

# NEPSI 2.0

MANAGEMENT SYSTEMS  
APPROACH TOWARDS  
NEPSI IMPLEMENTATION



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## LIST OF ACRONYMS

**HSE:** Health, Safety, Environment **NEPSI:** the European Network on Silica **OEL:** Occupational Exposure Limits **OH & S:** Occupational Health and Safety **RCS:** Respirable Crystalline Silica



# 00

## FOREWORD

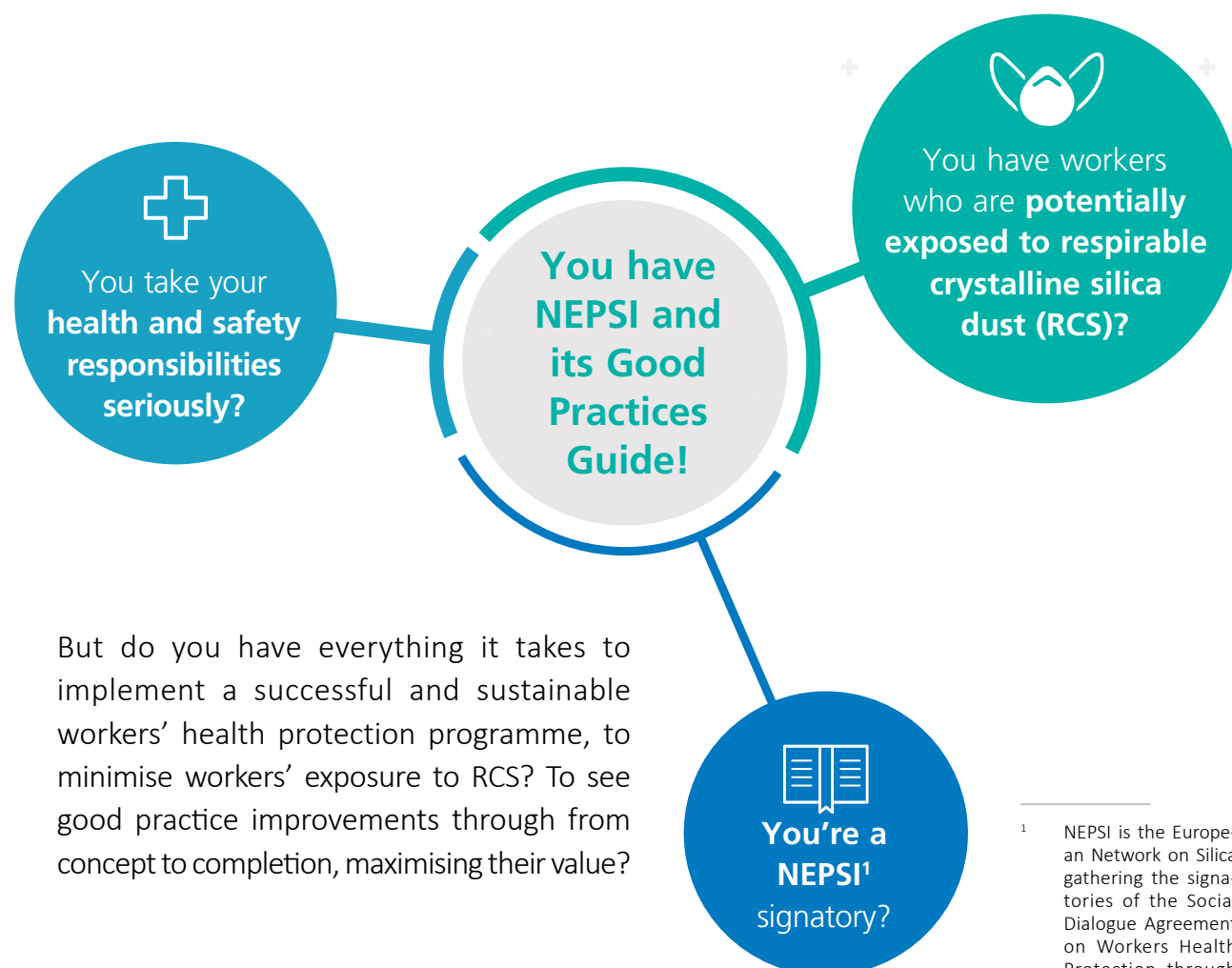




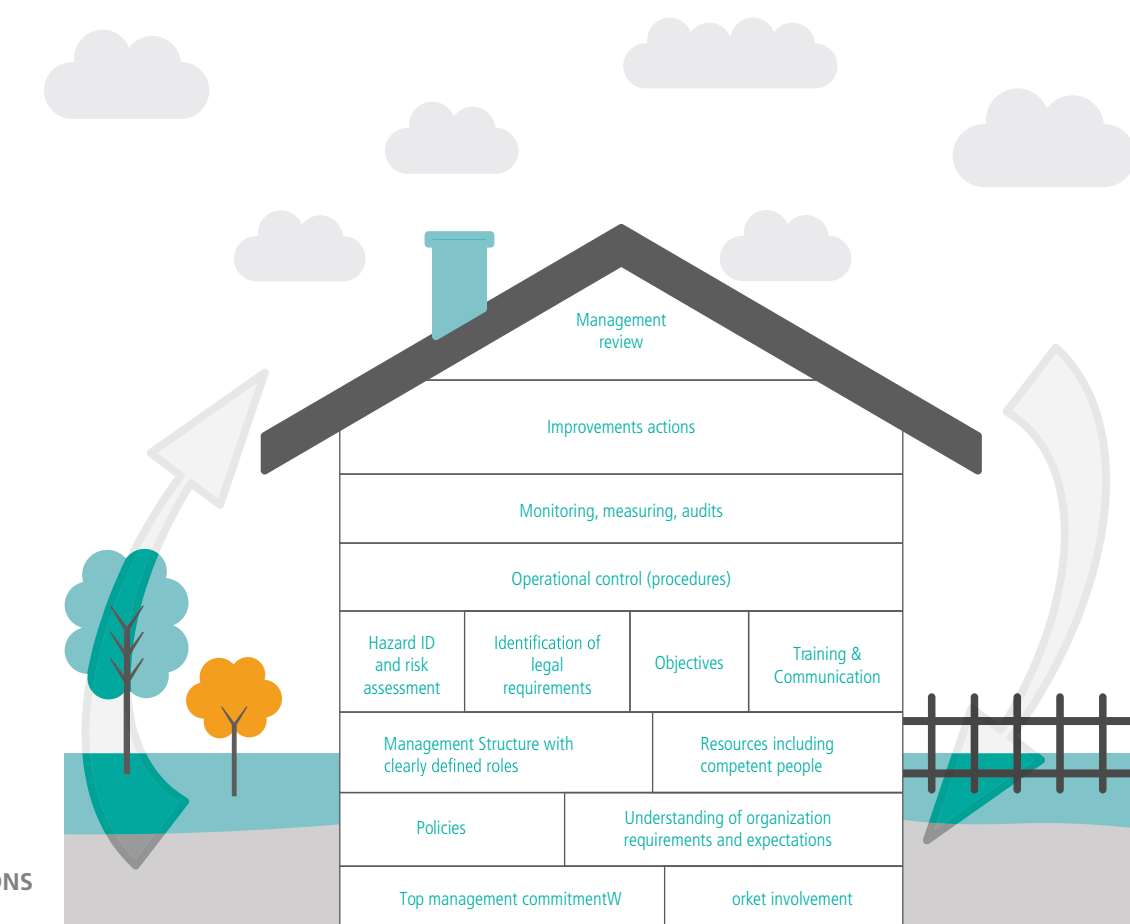
# 00

## FOREWORD

You're a producer and/or user of products containing crystalline silica?



<sup>1</sup> NEPSI is the European Network on Silica gathering the signatories of the Social Dialogue Agreement on Workers Health Protection through the Good Handling and Use of Crystalline Silica and Products containing it, OJ C 279, 17.11.2006



Building blocks of a holistic "plan, do, check, act" management system

"Setting limit values through EU legislation is instrumental in protecting workers' health but it is the quality of implementation and enforcement that will determine whether lives are saved."

As Commissioner Marianne Thyssen highlighted on the occasion of the NEPSI Agreement tenth anniversary:

What you need is a holistic management systems approach to NEPSI in order to improve the quality of implementation of your obligations.

This guidance document brings together industry experts' knowledge and expertise on how to build a successful management system that ensures all is in place to support NEPSI

implementation. Besides explaining management systems requirements (as they may be applied to this workers' health protection topic) the document also brings a wealth of tried and tested tools that can be applied in any workplace.

Reference is made to the newly proposed occupational health and safety standard ISO45001, but the principles described here are equally valid for the existing OHSAS18001 and equivalent systems. The guidance is particularly rel-

evant for companies where no management system exists, since it provides a useful framework to build upon and/or integrate into any existing management system.

This guidance is structured in a similar way as existing management system standards. Within each section, the requirements of a typical standard are explained in the context of NEPSI. Examples of how to implement the requirements are then explained.

Leadership in this topic is demonstrated not just by protecting the health of our own workers, but also by helping others in the value chain to protect theirs. NEPSI provides an excellent source of good practice guidance that is ready to be shared even beyond the NEPSI signatories. Relevant RCS product stewardship aspects are therefore covered in relevant sections of this document.





# 01

## CONTEXT OF THE ORGANISATION



# 01

## CONTEXT OF THE ORGANISATION

References: ISO 45001 – Chapter 4



### PROTECTION OF WORKERS' HEALTH SHOULD BE A PRIORITY OF EVERY ORGANISATION.

In this context we refer to the health hazards of respirable crystalline silica dust (RCS), which may be generated during the handling and use of raw materials and products containing crystalline silica.



