NOTE:
These Tools will be amended as the UNEP Basel Convention sets Occupational Safety & Health criteria for companies in its 'Framework for the Environmentally Sound Management of hazardous wastes and other wastes'.

January 2013
Preface

We are pleased to provide you with this 2013 BIR publication "Tools for Occupational Health and Safety Management". It provides the necessary information for companies in the waste management sector, the recovery and recycling sector of scrap collectors, sorters, processors and metal-works and foundries to implement an OHSAS-compliant Occupational Health and Safety Management System. These tools are freely available to everyone via the BIR website (www.bir.org), and are provided in hard copy to BIR members, certain secretariats and associations.

These "Tools for Occupational Health and Safety Management" are particularly intended to assist both Small and Medium Sized Enterprises as well as large companies to comply with the criteria as set out in the “Framework on Environmentally Sound Management of hazardous wastes and other wastes” by the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal within the United National Environmental Programme (UNEP). Besides the many benefits Occupational Health and Safety Management Systems may bring to companies, this initiative is intended to enable trade in recyclables or secondary materials by providing companies whose activities are covered by the ‘Framework’ or who are otherwise obliged by law to show, after implementation, and if necessary verification and certification that they have an applicable Occupational Health and Safety Management System.


Currently these "Tools for Occupational Health and Safety Management" are published in English, in the future translation into certain other languages will be decided upon, and meanwhile national associations are encouraged to translate these tools for their own members.

The "Tools for Occupational Health and Safety Management" are intended to be user-friendly with the basic elements of OHSAS 18001 complementing any tailored sectoral Occupational Health and Safety Management System, and to any already developed national OHSAS based system, taking into account the size of the enterprise, especially the situation of Small and Medium sized Enterprises (SMEs), the type and amount of wastes, the nature of the operation and their domestic legislation.

BIR thanks Mr. Frans Bijlhouwer MBA BSc, for compiling these "Tools for Occupational Health and Safety Management".

Ross Bartley
Environmental & Technical Director
Bureau of International Recycling
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Disclaimer

With this guide the Bureau of International Recycling aims to assist recyclers, whether members of BIR or customers of BIR members, to demonstrate their Occupational Health & Safety Management. The BIR stands for free and fair trade in recyclables and recycled materials and maintains that any company that is properly licensed, permitted or otherwise authorised by its local, state or national authority to carry out its business should not be hindered in accessing its required material infeud whether from national or foreign suppliers. However, regarding international trade in materials classified as wastes, the Competent Authorities of certain exporting countries require proof that the importing company maintains a certified Occupational Health & Safety Management System. Therefore this guide may be particularly useful to companies that import materials classified as wastes from countries or regions with strong protection laws for human health, quality and the environment. This initiative is intended to enable trade in recyclables or secondary materials.

This implementation guide with the basic elements of OHSAS 18001 is meant to be complementary to any tailored sectoral Occupational Health & Safety Management System, and to any already developed national based system, especially for the Small and Medium sized Enterprises (SMEs) in the recycling industry.

The intention of the BIR is to follow up this initiative with further workshops at its biannual Conventions and to gather experience from companies and national associations.
The Easy Implementation of a Dedicated Occupational Health & Safety Management System for The Recycling Industry

In the history of Occupational Health & Safety (OH&S) Management Systems, the development of OHSAS 18001: 1999 was certainly a milestone. OHSAS 18001: 2007, the latest version, which was released in July 2007, takes this development process further by making it more robust, introducing skill requirements and improving compatibility with other management system standards.

Those familiar with OHSAS 18001: 1999 know that it went a long way in putting together requirements from various sources into a specification and bringing about clarity towards OH&S requirements. That led to its adoption by several organisations and countries. However, on the other side, the generic nature of the standard did not perhaps sufficiently set it apart as an OH&S sector specific requirement.

Given the sensitivity associated with OH&S, this typically is a regulatory requirement in most countries. Also, governments typically have their own requirements and there is little consistency among various countries. Recognising this diversity, when OHSAS 18001 was first introduced in 1999, it was released only as a specification and not as a standard. Expectedly, there were barriers to implementation. To drive more consistency in interpretation and adoption, the International Labour Organisation (ILO) published guidelines for the OH&S in 2001. This led to over 80 countries trying to adopt the specification consistently.

The collective experience has resulted in a situation where the OHSAS has moved from being a specification in 1999 to a standard in 2007.

Over the last few years there has been activity at ISO, the International Labour Organisation (ILO) and the European Committee for Standardization (CEN) with respect to OH&S management systems. These discussions are ongoing.

One of the important changes in new version relates to clause 4.3.1 Hazard Identification, Risk Assessment, and Determining the Controls. This clause requires the organisations to take into account human behaviours, the changes of organisation activities and system, the changes of legal requirements, and processes such as design process when implementing hazard identification and risk assessment. Hierarchy is required to be considered during determination of controls. The controls range from elimination, substitution, engineering controls, signage/warning/administrative controls to the last option being the use of personal protective equipments.

The current version of the standard is OHSAS 18001:2007. This supersedes OHSAS 18001:1999, which was to be phased out by July 2009. Thereafter it will no longer be recognised.

OHSAS 18001 is an Occupational Health & Safety Assessment Series (OHSAS) for occupational Health & Safety (OH&S) management systems created to enable organisations to control occupational Health & Safety risks and to improve continually the performance in that area.

OHSAS 18001 is designed to place a proactive and preventative emphasis on risk control factors by identifying and assessing the likelihood of hazards in the workplace.

OHSAS 18001 can be implemented by organisations of all sizes and in any industry. This implementation guide is dedicated for implementation in a recycling company. An organisation’s conformance to OHSAS 18001 safeguards that employees, clients and all parties in question are exposed to as few risks as possible, while third-party certification authenticates that an organisation has taken steps to avoid accidents and hazardous situations using a comprehensive and effectively implemented system.

Even though OHSAS 18001 is not recognised as a standard by ISO, it is internationally recognized by more and more international organisations, encompassing a variety of industries requiring their suppliers to be OHSAS certified.
Additionally, since OHSAS is similar in structure to ISO 9001 and 14001, it is possible for an organisation to integrate OHSAS 18001 with ISO 9001 and/or ISO 14001 allowing a single audit for any combination through an auditing organisation and thus helping organisations to achieve an integrated management strategy.

It is important to note that conformance / accredited certification will not eliminate all risks and does not release an organisation from its obligation to fulfill any additional legal requirements. OHSAS 18001 certificates are valid for three years, with surveillance audits held annually.

The OHSAS 18001 standard specifies a number of key criteria for an organisation to demonstrate and includes:

- Occupational Health & Safety Policy
- Structure and responsibility
- Planning for hazard identification, risk assessment and risk control
- Implementation and Operational control
- Checking and Corrective Actions
- Management Review
- Training, awareness and competence
- Consultation and communication
- Emergency preparedness and response
- Performance measuring, monitoring and continual improvement
Benefits of OHSAS 18001

Most organisations pursue OHSAS 18001 certification to qualify for a tender or to achieve preferred supplier status: e.g. for a Local Authority. However, there are many other benefits that can be gained, including:

- Reduced risk of major accidents occurring to employees, customers and suppliers
- Reduction in the costs and lost revenue associated with accidents at work such as down time, disabilities or death
- Enhanced staff morale and motivation
- Demonstrate legal compliance
- Reduced insurance premiums
- Competitive advantage
- Enhance status
- Result in the identification of hazards and assessment of risks in the work environment.
- Provide for the development of methods to eliminate hazards and risks.
- Result in the implementations of measures to evaluate improvement.
- Benefits of an effective occupational Health & Safety management system

In a competitive market, your customers are looking for more than just keen pricing. Organisations need to demonstrate that their delivery is managed efficiently and responsibly, and that they can provide a reliable service free of the downtime associated with work-related accidents and incidents.

An effective occupational Health & Safety management system promotes a safe and healthy working environment by providing a framework that allows your organisation to identify and control its Health & Safety risks, reduce the potential for accidents, aid legislative compliance and improve overall performance.
What is needed and what is already available?

