

UNDERSTANDING EMPLOYEE HEALTH & WELFARE ISSUES IN CHINA

A Report by the EICC®

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ELECTRONIC INDUSTRY CITIZENSHIP COALITION

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I. Executive Summary

The mission of the Electronic Industry Citizenship Coalition® (EICC®) is to help enable progress towards the EICC vision of improved social, environmental, and economic responsibility through a common code of conduct, collaborative efforts and shared tools and practices. Because of this focus, the 2010 rash of suicides in the information and communications technology (ICT) industry in China was particularly concerning. The EICC took action to assess what it, as a business coalition, could do to improve the situation.

To provide focus on this issue, in June 2010, the EICC established the Employee Health & Welfare Task Force (“task force”), based in Asia. The mission of the task force was to identify the cultural, social, and industrial factors that affect employee¹ welfare, understand root causes of employee dissatisfaction, and develop initiatives to address employee concerns.

In summary, the research found that industrial, corporate, and facility factors are easier for the EICC to influence through our membership, although the extent to which the EICC can influence these factors depends on various levels of industry cooperation and resources. Cultural, societal, and personal factors that affect employee welfare are most difficult for the EICC to address because they require significant involvement of government and other non-EICC member organizations.

This report details the understanding the task force gained through research and stakeholder engagement on employee health and welfare. While the ultimate goal is to develop initiatives the EICC and individual members can undertake to improve employee health and welfare, particularly in China, this report stands as a tool to support those initiatives and inform our members and our stakeholders on this important work.

For questions on this report or the findings, please contact stakeholders@eicc.info.

¹ The term “employee” in this report covers all laborers, including contracted laborers, who work for ICT companies in China.

II. Background

The task force developed a three-phase process to:

- 1) identify the factors that impact employee health and welfare
- 2) develop initiatives to improve employee welfare
- 3) implement the initiatives

The task force concluded Phase I of the process with the publication of this report.

This report summarizes the task force findings, and is intended to guide Phase II efforts. It is also intended to provide EICC members and stakeholders with an explanation of the steps used to identify and prioritize the “root causes” that undermine employee welfare.

The task force conducted desktop research, interviewed experts on this topic, and relied on the input of 22 representatives from 17 EICC member companies. The task force also hosted presentations and a discussion panel by experts in China from government, academia, and nongovernmental employee service organizations.² The process helped the EICC develop a consensus on the causes of dissatisfaction, disaffection, and depression among Chinese employees in the ICT supply chain.

III. Research Findings

In studying this important topic, the EICC realizes that there are many factors that can influence worker health and welfare and that it may be difficult to correlate any single effort with either an improvement in or a negative impact to that welfare. However, the EICC felt it was important to identify areas that members and / or the EICC should understand in more depth to inform recommendations for further work.

In preparing this report, the task force limited its focus to those factors that the EICC and its members can affect within a reasonable timeframe, and within the constraints of industry resources. As a result, the task force identified the major factors that affect employee welfare, and then assigned the factors to one of the following six categories: cultural, societal, industrial, corporate, facility (work location), and personal (see chart below).³

The categories were then arranged on the chart to indicate the degree of difficulty and related effort to address each factor. As the chart indicates, cultural, societal, and personal factors that affect employee welfare are most difficult for the EICC to address because they require significant involvement of government and other non-EICC member organizations. By comparison, industrial, corporate, and facility factors are easier for the EICC to influence through our membership, although the extent to which the EICC can influence these factors depends on various levels of industry cooperation and resources. The chart indicates the relative level of complexity and effort required to affect each category of factors.