### Helpful hints:

Stating our commitment to workers' health protection from RCS should be a priority in our internal policies and also in our communications to external stakeholders. It demonstrates that we care for our own workers and those throughout the value chain and it helps to build trust.

In our internal policies and external communications with customers, NEPSI signatories should advocate the use of the NEPSI Good Practices as the best way to protect workers in addition to regulatory compliance.

Legally and morally, the need for workers' health protection extends not only within our own organisations, but also within those of our customers (and their customers!) in the NEPSI signatory sectors and beyond.

Every one of our workers is an ambassador for our companies and for our industry as a whole. Looking after them is not only good for their health, it is also good for business.

At the heart of this are the following elements of the NEPSI Agreement which are aimed at workers' health protection:

- Identification and assessment of risks
- Implementation of control measures to minimise exposure
- Monitoring to ensure the effectiveness of the controls (including occupational exposure monitoring)
- Education for workers on the risks and the control measures that should be used

- Health surveillance
- Follow-up via Key Performance Indicators

Stakeholders will expect communication about hazards and risk controls associated with the production, handling and use of raw materials and products containing crystalline silica. They will also expect us to be able to answer their questions and give advice on this topic.

There are some actions we must take, either because they are a legal requirement or because they are required by the NEPSI Agreement. Compliance should be the minimum standard. Our management systems are a tool to ensure that all is in place to allow all of this to happen effectively.

**When setting the scope of our management systems, we need to include all the functions/departments, activities and services that are needed to satisfy the above needs and expectations.**

When developing their management systems, NEPSI signatories should consider the needs and expectations of their own workers and also, where relevant, their customers and other stakeholders.



# 02

## LEADERSHIP AND WORKER PARTICIPATION





# 02

## LEADERSHIP AND WORKER PARTICIPATION

### 2.1 Leadership and commitment

References: ISO 45001 – Chapter 5.1

Workers' health protection starts at the very top of our organisations, with the commitment of our top management who recognise that it makes sense legally, morally and financially.

**IN SHORT, GOOD HEALTH  
MAKES GOOD BUSINESS.**

Workers' health protection from RCS should be a regular item on the top management agenda, setting objectives and targets and regularly reviewing performance.

To ensure the continuing success of our workers' health protection programmes, the actions of our top management must demonstrate leadership and commitment. This means taking overall **responsibility and accountability** and ensuring that the management system and its requirements and processes are **established, resourced** (with competent people, money, equipment...) **and implemented** as necessary to achieve the desired outcomes. It means **communicating** the importance of this topic at all levels of our organisations.

Worker participation is important to gain a full understanding of the situation (the environment, activities and risks) faced by workers on the front line, to get their suggestions through open dialogue and to get their ownership of improvements. It is key to effective health and safety leadership.

**The topic should also be a focus of site visits and interactions with workers, where top management should emphasise the importance of using good practice dust control measures and encourage hazard and defect reporting.**

In the respect of leadership, it is worth noting that there are two different forms of leaders, active and passive:

- Active leaders are considered to be in a supervisory or management role and in a position to direct others.
- Passive leaders are considered the people who others aspire to be like. They exist in all levels in an organisation.

Leaders in any organisation are assumed to come from amongst those in management or supervisory positions. These people are in a position to create the culture within an organisation, but not all are considered true leaders. It is necessary that all managers possess some of the leadership qualities, but it is not a requirement that all become leaders. One of the challenges in any organisation is the tendency to promote on the basis of competence in present position, rather than on leadership potential.

Leaders do not have to be perfect, they make mistakes. True leaders admit their mistakes, they learn from them and move on. Most importantly, they ac-

<sup>2</sup> Reference: QNJAC Leadership & Workforce Engagement Guidance



cept the consequences of their mistakes and do not seek to blame others.

In any organisation, both positive and negative influencers can be identified. The negative influencers are the people who need leadership the most. The majority of people have a passive attitude and will react well to the influence of positive leaders. A disregarded characteristic of a leader is that they are generous in their recognition of the efforts of others, the so-called “pat on the back”/ personal praise, which is noted in active leaders.

Passive leaders are the role models. A simple example to describe a passive leader, could be the loading shovel operator whose machine always has a clean and dust free cab, or who is the most fuel-efficient driver.

An effective active leadership leads to an engaged workforce. Some characteristics of an engaged workforce are:

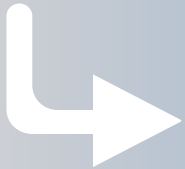
- Empowered
- Involved
- Consulted
- Interested
- Enthusiastic
- Efficient
- Safe

In Annex I, a leadership and worker participation tool-

box is included to demonstrate all the important behavioural elements of leaders which may help to inspire a well-engaged workforce.

It is already clear that the behaviour of the leaders plays an important role for a healthy and successful environment for the workers. The following elements are examples of successful leadership behaviour regarding RCS management:

- To include the topic of potential exposure to respirable crystalline silica on the agenda for leadership team meetings
- To assign a person to monitor the application of the NEPSI good practice guide
- To set targets for low exposure levels of RCS
- To provide training on RCS prevention and control to the leadership team members and employees
- To support employee engagement in RCS prevention and control
- To monitor and investigate sickness absence of employees
- To discuss health and safety implications of changes in operations



### Helpful hints:

A key challenge is to motivate workers to protect themselves today from a health hazard which may only impact them much later in their lives. When engaging with workers, provide positive and specific feedback when witnessing safe and healthy behaviour. It is important to emphasise the positive consequences of safe behaviour (and the potentially negative consequences of unsafe behaviour). Where improvement is needed, adopt a coaching style, ask for suggestions, consider what action may be required (by management, workers or both) and seek agreement on the way forward.

- To benchmark the organisation’s conditions and performance regarding potential exposure to RCS against that of other organisations
- To report to interested parties the organisation’s health and safety performance
- To reward good behaviours in RCS prevention and control

## 2.2 OH & S Policy

References: ISO 45001 – Chapter 5.2

Policies are a statement of the intentions and direction of an organisation, as expressed and endorsed by top management.





Stating our commitment to workers’ health protection from RCS should be a priority in our internal OH & S policies and also in our communications to both internal and external stakeholders. It demonstrates that we care and it helps to build trust.

Our OH & S Policies should refer to our commitment to providing the resources necessary to implement the management system and to satisfy legal compliance and other requirements including the NEPSI obligations.

Policies should state the organisation’s commitment to

the control of risks using the hierarchy of controls, giving priority to collective and preventive control measures in preference to individual protection measures. Additionally, NEPSI signatories may specifically advocate the use of the NEPSI Good Practices as the best way to protect workers in addition to regulatory compliance.

An example of Occupational Health and Safety Policy is described in Annex II. This may be integrated in your existing company policy.

### 2.3 Organisational roles, responsibilities, accountabilities and authorities

References: ISO 45001: Chapter 5.3

Essential to successful implementation of workers’ health protection programmes is an adequately resourced and competent management structure to establish, implement, maintain, monitor and improve the management system. At all levels of the organisation, roles and responsibilities should be clearly defined.



It is good practice to define roles and responsibilities in each individual’s job description. Responsibilities extend throughout the management hierarchy, all the way to the front line where workers should have a defined responsibility to use the dust control measures provided and to report problems and defects.



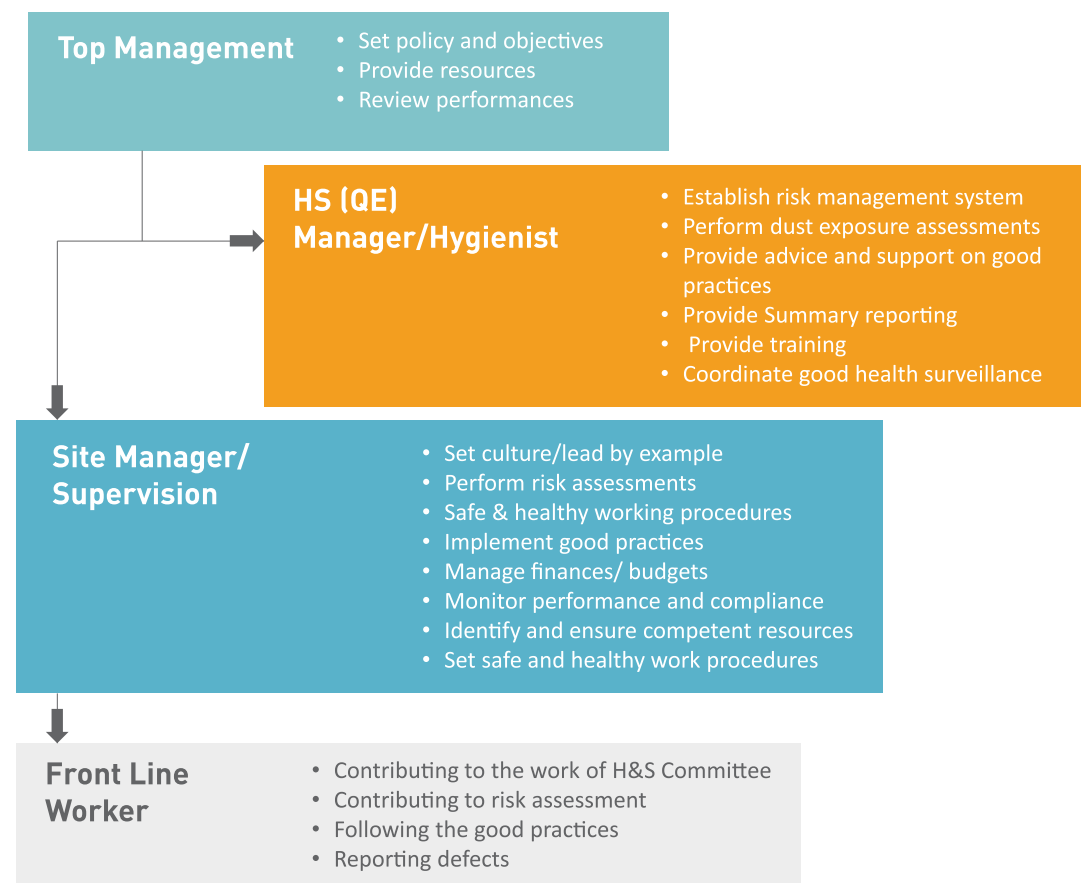
In the context of NEPSI implementation, this means defining roles and responsibilities of people involved in enacting each of the NEPSI obligations:

- Identification and assessment of risks
- Implementation of control measures to minimise exposure
- Monitoring to ensure the effectiveness of the controls (including occupational exposure monitoring)
- Education for workers on the risks and controls
- Health surveillance
- Follow-up via Key Performance Indicators

Responsibilities should be communicated to those to whom they are assigned.

