



EMPLOYEE HEALTH & SAFETY

CODE OF MANAGEMENT PRACTICES

Developed by
Chemical Industries Council of Malaysia (CICM)
(Company No: 82699T)
c/o Federation of Malaysian Manufacturers
Wisma FMM, No. 3, Persiaran Dagang, PJU 9
Bandar Sri Damansara, 52200 Kuala Lumpur

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EMPLOYEE HEALTH AND SAFETY CODE

Introduction

This Code is aimed at protecting the workers in the facility and deals with the human rather than the equipment side of safety and environment.

This Code calls for a commitment by management of member companies to provide resources and mechanisms to identify and evaluate hazards and to control or prevent them. The Code also specifies training for workers and requires employee participation in developing and implementing health and safety programmes. As with the other Responsible Care Codes, self-audits to evaluate the effectiveness of health and safety programmes are also included.

One key issue of this Code is the requirement for companies to train contractors and sub-contractors who carry out work on their facilities. The Code also includes safety of visitors to the facilities and procedures are to be drawn-up for their protection.

Generally, the Employee Health and Safety Code deals with people operating equipment and focuses on establishing procedures that provide safe and healthy working environment.

Scope

The scope of this Code covers the prevention and control measures which include mechanisms for reviewing plant designs, job tasks, system covering personal protection equipment, preventive plant maintenance, housekeeping programmes, security procedures and systems and emergency medical provision.

Objectives

The Code provides a framework for identifying and assessing work related hazards, preventing unsafe acts and conditions, maintaining and improving employee health and safety and fostering communications on health and safety issues within the facility and the community.

Compliance with Responsible Care Guiding Principles

1. To develop and produce chemicals that can be manufactured, transported, used and disposed off safely.
2. To make health, safety and environmental considerations a priority in planning for existing and new products and processes.
3. To operate plants and facilities in a manner that protects the environment and health and safety of employees and the public.

MANAGEMENT PRACTICES AND IMPLEMENTATION GUIDELINES

The 18 Management Practices that protect and promote health and safety of people working at, or visiting company facilities :-

Management Practices

1. Commitment by all levels of management to protect and promote the health and safety of people who work at or visit company facilities, through :
 - published policies;
 - accountability for implementation ; and
 - provision of sufficient resources, including qualified health and safety personnel.
2. Opportunities for employees to participate in development, implementation and review of health and safety programmes.
3. Provisions, including selection criteria to confirm that on-site contractors health and safety programmes are consistent with applicable portions of company's policies.
4. Written and current health and safety programmes and procedures which are appropriate to the site.

Implementation Guidelines

Management leadership and commitment by :

- Demonstrating management leadership through written policy, active participation and communication.
- Establishing goals and responsibilities for implementing employee health and safety throughout the organisation. Measures performance against these goals.
- Committing resources necessary to implement and maintain employee health and safety practices.

Provide employees at all levels opportunities for participation in the development and implementation of health and safety programmes such as :-

- Hazard Communication Programmes
- Safety Committees / Teams
- Safety & Health Training
- Personal Protective Equipment (PPE) Selection and Assessment
- Operating Procedures

Safety programmes and performance are included as criteria of the contractors selection process. Contractors to have written health and safety policies and implementation guidelines with responsibilities identified. Training of their workers to ensure compliance with company's safety rules, procedures and practices related to the services being provided. Periodic review of contractor's safety performance.

Maintain site specific health and safety procedures that are simple to understand by the workforce, such as :

- Safe practices manual or procedures
- Emergency Response Plan
- Safe handling and Use of chemicals
- Preventive Medical Services

Management Practices

5. Means to verify that health and safety programmes and procedures are effective and that actual practices are consistent with these programmes and procedures.
6. Systems for maintaining records and analysing data to evaluate health and safety programmes, determine trends, and identify areas for improvement.
7. Methods to identify and evaluate potential health and safety risks in planned or existing facilities, including facilities to be modified.
8. Exposure assessments and safety analysis to evaluate health and safety risks to employees from processes; equipment; potentially hazardous chemicals, physical or biological agents; or work-site conditions.
9. Health assessment to determine employee medical fitness for specific job tasks.
10. Employee occupational medical surveillance programmes tailored to work-site hazards.

