

INDEX 

Health and Safety Executive		Sector Information Minute	
Agriculture and Food Sector		SIM 01/2004/51 (formerly 05/2004/03)	
Cancellation Date	20/04/2008	Open Government Status	Fully Open
Version No & Date	1: 20/04/2004	Author Unit/Section	Food Section

Target Audience:

FOD Inspectors responsible for food manufacturing industries

Specialist Inspectors (Ergonomics & Slips prevention)

FOOD MANUFACTURE INSPECTION 2004/5

This SIM sets out inspection requirements and priorities for the food and drink manufacturing industries for 2004/5.

BACKGROUND

1 Inspection in the food/drink manufacturing industries during 2002/3 and 2003/4 has been guided centrally by FOD under the Priority Programmes for musculoskeletal disorders (MSD), slips and trips, falls from height, workplace transport, occupational asthma etc. Only priority Sectors (agriculture, construction, health services) had their own dedicated inspection programmes.

2 With the move to programme working in 2004/5, a review of the areas needing to be addressed (to ensure that HSE's Public Service Agreement (PSA) targets were met) concluded that food/drink manufacture should be part of the 'other sectors' programme within the Sector Strategic Programme. Details of the projects required to be resourced by FOD divisions, as part of their contribution to this programme in 2004/5, are set out in [paras 5-22](#) below.

3 The food/drink manufacturing industry has the highest overall injury rate (and highest O-3-D injury rate) of all HSE inspected activities (except mining/quarrying) and has also among the highest major injury rates. The overall injury rate is twice the manufacturing average and the food/drink industries cause 25% of all manufacturing injuries.

FOOD/DRINK MANUFACTURE INSPECTION 2004/5

Investigation and enforcement

4 For 2004/5, resources are split between 'core' and 'strategic programme' work. 'Core' work (ie investigations of accidents and complaints and all enforcement work), should be carried out as required by FOD's Incident Selection, Investigation and Complaints Procedures and the Enforcement Management Model. This SIM does not cover these activities.

Projects contributing to 'Other sectors' strategic programme work

5 As part of the programme, significant B3/4 resource has been allocated to projects in the food/drink manufacturing industries. Divisions will be advised shortly on the more detailed resource allocation between projects in the 'Other sectors' programme. Rather than contact

numbers, it is the project outcomes which are important, i.e. the improvements in health and safety management which contribute to the necessary reduction in numbers of injuries, days lost and cases of ill health.

6 Priority should be given to inspection of the fruit/vegetable processing industry as this has the highest overall injury rate. Other food industries with highest injury rates are meat/poultry, slaughtering, brewing, dairy/cheese manufacture, edible oils and fats, sugar manufacture and bakeries.

7 Inspection should be targeted primarily at slips prevention and MSD (which together cause 53% of the injuries). Other priority topics which may also be covered at visits are highlighted in [paras 21 and 22](#) below. Work on most of these topics also contributes to the H&S Hazards Strategic Programme 2004/5 for MSD, slips, falls from height, transport and occupational asthma.

Slips management

8 Slips injuries occur in the food/drink industries at 4 times the average for manufacturing and cause the greatest proportion (33%) of major injuries and a further 22% of O-3-D injuries. Some 90% of slips result from wet or contaminated floors. All employees in these industries are at risk. A national survey by inspectors in 2000/01 indicated that slips risks were significant in 63% of food/drink premises. Trips account for only 14% of slips and trips in the food industry.

9 During routine food processing the actual risk is likely to be of possible serious injury, in the absence of management controls. However a probable risk of serious injury will exist if there are likely to be added consequences, for example carrying hot liquids or a slip which might cause a fall from height.

10 Inspection of slips management should follow the slips and trips strategic programme guidance. Particular emphasis should be placed on keeping floors dry and free from food product. Where it is not reasonably practicable to keep floors dry, appropriate slip resistance should be offered by the floor and footwear. Research clearly indicates that floors which have sufficient micro-roughness to prevent slips can still be hygienically cleaned.

11 A useful Management of Slips Audit Form is given in [Appendix 1](#) and this may assist at visits. The Food Section (Glasgow office) would be grateful for copies of any completed forms to be sent to them for national benchmarking against forms returned in earlier years.