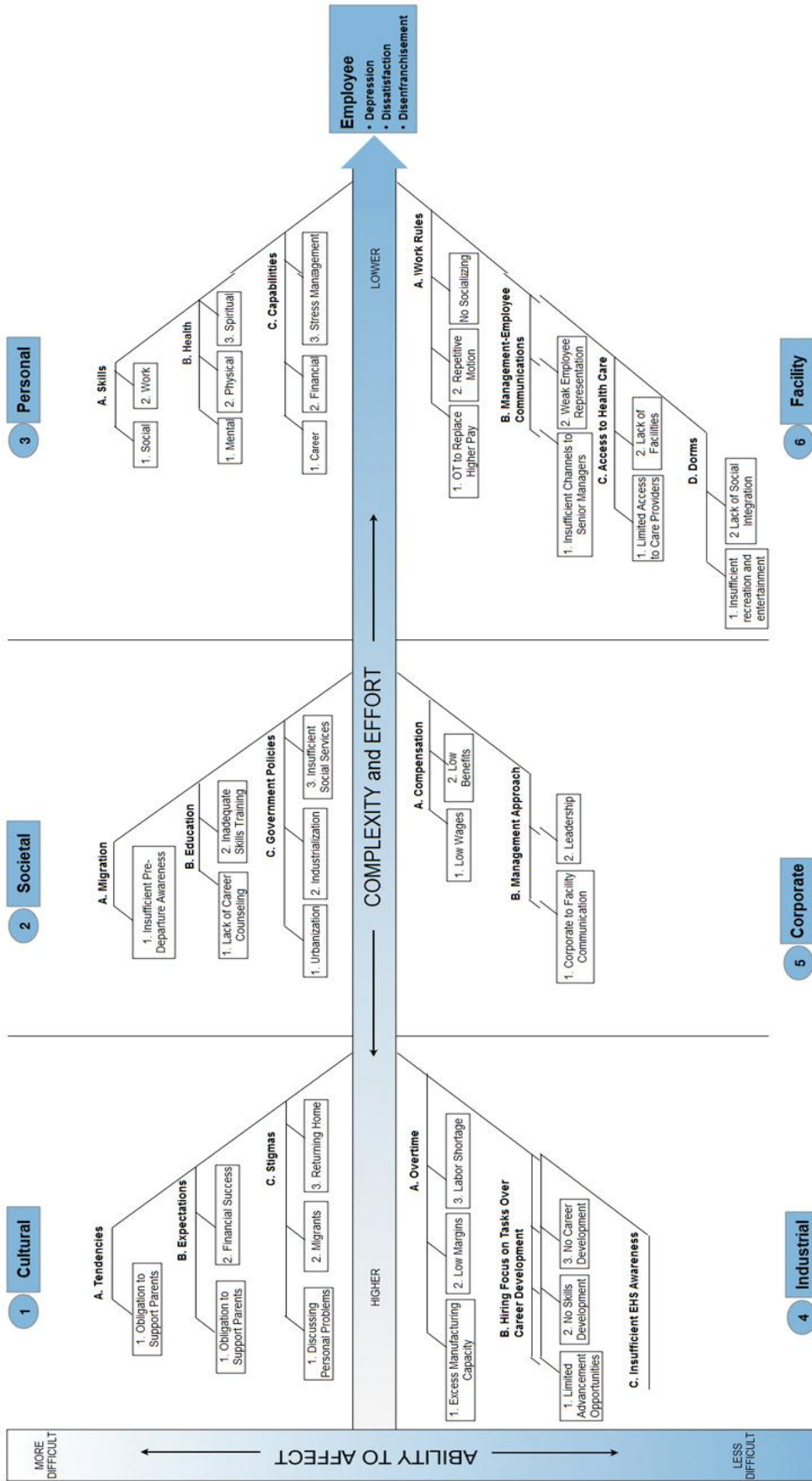
² See Appendix A.

³ The chart may be viewed in greater detail at http://www.ngrc.com/Root_Cause_Analysis.html.

EICC Employee Health & Welfare Task Force

Factors That Affect Employee Welfare

Root Cause Diagram



A. Culture and Society Factors

The task force researched factors originating from the Chinese culture and society to understand their contribution to employee dissatisfaction in the workplace.

This included research, discussions with experts, and presentations by the experts of cultural issues and the nature of migratory labor, rapid economic transformation, and generational change in China. It also included input from the experts about the impact of these issues and trends on ICT employees in China.

1. Migration

A 2010 McKinsey report lists “massive urbanization and industrialization” as the primary challenge that should be better understood by global businesses that seek to operate in China⁴. This includes the tremendous impact of migrant labor on key industries. The task force spent a significant amount of time to understand the impact of migration on EICC member companies and their employees, since ICT manufacturers are among the largest employers of migrant workers in China.