A OH&S Management System has a fundament of Policies, Procedures, Job instructions and registrations or records.

Most recycling companies already have some procedures and job instructions that are usually easily made to fit the OH&S Management System.

The pyramid below shows basically what is need.

The Occupational Health & Safety Manual is the core of the OH&SMS. It should address each area of the OHSAS 18001:2007 standard with a basic statement claiming compliance and how the company maintains compliance.

It often also contains the Recycling company’s OH&S Policy.

The OH&S Policy is a statement from Management and describes the overall intentions and direction of a company related to quality as formally expressed by top management. The quality Policy must also address the quality objectives of the company.

Usually this policy is part of the Quality Manual. See for details on the policy chapter 4, To determine the Health & Safety Policy and responsibilities.

A Procedure is a documented practice, defining the who, what and when of activities. Procedures are typically used at department levels and may involve more than one department.

See what is available in your company on procedures. Usually you find already procedures with regards to Document Control or other Quality Assurance activities.

A Job Instruction is a document that describes how to deal with health and safety situations and eliminating or reducing hazards.

These instructions can be for example about how to handle in case of spilling hazardous liquids or who to contact in case of an emergency. But also how to assure that purchased scrap is not radioactive or safety precautions to be taken bij transferring molten metal. In some cases these job instruction are overlapping with job instructions written for the QMS or EMS.
You will probably find that you already have job instructions covering many of your key operations. Maybe these instructions are not yet written down. In that case the best way to get a job instruction is to interview the operator and write down exactly how he or she will handle potential risks of hazardous situations. Keep such a description simple, use a standardised format and avoid any jargon.

Such a written down reflection of the reality is the start point for collecting of up-to-date work instructions for the OH&S management system.

Over time these documents can develop into a system of job instructions that cover all activities in a recycling operation that carry risks for health and safety.

**Records** must be maintained to show compliance of the OH&SMS, for feedback into the OH&SMS and for historical reasons. These records must be determined by the organisation to be necessary to ensure the operation and control of risks.

Each recycling company that is established for a while makes use of documents or systems on computers to register all kinds of processes and activities. This is what is meant by records.

OHSAS 18001:2007 requires and specifies 13 different procedures on certain subjects that should be part of the OH&S management system. The following procedures are at least required:

<table>
<thead>
<tr>
<th>OHSAS 18001 reference</th>
<th>Title of the procedure</th>
<th>Similar to:</th>
<th>See page</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.3.1</td>
<td>Procedure for hazard risk identification and risk assessment</td>
<td>ISO 14001:2004</td>
<td>29</td>
</tr>
<tr>
<td>4.3.2</td>
<td>Procedure identifying and assessing legal and other OH&amp;S requirements</td>
<td>Procedure to identify applicable legal and other requirements</td>
<td>30</td>
</tr>
<tr>
<td>4.4.2</td>
<td>Procedure competence, training and awareness</td>
<td>ISO 14001:2004</td>
<td>31</td>
</tr>
<tr>
<td>4.4.3.2</td>
<td>Procedure communication, participation and consultation</td>
<td>Procedure for internal and external communication</td>
<td></td>
</tr>
<tr>
<td>4.4.6</td>
<td>Procedure operational control</td>
<td>Procedure operational control</td>
<td></td>
</tr>
<tr>
<td>4.4.7</td>
<td>Procedure emergency preparedness and response</td>
<td>Procedure emergency preparedness and response</td>
<td></td>
</tr>
<tr>
<td>4.5.1</td>
<td>Procedure performance measurement and checking</td>
<td>Procedure monitoring and measurement</td>
<td></td>
</tr>
<tr>
<td>4.5.1</td>
<td>Procedure calibration</td>
<td>ISO 14001:2004</td>
<td></td>
</tr>
<tr>
<td>4.5.2.1</td>
<td>Procedure periodic evaluation compliance</td>
<td>Procedure evaluation of compliance</td>
<td></td>
</tr>
<tr>
<td>4.5.3</td>
<td>Procedure incident investigation, nonconformity, corrective action and preventive action</td>
<td>Procedure nonconformity, corrective action and preventive action</td>
<td></td>
</tr>
<tr>
<td>4.5.4</td>
<td>Procedure control of records</td>
<td>Procedure control of records</td>
<td></td>
</tr>
<tr>
<td>4.5.5</td>
<td>Procedure internal audit</td>
<td>ISO 14001:2004 and ISO 9001:2008</td>
<td></td>
</tr>
</tbody>
</table>
If the Recycling Company is large and has a number of divisions, you maybe need more procedures on certain processes.

What is mentioned here is the minimum that is needed for your OH&S management system. In the column “similar to” you find the procedures that are maybe used in the quality and environmental management systems in your company.

In that case these procedures can be modified to fit your OH&S management system.

In time you can integrate the quality, environmental and occupational health & safety management systems and reduce the number of procedures, combine audits and the management reviews.

Procedures are the documents defining who, what, when and where policies are carried out. Normally procedures are written by the process owners. They describe the activities that accomplish the output of the identified process and their relationship to the organizational operations as a whole. In your company, implementing the QMS, you will more than likely, participate in the preparation of the procedures and/or job instructions.

To obtain a suitable set of procedures, it makes sense to identify in the first place the current procedures that exist in your company. Be aware that many times documents are called procedures, but are just job instructions or other documents.

Form a team of people around each process that has to be documented in a procedure and discuss the applicable clauses from OHSAS 18001:2007.

The most logical step is to document the process under investigation in a flowchart. By doing this and having the experts around the table, critical questions may be asked in order to improve or simplify the process. If it can be improved, the responsible people should implement the changes and document it in the procedure and flowchart.

After agreeing on the time table for the implementation of the new or revised procedure, the procedure can be written in its final form. Nowadays the written procedures are often replaced by flowcharts, because they visualize far better the actions, decision moments and the responsibilities for a process.

In the example procedures in this implementation guide, we have provided the flowcharts.

The following information must be added to be complete:

<table>
<thead>
<tr>
<th>Name of the Procedure:</th>
<th>Description:</th>
<th>Number of the Procedure:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Revision number:</td>
<td>Date of first issue:</td>
<td>Issued by:</td>
</tr>
<tr>
<td>Prepared by:</td>
<td>Date of revision:</td>
<td>Approved by:</td>
</tr>
</tbody>
</table>

After the completion of the procedure there should be a phase to test the procedure against the process. If needed the procedure must be redrawn or rewritten. This should lead to the final procedure that reflects the process.
To determine the Health & Safety Policy and Responsibilities

The OHSAS standard requires a OH&S Policy explaining and making clear the overall intentions and direction of the recycling company related to its OH&S performance as formally expressed by top management.

Top management should demonstrate the leadership and commitment necessary for the OH&S management system to be successful and to achieve continually improved OH&S performance.

An OH&S policy establishes therefore an overall direction and is the driver for implementing and improving an organisation’s OH&S management system so that it can maintain and potentially improve over time its OH&S performance.

Therefore the contents of the policy must be chosen carefully and should be a task for the mutual management.

It should enable persons under the control of the organisation to understand the overall commitment of the organisation and how this can affect their own responsibilities.

The responsibility for defining and authorising an OH&S policy rests therefore with the organisation’s top management only.

In order to be appropriate, the OH&S policy should:

• be consistent with a vision of the organisation’s future
• be realistic, neither overstating the nature of the risks the organisation faces, nor trivialising them

In developing its OH&S policy, the organisation should consider:

• its mission, vision, core values and beliefs, in coordination with other policies (corporate, quality, environmental),
• the needs of persons working under the control of the organisation,
• the OH&S hazards of the organisation,
• legal and other requirements to which the organisation subscribes that relate to its OH&S hazards,
• historical and current OH&S performance by the organisation
• opportunities and needs for continual improvement and the prevention of injury and ill health
• the views of interested parties, what is needed to establish realistic and achievable objectives

The policy is, as a minimum, required to include statements about the commitment of an organisation to:

• the prevention of injury and ill health,
• continual improvement in OH&S management
• continual improvement in OH&S performance
• compliance with applicable legal requirements
• compliance with other requirements to which the organisation subscribes
The OH&S policy should be linked with other policy documents of the organisation and should be consistent with the organisation’s overall business policies and with its policies for other management disciplines, e.g. quality management or environmental management.