12 HSE's Slips Assessment Tool (SAT), formerly known as the Pedestrian Slips Expert System (PSES), will be helpful to inspectors in assessing the slip risk on smooth floors. SAT is also a useful tool for convincing duty holders to take action on slips. Currently SAT, and the associated floor roughness meters, are on issue to FSSUs and nominated inspectors from whom inspectors can request assistance to take measurements in food premises. From July 2004 it is anticipated that improved SAT software will be available and additional floor roughness meters. OC 207/1 gives further guidance.

13 To assist targeting of inspections, the Food Section has produced a list of 98 large food sites (>50 employed) with high slips injury rates; see [SIM 1/2004/53](#). However the accuracy of this list will be restricted by the accuracy of FOCUS data, particularly the number employed, and will need checking locally to ensure the slips injury rate shown against a site is correct. In addition FOD Safety Unit will be producing a larger all-industry list of incumbent sites (including food manufacturers) which have high total numbers of slips

injuries.

14 In addition to site inspections, plans are in hand for the Food Section to organise selected Head Office visits to multi-site companies to address inconsistent injury rates across sites, or high slips rates generally. The selection process will utilise a new tool developed by a research contractor interrogating databases of the structure of large companies and injury rates.

Musculoskeletal disorders

15 Manual handling injuries cause the greatest proportion of injuries in the food/drink comprising 31% of O-3-D injuries and 29% of all RIDDOR reported injuries. Furthermore, when last studied in these industries, upper limb disorders (from repetitive production line work etc) comprised 45% of prescribed disease cases assessed by the Department of Social Security. All employees are at risk, particularly those handling heavy loads or those carrying out repetitive lifting or production tasks without controls.

16 A national survey by inspectors in 2000/01 indicated that food/drink companies had not assessed the causative risks for MSD, or eliminated manual handling where reasonably practicable, in 40% of cases. Where elimination of the task was not reasonably practicable, companies had not introduced measures to minimise the risk or provided adequate and effective control to reduce MSD injuries, in 30% of cases. Overall the 2000/01 survey, and an earlier identical survey in 1998/99, indicated an average 30% non-compliance with the key factors of manual handling management.

17 Preventative inspection for musculoskeletal disorders should follow the MSD strategic programme guidance. Particular emphasis should be placed on the 5 main causes of MSD risk in food/drink manufacture:

- (1) stacking/destacking (e.g. boxes, sacks, containers)
- (2) pushing/pulling (e.g. wheeled trolleys, oven racks, non-wheeled loads)
- (3) manual handling of drinks containers (e.g. delivery of kegs, crates to licensed premises)
- (4) packing products (e.g. cheese, confectionery, biscuits)
- (5) cutting, boning, jointing, trussing and evisceration
(e.g. meat and poultry).

18 A Management of MSD Audit Form is given in [Appendix 2](#) and this may assist at visits. The Food Section (Glasgow office) would be grateful for copies of any completed forms to be sent to them for national benchmarking against forms returned in earlier years (see [para 16](#)).

19 To assist targeting of inspections, the Food Section has produced a list of 95 large food sites (>50 employed) with high MSD injury rates; see [SIM 1/2004/52](#).

20 As with slips, in addition to site inspections, plans are in hand for the Food Section to organise selected Head Office visits to multi-site companies to address inconsistent injury rates across sites, or high MSD rates generally. Again the selection process will utilise a

new tool developed by a research contractor interrogating databases of the structure of large companies and injury rates.

Other health and safety risks

21 Other priority topics which may be looked at during visits to food/drink manufacturing sites are:

- (1) falls from height (causing 21% of deaths and 17% of major injuries)
- (2) workplace transport (causing 41% of deaths)
- (3) occupational asthma (e.g. from flour and bakery dusts).

22 Additionally the following risks cause many injuries in food/drink industries:

- (1) being struck by objects (particularly hand knives)
- (2) processing and packaging machinery
- (3) occupational dermatitis.

'Recipe for Safety' initiative

23 Inspectors should be aware of this ongoing joint HSE/food industry initiative which commenced in 1990/91. The initiative is a partnership between HSE, the Food & Drink Federation (the industry's umbrella trade association) and the four main food industry trade unions (GMB, TGWU, USDAW and BFAWU). Many other food/drink trade associations, industry committees and large food companies also take an active role. The initiative is supported by HSE involvement and organisation of national conferences/seminars and the new Food Manufacturing Industry Health and Safety Forum (which represents most of the 33 food/drink manufacturing industries).