A document detailing the relevant parts of the management structure should be kept up to date and available (ideally on display) at each site. This document should summarise the key responsibilities of the persons in the structure.

As a NEPSI signatory it is important for each organisation to install a monitoring system for ensuring the application of Good Practices. Thus, the organisation needs to designate responsible persons to provide resources, to monitor the application of the Good Practices, ensure a safe and healthy workplace environment and more. There are a number of important roles to note and detail their responsibilities. An example of a simplified chart of the part of the organisation relevant to RCS is shown below.



## 2.4 Participation and consultation

References: ISO 45001 – Chapter 5.4

Worker participation is important at all levels of an organisation in risk identification and assessment and in the development, planning, implementation and evaluation of actions for improvement. It is particularly important to gain a full understanding of the situation (environment, activities and risks) faced by workers on the front line.



The NEPSI Good Practice Guide task sheet 2.1.19 gives guidance on the content of awareness training programmes for workers. These are a good starting point for worker participation.

Participation on a day to day basis can take many forms and these should be documented in the management system.

Tools to further engage the participation of workers include:

- Toolbox talks and pre-shift briefings
- Involvement in review of risk assessments and safe working procedures
- Inspections and audits of the workplace
- Investigation into incidents relating to dust and RCS, including

high exposure monitoring results

- Near miss, hazard and defect reporting
- Local dust improvement teams
- Health and Safety committees, with workforce representation
- Setting objectives, including personal objectives relating to dust and RCS

The level of participation of workers depends also on the role of the employer or leader. For further insight refer to Annex I, "Leadership and Participation toolbox".





# 03

## PLANNING



# 03

## PLANNING

References: ISO 45001 – Chapter 6



### THE PRECEDING SECTIONS HAVE COVERED THE BASIC FOUNDATIONS OF OUR MANAGEMENT SYSTEM.

By now, we have an understanding of our organisational priorities and the needs and expectations of our workers. We have the top management commitment, management structures, roles and responsibilities in place. Now we need to identify and prioritise the areas where action is needed, to protect workers from exposure to RCS.

### Hazard identification and risk assessment

Dust generating work processes involving crystalline silica and products containing it may, unless properly controlled, create risks to workers' health. Measures should therefore be implemented to reduce the identified risks to an acceptable level.

Evaluation of risks from RCS should be undertaken at all levels of the organisation in order to ensure that appropriate systems are put in place to satisfy the requirements of Company policy, including the legal and other requirements to which the Company subscribes.

Our NEPSI Agreement and Good Practices Guide provide a framework for hazard identification and risk assessment. Refer to:

- The Risk Management section of the Good Practices Guide
- Annex 2 of the Good Practices Guide (identification of processes generating fine particles that could result in RCS exposure)
- Task sheet 2.1.6 "Dust Monitoring"
- Task sheet 2.1.21 "Real time dust monitoring"

The different processes that can be considered for the identification of hazards and risks from RCS are:

1. Activities and situations in the workplace
2. Factors leading to exposure, including
  - Equipment, tasks, number of people, duration of exposure, frequency of exposure, industrial processes, weather/ambient conditions, housekeeping standards, substance/agent, raw materials, hygiene, accompanying activities, behaviours (e.g. use of controls), incidents, dust emission sources, organisation factors (e.g. production schedules), Respiratory Protective Equipment use, shift length of the worker, training and competence, maintenance standards, age and health of workers
3. Existing control measures, including the condition of the equipment, position in hierarchy of controls and reliability

Evaluation of risks from RCS should be undertaken at all levels of the organization



ACTIVITIES	IDENTIFIED RISKS	DESCRIPTION	LIKELIHOOD	CONTROL	RISK RATING
Small bag filling with flours	Leakage of dust	Bag is not effectively clamped/sealed onto the bagging head	Possible	Make sure the ventilation system is working properly; ensure that bags are effectively sealed	Medium

4. Quantification of exposure levels/ambient levels in workplace. This shall be compared against the relevant OELs
5. Assessment of exposure risk
6. Evaluation of improvement actions

At site level, risks affecting every process and activity should be identified, evaluated and documented. A good way of doing this is by first developing a risk register to give a broad view of the significant risks at the site. This will help to prioritise the risk evaluation at site level. The list of dust generating processes given in Annex 2 of the NEPSI Good Practices Guide may be a helpful starting point.

An appropriate risk register will support the procedure of identifying, assessing and controlling health and safety risks associated with the relevant workplace. A common risk register includes activities, identified risks,

description and analysis of risk, likelihood and control method. It is suggested that a small group including workers and technical supervisors is appointed to observe and analyse the risks identified. In the table above a simplified example is presented.

Once risks have been identified, they should be evaluated through measurement (e.g. personal dust exposure monitoring) which allows comparison against occupational exposure limits and/or static sampling of the workplace air.

Even before measurement results are available, comparison of existing control techniques against the NEPSI good practices will help to identify priorities for improvement.

Besides assessing the routine situation (e.g. the activities that are done on a daily basis and under normal conditions), consideration should also be given to the risks from non-routine tasks and to fault and emergen-

Seek opportunities  
to eliminate or  
reduce risks from  
RCS exposure

cy situations which could result in higher exposures or short-term peaks in exposure.

Processes should also be put in place to assess the potential impacts of changes in the organisation. It is necessary to keep risk assessments up to date, so dust exposures should be re-evaluated following significant changes to the workplace and operations.

Good practice: In anticipation of future planned changes, it is recommended to seek opportunities to eliminate or reduce risks from RCS exposure. In this respect, a task sheet on real time dust assessment using Helmet-CAM technology and a task sheet on dust monitoring listing the requirements for executing personal dust monitoring are included in Annex III and Annex IV, respectively.

**Determination of applicable legal requirements and other requirements**

Organisations should implement processes which demonstrate that all applicable legal requirements and other requirements have been identified, their relevance assessed and actions implemented to en-

sure the requirements are satisfied.

Organisations may choose to identify the legal requirements internally, where the relevant expertise and access to information exists (e.g. via online subscription service or trade association membership). Alternatively, they may outsource this work to specialist external service providers.

In the context of RCS and workers' health protection, organisations should identify the requirements that apply to hazardous substances generally and also to RCS specifically.

[In the European Union, the Carcinogens and Mutagens Directive applies for Work involving exposure to respirable crystalline silica dust generated by a work process and there is a Binding Occupational Exposure Limit value of 0.1 mg/m3 \(Directive EU 2017/2398\). The obligations of this Directive, are summarized in Annex V of this document.](#)

There may also be specific requirements at national



(member state) level. Identify and document these requirements.

Signatories to the NEPSI agreement are obliged to implement good practices in their workplaces, undertake exposure monitoring, implement health surveillance and provide training to the workers. Full information is available in the NEPSI agreement at [www.nepsi.eu](http://www.nepsi.eu) translated into all EU languages.

Recognising the obligations and expectations to provide information on hazards into the supply chain, producers of products and raw materials should also identify the relevant legal requirements, including classification and labelling obligations (under the CLP Regulation) and the provision of safety data sheets (under REACH).

LEGISLATION	ACCESS	REQUIREMENTS	APPLICABILITY	IMPLEMENTATION/ CONTROLS IN PLACE	IN CONFORMITY?
Carcinogens and Mutagens Directive 2004/37/EC amended by Directive 2017/2398	Official Journal of the European Union (OJ L158 and OJ L345)	<div>Substitution (of processes) where possible.</div> <div><ul style="list-style-type: none"><li>• Use enclosed work processes</li><li>• Reduction of workers' exposure as low as technically possible, below the Binding Occupational Exposure Limit (BOEL)</li></ul></div> <div>See full text of the Directive for all requirements</div>	Applicable to all sites, all locations where there is exposure to RCS	The employer shall assess and manage the risk of exposure to carcinogens or mutagens in accordance with the obligations set in the Directive. This process shall be renewed regularly, data shall be supplied to authorities at request	Yes/No



Helpful  
hints:

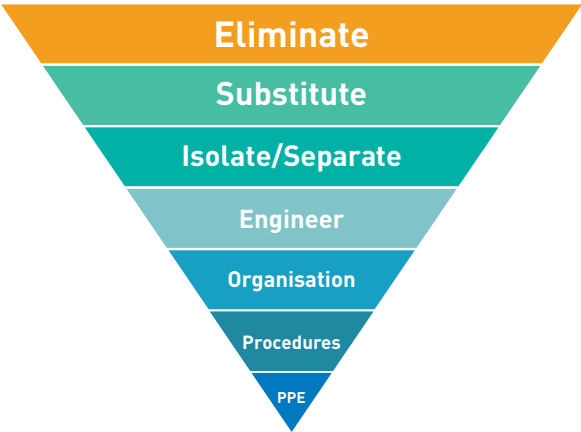
A good way to document this part of the management system is via a simple legal compliance matrix or register. An example is shown on page 30.