The communication of the policy to the workers of the recycling company should assist in:

- demonstrating the commitment of top management to OH&S,
- increasing awareness of the commitments made in the policy statement,
- explaining why the OH&S system is established and is maintained,
- guiding individuals in understanding their OH&S responsibilities and accountabilities.

In communicating the policy, consideration should be given to how to create and maintain awareness in both new and existing persons and contractors under the control of the organisation. The policy can be communicated in alternative forms to the policy statement itself, such as through the use of rules, directives and procedures, wallet cards, posters, etc. In communicating the policy, account should be taken of issues such as diversity in the workplace, literacy levels, language skills, etc.

It is for the organisation to determine how it wishes to make the policy available to its interested parties, e.g. through publication on a web site, or by providing printed copies on request.

The OH&S policy should be reviewed periodically to ensure that it remains relevant and appropriate to the organisation. Change is inevitable, as legislation and societal expectations evolve; consequently, the organisation’s OH&S policy and OH&S management system need to be reviewed regularly to ensure their continuing suitability and effectiveness. If changes are made to the policy, the revised policy should be communicated to all persons working under the control of the organisation.

In the development of the OH&S policy it is helpful to check the following questions:

- Is the OH&S policy appropriate to the nature and scale of your organisation’s risks?
- Do you provide adequate and appropriate resources to implement your OH&S policy?
- Is OH&S recognized as an integral part of your business?
- Do you include a commitment to comply with current applicable OH&S legislation and with other requirements to which the organisation subscribes?
- Do you make management of OH&S a prime responsibility of your line managers, from your most senior executive down to your first-line supervisors?
- Do you have a framework for setting and reviewing OH&S objectives?
- Do you communicate your policy to everyone working under the control of the organisation and ensure that they are made aware of their individual OH&S obligations?
- Is the policy available to all interested parties?
- Is your policy and management system reviewed periodically to ensure that it remains relevant and appropriate to the organisation?
The HEALTH & SAFETY POLICY of *The Recycling Company*

*The Recycling Company* recognizes and accepts its duties as an employer to ensure in so far as is reasonably practicable, the health, safety and welfare at work of all its employees.

*The Recycling Company* will ensure that all reasonably practicable efforts are made to safeguard its visitors, contractors and members of the public, who may be affected by its activities.

*The Recycling Company* will observe all relevant statutes, regulations and codes of practice and will take appropriate steps within its authority for the:

- Provision and maintenance of plant and equipment that is safe and without risks to health.
- Arrangements for ensuring safety and absence of risks to health in relation to the use, handling, storage and transportation of articles and substances.
- Provision of sufficient information, instruction, training and supervision as is necessary, to ensure the health and safety of its employees at work.
- Maintenance of a safe place of work and provision and maintenance of a safe means of access to it and egress from it.
- Provision and maintenance of adequate welfare facilities.

To realize these objectives the company shall make available adequate resources to promote and maintain best practice in Health and Safety Management.

Management responsibility

*The Recycling Company* firmly believes that Health and Safety is an aspect of management equal in importance to any other management function. The company expects all Managers and Supervisors to consider Health and Safety as part of their normal duties and responsibilities, in order to prevent injury and ill-health.

Middle and Junior Management will be accountable to their appropriate Senior Manager and ultimately, to the Chief Executive for maintaining *The Recycling Company*’s Health and Safety standards at their workplace. Their performance with regard to Health and Safety will be monitored and will be taken into account as part of their overall performance appraisal. Details of their duties and responsibilities are contained in the Health and Safety Management System.

Employees responsibility

*The Recycling Company* requires all its employees to co-operate with the management of the company in order to achieve legal compliance and meet our own Health and Safety standards.

Employees are reminded not to take risks which could affect their own or other persons’ Health and Safety. Any breaches of the Company Health and Safety Policy/Rules will result in disciplinary action.

All employees will receive a written copy of their duties and responsibilities as contained in the Health and Safety Management System.

Health and safety assistance

The prime function of the Health and Safety Management system is to assist *The Recycling Company*’s in meeting its Health and Safety Objectives. Health and Safety Managers are ultimately responsible to the Chief Executive for the provision of a professional and comprehensive Health and Safety service to the organisation, including the development, implementation, monitoring and review of *The Recycling Company*’s Health and Safety Policies.
Job safety analysis
As part of our overall Health and Safety arrangements, suitable and sufficient assessment of the risks to Health and Safety will be undertaken for all tasks performed by this organisation.

The purpose of such assessments is to identify the appropriate preventative and protective measures necessary, to comply with any relevant statutory, provision and to ensure the Health and Safety of our employees and other persons affected by The Recycling Company's activities.

Consultation
No Health and Safety Policy is likely to be successful unless it actively involves all our staff. Safety improvement meetings will be held at each work location and their role is outlined in the Health and Safety Management system.

In accordance with legal requirements, Safety Representatives shall be appointed at each main location and participate in the work of monitoring and improving safety in the workplace.

Training
The Recycling Company recognizes the need for Health and Safety Training to ensure that our employees are competent to perform their work without risks to themselves or others. Such training will be provided at induction and periodically during the course of employment.

Reporting and investigation of accidents
The designated Health and Safety Manager or its deputy is responsible for investigating and reporting the circumstances surrounding and causes of all incidents concerning personal injury, property damage, near-misses or non-conformance. Where necessary, this person will be assisted by Senior Management and will provide assistance to independent accident investigators.

An appropriate report must be completed for personal accidents. Copies of all reports should be sent to Management.

In certain circumstances external authorities may need to be advised. Full disclosure of all available information will be provided to them.

Policy publication
Copies of this policy shall be made available to all employees and displayed at all main locations. It shall be brought to the attention of all contractors, customers and visitors and be made available to any other interested party.

Review of policy
The Recycling Company’s OH&S management Policy and OH&S performance will be continually reviewed and improved in light of any legislative changes and/or needs of the organisation. Where necessary, new Health and Safety objectives will be set and circulated to all main locations. All relevant Health and Safety stakeholders will be advised of any changes.

Signature and Date
Managing Director
The Recycling Company
Responsibilities

One senior manager (usually a Board or executive committee member) should be designated as the person in overall charge of the organization’s OH&S. (Management Representative) This appointee may be supported by other personnel who have delegated responsibilities for monitoring the overall operation of the OH&S function. Clear lines of communication to and from this person should be established for all aspects of OH&S.

Everyone in the organization should be made aware of the name of this Management Representative for OH&S and they should understand her/his role.

You should define the roles, responsibilities, accountability and delegating authority of all persons performing duties that are part of the OH&S management system. These persons may include managers, trainers, process operators and those managing OH&S contractors. However, you should continue to promote the requirement for all employees to take responsibility for OH&S.

The responsibility of the senior management team should include defining the OH&S policy and ensuring that the OH&S management system is implemented and maintained. Ultimate responsibility rests with the management.

Line managers should be responsible for ensuring that OH&S is properly managed within their area of the recycling operation. However, to avoid any conflict between OH&S and productivity considerations, the respective roles of line managers and OH&S specialists should be clearly defined.

An OH&S performance reporting structure should be established for top management to review and use as the basis for ongoing improvement of the OH&S management System.

OH&S responsibilities and authorities should be documented in an appropriate form within:

- OH&S manual
- Procedures
- Job instructions
- Records

An organization’s employees are a valuable source of information in identifying hazards and assessing risk and their cooperation is essential in implementing control measures. There are many ways to involve staff with OH&S issues, one of which is to set up an OH&S committee to act as a vehicle for active participation.