Implementation Guidelines

Establish means to assess health and safety programmes, procedures and practices. Perform regular assessments or audits. Analyse compliance and take corrective action.

Maintain health and safety data for analysis to determine trends, performance and improvements. Performance must meet or exceed legal requirements. Generally, safety performance is measured with respect to fatalities, lost time injury, reportable accidents and occupational illnesses.

Establish review plans for new or modified processes, operations, and facilities to identify sources of workplace hazards. Regular work-site inspections to identify safety deficiencies and / or occupational hazards. Develop corrective action plan.

Periodic exposure assessment and safety analysis to evaluate health and safety risks to employees from processes; equipment; potentially hazardous chemical, physical or biological agents; or work-site conditions such as noise and heat. Records of exposure assessment will be maintained and regularly updated.

Establish medical fitness standards for specific job tasks (e.g. working in confined space, working at heights, wearing breathing apparatus, etc.), conduct employee health assessment to these standards and maintain documented records.

Establish health surveillance programme for employees exposed to particular hazard e.g. noise, heat, lead poisoning and asbestos, chemicals etc.

Management Practices

Implementation Guidelines

11. Mechanisms for reviewing the design and modification of facilities and job tasks, taking into account the following hierarchy of controls; inherently safer design, material substitution, engineering controls, administrative controls and personal protective equipment.

Establish mechanism for reviewing the design and modification of facilities by having documented Process Hazard Analysis and Process Safety Review. The hierarchy of design options employed to control or mitigate potential hazards associated with production processes shall be as follows :-

- inherently safer design techniques
- material substitution
- active hardware controls
- specific procedural or administrative controls
- general safe work practices and procedures
- Personal Protective Equipment (PPE)

12. Systems to verify that personal protective health and safety equipment is properly selected, maintained and used.

At each facility establish the following :

- Standards to ensure appropriate PPE, selection to match the potential hazard.
- Methods to test, clean, evaluate and maintain such PPE.
- Training in use and limitation of such PPE.
- Disciplinary measures to ensure proper use of such PPE.

13. Preventive maintenance and house-keeping programmes to maintain the safety of facilities, tools and equipment

At each facility establish the following :

- Written housekeeping and preventive maintenance programmes to ensure safety of facility, equipment and tools.
- An approved vendor list.
- Written audits to verify effectiveness of housekeeping and preventive maintenance and to track corrective action is promptly implemented.

14. Timely investigation of work-site illnesses, injuries, and incidentsq corrective actions to prevent recurrence and evaluation of the effectiveness of corrective actions plan.

Every facility will have documented illness, injury and incident investigation procedure in place, such occurrences must be investigated. Analyse historical incidences to determine trends and root causes, and corrective action to prevent recurrence.

15. Security procedures and systems to control entry and exit of personnel and materials at the work-site and other restricted areas.

Establish and implement at each facility the following written security procedure and system to control entry and exit of :

- Employees, contractors and visitors
- Equipment and materials

Management Practices

16. Provisions for emergency medical assistance and occupational medical care for people at company site.
17. Communication of health and safety information which is relevant to specific job task and the work site.
18. Health and safety training programmes, including documentation of these programmes, and methods to evaluate the effectiveness of both training and communications activities.

Implementation Guidelines

Establish provision for :

- emergency medical care including first aid by qualified providers
- occupational medical care

At each facility establish and implement systems for communication of health and safety policy and task specific information to relevant employees, contractors, visitors, customers and the community. Regular updates of such information due to changes in regulations and standards.

All employees to receive health and safety training appropriate to their job function. Provide additional refresher training as and when necessary. All training to be documented and regularly evaluated to determine effectiveness.

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