



Phil Bloomer  
Executive Director  
Business and Human Rights Resource Center (BHRRC)

Yoona Kim  
Korea Research and Representative  
Business and Human Rights Resource Center (BHRRC)

26 April 2023

**Reference: Samsung response to BHRRC invitation to address methanol poisoning and Samsung whistleblower testimony as outlined in the press release from CGFED, SHARPS, and IPEN**

Dr. Mr. Bloomer and Ms. Kim,

We are writing to respond to Samsung's 24 April 2023 reply<sup>1</sup> to BHRRC's invitation<sup>2</sup> to address two issues: 1) testimony from a Samsung whistleblower as summarized in a press release from CGFED, SHARPS, and IPEN<sup>3 4</sup>; and 2) the tragic methanol poisoning that occurred at one of Samsung's suppliers in Vietnam.<sup>5</sup> Samsung has actively ignored the testimony of its own whistleblower who served as a manager of environmental health and safety at Samsung Vietnam. The Samsung whistleblower experienced repeated indifference by Samsung senior management to documentation of water pollution, air pollution, poor fire safety, lack of occupational safety, poorly regulated toxic chemical use, and outsourcing of risk to suppliers, among others.<sup>6 7 8 9 10</sup> One illustration of Samsung's management approach is the company's refusal to take responsibility for the tragic methanol poisoning of 37 workers at one of its suppliers in Vietnam, which killed one worker and blinded three teenage workers in March 2023. Taken together, Samsung has failed to adequately respond to BHRRC and failed to honor its business obligations on human rights.

The UN Guiding Principles on Business and Human Rights, endorsed by the UN Human Rights Council in resolution 17/4 of 16 June 2011, clarify that: (1) States have an obligation to protect against human rights abuses due to business activities, including abuses arising from working conditions; (2) businesses have a responsibility to respect human rights "*throughout their operations*"; and (3) businesses and States have a shared responsibility to realize an effective remedy for human rights abuses.<sup>11</sup> Respecting human rights "*requires*" that businesses avoid "*causing or contributing to*" adverse human rights impacts through their activities and address such impacts when they occur. Businesses should "*prevent or mitigate*" impacts "*directly linked*" to operations, products, or services by their business relationships, even if they have not contributed to those impacts.

In addition, two key human rights that are relevant to the Samsung whistleblower testimony were confirmed in 2022. In June 2022 at its 110<sup>th</sup> Session, the International Labor Conference decided to update the ILO Declaration on Fundamental Principles and Rights at Work by including "*a safe and healthy working environment*" as a fundamental human right of workers.<sup>12</sup> In July 2022, the UN General Assembly recognized, "*the right to a clean, healthy and sustainable environment as a human right.*"<sup>13</sup> Both of these rights have been violated repeatedly at Samsung's operations in Vietnam.

Samsung's indifference to the whistleblower testimony and its refusal to take responsibility for the tragic methanol poisoning that recently took place at one of its suppliers in Vietnam are inconsistent with Samsung's obligations under the UN Guiding Principles on Business and Human Rights, ILO's updated Declaration on Fundamental Principles and Rights at Work, and the UN General Assembly recognition of the right to a healthy and safe environment.

## Testimony from a Samsung whistleblower

In its 17 April 2023 inquiry to Samsung, BHRRC asked the company to respond to issues outlined in a press release from CGFED, SHARPS and IPEN concerning “*long-standing and widespread use of toxic chemicals and environmental violations by Samsung Electronics in Vietnam.*”<sup>14 15</sup> The Samsung whistleblower’s damning testimony has been revealed in a series of comprehensive news reports from investigative journalists at South Korea-based *Newstapa*.<sup>16 17 18 19 20</sup> In its response, Samsung simply ignored BHRRC’s request to address these issues, despite their relevance to Samsung’s human rights obligations. Samsung pretends that its own whistleblower does not exist.