Improvement  
Actions

Once risks have been assessed and legal and other requirements have been identified, consideration needs to be given to the improvement actions that may be necessary to minimise workers’ RCS exposure.

The NEPSI Good Practices Guide section “Risk Management” gives advice on the general principles of prevention that help to prioritise the kinds of control measures that should be implemented. Priority should be given to control options

with higher reliability in preventing work-related diseases related to RCS. The dust generating work processes should be enhanced where feasible, after examining the possibility to replace some of the processes by others generating less dust. In any case collective (e.g. engineering) controls should be given priority over individual controls (e.g. respiratory protective equipment) or procedural/administrative controls. The NEPSI task sheets give examples of each type of control measure.



Hierarchy of controls



Following implementation of improvement actions, the effectiveness of the actions should be re-assessed, e.g. via workplace monitoring. Risk assessments should then be updated.

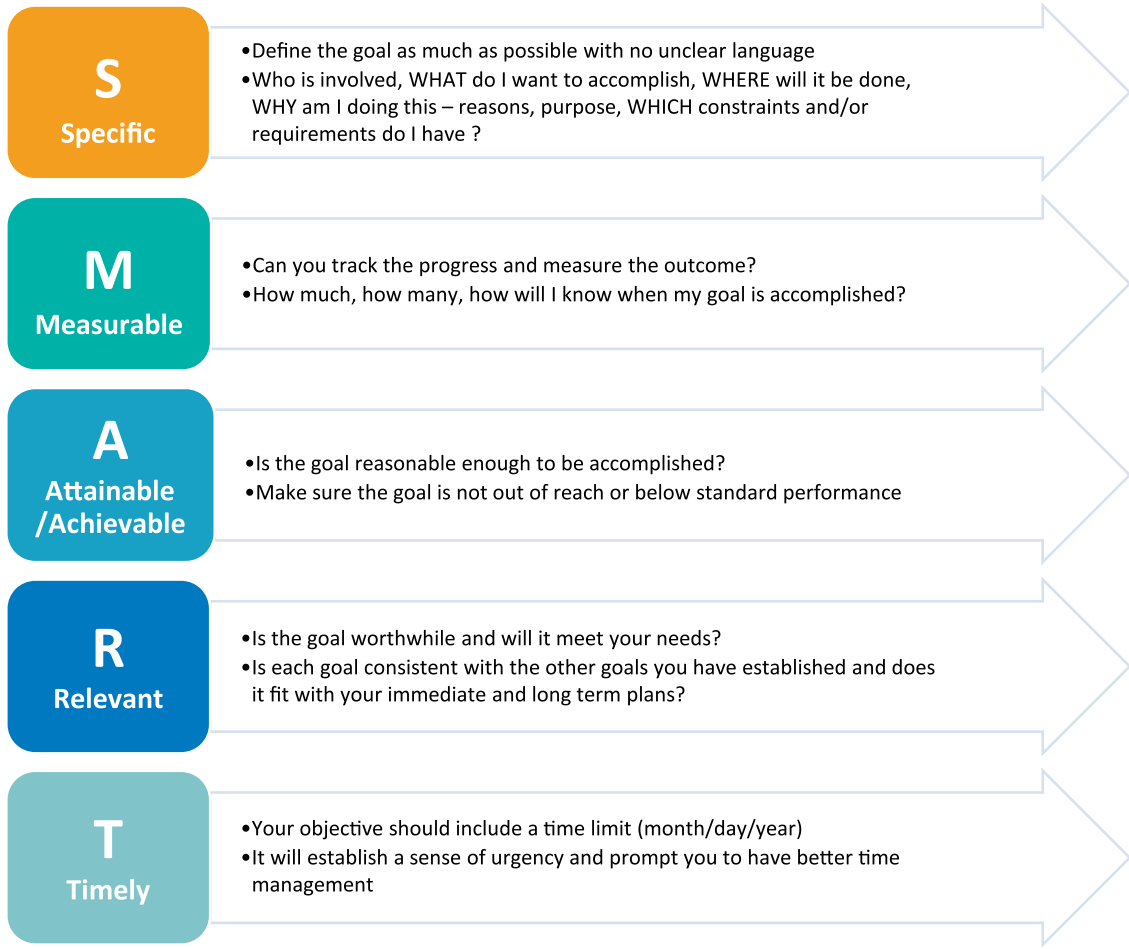
To ensure successful delivery of the actions an action management plan shall be

established. This can start with a simplified plan listing the actions and the relevant people and develop into a more detailed plan covering the milestones of a project.

A simple action management plan shall include the following:

ACTION MANAGEMENT PLAN					
Plant Title:					
Goal:					
Action Plan (brief description):					
Action Step (What)	Responsible (Who)	Deadline (When)	Resources & Methods (How)	Metric (How do you measure)	Efficiency (Ranking)
Use this text box for action plan	Indicate the individuals accountable for this task	Determine deadlines or due dates	Record details about the methods to be used for the task and resources required to complete the action (ex. NEPSI good practices)	Record the metrics that will monitor this action step from start to finish	Indicate if the result is efficient or not

A “SMART” principle of an action plan management may be designed as shown in the scheme below:



Objectives

Quite simply, what we measure tends to become reality. Setting objectives and targets is a good way to focus attention on a specific topic and helps us to achieve the desired outcomes.

In this context, the objectives will relate to reducing the risks from workers’ ex-

posure to RCS and improving elements of the management system to support NEPSI implementation.

Objectives need to be aligned to the overall policies and goals, or strategy, of an organisation. Therefore, when setting them, a logical place to start is with top management.

At top management level, consideration should be given to the identified risks from RCS. Besides helping to set objectives, this will also help to identify actions and any requirements for additional resource.

Objectives and the actions relating to them should then be cascaded down through each level of the organisation within relevant functions. Objectives and actions will become more detailed, specific and operational as they cascade. Importantly, people at all levels should have objectives that contribute to implementing the high-level strategy.

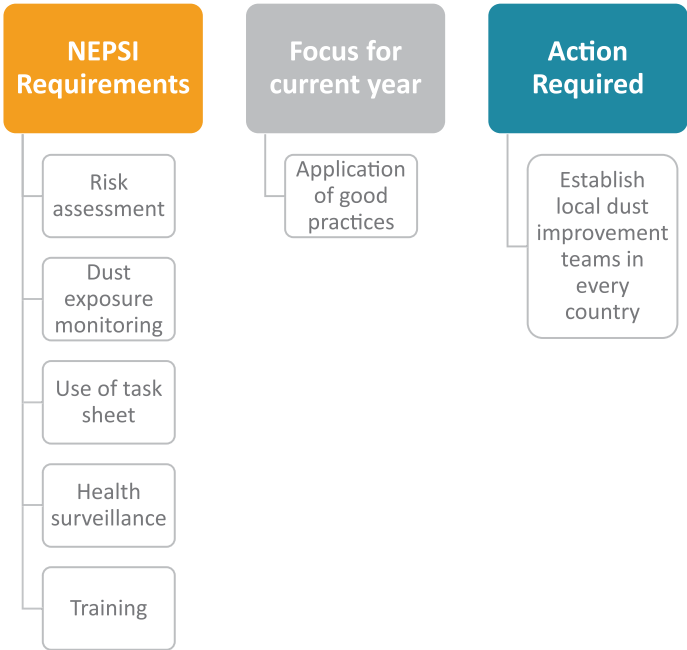
For example, a high level strategic objective may re-

late to reducing workers’ exposure to RCS in the organisation. As the objective is cascaded it will become more operational, perhaps relating to reduction in dust emissions from a specific process or even at the level of an individual machine.

Objectives and actions should be documented and worded such that:

- a. there is a clear cascade down through the Company
- b. they are SMART

The following illustrates a simple format that may be used to demonstrate the cascade of objectives related to RCS.



The following diagram illustrates the process by which high level strategic objectives from the top management may be cascaded

down through an organisation and actions to achieve the objectives related to RCS.





# 04

## SUPPORT



# 04

## SUPPORT

References: ISO 45001 – Chapter 7



### ESSENTIAL TO SUCCESSFUL IMPLEMENTATION OF WORKERS’ HEALTH PROTECTION PROGRAMMES

is an adequately resourced and competent management structure to establish, implement, maintain, monitor and improve the management system.



### Resources

Besides people, other kinds of resources are needed to support the overall management system implementation and to achieve objectives including those related to NEPSI. These include financial, technical and infrastructure resources, and competent expertise.

In the context of workers’ exposure to RCS, the results of the risk evaluation will define what actions, projects and additional resources may be needed to support improvement actions. This will, in turn, guide the management decision making process on resource levels, budgeting etc.

It is important that a formalised process is put in place and documented, such that operational sites communicate upwards through the organisational structure their priorities for preventive and protective measures to reduce workers’ exposure to RCS. Information gathered during risk evaluation should be used to justify requests for additional resource.



Competence

Whatever their local legal requirements, employers are increasingly being required to be able to demonstrate the competence of their employees through the use of formalised, documented systems.

Each person in an organisation should have the necessary skills, knowledge and other qualities necessary to undertake his duties safely.

