

TOPIC INSPECTION PACK

Craft bakeries:
exposure to flour dust and enzymes
in improvers

Disease Reduction Programme (DRP)

Version 2
December 2008

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1. PURPOSE OF INTERVENTION

- 1.1 HSE has established a Disease Reduction Programme (DRP) as part of the FIT3 Strategic Programme. The aim of the Disease Reduction Programme is to achieve a reduction in the incidence of work-related ill health caused by exposure to hazardous agents. Respiratory disease accounts for a significant proportion of work-related ill health, and therefore a specific respiratory disease project has been set up to address this. The respiratory disease project aims to achieve a 10% reduction in new cases of occupational asthma by 2007/08 compared with 2003/04.
- 1.2 HSE statistics (2003/04) showing incidence rates of occupational asthma reported by chest physicians indicates that bakers are the second most at risk occupational group. Exposure to flour dust and the enzymes contained in improvers may also provoke an asthmatic attack in individuals with pre-existing disease. Flour may also cause irritant or allergic dermatitis.
- 1.3 To support this project, Health and Safety Inspectors and Local Authority Health and Safety Enforcement Officers will carry out inspections in bakeries, concentrating on the issue of controlling exposure to flour dust and to enzymes in the improvers.
- 1.4 This inspection pack provides information to HSE and LA inspectors for raising awareness and for enforcement in this area.

2. 5 MAIN MESSAGES

- When lubricating dividers, dough brakes, tables etc, use alternative materials to flour such as vegetable oil or greaseproof paper (for trays)
- Minimise flour dust generation by implementing the 10 Top Tips in HSE Guidance (see appendix 2)
- Install Local Exhaust Ventilation (LEV) to those sources where flour dust emissions are not otherwise controlled (COSHH Essentials refers – appendix 3)
- Provide suitable RPE where adequate control cannot be achieved (dust mask of FFP3 classification or powered respirator)
- Implement health surveillance

3. WHAT THE LAW REQUIRES

3.1 Flour dust and enzymes in improvers are hazardous substances under the Control of Substances Hazardous to Health Regulations 2002 (as amended). There are Workplace Exposure Limits (WELs) for flour dust. These are:

- 10 mg/metre³ 8-hour TWA (full shift exposure averaged over 8 hours)
- 30 mg/metre³ (averaged over a 15 minute period)

3.2 Exposure to substances that cause occupational asthma should be **reduced as low as reasonably practicable (ALARP) below the WELs** (COSHH Regulation 7.7 (c)(ii)).

4. ENFORCEMENT MANAGEMENT MODEL (EMM)

4.1 EMM was set up to help inspectors reach a proportionate enforcement decision. It is used to determine the risk gap, risk-based decisions and compliance issues. It also takes account of the Initial Enforcement Expectation, taking account of the different authority in law of the standards of control required.

4.2 In terms of the EMM, occupational asthma is described as a serious health effect. The benchmark standard is set as nil or negligible risk. This can be achieved by (1) substituting the use of flour as a lubricant on dividers, tables, brakes, trays etc. with vegetable oils; (2) reducing the propensity for flour to become airborne by training operatives in the 10 Top Tips to control exposure to flour dust described in guidance and ensuring that they are followed; (3) installing LEV at bakery machinery/tables where flour dust emissions/exposure occur, as described in HSE Guidance COSHH Essentials control sheets FL01 – FL05 (4), using suitable Respiratory Protective Equipment (RPE) in combination with other control measures; and (5) providing health surveillance.

4.3 Exposures above the WELs for flour dust will result in an **extreme risk** gap. To accommodate ALARP; exposure at the WELs for flour dust will produce a **substantial risk** gap. Both scenarios have initial enforcement expectation of an Improvement Notice.

5. INSPECTION GUIDELINES

5.1 General Information

- High airborne dust levels are generated when flour is thrown, poured, brushed, blown or vibrated.
- This may occur when filling mixers from bags/hoppers; disposing of sacks; mixing; hand dusting with flour at tables, using dough brakes

and dividers; using roll machines; weighing; brushing (surfaces and equipment); cleaning trays.