**Key findings ignored by Samsung.** BHRRC asked Samsung to respond to the following key findings as summarized in our 12 April 2023 press release:

- A forty-year veteran in charge of Environmental Health and Safety lost his pride in the company when recommendations to address safety measures were ignored by Samsung management due to costs.
- Samsung outsourced work environment risks to Vietnam and used a double standard by conducting operations in Vietnam in a way that would not be permitted in South Korea.
- Within Vietnam, Samsung outsourced toxic chemical-intensive processes to subcontractors who were revealed to be using a variety of toxic chemicals including methanol. Recently, 37 workers were poisoned by methanol at a Samsung supplier in Vietnam. One worker died and three teenage workers lost their eyesight.<sup>21</sup>
- Serious fires at Samsung suppliers occurred because basic safety measures were ignored. In 2017, 78% of Samsung’s suppliers in Vietnam violated fire safety requirements.
- Samsung left design defects in pollution control devices unaddressed and knowingly released chemicals to air and water.
- 48% of the chemical products used have at least one ingredient that is carcinogenic, mutagenic, or toxic to reproduction. This is the first time information about toxic chemicals used in Samsung’s Vietnam factories has been disclosed publicly.
- Toxic chemicals were used openly without proper containment and fume hoods, ventilation systems and pollution controls were inadequate or absent.
- There was inadequate or a complete lack of personal protection equipment.
- An investigation by Vietnamese regulators in 2017 concluded that there were no problems at Samsung’s factories but this contradicted the company’s own investigation revealed in internal documents.
- *Newstapa* received an email from a worker at Samsung Electronics, reporting that the company has systematically covered up risks, injuries, and accidents at its global factories in order to achieve Key Performance Indicators.

These brief bullet points correspond to a long list of human rights violations at Samsung Vietnam. *Newstapa* reporting has revealed hundreds of cases of non-compliance with occupational safety and health and environmental standards, including even basic adherence to fire safety standards set by Samsung itself.<sup>22 23</sup>

**Samsung whistleblower revelations connect to 2017 study.** The Samsung whistleblower served as manager of environmental health and safety in 2017 when CGFED and IPEN released an unprecedented study on the experiences of women working at two Samsung factories in Vietnam. The study documented health and workplace violations by the electronics industry giant.<sup>24</sup> Workers reported experiences of frequent fainting, dizziness, miscarriages, standing for eight-to-twelve hours, and alternating day/night shift work. The lack of proper chemicals management revealed by the Samsung whistleblower is consistent with some of the health effects reported by women workers in the 2017 report.

Samsung’s response to the information revealed by its own workers in the CGFED-IPEN report was to threaten their employees with firing and lawsuits if they talked to any outsider. The company tried to prevent the release of report and later mounted an attack campaign in the Vietnamese press. The situation became so extreme, three UN Special Rapporteurs issued a statement on the matter expressing concern about intimidation.<sup>25</sup>

**Tangible measures to begin human rights compliance.** To begin work on complying with its human rights obligations, Samsung should acknowledge the problems revealed by its whistleblower. The company should support the right to form independent trade unions in Vietnam and issue a public statement together with the Government of Vietnam, that workers at its factories and suppliers are free to discuss their working conditions with the news media and civil society organizations. These first steps would provide tangible signals that Samsung is ready to go beyond a public relations approach and is serious about beginning to work on complying with its human rights obligations.

**Methanol poisoning tragedy at a Samsung supplier in Vietnam**

In response to the inquiry<sup>26</sup> from BHRRC to “respond to worker death and injuries due to methanol poisoning reported from a supplier in Bac Ninh, Vietnam,” Samsung provided a one-page statement that ironically describes its regulation of toxic substances as “rigorous” and subtly seeks to transfer responsibility away from itself.<sup>27</sup>

**Ignoring the Code of Conduct.** The Samsung statement states that its suppliers are required to abide by the company’s Supplier Code of Conduct. However, the recent methanol poisoning tragedy demonstrates that neither the company nor the supplier paid attention to the implementation of Samsung’s Code.

<i>Samsung Supplier Code of Conduct</i>	<b>HS Tech methanol poisoning, March 2023</b>
<i>2.1 Potential or actual worker exposure to safety hazards... are to be identified, assessed, and controlled.</i>	Methanol poisoning symptoms in workers occurred for weeks without any company action. Safety hazards were not identified, assessed, or controlled by Samsung or HS Tech
<i>2.3 investigate cases and implement corrective actions to eliminate their causes...</i>	Neither company investigated the cause of the poisoning. In fact, the family of one of the victims discovered the cause by sending a sample of the suspect alcohol for testing, which proved that it was methanol. <sup>28</sup>
<i>2.4 Potential hazards are to be eliminated or controlled...</i>	Doctors determined that breathing methanol-contaminated air and direct skin contact caused the poisoning. This indicates that normally workers breathe ethanol-contaminated air and get it on their skin. Neither HS Tech nor Samsung eliminated or controlled potential hazards from ethanol exposure, paving the way for methanol poisoning.

