

Health and Safety Executive		Sector Information Minute	
Manufacturing Sector		SIM 03/2007/07	
Cancellation Date	31/03/2010	Open Government Status	Fully Open
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Target Audience:
All Inspectors (Band 4)
Health and Safety Awareness Officers,
Safety Unit
Health Unit

HSAO INTERVENTION 2007/08 - RESPIRATORY DISEASE IN THE WOODWORKING INDUSTRY

This SIM sets out FOD's contribution to the delivery of the respiratory disease project to reduce ill health in the woodworking industry. It builds on a similar intervention carried out last year by Band 4 Inspectors, as well as the woodworking Safety and Health Awareness Days (SHADs) held in recent years.

1. This intervention is part of a number of Disease Reduction Programme target initiatives involving FOD to reduce respiratory disease. The focus is on small and medium sized enterprises (SMEs) in the shop-fitting, furniture (including kitchen fabrication) and general joinery/woodworking sectors. Visits will capitalise on the awareness raising already achieved by Woodworking Safety and Health Awareness Days (SHADs).

AIM

2. To improve compliance with COSHH and ensure better control of exposure to wood dust in the woodworking industry.

EFFECTIVE CONTROL OF WOOD DUST IN SMEs

BACKGROUND

3. Wood dust is currently one of the top 8 asthmagens encountered in UK workplaces, and is the fifth highest reason for the payment of disability benefit. Compliance with COSHH in the woodworking industry in general remains poor, particularly in relation to controlling exposure to wood dust. Dry sweeping of wood dust and the use of airlines to clear dust from workpieces, machinery and clothing is widespread. Where present, local exhaust ventilation (LEV) equipment is often poorly maintained and statutory examinations frequently not carried out. Although wood dust is classified as a respiratory sensitiser, Health Surveillance is rarely carried out.

ACTION REQUIRED- TARGETING AND RESOURCING

4. HSAOs are asked to visit premises involved in the manufacture of builder's joinery and carpentry and the manufacture of furniture, fitted kitchens, shop fitting premises, etc.

Appendix 1 provides more information on criteria for the selection of premises and on the allocation of resources. 600 HSAO visits nationwide have been planned over the course of the 2007/2008 workyear. It is envisaged that in around 25% of cases Band 4 Inspector resource will be required to follow up poor compliance issues.

5. During contacts particular attention should be paid to the issues identified in Appendix 1 'Asthmagens in Woodworking' of the Asthmagens Topic Pack. These are:
 - Maintenance and thorough examination of LEV systems;
 - The promotion of vacuum systems to replace airlines and dry sweeping for removing wood dust;
 - High level of health surveillance where western red cedar is used; and
 - Use appropriate RPE for dusty jobs (FFP2 or equivalent for people with facial hair)
6. In addition, pre-start and on-going low level (questionnaire based) health surveillance should be in place for all those exposed to and appropriate health records maintained. (For further guidance on health surveillance questionnaires please see health surveillance for asthmagens).
7. Where compliance is poor, HSAOs should request that a Band 4 visit, at this stage enforcement action may be required in accordance with the HSC Enforcement Policy Statement and the Enforcement Management Model.
8. In light of the priority issues detailed in paragraph 4 most enforcement action will be under the Control of Substances Hazardous to Health Regulations 2002 (as amended). Any enforcement action taken should reflect the new emphasis in Regulation 7 of COSHH to apply the principles of good control practice when controlling exposure to substances hazardous to health – see Schedule 2A of the Regulations for details
9. Any consideration of control of dust will involve looking at local exhaust ventilation (LEV) fitted to machines –which may turn out to be poorly guarded or not guarded at all. These instances of matters of evident concern should be dealt with in line with existing procedures
10. If a Band 4 visit is required to follow up on compliance issues, this may present an opportunity to consider the issue of noise as per SIM 03/2007/08 – HAV and Noise Control Campaign under FIT3 Programme – Year 2: Noise (for further information on Noise, contact Bruce Appleton (Project Manager), VPN 525 2509 or Tim Ward, VPN 523 3985)

WORK RECORDING

11. COIN recording details will be notified by FOD.

START AND COMPLETION DATE

12. This initiative should start in April and all visits should be completed and recorded by the end of 2007/08 workyear.

TRAINING

13. The Disease Reduction Programme team is hoping to deliver a one day briefing session for HSAO staff on all operational aspects of its programme in April / May 2007. A comprehensive Topic Inspection pack for this specific initiative has been developed.

STAFF HEALTH AND SAFETY

14. The Health and Safety Supplements relating to general site visits are available on the Intranet under 'Your Health and Safety'.

SECTOR CONTACT

15. For further information contact: Brian.coggans@hse.gsi.gov.uk, Manufacturing Sector, Pegasus House, 375 George Street, Glasgow G2 4LW, Tel 0141 275 7218 / VPN 521 7218

APPENDIX 1

Criteria for selection/ Allocation of FOD resources

The following table is intended as a guide to planning. It gives an indication of the criteria that should be used when selecting premises, the resource available and the type of woodworking premises that need to be visited. (More detail could be found in the Manufacturing Business Group Delivery Plan).

TABLE 1 - CRITERIA FOR SELECTION OF PREMISES/RESOURCE ALLOCATION

Targeting Criteria	Timeframe	Resource	No of visits/Time allocates	Activity
1) Premises which were invited but did not attend previous SHADs - (names and addresses will be provided by the Sector for areas where a SHAD has been held since October 05). 2) Premises which have not been inspected within the last 2 years. 3) Premises with RCI scores of less than or equal to 3 or 4 for managing wood dust health risks.	Throughout 07/08	HSAO	600 visits	Premises that meet the criteria within the following SIC codes will be targeted. <ul style="list-style-type: none"> • SIC 20300 - Manufacture of builders joinery and carpentry • SIC 20400 - Manufacture of wooden containers and other products. • SIC 36110 - Manufacture of chairs and seats • SIC 36120 - Manufacture of office and shop furniture • SIC 36130 - Manufacture of other kitchen furniture • SIC 36140 - Manufacture of other furniture.
NB - Those premises that attended the SHADs held in 06/07 at Exeter, YNE, W. Midlands and S. Wales should not be visited in 07/08.				
	Throughout 2007/8	B4	150 visits	Support to HSAO's, visits & taking enforcement action.

APPENDIX 2

RISK CONTROL INDICATIONS FOR OCCUPATIONAL ASTHMA

ASSESSMENT SCALE			
Each risk control indicator should be assessed against the following 1 - 4 scale. A score of 1 must satisfy all the appropriate criteria of the risk control indicator.			
1	2	3	4
Full compliance in areas that matter	Broad compliance in areas that matter	Some compliance in areas that matter	Limited or no compliance in areas that matter

Occupational asthma	
Asthmagen management system	Effective organisation and arrangements including adequate COSHH assessment, provision of information, instruction, training and supervision. Evidence of management commitment and arrangements for review.
Control strategy	Substitution considered and effected where possible (for woodworking this is unlikely to be a practical option). Adequate engineering controls provided, used, maintained, examined and tested at suitable intervals. Suitable PPE provided, worn and stored correctly, suitably cleaned and well maintained. Appropriate instruction and training in proper use of engineering controls and PPE.
Health surveillance	A competent person provides suitable health surveillance, everyone requiring it has been included, it is repeated as necessary and health records are kept. Cases of occupational asthma are reported under RIDDOR.
Woodworking is a 'difficult to reach' industry, where a non-written culture prevails. A guide to pragmatic enforcement is contained in the Topic pack - inspection and enforcement activity should be carried out with reference to this.	