24 The initiative requires food/drink companies to target the known health and safety risks in their industry, as listed in [paras 8-22](#) above. The risks, solutions, management action plan and guidance are highlighted in HSE's 'A Recipe for Safety' (TOP05rev1). Since 1990/91 when the initiative commenced, the injury rate in the food/drink industry has dropped by 22%. Inspectors are encouraged to ensure food/drink companies are aware of the initiative and are following the guidance in HSE's 'A Recipe for Safety' and its supplementary guidance listed in [Appendix 3](#).

GUIDANCE

25 Current industry-specific guidance, which includes the HSE food website, is listed in [Appendix 3](#).

Date first issued: 20 April 2004

Appendix 1
([para 11](#))

MANAGEMENT OF SLIPS AUDIT FORM**Client:****Location:****Date:**

	Fully	Mostly	Partly	No	Yes	No
Planning and Organising						
1. Has the site assessed whether slips risks are significant for them?						
2. Are slips risks a main injury cause or a significant risk?						
3. Are management arrangements set specifically to target slips risks?						
4. Is competent assistance appointed?						
5. Have employee reps. been consulted?						
Control						
6. Have physical measures been taken to prevent contamination reaching walkways where practical?						
7. Is there still a residual risk of slipping? - if so, for those areas is there:						
8. - an effective cleaning regime?						
9. - floors of sufficient surface roughness?						
10. - adequate drainage?						
11. - adequate lighting, marking etc?						
12. - suitable footwear worn?						
13. - a system to ensure tasks do not require movement or carrying of goods inappropriate to a residually slippery area?						
14. - trained staff?						
Monitor and Review						
15. Are there adequate procedures?						

The A&F Sector (Food Section) at HSE Glasgow Office would be grateful for copies of completed forms (para 11)

Appendix 2
([para 18](#))

MANAGEMENT OF MSD AUDIT FORM

Client:

Location:

Date:

1 Are the following main causes of injury/ill health in the food/drinks industries identified as a problem at this particular site:

- stacking/unstacking containers of boxes, sacks etc)? Yes / No
- pushing/pulling wheeled trolleys, racks, roll cages etc? Yes / No
- cutting, boning, jointing, trussing (meat and poultry)? Yes / No
- packing products (e.g. cheese, biscuits, confectionery)? Yes / No
- handling drinks containers (e.g. delivery of casks, crates etc)? Yes / No

	Fully	Mostly	Partly	No
2 Has the company assessed the risks of these activities adequately?				
3 Has the company eliminated manual handling at these tasks where reasonably practicable?				
4 Has the company introduced a range of measures to minimise the risks relevant to the activity?				
5 Are risks from manual handling/ musculoskeletal risks now under adequate control?				
6 Is there full worker involvement in MSD risk assessment and the selection of controls?				
7 Are cases of MSD investigated jointly by management and worker/s and is remedial action taken?				
8 Is adequate training provided in correct manual handling and correct use of handling aids?				

The A&F Sector (Food Section) at HSE Glasgow Office would be grateful for copies of completed forms ([para 18](#))

Appendix 3
([para 25](#))

INDUSTRY-SPECIFIC TOPIC GUIDANCE

[Food/drink manufacture website](#)

For slips/trips:

Slips and trips – guidance for food processing industry (HSG156)

Slips and trips: summary guidance for the food industry (FIS6)

Preventing slips in the food and drink industries – technical update on floor specifications (FIS22)

Stop Slips (HSE video)

For MSD:

Moving food and drink – 100 case studies (HSG196)

Injuries and ill-health caused by handling in the food and drink industries (FIS23)

Reducing injuries caused by sack handling in the food and drink industries (FIS23)

Roll cages and wheeled racks in the food and drink industries: reducing manual handling injuries (FIS33)

Manual handling in drinks delivery (HSG119)

Manual handling in the brewing and licensed retail industry BLRA booklet (see OC 525/2 for details)

Other publications:

A Recipe for Safety (TOP05rev1)

Preventing falls from height in the food and drink industries (FIS30)

Workplace transport safety in food and drink premises (FIS21)

Sound solutions for the food and drink industries – 60 case studies (HSG232)

Reducing noise exposure in the food and drink industries (FIS32)

Occupational dermatitis in the catering and food industries (FIS17)

Controlling exposure to disinfectants used in the food/drink industries (FIS29)

Safety at flat belt conveyors in the food and drink industries (FIS25)

Packaging machinery (FIS 26, 27 & 28)

A Baker's Dozen – 13 essentials for a safer bakery (HSG233)

Guidance on dust control in bakeries (also a 'Breathe Easy' training package) available from Federation of Bakers, London

TOP ▲