**Incentivizing cheating.** Samsung’s management system provides a strong incentive for suppliers to conceal human rights violations and other problems. The company conducts evaluations of its suppliers based on what the suppliers submit to the company as self-evaluations. Companies are rated based on these evaluations and good scores result in getting a higher priority for supply volume allocation for the following year. This provides a strong motivation for the supplier to deliver a good self-evaluation in order to obtain more business. This arrangement also benefits Samsung headquarters when it comes time to describe how well its suppliers are complying with company policies in its sustainability report or other matters related to environmental, social, and governance reports. Samsung may view this arrangement as a win-win, but it is a cynical approach that fosters dishonesty and fails to sincerely implement human rights obligations and environmental and occupational health and safety practices.

**Weak management of toxic chemicals.** Electronics manufacturing uses more than 1000 chemicals but Samsung has a list of regulated substances for manufacturing that contains only 25 chemicals.<sup>29</sup> Of these 25, only two are completely prohibited: benzene and n-hexane. The remaining 23 substances represent a toxic collection of carcinogens and substances toxic to reproduction and the nervous system, among a variety of other effects. The restriction of these 23 substances is confined to manual use. All automated uses of these toxic chemicals are permitted, though they require humans for certain operations that could include measuring, refilling, cleaning, etc. that provide opportunities for exposure. Twenty-two substances should not be used for manual cleaning or degreasing. The remaining one, methanol, should not be used for manual cleaning, degreasing, or cooling. All other uses of these 23 toxic chemicals are permitted at all Samsung factories and suppliers. The toxic chemicals that are not on this list can be used for any purpose.

Aside from its small list and limited restrictions, the regulatory approach taken by Samsung easily creates a situation where substances are present in a factory or supplier for a use that is not restricted, but can be diverted to other uses that are restricted. This temptation is especially difficult to resist if there are significant price differences between different substances. For example, all uses of methanol are permitted except manual cleaning, degreasing, and cooling. This means methanol might be present in a factory for a use that Samsung does not restrict. An internal inspection by Samsung in 2016 revealed that 74 suppliers in Vietnam were using methanol and 14 of them were using the substance for washing or cooling which is prohibited by the company.<sup>30</sup> Since methanol is one-third the price of ethanol, the temptation to divert use of methanol for use in cooling could provide a substantial cost savings, especially at the volumes used for cooling in metal cutting. If this happens in a supplier, all the supplier must do is give themselves an excellent self-evaluation and turn it in to Samsung in hopes of getting an even bigger supply contract the following year. As *Newstapa* noted, methanol use is a reality in Samsung's production process. "*Even in 2021, just two years ago, it was discovered that some of Samsung's subcontractors in Vietnam had still used methanol.*"<sup>31</sup>

**Avoiding responsibility.** Samsung has brushed off calls by civil society groups and trade unions for the company to take responsibility for the methanol poisoning tragedy.<sup>32,33,34</sup> Because the harms of methanol poisoning at its supplier were obvious, the company could not use Steps 1 – 3 of the Four Dog Defense and had to turn to Step 4: "*My dog bit you and hurt you, but it wasn't my fault.*"<sup>35</sup> In this step, the company admits that exposure to a toxic substance caused harm, but tries to shift the blame away from itself. Samsung's 24 April 2023 response to BHRRC illustrates the approach. Samsung also successfully implemented this strategy following a civil society and trade union press conference about the methanol poisoning tragedy on 29 March 2023.