Managers can provide a visible demonstration of their commitment to OH&S by, for example, visiting sites, participating in incident investigation and attending OH&S meetings.

Managers should ensure that adequate resources are available for the maintenance of a safe workplace, including equipment, human resources, training, specialized skills, organizational infrastructure, technology and financial resources.

To comply with the organization’s objective of continually improving all aspects of OH&S performance, the necessary resources should be made available to enable those improvements to be implemented. In the event of a dispute arising over the provision of “reasonable resources” the ultimate decision should be referred to the Director of OH&S.
Identify the health and safety hazards in your recycling company

Identifying the health and safety hazards in your recycling company is one of the main tasks in implementing the OH&S management system. One of the reasons that makes it difficult is that the employees in your recycling company are after some time are blind for these risks and they are used to some, maybe dangerous situations. It is very helpful by the identification of health and safety risks in your company to have assistance from someone from outside, that is not knowledgeable about the recycling industry. Risk assessment is a legal requirement that will enable you to effectively manage health and safety in your workplace. Risk assessment makes good business sense, too. Taking action to minimize risks will result not only in a healthy, motivated workforce, but also fewer opportunities for lost production.

The assessment itself is a process of identifying potential hazards in your work and putting controls into place to control the risks. You need to decide how significant each hazard is and whether or not you have adequate precautions in place to reduce the risk to its minimum level.

The key steps in carrying out a risk assessment are:

1. List work activities
2. Look for the hazards
3. Determine the risk
4. Decide if the risk is tolerable
5. Prepare a risk control action plan
6. Review the adequacy of the action plan
7. Record your findings

Tailor your risk assessment process to the needs of your business. The process does not need to be a complex one in most organizations.

Risk assessment is the process of identifying and assessing potential hazards and implementing risk controls. It is a fundamental part of any OH&S management system.

All employers and self-employed people are obliged by law to assess the risks arising from the hazards in their work activities. Risk assessment will help you to decide whether or not your controls are adequate.

OHSAS 18001 defines the key terms as follows:

‘hazard’: source or situation with a potential for harm in terms of injury or ill health, damage to property, damage to the workplace environment, or a combination of these

‘risk’: combination of the likelihood and consequence(s) of a specified hazardous event (3.14)

All risks have two elements:

• the likelihood that a hazard may occur;
• the consequences of the hazardous event.
Risk assessment

Step 1, List work activities
A list needs to be made of all work activities. (receiving, checking, sorting, shredder, baling, shipping etc.)
You can group these activities according to their geographical location or work team or production stage.

Step 2, Look for the hazards
Hazards in any work activity can be identified by asking three key questions:
1. Is there anything that could cause harm?
2. Who or what could potentially be harmed or damaged?
3. In what ways could harm occur?

There are many ways to go about categorizing hazards. You could, for example, categorize them by topic, such as fire, electrical, temperature, etc. Alternatively, you could develop a prompt list of hazards and then determine, using a checklist, whether or not these are likely to exist in each work activity.

There are different approaches that can be used to help identify hazards.

By categorizing hazards into broad categories, for example:
- mechanical
- electrical
- substances (chemicals)
- fire
- explosion
- temperature (hot and cold)
- radiation (in scrap for example)
- biological

By developing a prompt-list of questions. The following example of a hazard prompt-list is not exhaustive and is intended as a starting point for recycling companies to build up their own list.

During work activities could the following hazard/s exist?
- slips/falls on the level
- falls of persons from heights
- falls of tools, materials, etc, from heights
- inadequate headroom
- hazards associated with manual lifting/handling of tools, materials, etc
- hazards from plant and machinery associated with assembly, commissioning, operation, maintenance, modification, repair or dismantling
- vehicle hazards, covering both site transport, and travel by road (to personnel and other vehicles)
- fire and explosion
- substances that may be inhaled (damp, gasses)
• substances or agents that may damage the eye (solutions)
• substances that may cause harm by coming into contact with, or being absorbed through the skin
• substances that may cause harm by being ingested (i.e., entering the body via the mouth)
• substances that may be injected by a needle or under pressure through broken skin
• harmful energies (e.g., electricity, radiation, noise, vibration)
• work-related upper limb disorders resulting from frequently repeated tasks
• inadequate thermal environment, e.g., too hot, too cold, extremely wide variations in temperature and humidity
• lighting levels (adequacy for tasks or emergencies)
• slippery, uneven ground/surfaces
• inadequate guard rails or hand rails on stairs
• contractors’ activities
• violence to staff

Step 3, Determine the risk
What do you think are the risks with each hazard? Are your existing controls adequate? What would happen if they failed?

Once you have a list of hazards, the next stage is to assess the level of risk from each hazard. To do this, you need to consider two things:

• How serious would the harm potentially be, and;
• How likely is it to happen.

How you make these judgments depends upon the nature of your organization’s business. A formal system will use numerical scores.

A less formal scheme could use, for example, a ‘high’, ‘medium’ and ‘low’ assessment system.

In order to estimate the likelihood of harm from an identified hazard, start by considering the risk controls already in place.

Consider the consequences of as many unplanned events as you can think of. Some examples are:

• The number of people who may be exposed;
• The failure of services, such as electricity or water;
• The failure of safety devices or protective equipment;
• Unsafe or foolhardy acts by staff.
Step 4, Decide if the risk is tolerable
Could it be reduced further? Are you at least meeting legal requirements? There are many methods of estimating risk level, but most are based on some kind of scoring system both for their likelihood and their potential consequences. The table below shows one simple method for deciding whether risks are tolerable. Risks are classified according to their estimated likelihood and potential severity of harm.

Risk Estimator
In risk-level assessment we assess each identified risk based on the occurrence (highly unlikely, unlikely and likely) and the harm it may cause (slightly harmful, harmful and very harmful) The matrix below tells us if this hazard is acceptable, tolerable, moderate, substantial and intolerable. The terms “Acceptable” and “Tolerable” may be redefined in the light of the new definition in OHSAS 18001:2007. This assessment should be carried out and documented for each identified hazard.

3-Category Method

<table>
<thead>
<tr>
<th>Likelihood</th>
<th>Slightly Harmful</th>
<th>Harmful</th>
<th>Very Harmful</th>
</tr>
</thead>
<tbody>
<tr>
<td>Highly unlikely</td>
<td>ACCEPTABLE</td>
<td>TOLERABLE</td>
<td>MODERATE</td>
</tr>
<tr>
<td>Unlikely</td>
<td>TOLERABLE</td>
<td>MODERATE</td>
<td>SUBSTANTIAL</td>
</tr>
<tr>
<td>Likely</td>
<td>MODERATE</td>
<td>SUBSTANTIAL</td>
<td>INTOLEERABLE</td>
</tr>
</tbody>
</table>

In this model, a ‘tolerable’ risk is one that has been reduced to its lowest possible level.
Step 5, Prepare a risk control action plan
Using the table above, a list of actions can be produced and prioritized. You will get a more balanced view if you involve a cross-section of people in this task as it is a subjective exercise. The table below may help you to decide what action needs to be taken.

