

Inspection intervention in the brickmaking industry

SIM 3/2007/14

Target audience:

HSE Band 2 and Band 3 Inspectors covering Manufacturing Industries nationally

Specialist Inspectors - Occupational Hygiene, Occupational Health Inspectors

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Summary

This SIM alerts Inspectors nationally to an intervention in the brickmaking industry. The aim of this intervention is to assess compliance with COSHH, particularly the new Workplace Exposure Limit for respirable crystalline silica (RCS) and to promote the good practice control guidance in Silica Essentials.

Background

1 The Disease Reduction Programme's (DRP) Respiratory Project includes this intervention to reduce the incidence of respiratory ill health (silicosis and Chronic Obstructive Pulmonary Disease - COPD) amongst brick makers. This intervention is part of the FOD Delivery Plan.

2 There are two main drivers behind the current focus on respiratory ill health associated with exposure to silica:

- Recent scientific evidence suggests that there is a 20% risk of developing silicosis at the previous occupational exposure limit of $0.3\text{mg}/\text{m}^3$. HSE's Consultation Document on Respirable Crystalline Silica (RCS) recommended a new Workplace Exposure Limit (WEL) of $0.1\text{mg}/\text{m}^3$, which came into force on 1st October 2006;
- Silica Essentials was launched in October 2006. This provides specific control guidance sheets covering around 50 tasks/processes in a range of industries including brickmaking, for which there are 8 guidance sheets.

3 This SIM outlines the second phase of a three-year FOD Inspection initiative that aims to assess and enforce compliance with COSHH 2002 (as amended), particularly focusing on compliance with the new WEL. The initiative also aims to promote awareness of the Silica Essentials guidance. The first phase targeted stonemasons and a further phase will target quarries.

4 Guidance on dust control measures for the brickmaking industry exists:

- Silica Essentials.
- 'Control of respirable dust in heavy clay and refractory processes' HSG 72 (published 1992). In need of revision.
- 'Stone dust and you: guidance for stonemasons' INDG 315 [PDF] (published October 2006).

Resources

5 Nationally Band 3 inspectors asked to visit 8 brick or tile plants and their associated Head Offices (16 visits in total), and a minimum 30 smaller brick and clay tile makers. The Regional Field Specialist Occupational Hygiene Inspectors will provide operational support. Their lead contact for this intervention is Marjorie Mitchell (RSG Scotland). The FOD Delivery Plan confirms the resource allocation by division.

Action required

6 **Timing** - The inspection intervention should run from October 2007 to 31 March 2008.

7 **Premises selection criteria** - The following selection criteria should be used for identifying and prioritising premises:

- Visit to one site, and head office of each of the large multi-site employers (16 visits nationally – see [Appendix 1](#));
- Visits to 30 smaller sites (for known premises, see [Appendix 2](#));
- Poor performers in terms of compliance with COSHH;
- Newly identified previously unvisited sites.

Where appropriate, the opportunity to ‘bundle’ visits with the Manufacturing Supply Chain work of the MGS3 programme should be considered. For further details see SIM05/2007/01.

8 **Content of inspection** - Inspectors should focus on the following 4 areas:

- Assess the control measures in place against the principles of good practice for control of exposure (Schedule 2A, COSHH 2002);
- Assess awareness of, and compliance with, the new WEL;
- Raise awareness of published guidance;
- Feedback to senior management of large employers ([Appendix 1](#)) with the objective of securing multi-site action plans for compliance with the new WEL.

9 **Compliance Issues** - Poor compliance should result in enforcement action in accordance with the HSC Enforcement Policy Statement and the Enforcement Management Model.

Enforcement action taken should reflect the emphasis in Regulation 7 of COSHH 2002 (as amended) to apply the principles of good control practice when controlling exposure to substances hazardous to health - Schedule 2A provides details on what is required.

A Brick Initiative Topic Pack [PDF] provides information on:

- The range of health issues associated with exposure to RCS;
- Where RCS is most likely to be present;
- Industry-specific good control guidance;
- Initial enforcement expectations for key risk control systems.

10 Reporting arrangements

The work should be recorded on COIN via a Service Order (IRF other) – IRF ratings tab - from the available menus select “Disease Reduction Other Respiratory”.

Health and safety issues

11 Please note the Health and Safety Supplements relating to site visits, which are available on the Intranet under 'Your Health and Safety'.

Sector / programme contacts

12 For further information please contact:

Industry/technical queries to

- David Appleton, Manufacturing Sector, City Gate West, Toll House Hill, Nottingham NG1 5AT – VPN 513 2841 – 0115 971 2841
david.appleton@hse.gsi.gov.uk

Intervention queries to

- Helen Smith, Disease Reduction Programme, Rose Court - VPN 522 6910 - 0131 247 6910
Helen.smith@hse.gsi.gov.uk

Appendix 1 - Selection of premises for inspection - Larger / multi-site employers

56 premises, representing approximately 60% of the UK’s brick manufacturing sites, are controlled by one of 5 major companies in the industry. Three other multi-site firms operate an additional 8 sites. These are:

- 1 Baggeridge Brick Plc (5)
- 2 Hanson Building Products (14)
- 3 Ibstock Brick Ltd (23)
- 4 Michelmersh Brick Holdings Plc (5)
- 5 Wienerberger Ltd (9)
- 6 Ashpark Handmade Brick & Tile Co Ltd (3)
- 7 Caradale Brick Ltd (2)
- 8 Sandtoft Roof Tiles Ltd (4)

NOTE: There are two potential changes involving large brick companies which have not yet been finalised:

- Wienerberger has offered to buy Baggeridge Brick
- Heidelberg has offered to buy Hanson Building Products

Planned inspections should continue to be carried out.

At least one site inspection should be undertaken for each of these 8 employers, in accordance with the allocation in the table below. The Manufacturing Sector is willing to discuss with FOD the most appropriate sites to be visited. To facilitate feedback to senior management with the aim of obtaining commitment to develop an action plan applicable to all the company's sites, inspections should not be carried out to multi-site employers unless assigned to a Division.

Division	Large multi-site employer	Small multi-site employer
Scotland		Ashpark, Caradale
YNE		Sandtoft Roof Tiles
NW	Wienerberger	
Midlands	Baggeridge, Ibstock	
ESE	Hanson, Michelmersh	
WSW		

Appendix 2 - Selection of premises for inspection - Smaller and single-site employers

Lists of premises, by Division, provided to HoOps in Sept 2007 (or are available from Helen Smith – contact as above).

The Divisional lists include the allocated multi-site employers from which at least one site should be selected for inspection, as described in [Appendix 1](#).

The lists also show the remaining smaller/single site employers to whom visits should be made in accordance with the allocation in the following table.

Division	Number of smaller sites	Target Number of visits
SCOTLAND	2	2
YNE	8*	6
NW	3	3
MIDLANDS	9	6
ESE	13	10
WSW	3	3
Total	38	30

Note: * Normanton Brick Co Ltd and William Blyth each have two closely located sites.