The competence requirements for the people responsible for implementing each of the NEPSI obligations should be assessed on the basis of education, training, skills and experience and other relevant factors for the tasks being assigned. Where appropriate, gaps in individuals’ competence should be filled by providing additional education, training and experience.

Consideration should be given to the use of formal vocational training and competence assessment methodologies, wherever possible following recognised standards. With respect to potential health risks arising from exposure to RCS, this type of assured competence system may be particularly relevant for front line site operations and maintenance personnel. For example, the assessment of a

production operative would verify their understanding and correct use of the dust control measures provided.

Other training and assessment methodologies may be relevant in other functions and, for management personnel, should be based around formal education, training, experience and continual professional development.

In some circumstances, an organisation may delegate work to those best capable of identifying, evaluating, and controlling the risks, including to contractors. This recognises that some contractors possess specialised knowledge, skills, methods, and means. The organisation should verify that contractors are capable of performing their tasks during the procurement process and before they are allowed to proceed with their work. This should include making an assessment of their competence in terms of qualifications, experience, training etc.

Awareness

RCS dust awareness training provided to workers is essential for their competence. The NEPSI task sheet 2.1.19 “Training” and part 1 of the NEPSI good practice guide provide a framework

“ Recognition should be given to the importance of sharing knowledge and best practice on workers’ health protection and, specifically, good practice control measures to reduce workers’ exposure to RCS”.



Stating our commitment to workers’ health protection from RCS should be one of the priorities in our internal policies and also in our communications to external stakeholders. It demonstrates that we care for our own workers and those throughout the value chain and it helps to build trust.

In our internal policies and external communications with customers, NEPSI signatories should advocate the use of the NEPSI Good Practices as the best way to protect workers in addition to regulatory compliance.

to follow and the content. Records should be kept of the training provided to each worker.

Information and communication

Recognition should be given to the importance of sharing knowledge and best practice on workers’ health protection and, specifically, good practice control measures to reduce workers’ exposure to RCS. A formalised and documented framework should be established to ensure that issues and requirements relating to workers’ health protection from RCS are communicated effectively throughout all levels of the business and to all relevant stakeholders

(including, for example, contractors).

Appropriate forums could include:

- Site health and safety committees
- Operations meetings
- Executive meetings
- Company Health and Safety meetings
- Trade associations

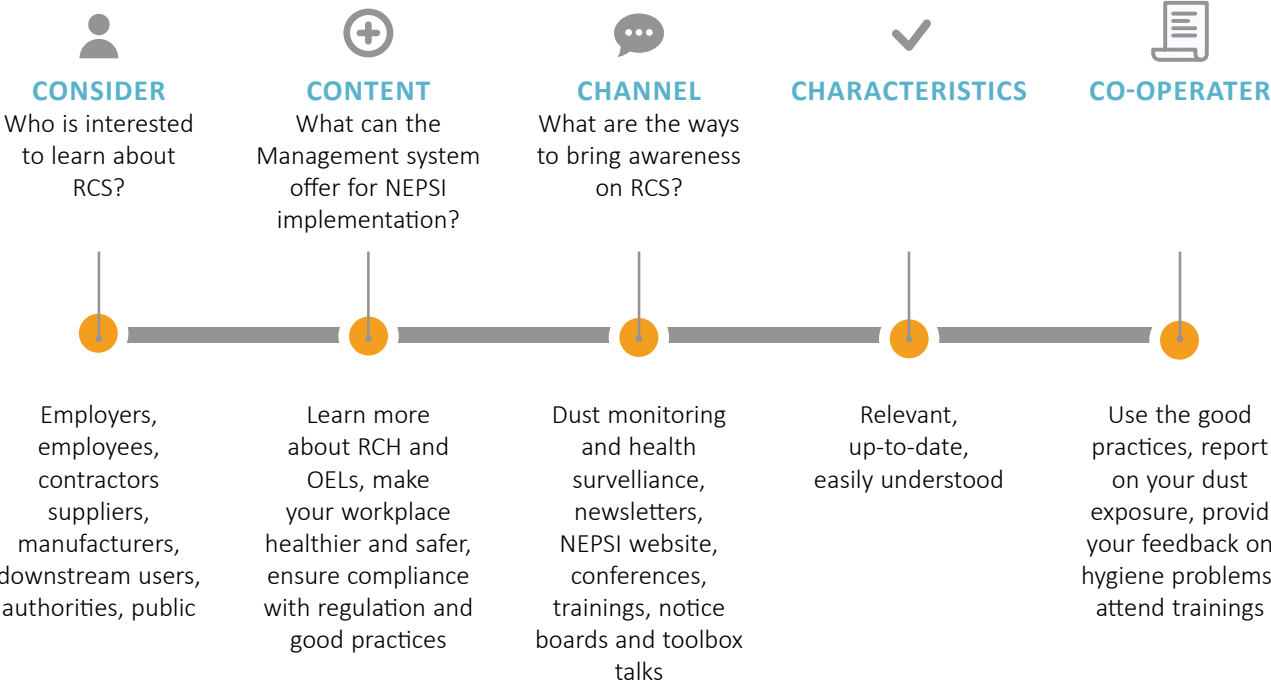
The purpose and attendance for each type of meeting should be defined, with agendas, meeting notes and actions kept on record.

When forming a framework for communication, a variety of channels may be used. The following gives some suggestions of what to consider.

Leadership in this topic is demonstrated not just by protecting our own employees, but also by helping others in the value chain to protect theirs. NEPSI provides an excellent source of good practice that is ready to be shared even beyond

the NEPSI signatories. It is good practice to brief those in customer facing roles on the issues surrounding crystalline silica and workers’ health protection from RCS. See <https://www.nepsi.eu/> available in all EU languages.

WHER ARE WE WITH COMMUNICATION?



DOCUMENTED INFORMATION

The organisation’s Health and Safety management system shall include:

- 1. Documented information as proposed in this document;
- 2. Additional documentation as determined by each organisation.

Documented information can include reporting of health and safety aspects in the workplace such as requirements of the Carcinogen and Mutagen Directive, as shown in Chapter 3 under the section “Determination of applicable legal requirements and other requirements”.

This documented information and reporting shall be kept within the organisation according to national regulation.



# 05

## OPERATION



# 05

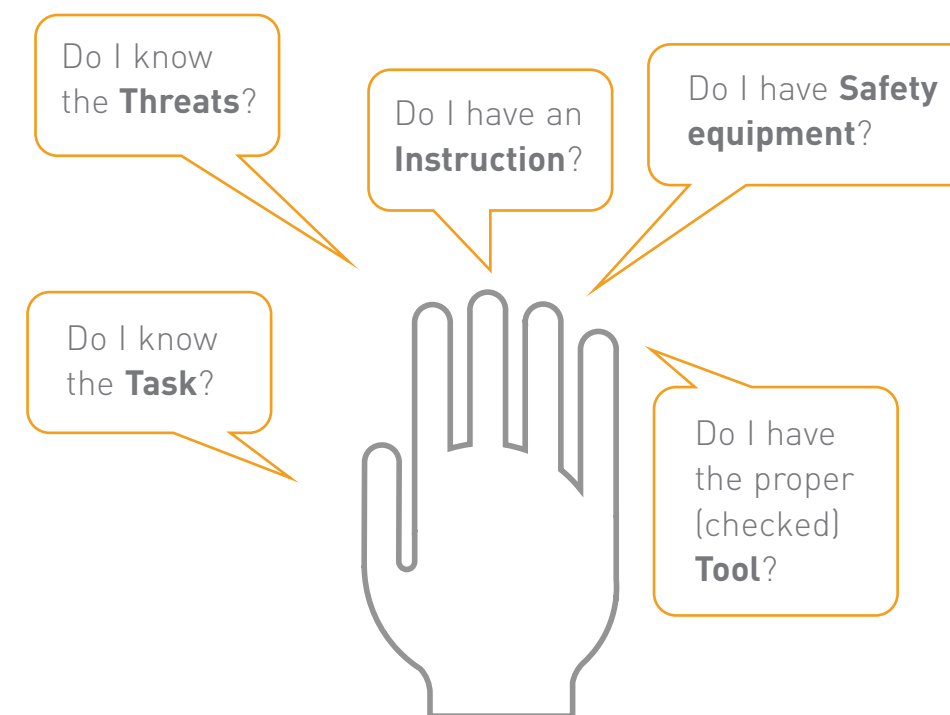
## OPERATION

References: ISO 45001 – Chapter 8



Dust generating work processes involving crystalline silica and products containing it may, unless properly controlled, create risks to workers' health.

**ALL AREAS AND ACTIVITIES, EMPLOYEES AND CONTRACTORS, NEED TO BE MANAGED CORRECTLY.**



**P**rocedures and instructions should be developed covering foreseeable aspects of plant and process operation, including routine operations, installation, maintenance, housekeeping, inspections and abnormal operating parameters.

These procedures and instructions should include elements related specifically to the significant health risks associated with workers' exposure to RCS identified locally and take on board any relevant legal and/or other requirements.

All procedures and instructions should be reviewed on a regular basis in consultation with the workforce. Systems should also be put

in place to ensure that procedures are reviewed as necessary to implement the recommendations from incident investigations.