- The main emphasis is to reduce airborne emissions at source, substituting flour, when it is used as a lubricant, with vegetable oils; provided that this does not affect the product (greaseproof paper can be used on trays instead of flour) and by careful handling of flour and avoiding practices that cause flour to become airborne
- If adequate control cannot be achieved by good work practices alone, some extraction may be required
- Control significantly below the full shift WEL of 10 mg/metre³ can be achieved (circa 2 mg/metre³ 8-hour TWA) when good work practices are undertaken and handling flour/producing floury products is < 2 hours per shift).
- Engineering controls/RPE is likely to be required where there is high level production of floury products (> 2 hours/shift, including extensive hand dusting, mixing and weighing).

6. INSPECTION TIPS

- Visit bakery when dough/pastry/floury products preparation is in full swing (**this may be in the early hours of the morning**).
- Observe the processes in sequential order so no tasks are missed.
- Focus on the flour-based tasks (namely: filling mixers from sacks/hoppers; sack disposal; mixing; hand dusting with flour at tables, using dough brakes and dividers; using roll machines; weighing; brushing/sweeping; cleaning trays).
- Assess if good work methods are practised at each of the relevant tasks above. A good indicator of poor practice is settled flour on surfaces (e.g. floors, ledges, and machinery). If bad practice is seen OR suspected, use a dust lamp - reference HSE Guidance MDHS 82 - (or strong torch) if available, to show the employees/manager the airborne dust generated.
- Assess what cleaning methods are used for dealing with spillages and cleaning flour-contaminated equipment and surfaces - dustless methods such as a vacuum cleaner (fitted with a HEPA filter) should be used rather than brushes. For selection of vacuum cleaners see Prevention of dust explosions in the food industry, appendix 1 (www.hse.gsi.gov.uk/food/dustexplosionapp1.htm).

- Speak to the employees to ascertain what information, training and instruction they have received on: the health risks associated with flour dust and bread enzymes, good control practice; and use of any extraction provided (ask employees if they experience any respiratory or skin problems that they associate with exposure to flour).
- Speak to the supervisor/charge-hand to identify what their role is in checking compliance with good work practices and use of any extraction controls and what action is taken if employees don't comply.
- Speak to the employees to ascertain if they receive health surveillance and, if so, what it entails and the frequency.
- If a responsible person has been nominated to undertake low level health surveillance or to report ill health problems, speak to the individual to check their competence (Medical or Occupational Health Inspectors may advise).

Paperwork to assess

Ask to see copies of:

- The company's COSHH risk assessment (if the company employs more than five people);
- Health surveillance records to verify it is being conducted;
- Test records for thorough examination of any extraction equipment provided, as required by COSHH regulation 9 (this should be conducted at least every 14 months);
- Instructions provided to employees covering:
 - ✓ Health hazards (i.e. asthma and dermatitis);
 - ✓ Signs and symptoms relating to asthma and dermatitis
 - ✓ Procedure for reporting signs and symptoms
 - ✓ Good work methods
 - ✓ How to use any extraction provided.

7. ENFORCEMENT GUIDANCE (EMM)

7.1 The level of enforcement taken for non-compliance will be in accordance with the EMM. Since flour dust/bread enzymes are respiratory sensitisers and also cause dermatitis, failure to follow the 10 Top Tips and implement controls etc. as detailed in the following table is likely to result in directing you to issue improvement notices.

Enforcement is likely to be taken using COSHH on the issues set out in Table 1:

Table 1

Observation/Regulation	Initial Enforcement Expectation (IEE) / Action
<p>COSHH assessment absent</p> <p>COSHH Regulation 6 (assessment)</p> <p>Factors to be considered</p> <ul style="list-style-type: none"> • reference to the hazardous properties and health effects of exposure to flour • description of activities that lead to exposure including level, type and duration of exposure • number of employees or groups exposed • reference to the Workplace Exposure Limits • description of control measures and their effectiveness • results of airborne monitoring (if any) • results of health surveillance • review date 	<p>IEE – compliance issue Action</p> <p>>5 employees Action – IN written COSHH assessment required</p> <p>< 5 employees Para 72 of COSHH ACOP – occupiers are strongly advised to record significant findings of assessment</p> <p>Action/IEE – IN/letter seeking evidence that company has systematically considered factors liable to produce exposure and to demonstrate that controls in place are effective</p>
<p>COSHH Regulation 7.2 (Substitution) Inspector observes flour being used extensively (>2 hours total) as a lubricant (hand dusted) on table, dough brake, divider or tray without care or training;</p> <p>Powder improvers used.</p>	<p>Risk gap - extreme Action/IEE – advice/letter to consider using vegetable oil as lubricant; advice/letter to use greaseproof paper for trays; and IN re control/training (see below)</p> <p>Risk gap; substantial Action; letter to consider liquid/sachet improvers</p>
<p>COSHH Regulation 7.7(a) Schedule 2A</p> <p>Principle(b) Failure to consider risk of inhalation or skin exposure.</p>	<p>Action/IEE – IN/letter to undertake risk assessment and identify activities that contribute to inhalation / skin exposure</p>
<p>COSHH Regulation 7.7(a)Schedule 2A</p> <p>Principle (c) Controls proportionate to the health risk</p> <p>Occupational asthma considered serious health effect A No Adverse Effect Level has NOT been identified Exposure must be below WELs Evidence of extensive hand dusting (>2 hours total) /no controls at mixer/scales</p>	<p>Ten Top Tips quoted in HSG 233 should be minimum standard of control. COSHH Essentials approach may be required in some cases e.g. LEV at weigh scales, mixers, particularly where single employee is dedicated to producing mixes.</p> <p>Action/IEE - IN served in absence of 10 Top Tips controls applied. - IN to provide LEV where there is evidence of high short term exposure (as seen by significant spillage around mixer/dust on surfaces)</p>
<p>COSHH Regulation 7.7(a)Schedule 2A</p> <p>Principle (d) Occupier not chosen the most effective and reliable control measures Evidence of extensive hand dusting (>2 hours total) /no controls at mixer/scales Hierarchical approach should be considered to substitute or alter process</p>	<p>Action/IEE – advice/letter/IN schedule re substitutes above; Dredger/sprinkler to be provided at dough brake. Industrial vacuum to be used for cleaning. LEV to be provided where poor controls observed and reluctance by baker to substitute flour as lubricant</p>

Observation/Regulation	Initial Enforcement Expectation (IEE) / Action
<p>COSHH Regulation 7.7(a) Schedule 2A</p> <p>Principle (e) PPE (dust masks) provided to supplement control</p> <p>Use of <i>nuisance</i> dust masks</p> <p>FFP1 or FFP2 dust mask used</p> <p>Dust masks of FFP3 classification may be used for short-term tasks where short-term exposures anticipated.</p> <p>Powered respirators should be used where evidence of high exposures are greater than 1 hour/per shift or dust mask worn >1 hour or beard or evidence of respiratory ill health</p>	<p>Action/IEE –IN requiring dust masks to comply with an approved standard (FFP3), if appropriate , see below note on powered respirators</p> <p>Action/IEE – letter where good work practices evident other wise IN to provide FFP3 mask or powered RPE</p> <p>Action/IEE – IN if 2 or more examples of following are absent/otherwise letter -; mask worn >1 hour; beard; no training re donning; no face fit test where dusk mask is worn</p> <p>Action/IEE - IN to provide powered visor/hood</p>
<p>COSHH Regulation 7.7(a) Schedule 2A</p> <p>Principle (f) Check and review controls</p> <p>If controls not defined in writing e.g. defined methods of working (10 Top Tips); supervisory actions; substitution; LEV maintenance etc are not recorded</p> <p>Some evidence of control but not fully implemented e.g. dredgers not used, liberal hand dusting, LEV not maintained, poor supervision etc</p>	<p>Action/IEE - letter/IN requiring evidence that company has put in place measures to control exposure (COSHH Regulation 6 - assessment)</p> <p>Action/IEE - letter/IN requiring review of controls (airborne monitoring may be required)</p>
<p>COSHH Regulation 7.7(a)Schedule 2A</p> <p>Principle (h) Controls measures should not increase overall risk</p> <p>Occupier to consider other risks when new controls provided e.g.</p> <p>Enclosures/LEV/vacuum may increase explosion risk (ATEX fire and explosion regulation may apply)</p> <p>Dusts masks may increase thermal comfort/stress issues</p>	<p>Action/IEE – letter re Risk assessment</p>