**Risk Levels**

<table>
<thead>
<tr>
<th>Level</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACCEPTABLE</td>
<td>No action is required and no documentary records need to be kept.</td>
</tr>
<tr>
<td>TOLERABLE</td>
<td>No additional controls are required. Consideration may be given to a more cost-effective solution or improvement that imposes no additional cost burden. Monitoring is required to ensure that the controls are maintained.</td>
</tr>
<tr>
<td>MODERATE</td>
<td>Efforts should be made to reduce the risk, but the costs of prevention should be carefully measured and limited. Risk reduction measures should be implemented within a defined time period. Where the moderate risk is associated with extremely harmful consequences, further assessment may be necessary to establish more precisely the likelihood of harm as a basis for determining the need for improved control measures.</td>
</tr>
<tr>
<td>SUBSTANTIAL</td>
<td>Work should not be started until the risk has been reduced. Considerable resources may have to be allocated to reduce the risk. Where the risk involves work in progress, urgent action should be taken.</td>
</tr>
<tr>
<td>INTOLERABLE</td>
<td>Work should not be started or continued until the risk has been reduced. If it is not possible to reduce risk even with unlimited resources, work has to remain prohibited.</td>
</tr>
</tbody>
</table>

The next stage in implementing your risk control action plan is to decide what controls are necessary. To do this, you need to think about the following:

1. can the hazard be completely eliminated, for example by using safer materials
2. if not, can the risk be reduced, for example by using safety guards or robotics
3. introduce or increase planned maintenance, such as regular inspections and servicing of machinery, to reduce risk
4. protect staff with safety equipment or clothing and restrict access to hazardous areas
5. install alarm systems and back-up controls for emergencies

Step 6, Review the adequacy of the action plan
Once you have decided what new controls are necessary, it is advisable to consider the consequences of each proposed action before implementing the controls. You need to consider the following:

- Will risk levels be reduced to tolerable levels?
- Is the solution cost effective?
- Are the controls practical and workable? Ask your operatives.
- Will you be able to easily and effectively revise the controls if changes to production methods are introduced at a later date?
Step 7, Record your findings

Use checklists to identify what action has been taken and what still has to be done.

Tell your employees. A record should be kept of each action point, indicating the risk assessment and what controls have been introduced.

Each new control should be reviewed within a stated timescale to ensure the effectiveness of the corrective measures.

A useful way of gaining the commitment of the workforce as well as ensuring issues are not overlooked is to involve everyone within the recycling company in identifying hazards. This will lead to information on how a task is actually carried out rather than how it should be done.

<table>
<thead>
<tr>
<th>Hazard</th>
<th>To be identified</th>
<th>Occurrence?</th>
<th>How harmful?</th>
<th>Conclusion:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>High unlikely</td>
<td>Slightly harmful</td>
<td>Acceptable</td>
</tr>
<tr>
<td>Burns</td>
<td>fire, hot liquids, steam, electrical plant, gas plant, chemicals, intensely cold liquids, contact with hot equipment, welding, explosions</td>
<td></td>
<td>Harmful</td>
<td>Tolerable</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Likely</td>
<td>Very harmful</td>
<td>Intolerable</td>
</tr>
<tr>
<td>Drop</td>
<td>tools, materials from height</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chemicals</td>
<td>inhalation, ingestion, burns, escape of gas, airborne harmful substances, handling of corrosive or toxic chemicals, contact with equipment</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Falls</td>
<td>working at height, slippery floors, trips, obstructions, stairs/steps, correct footwear</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Injuries</td>
<td>cuts from sharp objects, electrocution, collisions, use of tools, use of personal protective equipment, bites from insects or animals, crushing injuries, falling objects, heavy lifting, manual handling, working with substances that may damage the eye</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Illness</td>
<td>water safety, blood borne pathogens, cleanliness and hygiene, sanitary accommodation, environmental comfort of workers, toxic chemicals, VDU/computer use, airborne harmful substances, long working hours, skin contact</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hazard</td>
<td>To be identified</td>
<td>Occurrence? High unlikely Unlikely Likely</td>
<td>How harmful? Slightly harmful Harmful Very harmful</td>
<td>Conclusion: Acceptable Tolerable Moderate Substantial Intolerable</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
<td>-------------------------------------------</td>
<td>----------------------------------------------------</td>
<td>---------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Hazardous tasks</strong></td>
<td>manual handling injuries, entanglement with equipment, working in confined spaces, working in isolation, working in trenches, working with hazardous substances, window cleaning, roof level work, changing electrical plugs, cables, fuses and light bulbs, inadequate headroom</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Working environment</strong></td>
<td>lighting, dust and smoke, noise, noxious gases, workplace temperature, clothing and protective equipment, asbestos, hazardous substances, slippery surfaces, hot surfaces, sharp surfaces, doors and openings, passageways, traffic movements, crowds in confined areas, distractions</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Hazardous materials</strong></td>
<td>corrosive materials, toxic materials, flammable materials, harmful materials, radioactive materials, explosive materials, irritant materials, glass, splinters, debris</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Equipment</strong></td>
<td>fixed machinery, failure/collapse of lifting equipment, use of vehicles and vehicle safety, radiation generating equipment, radiation detecting equipment, portable/powered equipment, kettles, gardening equipment, sharp hand tools, mechanical handling equipment, hired equipment, newly purchased equipment</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>People at risk</strong></td>
<td>untrained workers, young persons, pregnant workers, people with disabilities, workers who are primarily foreign language speakers, workers with reading difficulties, contractors, people outside the organization, visitors, people in close proximity to the workplace, tired workers, workers performing repetitive tasks, distracted workers</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Energy</strong></td>
<td>Electricity, Radiation, Noise, Steam, Water, Vibration</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Determine the gaps between what you have and what you need

This gap analysis provides you with the gaps between what is already in place and functioning well versus what is missing and has to be implemented in the OH&S Management System. It follows the numbering of the elements as mentioned in the OHSAS 18001 standard.

Going through this gap analysis form teaches you the weak points of your existing system and determines exactly where and how you can improve it. Do not skip any step in this analysis because it provides useful information about the completeness and correctness of your OH&S Management System.

This gap analysis provides you with the gaps between what is already in place and functioning well versus what is missing and has to be implemented in the QMS. It follows the numbering of the elements as mentioned in the ISO standard.

Text in red makes you aware of the need for a dedicated procedure.

<table>
<thead>
<tr>
<th>4. OHSAS 18001:2008 Management System Requirements</th>
<th>Status/Remarks</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>4.1 General Requirements</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Has the organisation established, documented, implemented maintained an OH&amp;S management system in accordance with OHSAS 18001:2007?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Does the organisation continually improve the OH&amp;S management system?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Has the organisation defined and documented the scope of the OH&amp;S management system?</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>4.2 OH&amp;S policy</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Has top management defined and authorized the organisation’s OH&amp;S policy and ensured that within the defined scope it:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) is appropriate to the nature and scale of the organisation’s OH&amp;S risks?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b) includes a commitment to prevention of injury and ill health and continual improvement in OH&amp;S management and performance?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c) includes a commitment to at least comply with applicable legal requirements and with other requirements to which the organisation subscribes that relate to its OH&amp;S hazards?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>d) provides the framework for setting and reviewing OH&amp;S objectives?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>e) is documented, implemented and maintained?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>f) is communicated to all persons working under the control of the organisation with the intent that they are made aware of their individual OH&amp;S obligations?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>g) is available to interested parties?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>h) Is reviewed periodically to ensure that it remains relevant and appropriate to the organisation?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### 4.3 Planning