Safety and health should be core to our operating principles:

1. **Modesty**  
Never underestimate the risks of any situations
2. **Courtesy**  
Always take care for the safety and health of the people around us
3. **Integrity**  
All unsafe situations must be reported
4. **Perseverance**  
Our target should be zero harm



# 06

## PERFORMANCE EVALUATION

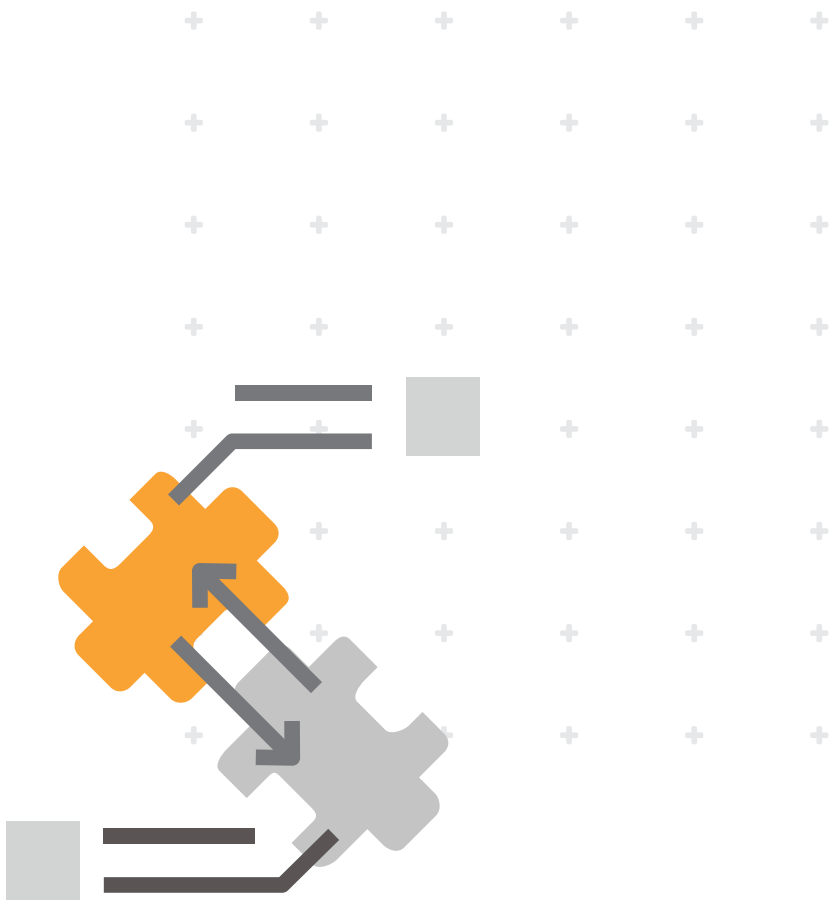




# 06

## PERFORMANCE EVALUATION

References: ISO 45001 – Chapter 9



**PERFORMANCE EVALUATION PROVIDES A MEASURE OF PROGRESS,** a mechanism for validating company objectives and an opportunity for policy review in the light of experience.



### Monitoring and measurement

Monitoring and measurement should be conducted in order to determine the extent to which applicable requirements (including NEPSI obligations, occupational exposure limits etc.) are being met. This helps to ensure that high standards are maintained.

Documented and formalised monitoring and measurement plans should be developed which are relevant to the legal (and other) requirements in force and proportionate to the risks encountered.

Examples of monitoring and measurement in the context of NEPSI may include:

- a) At site level, creation of a schedule of inspections on a timely basis, using manufacturer’s guidance, legal requirements and a risk assessment basis. This should detail how often plant and equipment is subjected to test and inspection, by whom, and the type of records to be maintained.
- b) Regular, documented inspections conducted by site management and/or local Health and Safety personnel and operatives.
- c) Hazard, near miss and fault reporting by employees and contractors

- d) Documented audits at each site.
  - e) Collection and analysis of health statistics (including health surveillance outputs) and benchmarking against other parts of the Company and similar organisations.
  - f) Regular monitoring of RCS ambient dust levels at the workplace and personal exposures and/or comparison with good practices in similar workplaces.
  - g) Regular review of risk assessments and procedures.
  - h) Regular review of progress against improvement action plans.
  - i) Regular review of progress with actions (action plans) contributing to the achievement of high level Company objectives relating to workers’ health protection from RCS.
- % of employees potentially exposed to RCS
  - % of employees covered by risk assessment
  - % of employees covered by exposure monitoring
  - % of employees with risk assessment requiring Health Surveillance Protocol for Silicosis
  - % of employees covered by generic health surveillance
  - % of employees covered by Health Surveillance for Silicosis
  - % of employees covered by information, instruction and training on General Principles
  - % of employees covered by information, instruction and training on Task Sheets
  - % of technical measures to reduce generation/dispersion of RCVS
  - % of organisational measures
  - % of distribution and use of Personal Protective Equipment, where necessary

In addition, the NEPSI Key Performance Indicators help to collect qualitative data at site level for better monitoring of RCS. These key performance indicators address the following:

Reference should be made to the NEPSI Agreement for guidelines on appropriate protocols for personal exposure monitoring and health surveillance.

The NEPSI KPIs reporting enables to see and show the progress in implementation

It is good practice to define internal auditing programmes on a risk assessment basis

Internal Audits

Internal HS audits are seen as a means of demonstrating the Company’s compliance with its declared objectives and the law, as well as route marks along a journey towards excellence.

Programmes for periodic internal management system audits should be established. These audits help to ensure that the systems in place conform to the requirements of the overall management system and that they are being implemented and maintained effectively.

Fundamentally, operations which result in higher risks to workers’ health should be audited more frequently. This enables the internal auditing resource to be targeted in the most effective manner.

Following recognised good practice, Health and Safety HS audits should:

- a) have defined scope and objectives and result in a written report which gives a balanced representation of the real situation
- b) be carried out by people with knowledge, training and experience in HSE issues and auditing techniques

- c) be independent (i.e. led by a person independent of the area or activity being audited and with no vested interest in the outcome), using cross-checking between sites to ensure consistency of approach
- d) be completed within a pre-set period
- e) generate a plan of agreed improvement actions
- f) contribute to the HSE Management Review process

In all cases audits should include a combination of a site tour, reviews of documentation and interviews with employees and other personnel on whom the success of the management system relies.

Following each internal audit an improvement action plan should be agreed, based on an assessment of each identified non-conformity, in order to ensure that action is taken to mitigate their impact. This plan should ensure delegation of appropriate remedial actions to named individuals and specify timescales for completion.



An example of an audit questionnaire or self-assessment checklist relevant to NEPSI requirements is shown below:

AUDIT COMPONENT	QUESTION
HS Commitment	Is there a current HS Policy commitment? Is the HS commitment signed by the Business Unit or Organisation Manager Is the HS Policy commitment communicated to all sites? Are the employees aware of the HS Policy commitment?
Management system	Does the company have a management system for workers’ health protection from RCS? Does the company apply PDCA cycle (Plan-Do-Check-Act) with respect to its HSE management? Does the company have specific annual health objectives based on the organisation’s objectives? Is performance against the objectives monitored? Is there action plan/program for improvement actions? Are adequate improvement actions introduced & checked?
Safety culture	Is there a program to promote safe behaviour? Is there a system to identify & report unsafe behaviour? Is there a system to correct unsafe behaviour?
SDA & IMA DM	Is Social Dialogue Agreement (SDA) applied in the BU? Is Social Dialogue Agreement (SDA) applied at all sites? Is there at least one Task sheet applied at every site? Is there training on the general principles for all employees? Is there training on the Task Sheets for concerned employees? Do new projects take into account the Task sheets in the design phase? Do modifications take into account the Task sheets in the design phase? Is dust monitoring implemented in the BU? Is dust monitoring implemented at the sites audited? Are NEPSI KPIs measured and submitted bi-annually?
Recognition	Are achievements recognised? Is HSE progress & performance part of the annual performance assessment for managers & supervisors? Is employee safe behaviour or contribution to safe conditions used as the basis for employee recognition?
Responsibilities	Is there a person appointed with responsibility for HS at each site? Are the responsibilities clearly written? Are the responsibilities communicated to the person and the employees? Does the person have sufficient mandate to perform the duties? Is there a Safety Coordinator/Safety Committee at each site? Is there a person assigned to monitor contractors’ work with respect to health & safety? Are Health and Safety included in project management?
Legal Compliance	Are the sites aware of relevant EU, national, regional and/or local regulations? Is there a system to demonstrate compliance with legal safety requirements? Is the site in compliance with OELs for the health hazards existing at the workplace? Does all equipment (incl. Personal Protective Equipment) on site meet the criteria for CE marking? Are Health and Safety part of purchase policies for new equipment?

# MANAGEMENT REVIEW

Management Reviews are a strategic and critical evaluation of the performance of the management system. The purpose is to ensure the continuing suitability, adequacy and effectiveness of the implemented systems, to assess opportunities for improvement and to identify any need for changes to policy and objectives. To facilitate collation of information for upward cascade through the Company, the review process should follow a standardised agenda.

- Suitability
- Adequacy
- Effectiveness

A review covering the performance of the organisation, as regards workers’ health protection from RCS exposure, should be conducted at planned intervals, including the production of a written report. It is good practice to conduct these reviews annually so that they can take on board the Objectives set by the top management.

The review should cover recent performance, identification of areas where capital investment or specific resource may be required, policy, objectives, future projects and initiatives and

forthcoming legislation. Periodic reviews should also be held at each site.