Approximately, 150 million Chinese have migrated from inland regions of the country to coastal regions in order to obtain work. According to 2006 data, 81 percent of the migrant workers moved from eight provinces (indicated on the following map in blue), and 82 percent of all migrant workers moved to seven coastal provinces (indicated in grey). Nearly half of these new workers relocated to Guangdong Province, where the employment market is largely dominated by ICT manufacturers.⁵



⁴ See “How to Think About China Differently,” by McKinsey & Company, March 9, 2010.

⁵ See “Research Report on Chinese Migrant Workers,” State Council, 2006.

2. Education and workplace preparedness

According to research data, the high school graduation rate in the rural areas that generate most of the migrant workers is less than one-third the rate of graduation rates in the urban areas that absorb them. In addition, the rural areas produce one-sixth as many vocational school graduates as the urban areas, and less than 2 percent of the number of college graduates produced by urban areas.⁶ This is resulting in a dilution of overall education levels among the Guangdong-based eligible workforce.

This makes clear that the majority of available manufacturing workers in the greatest area of ICT manufacturer concentration have insufficient education and vocational training. Migrant workers also tend to lack adequate skills training to allow meaningful employment beyond entry-level factory work. Experts who provided input on this subject also pointed out that migrants are typically not well prepared for the challenges they will face in their new communities, and that no “pre-departure” assistance is provided to migrants by the government, NGOs, or industries, despite the huge impact of migration on society as a whole.⁷

3. City registries

The task force considered the impact to migrant employees of state policies that prevent full citizenship rights for workers who relocate into new communities. The result of the policy is to bind migrant employees more closely to their places of employment, rather than to the broader social networks the communities can provide.⁸

4. Cultural stigmas

Some experts indicated that many migrant workers struggle with specific cultural stigmas and expectations that are attached to their decisions to leave home. In particular, the cultural expectation that children will care for their parents creates a dilemma for many young Chinese who migrate, especially if they cannot generate enough income to send home. The experts also indicated that migrants who return home without having achieved economic success are often stigmatized as having “failed,” compounding the shame they may feel for having left in the first place.

Experts also educated the task force about the cultural tendency of Chinese citizens (especially men) to avoid sharing their concerns with others. Rather, personal problems are generally kept private, despite how difficult the problems may be.

The task force considered several examples of how cultural, societal, and personal factors associated with individual well-being collide to place unbearable challenges on employees. Professor Shang-Jen Wei of Columbia Business School points out in a 2010 study that one-fifth of Chinese males are pushed “out of the marriage market” as a result

⁶ US-China Energy Cooperation Program.

⁷ Ms. So Sheung So, Chief Executive of the Labor & Education Service Network (LESN) told EICC members on August 25, 2010 that pre-departure training is needed for migrant workers, and that community-based and in-factory services and training should be provided to help. She stated that the training could best be provided through vocational schools and NGOs.

⁸ Dr. Liu Kaiming, Director of the Institute of Contemporary Observation (ICO) in Shenzhen told EICC members at a meeting on August 25, 2010 that city registry rules leave workers “trapped” at their places of employment.

of the fact that the current young-adult generation consists of 100 women per 122 men.⁹ Some experts who presented their research findings to the EICC focused on the high impact of failed romantic relationships on young male workers, and on the tendency of too many young Chinese to act impulsively in reaction to such setbacks.¹⁰

B. Industry Factors

The task force determined that there are several industry-wide factors that affect employee welfare. These include reliance on overtime (for both companies and employees) and employee career aspirations.

1. Overtime

Task force members considered the effect of macro-economic pressures on the industry and the resulting impact of the pressures on employees in the region. This includes overcapacity among manufacturers, which leads to low profit margins. It also includes the tendency of manufacturers to maximize returns on their significant investments in plants and equipment by running operations at near-maximum output. In addition, the industry faces labor shortages, despite the considerable influx into the region of migrant workers. These pressures result in an emphasis on the use of overtime labor to maintain the high output needed to generate sufficient profits.¹¹

During the research on this topic, several EICC members pointed out another challenge in reducing use of overtime labor: not only must companies rely on overtime to maximize their productivity in the face of labor shortages, but employees demand overtime opportunities in order to maximize their income. Companies that fail to make maximum overtime available risk losing their employees to other companies that will.