#### 4.3.1 Hazard Identification, risk assessment and determining controls

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Has the organisation established, implemented and maintained a <strong>procedure for hazard identification and risk assessment</strong> and determination of necessary controls?</td>
<td></td>
</tr>
<tr>
<td>Does the procedure for hazard identification and risk assessment take into account:</td>
<td></td>
</tr>
<tr>
<td>a) routine and non-routine activities?</td>
<td></td>
</tr>
<tr>
<td>b) activities of all persons having access to the workplace (including contractors and visitors)?</td>
<td></td>
</tr>
<tr>
<td>c) human behaviour, capabilities and other human factors?</td>
<td></td>
</tr>
<tr>
<td>d) identified hazards originating outside the workplace capable of adversely affecting the Health &amp; Safety of persons under the control of the organisation within the workplace?</td>
<td></td>
</tr>
<tr>
<td>e) hazards created in the vicinity of the workplace by work-related activities under the control of the organisation?</td>
<td></td>
</tr>
<tr>
<td>f) infrastructure, equipment and materials at the workplace, whether provided by the organisation or others?</td>
<td></td>
</tr>
<tr>
<td>g) changes or proposed changes in the organisation, its activities, or materials?</td>
<td></td>
</tr>
<tr>
<td>h) modifications to the OH&amp;S management system, including temporary changes, and their impacts on operations, processes, and activities?</td>
<td></td>
</tr>
<tr>
<td>i) any applicable legal obligations relating to risk assessment and implementation of necessary controls?</td>
<td></td>
</tr>
<tr>
<td>j) the design of work areas, processes, installations, machinery/equipment, operating procedures and work organisation, including their adaptation to human capabilities?</td>
<td></td>
</tr>
<tr>
<td>Does the organisation’s methodology for hazard identification and risk assessment:</td>
<td></td>
</tr>
<tr>
<td>a) define with respect to its scope, nature and timing to ensure it is proactive rather than reactive?</td>
<td></td>
</tr>
<tr>
<td>b) provide for the identification, prioritization and documentation of risks, and the application of controls, as appropriate?</td>
<td></td>
</tr>
<tr>
<td>With regards to management of change:</td>
<td></td>
</tr>
<tr>
<td>Has the organisation identified the OH&amp;S hazards and OH&amp;S risks associated with changes in the organisation, the OH&amp;S management system, or its activities, prior to the introduction of such changes?</td>
<td></td>
</tr>
<tr>
<td>Has the organisation ensured that the results of these assessments are considered when determining controls?</td>
<td></td>
</tr>
<tr>
<td>When determining controls, or considering changes to existing controls, is consideration given to reducing risks according to the following?</td>
<td></td>
</tr>
<tr>
<td>a) elimination</td>
<td></td>
</tr>
<tr>
<td>b) substitution</td>
<td></td>
</tr>
<tr>
<td>c) engineering controls</td>
<td></td>
</tr>
<tr>
<td>d) signage/warnings and/or administrative controls;</td>
<td></td>
</tr>
<tr>
<td>e) personal protective equipment.</td>
<td></td>
</tr>
</tbody>
</table>
### 4.3.2. Legal and Other Requirements

Has the organisation established, implemented and maintained a procedure for accessing legal and other OH&S requirements that are applicable to it?

Has the organisation ensured that these applicable legal requirements and other requirements to which the organisation subscribes are taken into account in establishing, implementing and maintaining its OH&S management system?

Has the organisation kept this information up-to-date?

Has the organisation communicated relevant information on legal and other requirements to persons working under the control of the organisation, and other relevant interested parties?

### 4.3.3 Objectives and programmes

Has the organisation established, implemented and maintained documented OH&S objectives, at relevant functions and levels within the organisation?

Are the objectives measurable, practicable, and consistent with the OH&S policy, including the commitments to the prevention of injury and ill health, to comply with applicable legal requirements and with other requirements to which the organisation subscribes, and to continual improvement?

When establishing and reviewing its objectives, has the organisation taken into account the legal requirements and other requirements to which the organisation subscribes, and its OH&S risks? Does it also consider its technological options, its financial, operational and business requirements, and the views of relevant interested parties?

Has the organisation established, implemented and maintained a program for achieving its objectives? The program should include as a minimum:

- a) designation of responsibility and authority for achieving objectives at relevant functions and levels of the organisation.

- b) the means and time-frame by which the objectives are to be achieved.

- c) The program should be reviewed at regular and planned intervals, and adjusted as necessary, to ensure that the objectives are achieved.

### 4.4 Implementation and Operation

#### 4.4.1 Resources, roles, responsibilities, accountability and authority

Has top management taken the ultimate responsibility for OH&S and the OH&S management system?

Has top management demonstrated its commitment by:

- a) ensuring the availability of resources essential to establish, implement, maintain and improve the OH&S management system?

- b) defining roles, allocating responsibilities and accountabilities, and delegating authorities, to facilitate effective OH&S management;

- c) communicating roles, responsibilities, accountabilities, and documented authorities?

Has the organisation appointed a member of top management with specific responsibility for OH&S, irrespective of other responsibilities, and with defined roles and authority for:

- a) ensuring that the OH&S management system is established, implemented and maintained in accordance with this OHSAS Standard?

- b) ensuring that reports on the performance of the OH&S management system are presented to top management for review and are used?
<table>
<thead>
<tr>
<th><strong>4.4.2 Competence, training and awareness</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Has the organisation ensured that any person(s) under its control performing tasks that can impact on OH&amp;S is (are) competent on the basis of appropriate education, training or experience, and shall retain associated records?</td>
</tr>
<tr>
<td>Has the organisation identified training needs associated with its OH&amp;S risks and its OH&amp;S management system?</td>
</tr>
<tr>
<td>Does it provide training or take other action to meet these needs, evaluate the effectiveness of the training or action taken, and retain associated records?</td>
</tr>
<tr>
<td>Has the organisation established, implemented and maintained a procedure roles and responsibilities to make persons working under its control aware of:</td>
</tr>
<tr>
<td>a) the OH&amp;S consequences, actual or potential, of their work activities, their behaviour, and the OH&amp;S benefits of improved personal performance?</td>
</tr>
<tr>
<td>b) their roles and responsibilities and importance in achieving conformity to the OH&amp;S policy and procedures and to the requirements of the OH&amp;S management system, including emergency preparedness and response requirements?</td>
</tr>
<tr>
<td>c) the potential consequences of departure from specified procedures?</td>
</tr>
<tr>
<td>Does a procedure for training take into account differing levels of:</td>
</tr>
<tr>
<td>a) responsibility, ability, language skills and literacy?</td>
</tr>
<tr>
<td>b) risk?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>4.4.3 Communication, participation and consultation</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>4.4.3.1 Communication</strong></td>
</tr>
<tr>
<td>With regard to its OH&amp;S hazards and OH&amp;S management system, has the organisation established, implemented and maintained a procedure for communication?</td>
</tr>
<tr>
<td>a) for internal communication among the various levels and functions of the organisation?</td>
</tr>
<tr>
<td>b) Does this procedure includes communication with contractors and other visitors to the workplace?</td>
</tr>
<tr>
<td>c) receiving, documenting and responding to relevant communications from external interested parties?</td>
</tr>
<tr>
<td><strong>4.4.3.2 Participation and Consultation</strong></td>
</tr>
<tr>
<td>Has the organisation established, implemented and maintained a procedure for participation and consultation for:</td>
</tr>
<tr>
<td>a) the participation of workers by their:</td>
</tr>
<tr>
<td>1. appropriate involvement in hazard identification, risk assessments and determination of controls?</td>
</tr>
<tr>
<td>2. appropriate involvement in incident investigation?</td>
</tr>
<tr>
<td>3. involvement in the development and review of OH&amp;S policies and objectives?</td>
</tr>
</tbody>
</table>
4. consultation where there are any changes that affect their OH&S?

5. representation on OH&S matters?

Has workers informed about their participation arrangements, including who is their representative on OH&S matters?

b) consultation with contractors where there are changes that affect their OH&S?

Has the organisation ensured that, when appropriate, relevant external interested parties are consulted about pertinent OH&S matters?

### 4.4.4 Documentation

Does the OH&S management system documentation include:

a) the OH&S policy and objectives?

b) description of the scope of the OH&S management system?

c) description of the main elements of the OH&S management system and their interaction, and reference to related documents?

d) documents, including records, required by this OHSAS Standard?

e) documents, including records, determined by the organisation to be necessary to ensure the effective planning, operation and control of processes that relate to the management of its OH&S risks?

### 4.4.5 Control of Documents

Are the documents required by the OH&S management system and by this OHSAS Standard controlled?

Are the records controlled in accordance with the requirements given in 4.5.4.?

Has the organisation established, implemented and maintained a procedure control of documents to:

a) approve documents for adequacy prior to issue?

b) review and update as necessary and re-approve documents?

c) ensure that changes and the current revision status of documents are identified?

d) ensure that relevant versions of applicable documents are available at points of use?

e) ensure that documents remain legible and readily identifiable?

f) ensure that documents of external origin determined by the organisation to be necessary for the planning and operation of the OH&S management system are identified and their distribution controlled?

g) prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose?
### 4.4.6 Operational Control

Has the organisation determined those operations and activities that are associated with the identified hazard(s) where the implementation of controls is necessary to manage the OH&S risk(s). Does this include the management of change (see 4.3.1)?