After 16 groups comprising civil society organizations and trade unions called on Samsung to take responsibility for the methanol poisoning and implement concrete steps to correct it, the South Korean news media rushed in to defend the company.<sup>36</sup> Numerous articles portrayed Samsung as a victim of fraud and criticized the press conference participants as unjustly demanding too much of the company.<sup>37</sup> SHARPS issued a rebuttal noting that Samsung claims to rigorously manage its suppliers, but "*No action was taken even after the victim was hospitalized in a coma. The family of the victim, who suspected the toxicity of alcohol, sent the alcohol to the poison control center, revealing the problem.*"<sup>38</sup> *Newstapa* noted the previous use of applying the victim frame to Samsung and pointedly observed that, "*It is not an incident that occurred because Samsung was accidentally harmed, but in fact, Samsung's poor management, which has been neglected for a long time, is the structural cause of the tragedy.*"<sup>39</sup> In South Korea, Samsung has a history of effectively wielding its large advertising budget to limit negative press stories about its operations.<sup>40,41</sup> As of this date, not one mainstream South Korean press outlet has written about the revelations of the Samsung whistleblower.

**Tangible measures to begin human rights compliance.** To begin work on complying with its human rights obligations with regards to the recent methanol poisoning, Samsung should stop its practice of outsourcing risk, acknowledge responsibility, and apologize for its occurrence.<sup>42</sup> Victims should be supported to recover from damage and measures should be implemented to prevent recurrence. The most meaningful tangible measure to prevent recurrence would be to ban the use of methanol at all Samsung factories and suppliers worldwide. No one in the 21<sup>st</sup> century should go blind or die due to methanol poisoning on the job.

### **How will Samsung respond to its whistleblower?**

Samsung, like other companies with poor management will likely proceed down a list of familiar corporate options in response to the revelations of numerous violations of occupational and environmental safety and human rights. These options are: 1) ignore the testimony of its own whistleblower; 2) provide a non-response by issuing bland public relations language; 3) deny that the whistleblower reports are true; or 4) claim that the whistleblower reports are true, but they are irrelevant because that was in the past and now things are much better.

**Ignore the whistleblower testimony.** Samsung already ignored the testimony of its whistleblower by refusing to respond to BHRRC's invitation to comment on the summary of the whistleblower testimony present in the press release from CGFED, SHARPs, and IPEN. Samsung also refused to provide comment to a report on these issues in the news outlet, *Rest of World*.<sup>43</sup> That report recounted that at Samsung Vietnam, "*the factory's wastewater was discharged directly through rainwater pipes to the river nearby.*" In addition, the reporter interviewed a former worker at Samsung Vietnam who said that managers asked him to remove an air filter to allow toxic chemical fumes

to be released to the outside air and that a company Samsung subcontracted to dispose of toxic chemical waste, “would dump the materials into a nearby river.” The Samsung whistleblower noted that the company, “regularly ignored environmental and safety regulations, and that in all 14 years of Bac Ninh’s operation, he was not aware of those lapses ever being investigated by the Vietnamese government.”

**Provide a non-answer with public relations language.** The company provided bland public relations language to Vietnamese language reporting by *Radio Free Asia*.<sup>44</sup> That report noted that, “the odor problem at Bac Ninh factory was found to be caused by toxic substances from the painting and printing process. However, it was revealed that Samsung executives did not take proper action for at least seven years after receiving the report.” In their response to *Radio Free Asia*, Samsung ignored all the findings, avoided any mention of the whistleblower, and provided some public relations language about their commitment to safety. Samsung also reacted the same way to the *Newstapa* reports and provided similar language in response to five investigative reports featuring one of their former managers of environmental health and safety.

**Deny that the testimony of the whistleblower is true.** Companies often attack and marginalize whistleblowers as alarmist, disgruntled employees who lack loyalty to the company and just want to extract money. This is often used as a basis for denying whistleblower testimony. Hopefully, Samsung will not stoop to personal attacks on the whistleblower. However, if Samsung’s efforts to prevent press coverage are not sufficiently successful, the company could try to deny the revelations of the whistleblower. The main problem for the company in doing this is that the media reporting on the whistleblower’s claims is based on Samsung’s internal documents, reports, and photos.