An annual management review agenda relevant to RCS should consist of the following topics:

1. Performance of Health and Safety HS on:
  - a. HS visits /investigations
  - b. Accidental overexposure situations
  - c. Personal monitoring results
  - d. NEPSI KPI reporting
2. Hazard identification and risk register
3. Evaluation of compliance with the Carcinogens and Mutagens Directive
4. Requirements for resources and training
5. Internal concerns analysis
6. Objectives set for the year
7. Communication to/from external parties

Inputs into the review process may include:

- a) a summary of internal and external audit findings
- b) interested party

feedback (including complaints)

- c) status of corrective, preventive and improvement actions
- d) follow-up on actions from previous management reviews
- e) changing circumstances, including developments in legal and other requirements
- f) recommendations for improvement
- g) data and information on the Business Unit’s or Organisation’s performance
- h) results of the evaluation of compliance with legal and other requirements

Outputs should include a management action plan documenting any decisions and actions relating to:

- a) improvements in the effectiveness of the management system
- b) improvements related to interested party requirements
- c) resource needs to enable improvement to the management system and its processes



# 07

## IMPROVEMENT



# 07

## IMPROVEMENT

References: ISO 45001 – Chapter 10



**CONTINUAL IMPROVEMENT IS AN IMPORTANT PRINCIPLE FOR A MANAGEMENT SYSTEM IN ORDER TO ENSURE AN ONGOING SYSTEMATIC EFFORT TO IMPROVE THE HEALTH AND SAFETY MANAGEMENT SYSTEM OVER TIME.**

The objectives as identified in chapter 3 shall be considered as the minimum an organisation shall set.

### Incident, non-conformity and corrective action

Following the identification of any high exposure situation (exceedance of OEL), non-conformity (from internal or external audits), internal concern (near miss) or complaint an investigation should be conducted to determine its validity and root causes.

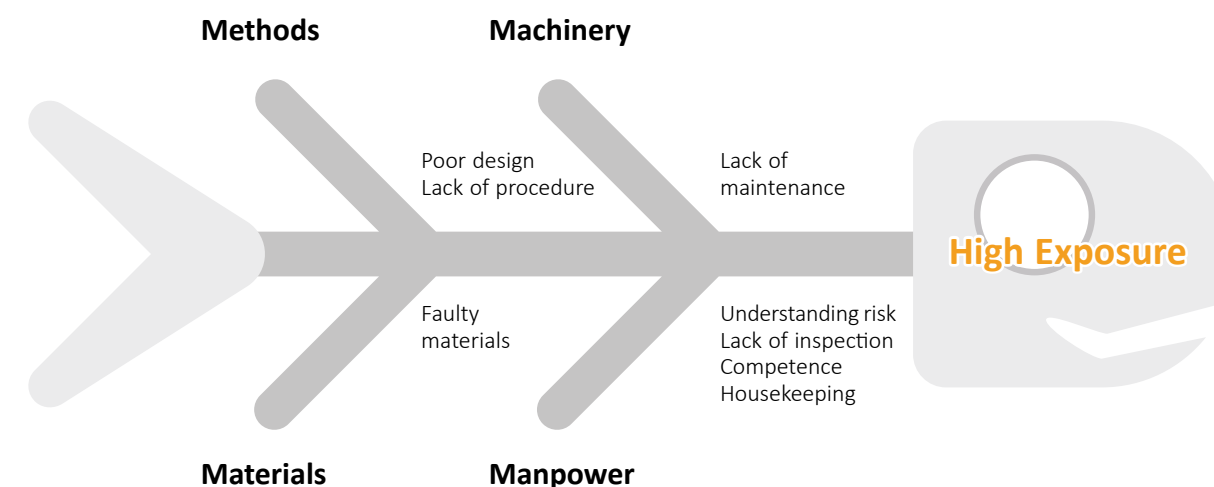
A management action plan should be agreed to ensure that appropriate action is taken as necessary to mitigate its impact. This plan should ensure delegation of appropriate corrective, preventive and improvement actions to named individuals and specify timescales for completion. Actions and timescales for completion should be appropriate to

the level of risk encountered.


Systems should be established to ensure regular review of progress with actions, to ensure that they are not forgotten. Increasingly these systems will be IT based. Records should be maintained to demonstrate progress, to log what actions have actually been taken and to give the reason for any decision to change or dismiss an outstanding action. The status and effectiveness of actions should be reviewed during subsequent internal audits.

Some models of incident investigation are given below to enable continuous improvement of the HS management system. These models, actually, demonstrate a root cause analysis.

#### 1. The Fishbone Analysis



2. The 5 Whys

INCIDENT CAUSES – 5 WHYS		
	What happened?	High exposure of bagging operative
	Why?	Burst bag
	Why?	Defective material, poor quality
	Why?	New supplier (to save money)
	Why?	Incorrect business focus (HS not priority)
	Why? Root cause	



# ANNEX



# ANNEX I: LEADERSHIP AND WORKER PARTICIPATION TOOLBOX

Leaders taking the role of a coach help people to think differently, so they will act in a different better way. Active interaction builds good employee engagement and a pleasant working environment.

Elements and practices of good engagement of a leader are listed below:

- **Active listening.**



- o How good a listener are you?
- o Can you become a better listener?
- o Concentrate on receiving information without interrupting
- o Ask questions to gain understanding
- o Give feedback
- o Develop empathy via eye contact, body language
- o Avoid looking at your phone whilst someone is speaking
- o Avoid speaking to someone from behind your computer screen (whilst glancing at e-mails)

- **Observing.**

- o What are good practices and conditions you see?
- o Is the worker using appropriate equipment and tools?
- o Is the work area clean and well organised?
- o Are there any practices or conditions that appear hazardous to you?

Further good engagement of a leader can be achieved through actions before, during and after the visit of a site.

## Engaging workers before the visit

- o Ask the Site Manager for their highest priority on safety and how, together you can engage the workforce
- o Reduce the size of the visit group to a number that is not intimidating
- o Ask the Site Manager to take you to the location of any recent incidents
- o Decide whether you want to have a general visit or focus on one specific subject. Explain your approach to the Site Manager
- o Always think about your own safety and the safety of the visit group

## Engaging workers during the visit

### 1. Observe

- o What are the good practices and conditions you see?
- o Are workers using appropriate equipment and tools?
- o Is the work area clean and well organized?
- o Are there any practices or conditions that appear hazardous to you?

### 2. Build rapport and learn

- o Greet the worker on site
- o Ask questions about their job activities to learn what is going on and how things work
- o State the positive things you observe
- o State any concerns you have for the worker's safety.
- o Focus on consequences and not on the unsafe act

### 3. Coach

- o Ask additional questions to learn what is going on and how things work focusing on the consequences if something goes wrong
- o Try to get the person to identify hazards for himself

- o Get them to think through how they can reduce the risk
- o Keep the mindset of a concerned team member

4. Reach agreement for the future

- o If together, you conclude that there are hazardous acts, reach agreement that will change behaviour
- o If together you conclude that there are hazardous conditions, reach agreement that:
  - o easy corrective actions will be taken immediately,
  - o difficult corrective actions will be taken promptly while administrative controls are put in place to control the risk
- o Keep the mindset of a concerned team member

5. Thank the person

Engaging workers after the visit

- o Debrief with the Site Manager on positive and negative observations
- o Agree on a simple action plan going forward
- o Follow up meaningfully on the action plan. Agree a timescale to do this

# ANNEX II: OCCUPATIONAL HEALTH AND SAFETY POLICY EXAMPLE

[Name of the organization] recognizes and accepts its responsibility to provide a safe and healthy working environment for all its employees, contractors and visitors who use its premises in order to prevent injury and ill health, in accordance with the Health and Safety at Work regulations in force and according to The Agreement on Workers Health Protection Through the Good Handling and Use of Crystalline Silica and Products Containing it.

[Name of the organization] approach to Health and Safety is based on the key clauses of BS OHSAS18001:2007 whereby emphasis is placed on:

- 4.2 OH&S Policy
- 4.3 Planning
- 4.4 Implementation and Operation
- 4.5 Checking
- 4.6 Management Review

[Name of the organization] recognizes the need to focus on continual improvement of its OH&S management and performance with a focus on workers’ health protection from RCS. Our aim is to encourage a positive health and safety culture.

To ensure this is achieved occupational health and safety is actively promoted throughout the organization through the provision of information, training, instruction among which the NEPSI Good Practices are covered.

[Name of the organization] operates a fair culture whereby employees are openly encouraged to report hazards, including near misses and dangerous situation, without fear of reprisal to ensure the root causes of incidents are identified thus enabling measures to be put in place to eliminate recurrence.

Emphasis is placed on effective management ensuring a systematic approach to the identification of risks and the allocation of financial and physical resources to control them.

In order to deliver these responsibilities [Name of the organization] undertakes to:

- Maintain a safe and healthy place of work with safe access and egress;
- Ensure that risk assessments are being carried out on an on-going basis with employees participating in the risk assessment process;



- Provide sufficient information, instruction, training and supervision to enable employees to avoid hazards and to contribute positively to the health and safety of themselves and others whilst at work;
- Consult with employees on issues relating to OH&S;
- Ensure access to competent health and safety advice;
- Provide plant, equipment and systems of work which are safe and without risks to health;
- Ensure safe arrangements for the use, handling, storage and transport of articles and substances;
- Arrange for the effective planning, organization, control, monitoring and review of preventative and protective measures; and
- Commit to reporting OH&S performance within its annual report, integrating RCS issues and assessment.

The Chief Executive Officer (CEO) takes overall responsibility for Health and Safety including the formulation, development and implementation of the Health and Safety policy within [Name of the organization] and requires the co-operation and support of all managers, employees, contractors and visitors in its implementation.

The CEO will ensure that the Policy is reviewed periodically to ensure that it remains relevant and appropriate to the organization.

This Policy will be communicated to all persons working under the control of the organization and will be made available to interested parties on request.

Chief Executive Officer

[Signature]

[Date]

# ANNEX III: REAL TIME DUST MONITORING

This sheet provides advice/info on how to implement real time dust monitoring and Helmet-CAM in order to assess sources of (respirable) dust from installations and/or to the employees.