For those operations and activities, has the organisation implemented and maintained:

- a) operational controls, as applicable to the organisation and its activities? The organisation should have integrated those operational controls into its overall OH&S management system.

- b) controls related to purchased goods, equipment and services?

- c) controls related to contractors and other visitors to the workplace?

- d) a documented procedure operation control, to cover situations where their absence could lead to deviations from the OH&S policy and the objectives?

- e) stipulated operating criteria where their absence could lead to deviations from the OH&S policy and objectives?

### 4.4.7 Emergency preparedness and response

Has the organisation established, implemented and maintained a Procedure Emergency preparedness and response:

- a) to identify the potential for emergency situations?

- b) to respond to such emergency situations?

Has the organisation responded to actual emergency situations and prevented or mitigated associated adverse OH&S consequences?

In planning its emergency response has the organisation taken into account the needs of relevant interested parties, e.g. emergency services and neighbours?

Has the organisation also periodically tested its procedure to respond to emergency situations, where practicable, involving relevant interested parties as appropriate?

Has the organisation periodically reviewed and, where necessary, revised its emergency preparedness and response procedure, in particular, after periodical testing and after the occurrence of emergency situations?

### 4.5 Checking

#### 4.5.1 Performance measurement and monitoring

Has the organisation established, implemented and maintained a procedure performance measuring and checking to monitor and measure OH&S performance on a regular basis?

This procedure shall provide for:

- a) both qualitative and quantitative measures, appropriate to the needs of the organisation.

- b) monitoring of the extent to which the organisation’s OH&S objectives are met.

- c) monitoring the effectiveness of controls (for health as well as for safety).

- d) proactive measures of performance that monitor conformance with the OH&S programme, controls and operational criteria.

- e) reactive measures of performance that monitor ill health, incidents (including accidents, near-misses, etc.), and other historical evidence of deficient OH&S performance.
If equipment is required to monitor or measure performance, has the organisation established and maintained a procedure calibration and maintenance of such equipment, as appropriate?

Records of calibration and maintenance activities and results should be retained.

### 4.5.2 Evaluation of compliance

#### 4.5.2.1

Consistent with its commitment to compliance. Has the organisation established, implemented and maintained a procedure periodical evaluation of compliance with applicable legal requirements?

Has the organisation kept records of the results of the periodic evaluations?

#### 4.5.2.2

Has the organisation evaluated compliance with other requirements to which it subscribes? The organisation may wish to combine this evaluation with the evaluation of legal compliance referred to in 4.5.2.1 or to establish a separate procedure.

Has the organisation kept records of the results of the periodic evaluations?

### 4.5.3 Incident investigation, nonconformity, corrective action and preventive action

#### 4.5.3.1 Incident investigation

Has the organisation established, implemented and maintained a Procedure incidents investigation in order to:

- a) determine underlying OH&S deficiencies and other factors that might be causing or contributing to the occurrence of incidents?
- b) identify the need for corrective action?
- c) identify opportunities for preventive action?
- d) identify opportunities for continual improvement?
- e) communicate the results of such investigations?

Are the investigations performed in a timely manner?

Any identified need for corrective action or opportunities for preventive action should be dealt with in accordance with the relevant parts of 4.5.3.2.

Are the results of incident investigations documented and maintained?
### 4.5.3.2 Nonconformity, corrective action and preventive action

<table>
<thead>
<tr>
<th>Has the organisation established, implemented and maintained a procedure nonconformity, corrective action and preventive action and for taking corrective action and preventive action?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the procedure define requirements for:</td>
</tr>
<tr>
<td>a) identifying and correcting nonconformities and taking action to mitigate their OH&amp;S consequences?</td>
</tr>
<tr>
<td>b) investigating nonconformities, determining their causes and taking actions in order to avoid their recurrence?</td>
</tr>
<tr>
<td>c) evaluating the need for actions to prevent nonconformities and implementing appropriate actions designed to avoid their occurrence?</td>
</tr>
<tr>
<td>d) recording and communicating the results of corrective actions and preventive actions taken?</td>
</tr>
<tr>
<td>e) reviewing the effectiveness of corrective action and preventive actions taken?</td>
</tr>
</tbody>
</table>

Where the corrective action and preventive action identifies new or changed hazards or the need for new or changed controls, the procedure should require that the proposed actions shall be taken through a risk assessment prior to implementation.

Any corrective action or preventive action taken to eliminate the causes of actual and potential nonconformities should be appropriate to the magnitude of problems and commensurate with the OH&S risk(s) encountered.

Has the organisation ensured that any necessary changes arising from corrective action and preventive action are made to the OH&S management system documentation?

### 4.5.4 Control of records

<table>
<thead>
<tr>
<th>Has the organisation established and maintained records as necessary to demonstrate conformity to the requirements of its OH&amp;S management system and of this OHSAS Standard, and are the results achieved?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Has the organisation established, implemented and maintained a procedure control of records?</td>
</tr>
</tbody>
</table>

Records should be and remain legible, identifiable and traceable.

### 4.5.5 Internal audit

<table>
<thead>
<tr>
<th>Has the organisation ensured that internal audits of the OH&amp;S management system are conducted at planned intervals to determine whether the OH&amp;S management system:</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) conforms to planned arrangements for OH&amp;S management, including the requirements of the OHSAS Standard?</td>
</tr>
<tr>
<td>b) has been properly implemented and is maintained?</td>
</tr>
<tr>
<td>c) is effective in meeting the organisation’s policy and objectives?</td>
</tr>
</tbody>
</table>

And to provide information on the results of audits to management.

Are there audit programs planned, established, implemented and maintained by the organisation, based on the results of risk assessments of the organisation’s activities, and the results of previous audits?

Is there an procedure internal audit established, implemented and maintained that address:

| a) the responsibilities, competencies, and requirements for planning and conducting audits, reporting results and retaining associated records? |
| b) the determination of audit criteria, scope, frequency and methods? |

Does the selection of auditors and conduction of audits ensure objectivity and the impartiality of the audit process?
### 4.6 Management review

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Has top management reviewed the organisation’s OH&amp;S management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness? Reviews should include assessing opportunities for improvement and the need for changes to the OH&amp;S management system, including the OH&amp;S policy and OH&amp;S objectives.</td>
<td>Yes/No</td>
</tr>
<tr>
<td>Are the records of the management reviews retained?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>Does input to management reviews include:</td>
<td></td>
</tr>
<tr>
<td>a) results of internal audits and evaluations of compliance with applicable legal requirements and with other requirements to which the organisation subscribes?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>b) the results of participation and consultation?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>c) relevant communication from external interested parties, including complaints?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>d) the OH&amp;S performance of the organisation?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>e) the extent to which objectives have been met?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>f) status of incident investigations, corrective actions and preventive actions?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>g) follow-up actions from previous management reviews?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>h) changing circumstances, including developments in legal and other requirements related to OH&amp;S?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>i) recommendations for improvement?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>Has the output from management reviews been consistent with the organisation’s commitment to continual improvement and does that include any decisions and actions related to possible changes to:</td>
<td></td>
</tr>
<tr>
<td>a) OH&amp;S performance?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>b) OH&amp;S policy and objectives?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>c) resources?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>d) other elements of the OH&amp;S management system?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>Are relevant outputs from management review made available for communication and consultation?</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>
Writing the Occupational Health & Safety Management System Manual

The development of a dedicated OH&S manual is not an easy task. For that reason we have developed a template that can be used to change and modify so that it fit your recycling company. It is fully based on the current standard OHSAS 18001:2007.

The text The Recycling Company can be replaced with your company name. The blue text are instructions or can be modified to fit your situation.

Introduction to the OH&S Management System Manual

*The Recycling Company* is dedicated to providing a healthy and safe work environment for employees, contractors, customers, visitors and involved third parties. To help achieve this goal, the OHSAS 18001:2007 (Occupational Health and Safety Assessment Series) standard has been used to develop a comprehensive Occupational Safety and Health (OH&S) management system.