**Claim that the whistleblower testimony is outdated and things are much better now.** Samsung could try to sidestep its responsibility by claiming that while the whistleblower testimony does not show the best side of the company, it is irrelevant because the company has made some great improvements in its management of overseas factories and suppliers. The main problem for the company in trying to use this technique is that the consequences of its poor management are currently occurring. One example is the recent methanol poisoning tragedy that occurred one month ago in March 2023. Ironically, while *Newstapa* reported the testimony of the Samsung whistleblower about mismanagement of toxic chemicals at Samsung Vietnam suppliers, news of the tragic methanol poisoning emerged. It seems unlikely that the company has suddenly reformed itself in a matter of weeks. Another example from the *Newstapa* reporting is that, “large and small fires and explosions caused by poor basic safety management are continuing at these partner factories.”<sup>45</sup> The truth is that the Samsung whistleblower testimony is currently highly relevant to Samsung’s lax approach to management of human rights and occupational and environmental health and safety at its overseas factories and suppliers and its continuing refusal to publicly take responsibility.

Thank you for inviting Samsung to comment on the testimony of its whistleblower and to respond to the methanol poisoning tragedy at one of its suppliers in Vietnam. These issues badly need more sunlight in the form of increased scrutiny by UN agencies and the public, news media, investment managers, and government regulators and lawmakers in South Korea, Vietnam, and other countries.

Best regards,

Pham Thi Minh Hang  
Vice Director  
Research Centre for Gender, Family, and Environment in Development (CGFED)

Lee Sangsoo  
Activist  
Supporters for the Health and Rights of People in the Semiconductor Industry (SHARPS)

Joseph DiGangi, PhD  
Special Advisor  
International Pollutants Elimination Network (IPEN)

## References

- <sup>1</sup> Samsung (2023) Samsung Electronics' response to methanol poisoning deaths and hospitalisations in Vietnam, Samsung <https://www.business-humanrights.org/en/latest-news/samsung-electronics-response-to-methanol-poisoning-deaths-and-injuries-in-vietnam/>
- <sup>2</sup> Business and Human Rights Resource Centre (2023) Vietnam: One worker died and 37 hospitalized due to methanol poisoning at Samsung Electronics supplier, CSOs connect incident to long-standing mismanagement of toxic chemicals, co. response included, Business and Human Rights Resource Centre <https://www.business-humanrights.org/en/latest-news/vietnam-report-alleges-methanol-poisoning-death-and-injuries-a-result-of-chronic-mismanagement-of-toxic-chemicals-in-samsung-supply-chain/>
- <sup>3</sup> CGFED = Research Centre for Gender, Family, and Environment in Development  
SHARPS = Supporters for the Health and Rights of People in the Semiconductor Industry (SHARPS)  
IPEN = International Pollutants Elimination Network
- <sup>4</sup> CGFED, SHARPS, IPEN (2023) Samsung Whistleblower Reveals Toxic Chemical Use and Violations at Samsung Vietnam <https://ipen.org/documents/samsung-whistleblower-reveals-toxic-chemical-use-and-violations-samsung-vietnam>