The impact of overtime on employees has resulted in increased attention by the EICC on the challenge overtime policies pose for the industry. In fact, the EICC invited Yu Chuntao, Director of Labor Relations at the Human Resources and Social Security Department of Guangdong Province to meet with EICC members at its membership meeting in Shenzhen on August 25, 2010. Director Yu encouraged the industry to address the challenge of overtime labor.

2. Employee career aspirations

Experts encouraged the EICC to help employees with career planning and skills development. Dr. Liu Kaiming of the Institute of Contemporary Observation told EICC

⁹ The study, "Why Do the Chinese Save So Much?" takes an innovative approach to explaining how gender imbalance in China affects the country's high savings rate and current account surplus. A summary of the research can be found at

<http://www4.gsb.columbia.edu/ideasatwork/feature/729422/Why+Do+the+Chinese+Save+So+Much%3F#>

¹⁰ For example, suicide is the leading cause of death for Chinese citizens 15-34 years of age, according to the U.S. Center for Disease Control and a report by *China Daily* (2007). According to Yang Fude, vice-president of Beijing Hui Long Guan Hospital, "suicide in China is an escape from immediate problems and not related to mental issues as much," (reported in a 2009 survey by researchers at Peking University).

¹¹ In other words, the industry is largely volume-driven at the manufacturing level. This results in "maximum output" as the primary business strategy among most ICT companies and suppliers in the region.

members that companies should recognize that the new generation of Chinese workers has “dreams,” and “helping them achieve their dreams through training and education” is the best way to improve outcomes.¹²

Experts told the EICC that the “new age” workers in China are more comfortable with the idea of “self-fulfillment” than their predecessors.¹³ While this means that new age workers want to earn more money and enjoy life outside of work, the experts agreed that these workers are no more equipped educationally than older generations to develop financial or career plans.¹⁴ Task force members indicated that their companies share a common concern about the lack of career and financial planning skills by most entry-level employees.

C. Corporate Factors

The task force also identified the factors at the corporate level that may undermine employee welfare, including compensation (wages and benefits) and management approaches.

1. Compensation

Compensation levels in the region reflect a balance between the difficulty of recruiting and retaining employees (placing upward pressure on wages) and the relatively low-level of skills that most workers bring to the job (putting downward pressure on wages). In general, regional wages are rising due to increased demand for labor. In fact, average wages for migrant workers have already increased 17.8 percent in 2010, according to a Central Bank Survey.¹⁵

2. Management approaches

The task force considered the problems faced by employees as a result of “command-and-control” management systems. The task force also looked at the effect of corporate-directed training of factory-level leaders, and of basic corporate policies relating to management-employee relations. Director Yu told EICC members that employees have greater access to information than employees of the past, and that they have a greater expectation that their rights and well-being will be protected in the workplace. As a result, Director Yu stated that the Chinese government believes “the development models of companies in the region and their workers are not in sync (meaning that the companies should “share” a greater percentage of profits with employees).”¹⁶

¹² Dr. Liu based his comments on research and surveys he has conducted in more than 500 factories in China (210 of which were in the Pearl River Delta). He presented his findings and recommendations to EICC on August 25, 2010.

¹³ Dr. Liu used the term “new age” to describe those born after 1989. These workers constitute 30 percent of the Chinese ICT workforce.

¹⁴ Dr. Liu reported that only 2% of rural children obtain higher education.

¹⁵ See “China Starts Looking Beyond its Era of Breakneck Growth,” *Wall Street Journal*, July 15, 2010.

¹⁶ Director Yu offered his comments on Aug. 25, 2010.

D. Facility Factors

The task force also studied the facility or location-specific factors that can undermine employee welfare. This includes manufacturing processes, factory-level management-employee communications, access to health care, and living conditions for employees who reside in dormitories or other company-provided housing.

1. Manufacturing processes

Manufacturing processes in China generally (and in the ICT industry especially) rely on repetitive motion manufacturing processes. Dr. Liu also singled out “oppressive” work rules and repetitive actions as key factors in the industry that undermine employee well-being.¹⁷

While EICC companies share concerns about the effect of repetitive-motion tasks on employee morale and health, the task force determined that employers face two obstacles to changing this model. First, employees often lack the training to handle multiple tasks where speed and efficiency (along with quality) are the keys to profitability. Second, because of the competitive advantage in manufacturing that China has enjoyed as a result of traditionally abundant and low-cost labor, the transition of repetitive manufacturing processes from reliance on manpower to automation lags behind Western nations.

