should be encouraged.
  - In addition, management must invest in enhancing the technical **skills of their teams to manage operational risks effectively** and ensure rapid emergency response.

#### For Improving Workers' Capacity and Quality

- □ Workers must receive continuous education on OSH **standards and be trained in hazard identification and reporting**, as well as emergency procedures.
  - Specific training programs should be **designed to help workers understand the risks associated** with hazardous materials, such as chromium and formaldehyde.
  - Furthermore, workers should be incentivized to follow safety protocols to create a culture of responsibility.
  - Health monitoring systems **should be implemented to detect and treat occupational diseases early**, ensuring workers remain healthy and productive over the long term.

#### For Brand and Buyers

- ☐ International brands and buyers have a **crucial role in ensuring better OSH compliance within the tannery** industry.
  - They must require suppliers to adhere to strict OSH standards as a prerequisite for business.
  - A legal requirement should mandate that brands conduct on-site inspections of factories before placing orders.
  - Additionally, buyers must invest in providing technical support to help their suppliers achieve compliance with safety standards.
  - Associations can be used as a platform to negotiate collaborative efforts between buyers and owners to enhance overall safety and operational sustainability.

#### For DIFE and DoL

- □ The Department of Inspection for Factories and Establishments (DIFE) must conduct frequent, unannounced inspections to ensure compliance with OSH regulations.
  - Factories found to be in violation should face immediate penalties, and DIFE should prioritize the swift implementation of the newly developed inspection checklists.
  - The Department of Labour (DoL) must ensure that all workers have formal contracts clearly outlining their rights to safe working conditions.
  - Coordination between DIFE and DoL should be strengthened to create an efficient enforcement system, eliminating gaps and overlaps in the regulatory process.

# **Thank You**