- <sup>5</sup> Thanh Ha - Duong Lieu (2023) 1 killed, dozens hospitalized due to methanol poisoning in northern Vietnam, Tuoi Tre News <https://tuoitrenews.vn/news/society/20230315/1-killed-dozens-hospitalized-due-to-methanol-poisoning-in-northern-vietnam/72109.html>
- <sup>6</sup> 김새봄 (2023) Global Samsung's Dangerous Factory #1: A Safety Manager's Confession, Newstapa <https://newstapa.org/article/E-rbn>
- <sup>7</sup> 김새봄 (2023) Global Samsung's Dangerous Factory #2: The Secret of 7 Years of Stench, Newstapa <https://newstapa.org/article/S3jfg>
- <sup>8</sup> 오대양 (2023) Global Samsung's Dangerous Factory #3: Evolving Risk, Newstapa <https://newstapa.org/article/HkjSO>
- <sup>9</sup> 김새봄 (2023) Global Samsung's Dangerous Factory #4: Risk Transferred, Newstapa <https://newstapa.org/article/z5s-l>
- <sup>10</sup> 오대양 (2023) Global Samsung's Dangerous Factory #5: A Hole in 'Samsung Management' <https://newstapa.org/article/ON-nB>
- <sup>11</sup> United Nations (2011) Guiding principles on business and human rights: Implementing the United Nations “protect, respect and remedy” framework, HR/PUB/11/04 [http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)
- <sup>12</sup> ILO (2022) A safe and healthy working environment is a fundamental principle and right at work, ILO <https://www.ilo.org/global/topics/safety-and-health-at-work/areasofwork/fundamental-principle/lang--en/index.htm>
- <sup>13</sup> UN (2022) UN General Assembly declares access to clean and healthy environment a universal human right, United Nations <https://news.un.org/en/story/2022/07/1123482>
- <sup>14</sup> CGFED, SHARPS, IPEN (2023) Samsung Whistleblower Reveals Toxic Chemical Use and Violations at Samsung Vietnam <https://ipen.org/documents/samsung-whistleblower-reveals-toxic-chemical-use-and-violations-samsung-vietnam>
- <sup>15</sup> Business and Human Rights Resource Centre (2023) Vietnam: One worker died and 37 hospitalized due to methanol poisoning at Samsung Electronics supplier, CSOs connect incident to long-standing mismanagement of toxic chemicals, co. response included, Business and Human Rights Resource Centre <https://www.business-humanrights.org/en/latest-news/vietnam-report-alleges-methanol-poisoning-death-and-injuries-a-result-of-chronic-mismanagement-of-toxic-chemicals-in-samsung-supply-chain/>
- <sup>16</sup> 김새봄 (2023) Global Samsung's Dangerous Factory #1: A Safety Manager's Confession, Newstapa <https://newstapa.org/article/E-rbn>
- <sup>17</sup> 김새봄 (2023) Global Samsung's Dangerous Factory #2: The Secret of 7 Years of Stench, Newstapa <https://newstapa.org/article/S3jfg>
- <sup>18</sup> 오대양 (2023) Global Samsung's Dangerous Factory #3: Evolving Risk, Newstapa <https://newstapa.org/article/HkjSO>
- <sup>19</sup> 김새봄 (2023) Global Samsung's Dangerous Factory #4: Risk Transferred, Newstapa <https://newstapa.org/article/z5s-l>
- <sup>20</sup> 오대양 (2023) Global Samsung's Dangerous Factory #5: A Hole in 'Samsung Management' <https://newstapa.org/article/ON-nB>
- <sup>21</sup> Thanh Ha - Duong Lieu (2023) 1 killed, dozens hospitalized due to methanol poisoning in northern Vietnam, Tuoi Tre News <https://tuoitrenews.vn/news/society/20230315/1-killed-dozens-hospitalized-due-to-methanol-poisoning-in-northern-vietnam/72109.html>
- <sup>22</sup> 김새봄 (2023) Global Samsung's Dangerous Factory #1: A Safety Manager's Confession, Newstapa <https://newstapa.org/article/E-rbn>
- <sup>23</sup> 오대양 (2023) Global Samsung's Dangerous Factory #5: A Hole in 'Samsung Management' <https://newstapa.org/article/ON-nB>