2. Social interaction

Experts told EICC that the “no socializing” policies imposed in many workplaces cause a special kind of pressure on employees. Dr. Liu estimates that 90 percent of migrant workers in ICT firms are not able to live with their families due to the wage structure and the urban living costs, and most don’t know their roommates’ names even though they are living in the same room.¹⁸ This leaves the worksite as the only remaining option for meaningful social interaction.

The task force considered cultural and societal imperatives that some strict work rules are intended to maintain, such as social harmony, efficiency, and respect for authority and chain of command systems. But the task force also considered how specific work rules may conflict with the intent of protections for workers that are in the EICC Code of Conduct. For example, the Code requires humane treatment of employees, which should prevent employers from discouraging normal and reasonable social interactions in the workplace.¹⁹

Employers may reasonably determine that the Code does not address general issues of employee rights regarding social interaction, and that it is not intended to interfere with a company’s workplace policies that are designed to ensure efficient operations. EICC members agree, however, that the Code is especially intended to protect employees

¹⁷ Dr. Liu indicated that these factors combined with low wages and long hours constitute the main sources of employee unhappiness (presentation at Aug. 25, 2010 EICC membership meeting).

¹⁸ *Ibid.*

¹⁹ See “Electronic Industry Code of Conduct V. 4.0 (2012),” at p. 2 (Section A. Labor, 5. Humane Treatment). Available at http://www.eicc.info/eicc_code.shtml.

against management approaches that would diminish their human rights, such as engaging in normal workplace social interaction.

3. Management-Employee communications

The task force concluded that the same management approach (*i.e.*, placing an emphasis on efficiency and respect for authority) may impact communication between facility-level management and employees. Specifically, task force members associate problems related to management-employee communication with the low emphasis companies in the region place on more progressive leadership training for managers. In fact, many managers interact with employees only to enforce rules and maximize efficiency, rather than to consider employee concerns and ideas.

Director Yu told EICC that he believes there is “lack of sufficient communication between labor and management,” and that “this is a permanent issue for research and understanding in China.”²⁰ Dr. Liu told EICC members that “oppressive” management systems in many Chinese factories prevent two-way communication, and contribute significantly to employee stress and unhappiness.²¹ He encouraged EICC members to help managers in the ICT industry “listen to employees” as the best means to improve conditions for workers.

4. Access to mental health care

While some companies provide on-site health clinics and medical care, most do not offer counseling or mental health services. Even in cases where companies may provide specialized care, task force members estimate that the number of caregivers available tends to be small compared to the employee populations. They also considered testimony from experts who said many employees opt not to seek counseling (particularly given stigmas and tendencies to keep personal concerns private, as indicated above). Finally, they considered what challenges migrant employees face when they seek care outside the workplace, especially given citizen registry rules.

5. Living conditions

Many ICT workers live in dormitories provided by the company for which they work. While this provides a ready place to live for migrant workers who are not from the town or even the region where they are employed, it does provide challenges for companies in managing the dormitories.

The task force discussed the importance of living conditions on employee welfare, particularly in the unique circumstances for many ICT manufacturers in China that house thousands of employees. These companies face a difficult task of managing potentially large housing programs, requiring the companies to take responsibility for the well-being of employees even after they leave the worksite.

²⁰ *Ibid.* 15

²¹ *Ibid.* 16

Most of the experts who contributed their views to the task force indicated they believe ICT companies should place a greater emphasis on a number of living condition issues. Specifically, they encourage companies to provide more social and recreational opportunities for employees, and increase access to health care (and especially mental health counseling) where employees live. They also questioned company policies that segregate employees who migrate from the same regions, or that intentionally undermine natural social networks.

IV. Recommendations

The task force identified three strategies the industry can adopt to produce improvements for its employees in China. The strategies are intended to provide immediate-, medium-, and long-term changes. The task force recommends that work begin to address these issues and to develop specific initiatives that can impact the recommended areas of improvement.