Observation/Regulation	Initial Enforcement Expectation (IEE) / Action
<p>COSHH Regulation 9 – Maintenance, examination and testing</p> <p>Employer who provides any control measure should ensure that (a) engineering plant/PPE is maintained in an efficient state (LEV at least every 14 months) and in case of (b) provision of systems of work and supervision and of any other measure, it is reviewed at suitable intervals</p>	<p>LEV not maintained 14 monthly as Action/IEE – IN</p> <p>Systems of work not reviewed</p> <p>Action/IEE – Letter/IN</p>
<p>COSHH Regulation 10 – Monitoring exposure</p> <p>Personal airborne monitoring may be required to show that WELs have not been exceeded (method as described in HSE guidance MDHS 14/3 “General methods for sampling and gravimetric analysis of respirable and inhalable dust”). *for personal monitoring, records should be kept for 40 years</p> <p>Dust lamp (MDHS 82) can be used to highlight exposure to flour dust in the event of poor work practices</p>	<p>Action/IEE – monitoring not normally required when principles of good practice have been implemented</p> <p>Letter/IN Monitoring required where evidence of poor control or reliance is wholly on good work practice when handling flour >2 hours per shift</p>
<p>COSHH Regulation 11 – Health Surveillance</p> <p>Health surveillance is mandatory where exposure is to a respiratory sensitiser such as flour dust or enzymes contained in improvers (HSE Guidance “MS 25 - Medical aspects of Occupational Asthma”)</p>	<p>Action/IEE – IN</p> <p>Absence of health surveillance (except for self employed)</p>
<p>COSHH Regulations 12 and 7.7 schedule 2A, principle (g) - Training and competent advice</p> <p>Above Regulations may seem to be asking for the same thing, but Regulation 7.7 is more explicitly aimed at how to use the controls properly instead of more general issues such as health hazards and risks Small craft bakeries may need competent help to give advice on control measures.</p>	<p>Action/IEE - COSHH Regulation 12(4) should be used to ensure that they get some help if scenario is too complex</p>
<p>RIDDOR</p> <p>The law also requires employers to report cases of occupational asthma to a central point. This is under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995. The Incident Contact Centre is at Caerphilly Business Park, Caerphilly CF83 3GG Tel: 0845 300 9923, Fax: 0845 300 9924, e-mail: riddor@natbrit.com.</p>	

8. RISK CONTROL INDICATORS

3 indicators have been selected against which performance will be measured. These are:-

(a) Management – there is evidence of effective organisation and arrangements including adequate COSHH assessments, provision of information, training and supervision and evidence of management commitment.

A score of 1 if all above are in place. A score of 4 would indicate that enforcement action is appropriate. Scores of 2 or 3 where enforcement may be appropriate

(b) Control Strategy – there is evidence that substitution has been considered and effected where possible, effective engineering controls have been provided and maintained, suitable RPE is provided, worn correctly (face fit test undertaken where appropriate). Appropriate training provided regarding use and maintenance of engineering controls/RPE.

A score of 1 where hierarchical approach to control has been taken, and exposure to flour dust has been either prevented or adequately controlled to significantly below the WELs.

A score of 4 would indicate that enforcement action is appropriate. Scores of 2 or 3 where enforcement may be appropriate

(c) Health Surveillance – a competent person provides high level of health surveillance.

A score of 1 should be allocated where health surveillance is provided by health provider. A score of 4 would indicate that enforcement action is appropriate. Scores of 2 or 3 where enforcement may be appropriate

9. FURTHER GUIDANCE

- “Guidance on dust control and health surveillance in Bakeries” (**booklet and video**) produced by the Health and Safety in Bakeries Liaison Committee. Published by the Processing and Packaging Machinery Association, Wallington, Surrey and available from the Federation of Bakers, Catherine St., London.
- COSHH Essentials control sheets-cover engineering controls and health surveillance (see Appendix 3) .
- The generic principles of good practice template for flour dust in small bakeries

APPENDIX 1

COSHH Regulations 2002 (as amended) - Principles of good practice for the control of exposure to substances hazardous to health

COSHH Regulation 7(7) – Schedule 2A

a)	Design and operate processes and activities to minimise emission, release and spread of substances hazardous to health
b)	Take into account all relevant routes of exposure – inhalation, skin absorption and ingestion – when developing control measures
c)	Control exposure by measures that are proportionate to the health risk
d)	Choose the most effective and reliable control options which minimise the escape and spread of substances hazardous to health
e)	Where adequate control of exposure cannot be achieved by other means, provide, in combination with other control measures, suitable personal protective equipment
f)	Check and review regularly all elements of control measures for their continuing effectiveness
g)	Inform and train all employees on the hazards and risks from the substances with which they work and the use of control measures
h)	Ensure that the introduction of control measures does not increase the overall risk to health and safety