- 
- <sup>24</sup> CGFED, IPEN (2017) Stories of women workers in Vietnam's electronics industry, CGFED and IPEN <https://ipen.org/documents/electronics-workers-vietnamese-women-report>
- <sup>25</sup> Tuncak B, Ramasastry A, Kaye D (2018) Vietnam: UN experts concerned by threats against factory workers and labour activists, United Nations Human Rights, Office of the High Commissioner <https://www.ohchr.org/en/press-releases/2018/03/vietnam-un-experts-concerned-threats-against-factory-workers-and-labour>
- <sup>26</sup> Business and Human Rights Resource Centre (2023) Vietnam: One worker died and 37 hospitalized due to methanol poisoning at Samsung Electronics supplier, CSOs connect incident to long-standing mismanagement of toxic chemicals, co. response included, Business and Human Rights Resource Centre <https://www.business-humanrights.org/en/latest-news/vietnam-report-alleges-methanol-poisoning-death-and-injuries-a-result-of-chronic-mismanagement-of-toxic-chemicals-in-samsung-supply-chain/>
- <sup>27</sup> Samsung (2023) Samsung Electronics' response to methanol poisoning deaths and hospitalisations in Vietnam, Samsung <https://www.business-humanrights.org/en/latest-news/samsung-electronics-response-to-methanol-poisoning-deaths-and-injuries-in-vietnam/>
- <sup>28</sup> Lê Nga (2023) Hon hai tuần chữa trị 37 công nhân nhiễm độc methanol qua hô hấp, VNExpress <https://vnexpress.net/hon-hai-tuan-chua-tri-37-cong-nhan-ngo-doc-methanol-4580763.html>
- <sup>29</sup> Samsung (2022) List of Regulated Substances for Manufacturing, Samsung [https://images.samsung.com/kdp/aboutsamsung/environment/environment\\_data/List\\_of\\_Regulated\\_Substances.pdf](https://images.samsung.com/kdp/aboutsamsung/environment/environment_data/List_of_Regulated_Substances.pdf)
- <sup>30</sup> 오대양 (2023) Global Samsung's Dangerous Factory #3: Evolving Risk, Newstapa <https://newstapa.org/article/HkjSO>
- <sup>31</sup> 오대양 (2023) Global Samsung's Dangerous Factory #3: Evolving Risk, Newstapa <https://newstapa.org/article/HkjSO>
- <sup>32</sup> 오대양 (2023) 참을 수 없는 '삼성 본색' 언론의 가벼움, 그들이 몰랐던 진실의 무거움, 뉴스타파 <https://newstapa.org/article/gqFHk>
- <sup>33</sup> SHARPS (2023) 삼성전자 베트남 공장 협력업체 메탄올 사고에 대한 삼성의 대응 규탄 성명, SHARPS <https://cafe.daum.net/samsunglabor/MHzN/720>
- <sup>34</sup> 김예리 (2023) 베트남 삼성 휴대폰 제조 공장 노동자 사망 사건에 언론은 삼성 입장 되풀이, 미디어오늘 <https://v.daum.net/v/20230330175708848>
- <sup>35</sup> Sass J, Rosenberg D (2011) The Delay Game; How the chemical industry ducks regulation of the most toxic substances, NRDC, <https://www.nrdc.org/sites/default/files/IrisDelayReport.pdf>
- <sup>36</sup> SHARPS (2023) 삼성전자 베트남 공장 협력업체 메탄올 중독 사망 사고 규탄 기자회견, SHARPS <https://cafe.daum.net/samsunglabor/MHzN/719>
- <sup>37</sup> 김예리 (2023) 베트남 삼성 휴대폰 제조 공장 노동자 사망 사건에 언론은 삼성 입장 되풀이, 미디어오늘 <https://v.daum.net/v/20230330175708848>
- <sup>38</sup> SHARPS (2023) 삼성전자 베트남 공장 협력업체 메탄올 사고에 대한 삼성의 대응 규탄 성명, SHARPS <https://cafe.daum.net/samsunglabor/MHzN/720>
- <sup>39</sup> 오대양 (2023) 참을 수 없는 '삼성 본색' 언론의 가벼움, 그들이 몰랐던 진실의 무거움, 뉴스타파 <https://newstapa.org/article/gqFHk>
- <sup>40</sup> Kim MS (2017) Samsung: leaked texts shed light on company's manipulation of press, Guardian UK <https://www.theguardian.com/technology/2017/aug/24/samsung-corruption-trial-leaked-texts-company-manipulation-press-south-korea>
- <sup>41</sup> Newstapa series of reports on Jang Chung-gi, Samsung's former top lobbyists, are here: <https://newstapa.org/search?s=%EC%9E%A5%EC%B6%A9%EA%B8%B0>
- <sup>42</sup> 박정연 (2023) 삼성전자 베트남 하청업체에서 37명 메탄올 중독, 1명 사, 프레시안 <https://www.pressian.com/pages/articles/2023032916260197534>
- <sup>43</sup> Special Correspondent (2023) Samsung knowingly exposed workers to highly toxic chemicals, whistleblower claims, Rest of World <https://restofworld.org/2023/samsung-toxic-chemicals-vietnam/>
- <sup>44</sup> Radio Free Asia (2023) Báo Hàn Quốc nói Samsung VN dùng hoá chất cấm, báo trong nước im lặng [https://www.rfa.org/vietnamese/in\\_depth/korean-newspaper-said-samsung-vn-used-banned-chemicals-vn-newspapers-keeps-silent-04042023131425.html](https://www.rfa.org/vietnamese/in_depth/korean-newspaper-said-samsung-vn-used-banned-chemicals-vn-newspapers-keeps-silent-04042023131425.html)
- <sup>45</sup> 오대양 (2023) Global Samsung's Dangerous Factory #5: A Hole in 'Samsung Management' <https://newstapa.org/article/ON-nB>