## Access

Restrict access to the work area to authorised personnel only.

## Design and equipment

A data logging Aerosol Monitor is used to provide real-time results and gravimetric validation of the aerosol in the air of the workplace and around the installations. It can be run in a fixed location, tripod mounted or hand-held, or on the belt of the employee. Fig 1.

An action CAM is used to make videos during the assessments of workplace. The camera is typically mounted on a hard hat. When making assessment of the exposure to the employee, the video gives also information on the worker’s practices when executing a task. Fig 2.

Software is used to compile/merge the real time measurement dust concentrations from the aerosol monitor with the video. Free software that can be used is EVADE, which is recognised/certified by OSHA. Fig 3.

Both static real time measurement dust concentrations (fixed location around dust source at installation) and real time measurements representative of exposure to the employee, can be used to assess the sources of dust.



Figure 1



Figure 2



Figure 3

The following are some helpful suggestions for implementing the real-time data logging aerosol monitor for (respirable) dust sampling:

- Inform the workers that real time dust concentration measurements will be undertaken and the reasons for it. This will help to ensure full co-operation. Inform them on the results of the real time dust concentration measurements.
- Record information during measurement, including: date, job function, worker's name, work activities/ task and working practices, protective equipment worn, comments on dust control measures that were in place, production process, (mineral) product produced, tonnage rate, dust extraction type, ventilation, etc.
- Important to be aware of the weather conditions. Outdoor measurements can be influenced by fog/ mist/fine dust pollution, while dust suppression mist/ fogging nebulisation systems can also influence real time dust concentration measurements.
- It may be helpful to make comparison of the measured airborne concentrations against occupational exposure limits. Remember that while the equipment is capable of measuring different dust fractions (including the respirable fraction) it does not analyse for the type of dust (e.g. crystalline silica).

## Maintenance

- Ensure dust measuring equipment is maintained as advised by the supplier/installer in efficient working order and in good repair.
- Keep the measuring equipment clean to prevent contamination.
- It may be necessary to replace the filter in the aerosol monitor to ensure a correct flow.
- Replace consumables (batteries etc.) in accordance with the manufacturer's recommendations

## Examination and testing

- Visually check the measuring equipment before and after each use for signs of damage.

- Zero the real-time data logging aerosol monitor prior to each use.
- Have measuring equipment serviced regularly, in accordance with manufacturers' recommendations.

## Personal Protective Equipment

- Refer to task sheet 2.1.15., of NEPSI Good Practice Guide, dedicated to Personal Protective Equipment.
- Risk assessment must be carried out to determine whether existing controls are adequate. If necessary, respiratory protective equipment (with the appropriate protection factor) should be provided and worn.
- Personnel taking measurements in the workplace should set a good example by wearing respiratory protective equipment in the required areas.
- Provide storage facilities to keep personal protective equipment clean when not in use.
- Replace respiratory protective equipment at intervals recommended by its suppliers.

## Training

- Provide employees with training on:
  1. using real time dust concentration measurements to investigate in detail personal dust monitoring results;
  2. dust exposure prevention;
  3. checking if control measures are working and how to use them;
  4. when and how to use any respiratory protective equipment provided
  5. what to do if something goes wrong.

Refer to task sheet 2.1.19 and part 1 of the Good Practice Guide.

## Supervision

- Archive the data in a dedicated database.
- Share and comment on the results of the real time dust concentration measurements with the workforce.

- Form teams including workers from production, maintenance, engineering and HS for follow up and support of the program
- Decisions should be taken on actions to improve the identified dust hot spots
- Repeat measurements after improvements are implemented in order to check their effectiveness

**Employee checklist for making the best use of the controls**

- Look for signs of damage, wear or poor operation of any equipment (aerosol monitor, camera) used. If you find any problems, identify this
- Ensure that devices are fully re-charged prior to commencing each assessment.
- Regularly check the correct operation of the equipment during the measurement.
- Keep detailed records of (operator) work activities, references to installations etc. observed during the measurement assessment.
- Use, maintain and store measuring equipment in accordance with instructions.



Assessment exposure to employees

**ANNEX IV:  
LIST OF (ISO/EN)  
REQUIREMENTS  
FOR EXECUTING  
PERSONAL DUST  
MONITORING**

1. **Resources:**
  - a. People executing the measurements should be well trained to execute the personal dust measurement, the certificates of competence should be available
  - b. People from the laboratory analysing the RCS content in the collected dust should be trained and the laboratory should be recognized as a qualified lab via round robin and other testing schemes.
  - c. Equipment should be in good condition and calibrated before use
2. **Local legal requirements have to be checked in the local legalization of Occupational Hygiene and the requirements should be documented with references to the legislations.**
3. **Standards to be known to perform the measurement within the standard requirements should be available to all personnel executing the measurements**
  - *PD CEN/TR 15230:2005 Workplace atmospheres. Guidance for sampling of inhalable, thoracic and respirable aerosol fractions*
  - *EN ISO 10882-1:2011 Health and safety in welding and allied processes - Sampling of airborne particles and gases in the operators breathing zone*
  - *EN ISO 7708:1995 Air quality: Particle size fraction definitions for health-related sampling*
  - *EN 481:1993 Workplace atmospheres: Size fraction definitions for measurement of airborne particles*
  - *EN 482:2012 Workplace exposure: General requirements for the performance of procedures for the measurement of chemical agents*
  - *prEN 13205:2012 Workplace exposure: Assessment of sampler performance for measurement of airborne particle concentrations – Part 6: Transport and handling tests*
  - *EH40/2005 Workplace exposure limits: Containing the list of workplace exposure limits for use with the Control of Substances Hazardous to Health Regulations 2002 (as amended) Environmental Hygiene Guidance Note EH40 (Second edition)*



*HSE Books 2011 ISBN 978 0 7176 6446 7  
[www.hse.gov.uk/pubns/books/eh40.htm](http://www.hse.gov.uk/pubns/books/eh40.htm)*

4. Report of the details of the measurement like duration time, weather conditions, flow rate, etc. These should be documented and stored
5. Report of the details on executed job function like task, smoking, welding. These should be documented and stored
6. Report of the measurement equipment used e.g. sampler head, flow instrument, calibration instrument etc. These should be documented and stored
7. Report summarizing the data after thorough evaluation of the personal dust measurements should be available.
8. Presentation to the employee of the data should be done in a personal and confidential way certainly when presentations are held in public.
9. Data confidentiality: all data stored in a database with reference to persons should only be available for the department HR and HS and all measures should be taken to keep the personal data confidential. All information shared with external parties will be encoded to make sure the data cannot be linked to a specific person.

## ANNEX V: OBLIGATIONS OF THE CARCINOGENS AND MUTAGENS DIRECTIVE

This Directive sets the rules for protecting workers against the risks related to exposure to category 1A or 1B carcinogens or mutagens in the workplace.

Those obligations include:

- Substitution (of processes) where possible.
- Use enclosed work processes
- Reduction of workers' exposure as low as technically possible, below the BOEL
- The employer shall apply measures such as:
  - o Limitation of the RCS quantities
  - o Reducing the number of workers exposed or to be exposed to RCS
  - o Design of work processes and engineering control measures in order to avoid or minimise the release of RCS
  - o Evacuation of RCS at source, local extraction system or general ventilation
  - o Use of existing appropriate procedures for the measurement of RCS
  - o Application of suitable working procedures and methods
  - o Collective protection measures and/or individual protection measures
  - o Hygiene measures
  - o Plans to deal with emergencies in case of high exposure
- In case of unforeseen exposure, the employer shall inform the workers. The workers concerned shall be provided with protective clothing and individual respiratory protection equipment which they need to wear. Exposure shall be kept to a minimum time.
- Under certain activities such as maintenance, the employer shall set measures to reduce the duration of workers' exposure to the minimum possible. In addition, the workers shall wear protective clothing and respiratory protection equipment

- In case of a risk of contamination, the employers need to take measures to ensure that:
  - o Workers do not eat, drink or smoke in working areas where there is a risk of contamination by RCS
  - o Workers are provided with appropriate protective clothing
  - o Separate storage places are provided for working or protective clothing and for street clothes
  - o Workers are provided with appropriate and adequate washing and toilet facilities
  - o Protective equipment is properly stored in a well-defined place, and is checked and cleaned before and after each use
  - o Defective equipment is repaired or replaced before further use
- The employer must ensure that workers and/or worker's representatives in the undertaking or establishment receive sufficient and appropriate training in the basis of all information concerning potential risks to health, precautions to be taken to prevent exposure, hygiene requirements, wearing and use of protective equipment and clothing, actions to be taken by workers in case of incidents
- The employer shall inform workers of installations and related containers containing RCS, ensure that all containers packages or installations are labelled clearly and legibly

The employer must take appropriate measures to ensure that the workers have sufficient information.

## ANNEX VI: REFERENCES AND HELPFUL WEBSITE LINKS

### References

1. ISO/DIS 45001 "Occupational health and safety management systems – Requirements", 2015
2. "Good practice guide on works health protection through the good handling and use of crystalline silica and products containing it", 2006
3. "IMA-Europe Standardised Dust Monitoring Protocol", 2006

### Website links

1. <https://www.nepsi.eu/>
2. <https://osha.europa.eu/en>
3. <https://www.crystallinesilica.eu/>
4. <https://www.iso.org/standards.html>



**IMA-Europe AISBL**  
**rue des Deux Eglises 26 box 2 (6° floor)**  
**B-1000 Brussels, Belgium**  
**Phone : 32 (0)2 210 44 10**  
**Fax : 32 (0)2 210 44 29**  
**[www.ima-europe.eu](http://www.ima-europe.eu)**