APPENDIX 2

THE 10 TOP TIPS

- Handle flour and powdered products carefully. Minimise the use of dusting flour. Dropping flour from a height or throwing with force will cause dust to be thrown up.
- Use dredgers or sprinklers to spread dusting flour rather than hand throwing
- Avoid spillages of flour where possible and where spillages do occur clean up immediately.
- Take care to avoid raising dust while loading ingredients into mixers.
- Start up mixers on slow speed until wet and dry ingredients are combined.
- Avoid damage to ingredients bags.
- Minimise the creation of airborne dust when folding and disposing of empty bags. One effective method is to roll the bag up from the bottom while tipping avoiding the need to flatten or fold empty bags.
- Avoid the use of compressed airlines for cleaning.
- Do not use brushes to dry sweep dust as they cause high levels of airborne dust. Use high efficiency industrial vacuum cleaners for general cleaning. Shovel up large amounts gently.
- Wear a suitable mask for any essential short term dusty tasks.

APPENDIX 3

COSHH Essentials Direct Control Sheets for craft bakers

- Bag opening and tipping, and dough mixing - control sheet FL01
- Weighing and handling flour improvers etc. - control sheet FL02
- Hand moulding, dividing, and using a dough brake - control sheet FL03
- Stand-alone dust collectors - control sheet FL04
- Immaterial lid dust extraction specification - control sheet FL05

They can be accessed at www.coshh-essentials.org.uk. Click to get started and choose 'Direct AdviceTopics', followed by 'production industry', then 'flour milling and craft bakery'.

APPENDIX 4

INSPECTION AIDE MEMOIRE

Note to person filling in form. Please qualify any yes/no answers where necessary

Company Name
Site Address
Total number of employees employed by company (all sites)
Total number of sites owned by company
Are the company a member of a Trade Association? e.g. •Federation of Bakers •National Association of Master Bakers •Biscuit, Cake, Chocolate and Confectionery Alliance
Is there a recognised Trade Union? (Bakery and Allied Food Workers Union is the official baker's union) (Please circle your answer) Yes/No
Name of Union
Is there an appointed safety representative? (Please circle your answer) Yes/No

Information about site and process

No of employees at this site
No of employees directly handling flour as part of their day to day work
What type of products are produced? •Bread •Cakes •Pastries •Pies •Other (please specify)
How much flour is used per day at this site?
How is flour supplied? •Bulk silo •Sacks

COSHH Assessment

Do the company have a copy of the HSBLC guidance booklet which has a generic assessment of flour dust levels for specific bakery tasks in tables 1,2, and 3? (Please circle your answer) Yes/No
Do the company understand that flour dust is a respiratory sensitiser? (Please circle your answer) Yes/No
Are the company aware that there is an 8 hour WEL and 15 minute STEL for flour dust and what the respective limits are? (Please circle your answer) Yes/No
Do they understand the difference between the 8 hour and the 15 minute WEL? (Please circle your answer) Yes/No
Has a written COSHH assessment been completed? (Please circle your answer) Yes/No

Comment on the quality of the assessment
Does it cover all activities where there is exposure to flour dust? (Please circle your answer) Yes/No
Has it identified the processes causing the highest exposures? (Please circle your answer) Yes/No
Have daily exposures to flour dust been quantified? E.g. by: •air monitoring •dust lamp •reference to generic exposure figures (eg in HSBLC book)
Are control measures well described and defined? (Please circle your answer) Yes/No
Does the assessment identify a need for health surveillance? (Please circle your answer) Yes/No
When was the assessment completed or last revised? Comment:

Dust Exposure control measures

Control “software” - working practices

Please comment on the degree of care taken and the quantity of dust generated when loading mixers from weigh hoppers or flour sacks?
Are mixers started up on slow speed until the mixture becomes wet? Comment:
Are bags folded carefully? Comment:
Is flour dusting done by: •Dredger or sprinkler (eg on dough brake); •By hand; other
If flour is hand dusted please comment on the degree of care taken to avoid flour dust generation.
Cleaning - how is general cleaning done? •Vacuum •Dry brushing •other
Describe how spillages are cleaned up

Is compressed air used to blow out flour from machines or anywhere else? (Please circle your answer) Yes/No

If local exhaust ventilation is provided please fill in Appendix A attached.

If RPE is used please fill in Appendix B attached.