A. Immediate Actions

1. Improve monitoring on social interactions in the workplace

The EICC Code of Conduct establishes specific standards for corporate treatment of employees. The Code obligates companies to treat their employees “with dignity and respect.”²² It also requires companies “to respect the rights of workers to associate freely.”²³ This is generally associated with the right of employees to “join or not join labor unions, seek representation, and join workers’ councils in accordance with local laws.”

The task force recommends that the EICC review measurements and questions in the Validated Audit Process (VAP) audit guidance to ensure that companies allow employees to interact with each other in the workplace, and to speak freely. This will allow the VAP auditors to uncover non-conformances to the Code.

2. Conduct best practice sharing among EICC members

The task force identified that several EICC members have developed programs that could be reviewed as best practices. The task force recommends that the EICC gather information about practices used by members to improve working conditions in their factories or those of their supply chains and develop a best practice educational sharing session among members.

B. Medium-Term Actions

1. Deploy the EICC training program designed to improve worker-management communications

²² *Ibid.* 19.

²³ *Ibid.* See Subsection A (7) Freedom of Association (p. 3).

The Code also provides clear direction on communication with employees. Specifically, the Code states that “open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues,” and that “workers shall be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.”²⁴

The task force believes there is insufficient training in effective management-employee communication in the ICT industry. To address this, the task force recommends the timely deployment of the Worker-Management Communication Program that is currently in development by the EICC, in partnership with the Global e-Sustainability Initiative.

2. Recreate Working Hours Work Group

The task force also recommends that the EICC recreate the Working Hours Work Group to address this important issue. Note: Per EICC policy, the previous Working Hours Task Force was disbanded after completion of their stated deliverables.²⁵

C. Long-Term Action

1. Collaborate with industries, government, and stakeholders to address overtime

Task force members agree that excessive use of overtime labor is the single most problematic factor that undermines employee welfare.

The EICC Code of Conduct requires members to operate in full compliance to local laws and regulations including those related to working hours. Where there are no applicable regulations related to working hours, the Code limits working hours to a maximum of “60 hours per week, including overtime, except in emergency or unusual situations.”²⁶ The task force determined as a result of input from EICC members and experts that improving industry conformance with this requirement should be an important long-term objective.

As a result, the task force recommends that the EICC engage with companies, other industries, stakeholders, and government officials in Guangdong Province and the Central Government to identify a comprehensive approach that will reduce excessive reliance on overtime labor. Director Yu told EICC members that the new government policy is to accelerate the development of workers into consumers.²⁷ He indicated that the government has formed groups of best-practice companies to develop strategies--including reducing overtime hours--that can be shared with government and other companies.

²⁴ *Ibid.*

²⁵ See our website for more information on Work Groups and Task Forces: <http://www.eicc.info/governance.shtml>.

²⁶ *Ibid.* Section A. Labor, Subsection 3. Working Hours at p.2.

²⁷ Specifically, Director Yu stated that the new government policy is to “accelerate exports and development,” and that development is “focused on the needs of workers, including as consumers.” He stated that this is a change from the previous government definition of development, which was focused on meeting the country’s energy needs. He also stated that the new policy is intended to help companies “focus on more than efficiency and extended working hours” as a business model in favor of helping to develop employees. (Aug. 25, 2010 presentation to EICC members.)

V. Next Steps

The next step for the EICC is to review the recommendations identified in this report and develop specific initiatives to address the recommendations. In some cases, this will require collaboration with and assistance from government and other stakeholders, particularly since no company (or even industry) alone can effect many of the changes that are needed to improve working conditions for all manufacturing employees in China.²⁸ In other cases, EICC Work Groups will review the recommendations for possible inclusion in current and future work plans.

The EICC will proceed as follows:

- Phase I--Root Cause Analysis
 - Status: Complete with publication of this report
- Phase II--Develop Initiatives
 - Status: Continue into 2012. See Appendix C for information on 2011 activities.
- Phase III—Implementation
 - Status: Begin in 2012

²⁸ The EICC invited Dr. Hou Lingling, Associate Professor and Vice-Director of the Social Security Institute at Shenzhen University to present her findings on this issue at its August 25, 2010 meeting. Dr. Hou reported that “professionals and academics believe there is no sufficient initiative for companies to improve the welfare of workers; the force from external parties and larger community is a must to accelerate the improvement on current situation” (專家學者相信,工廠在提高和改善工人的福利狀況上內在動力不足, 需要其他社會力量, 從外部來推動和協助工廠提高和改善工人的福利狀況。)).