Bread Improvers

Are bread improvers added separately to any of the bread mixes? Please comment on extent of usage. (e.g. No of sachets/kg per day)

What form do they come in? •Powder •Liquid •Paste •Granular

What packaging do they come in? •Type: •Size:

Is a safety data sheet provided by the manufacturer/supplier? Does it acknowledge that amylase is a respiratory sensitiser (Please circle your answer) Yes/No
--

How are improvers added to the mix (e.g. Automatic dosing, by hand)? Please describe how the packets are opened and added to the mix. Comments:

If the bakery uses powder improvers, would they be willing to consider changing to liquid or paste formulations? (Please circle your answer) Yes/No
--

Do they envisage any technical/cost problems with changing to liquid or paste and if so what are they? (Please circle your answer) Yes/No
--

Management of Control Measures

Overall, are the “control measures” adequate (<i>ie will they reduce exposure to well below the 8-hour and 15 minute WEL - eg 0.2 of the WEL?</i>) (Please circle your answer) Yes/No
--

Is the management, including maintenance of software control measures, adequate ie is it likely that exposure control will be reliable and sustained? (Please circle your answer) Yes/No
--

If not, what actions do the company management need to take? Comments:

Training, information and supervision

<p>Are the company aware of the HSBLC 'Guidance on dust control and health surveillance in bakeries' and interactive training package with 'Breathe Easy' video and training notes? (Please circle your answer)</p> <p>Yes/No</p>
<p>What induction training on flour dust is given to employees joining the company? Do the company use the 'Breathe Easy' package? Comments:</p>
<p>Does training cover:</p> <ul style="list-style-type: none"> •Flour dust and possible health effects? Yes/No •Signs and symptoms to look out for? Yes/No •Who to report symptoms to and where to get further help? Yes/No •Correct use of control measures? Yes/No •Good and bad working practices? Yes/No
<p>Are employees given information on bread improvers and possible health effects? (Please circle your answer)</p> <p>Yes/No</p>
<p>What training are employees given on controlling dust from bread improvers? Comments:</p>
<p>What training is given to employees on RPE and PPE? In particular does training cover:</p> <ul style="list-style-type: none"> •Unsuitability of disposable respirators for employees with facial hair Yes/No •How to ensure a good fit with half mask respirators Yes/No •Storage of RPE/PPE Yes/No •For what circumstances RPE should be worn (e.g. Cleaning up spillages, weighing) Yes/No
<p>Is there any supervision of employees to ensure that good working practices are adhered to and RPE/PPE worn? (Please circle your answer)</p> <p>Yes/No</p>

END

Appendix A

Only complete if extraction is provided for flour dust/enzyme emissions

Control “hardware” - mechanical ventilation

Does the premises have any extraction for reducing dust exposure from flour/bread enzymes? <p style="text-align: right;">(Please circle your answer) Yes/No</p>
If so what form does it take? e.g. <ul style="list-style-type: none">• Local exhaust Ventilation (See examples 1 - 8 and 13 -14 in HSBLC guidance)• Ventilated booth/room (See examples 9 -12 in HSBLC guidance)• Extraction fan in wall
If LEV is provided please list all equipment that is served by LEV: If a ventilated booth or room is provided please list/describe equipment and process in booth/room:
Comment on the effectiveness of the extraction. Is it in efficient working order and good repair? (Use a dust lamp and smoke to visually check the effectiveness)
What routine checks are made on the LEV?
Are there records of thorough examination and testing as required by COSHH Reg 9 <p style="text-align: right;">(Please circle your answer) Yes/No</p>
How confident are you that the local extraction control measures work and will continue to work after you have left the site?

APPENDIX B

Only complete if respiratory protection is used.

Respiratory Protective Equipment (RPE) Management Programme

Is Respiratory protective equipment provided? (Please circle your answer)	Yes/No
Does it meet a recognised standard? (e.g. FFP2, P2 - See table 4 of HSBLC guidance) (Please circle your answer)	Yes/No
Is there any evidence that nuisance dust masks are used-(<i>n.b. nuisance masks are not marked with a 'P' number?</i>) (Please circle your answer)	Yes/No
Has there been any attempt to match the RPE to the level of exposure and/or the nature of the work (how strenuous it is - see table 4, HSBLC guidance)? (Please circle your answer)	Yes/No
Where is RPE stored? Comment:	
Are records kept of RPE maintenance? (Please circle your answer)	Yes/No
If disposable respirators are provided is there a ready supply so that used masks can be discarded (Please circle your answer)	Yes/No
Do people know when to change their disposable respirators or filter cartridges (Please circle your answer)	Yes/No