VI. Conclusion

The EICC is focused on enabling members to make improvements in the global electronics supply chain. The research conducted by the task force points to areas that could be addressed through collaborative action within EICC and its members, and in some cases, with stakeholders. While this work could not possibly identify every factor that impacts employee health and welfare, it does provide a starting place for the EICC and EICC members to understand the situation and take action. The task force participants look forward to working with the broader EICC organization on developing and implementing detailed initiatives to address worker health and welfare. The EICC welcomes feedback and suggestions from interested stakeholders, in particular on how collaborative efforts could support these initiatives.

Appendix A: Expert Panel

The following resources participated in a panel on this topic:

- 1) Dr. Hou Lingling, Associate Professor and Vice-Director of the Social Security Institute at Shenzhen University
- 2) Mr. Ji Feng, co-founder of the Shenzhen Industrial Forum, an organization which supports migrant workers and works to improve labor relations in the Shenzhen, China area
- 3) Dr. Liu Kaiming, Director of the Institute of Contemporary Observation (ICO) in Shenzhen
- 4) Peter Zhou, researcher and accreditation auditor of Better Factory Certification (a private consulting company)
- 5) Ms. So Sheung So, Chief Executive of the Labor & Education Service Network (LESN)
- 6) Yu Chuntao, Director of Labor Relations at the Human Resources and Social Security Department of Guangdong Province.

Appendix B: Acronyms

EICC®	Electronic Industry Citizenship Coalition®
ICT	Information and Communications technology
NGO	Non-Governmental organization
VAP	Validated Audit Process

Appendix C: Update on 2011 EICC Activities

Since the original research was completed in 2010, the EICC[®] has focused in several areas related to findings identified in this report.

Immediate Actions

1. Improve monitoring on social interactions in the workplace

The EICC updates the Code of Conduct every three years with member-approved Code provisions that have been proposed by members and stakeholders. Any newly approved provisions, including ones that relate to workplace social interactions, will be included in tools and resources, including audit protocols. The EICC Code of Conduct Review process started in August 2011 and runs through April 2012; the Code of Conduct can be found at http://www.eicc.info/eicc_code.shtml.

2. Conduct best practice sharing among EICC members

Best practice sharing started at a 2011 EICC meeting with members and executives and continued into the 2011 summer EICC membership meeting. Cross-industry collaboration was suggested along with suggestions for collaboration with specific companies outside of the ICT industry. Work to identify these beneficial cross-industry relationships has begun and will be ongoing as possible partners are identified and dialog begins with them.

Medium-Term Actions

1. Deployment of the EICC training program designed to improve worker-management communications

The Learning and Capability Building Work Group has developed a Worker-Management Communication training program. It is a train-the-trainer program intended for facility management with the aim to improve the capability of managers to communicate effectively with their workers.

This training was developed by EICC and GeSI members in collaboration with the FLA and INFAC, and with review and input provided by the ILO. The development process was completed in the fourth quarter 2011 and has been released to members for their deployment.

See the [2010 EICC Annual Report](#) for more information on this training program. Additionally, more information will be made available on the [EICC website](#).

2. Recreate Working Hours Work Group

After completing its initial deliverables, the previous Working Hours *Task Force*²⁹ was disbanded by the EICC. However, the EICC and its members, recognizing that working hours remains a critical sector issue, reconvened a Working Hours *Work Group*³⁰ a team that has an ongoing mandate.

The Working Hours Work Group's strategy is to:

- Improve ability of members to measure and manage working hour performance
- Explore regional multi-stakeholder collaboration opportunities
- Determine EICC approach to measuring/monitoring working hours improvements
- Leverage the project deliverables from the Working Hours Task Force

As this team further develops their plans and deliverables, more information may be periodically shared.

Long-Term Actions

1. Collaboration with industries, government, and stakeholders to address overtime

Specific collaboration activities will result from the work of the Working Hours Work Group and will be developed within this context.

²⁹ EICC Task Forces are created to perform a specific task and disband once their task is completed.

³⁰ EICC Work Groups are ongoing teams that translate the strategy and guidance provided by the Board of Directors into action.