*The Recycling Company* is committed to achieve OHSAS registration for all operations as a primary mechanism to eliminate or minimize OH&S risks in its activities.

The purpose of this manual is to document the implementation of the Occupational Health and Safety Assessment Series (OHSAS) 18001 standard criteria within all the activities conducted by *The Recycling Company*.

This manual is intended primarily as an OH&S management tool for the management of *The Recycling Company*, the staff involved in the implementation and improvement of the OHS system, and to demonstrate conformance to assessors who review OHSAS implementation at *The Recycling Company*.

This manual and its procedures are the primary documents for defining specific OHSAS requirements relating to performance in the work place, job risk assessments, worker qualifications and training for the workers.

Responsibilities for maintaining the OHSAS program elements are also assigned in this manual. An OHSAS Management Representative is assigned and its primary role is to monitor the performance of the OHSAS Management Program, report to management and support continually improvement of the OH&S Management System.

The manual is divided into four sections that correlate to the OH&S Management System sections of OHSAS18001:2007.

This manual is used internally to guide the company's employees through the various requirements of the OHSAS standard that must be met and maintained in order to ensure a healthy and safe work environment, continual improvement and providing the necessary instructions that create an empowered work force.

Section 1: Scope

1.1 General

*Describe the scope of your QMS:*

The OH&S manual outlines the policies, procedures and requirements of the Occupational Health & Safety Management System. The system is structured to comply with the conditions set forth in the International Standard OHSAS 18001:2007.

1.2 Application

*The Recycling Company* has determined that the following requirements are not applicable to the operations at this site and are documented as exclusions:

*Identify permissible exclusions. If none, document that there are no exclusions. Document the justification for any exclusions that are made.*
Section 2: Normative Reference

2.0 Occupational Health & Safety Management System References

The following documents were used as reference during the preparation of the Occupational Health & Safety Management System:


Section 3: Definitions

3.0 Occupational Health & Safety Management System Definitions

This section is for definitions unique to The Recycling Company.

- Risk assessment - process of evaluating the risk arising from a hazard taking into account the adequacy of any existing controls, and deciding whether or not the risk is acceptable.
- Workplace - any physical location in which work related activities are performed under the control of The Recycling Company.
- Incident - work related events in which an injury or ill health or fatality occurred or could have occurred.
- Hazard - source, situation or act with potential for harm in terms of human injury or ill health or a combination of these.
- Health & Safety Records - Documentation of those activities wherein records of said activities must be maintained will be specified in the procedure or work instruction level documents, as applicable
- Interested party - person or group, inside or outside the workplace, concerned with or affected by the OH&S performance of The Recycling Company.

Add, delete and revise definitions as appropriate to your OH&S system.

Section 4: General Requirements

4.1 General requirements

The Recycling Company has established, documented and implemented an Occupational Health & Safety Management System (OH&SMS) in accordance with the requirements of OHSAS 18001:2007. The system is maintained and continually improved through the use of the Health & Safety policy, Health & Safety objectives, audit results, analysis of data, corrective and preventive action and management review.

The Recycling Company’s commitment is to implement, maintain and continually improve an OH&S management system that:

a) clearly states occupational health and safety policies, programs and objectives appropriate for its operations
b) identifies occupational health and safety risks and legal requirements
c) takes a proactive approach to occupational health and safety risks and involves employees in the development and implementation of procedures
d) controls or eliminate risks to prevent accidents
e) monitors occupational health and safety system performance
f) ensures continual reviews, evaluation, and improvement of the system

Applicable documents: OH&S manual
4.2 OH&S Policy
It is the Policy of The Recycling Company to take all possible steps to ensure the health, safety and welfare of all employees and other persons engaged in work for The Recycling Company and any third parties who come into contact with the business.

It is the duty of each employee to comply with the company occupational health & safety policy and to cooperate with the management of the company to ensure that the work place remains as safe as possible.

If any person is in any doubt as to whether anything is safe or unsafe then they must assume that it is unsafe until further guidance has been given by their manager or by the safety officer.

The Board of Directors of The Recycling Company is fully committed to maintaining safe systems of work and fully recognises their overall responsibility for health and safety in the workplace.

Any member of staff who does not comply with this occupational health & safety policy or any other safety requirement will be liable to disciplinary action.

Add, delete and revise definitions as appropriate to your OH&S policy. Be aware that this policy is the minimum that is acceptable. See chapter 4, to determine the Health & Safety Policy and responsibilities for a more extensive version of the OH&S policy and how to create your own policy.

Date and signed by the Managing Director

4.3 Planning

4.3.1 Hazard Identification, risk assessment and determining controls
The Recycling Company has established, implemented and maintains a procedure for the ongoing identification of hazards, risk assessment and determining controls. (Develop a Procedure for Hazard Identification, Risk Assessment and Determining Controls)

This procedure includes:

- routine and non-routine activities
- activities of all persons having access to the workplace (including contractors and visitors)
- human behaviour, capabilities and other human factors
- identified hazards originating outside the workplace capable of adversely affecting the health and safety of persons under the control of The Recycling Company within the workplace
- hazards created in the vicinity of the workplace by work-related activities under the control of The Recycling Company
- infrastructure, equipment and materials at the workplace, whether provided by The Recycling Company or others
- changes or proposed changes in The Recycling Company, its activities, or materials
- modifications to the OH&S management system, including temporary changes, and their impacts on operations, processes,
- and activities
- any applicable legal obligations relating to risk assessment and implementation of necessary controls
- the design of work areas, processes, installations, machinery/equipment, operating procedures and work organisation, including their adaptation to human capabilities.

The Recycling Company’s methodology for hazard identification and risk assessment includes:

a) be defined with respect to its scope, nature and timing to ensure it is proactive rather than reactive

b) provide for the identification, prioritization and documentation of risks, and the application of controls, as appropriate
For the management of change, The Recycling Company does identify the OH&S hazards and OH&S risks associated with changes in The Recycling Company, the OH&S management system, or its activities, prior to the introduction of such changes. The Recycling Company ensures that the results of these assessments are considered when determining controls.

When determining controls, or considering changes to existing controls, consideration is given to reducing the risks according to the following hierarchy:

- elimination;
- substitution;
- engineering controls;
- signage/warnings and/or administrative controls;
- personal protective equipment.

The Recycling Company documents and keeps the results of identification of hazards, risk assessments and determined controls up-to-date. The Recycling Company ensures that the OH&S risks and determined controls are taken into account when establishing, implementing and maintaining its OH&S management system.

Applicable documents: Results of identification of hazards, risk assessments and determined controls

Procedure for Hazard Identification, Risk Assessment and Determining Controls

4.3.2 Legal and other requirements

The Recycling Company has established, implemented and maintained a procedure for identifying and accessing legal and other OH&S requirements that are applicable to the company and its activities.

With this procedure The Recycling Company ensures that the legal and other requirements to which The Recycling Company subscribes are taken into account in establishing, implementing and maintaining its OH&S management system and will be kept up-to-date. The Recycling Company ensures that relevant information on legal and other requirements to persons working under the control of The Recycling Company and other relevant parties will be communicated.

Applicable documents: Procedure assessing legal and other OH&S requirements

4.3.3 Objectives and programmes

The Recycling Company has established, implemented and maintained documented OH&S objectives, at the relevant functions and levels within The Recycling Company.

These objectives are set as follows for the year 2010 and will be reviewed and redefined each next year.

- Introduction of job instructions for new equipment
- Safety training for workers to be completed
- Reducing near-accidents with 15% compared with last year
- Reducing accidents with job leave with 15% compared with last year
- Auditing the use of personal protection gear
- Auditing the OH&S rules at sub-contractors on the premises

Set objectives for OH&S and a programme to reach these objectives

The objectives are measurable, practicable and consistent with the OH&S policy of The Recycling Company.

By reviewing the objectives the legal and other requirements will be taken into account.

To reach the set objectives, The Recycling Company has established, implemented and maintained a program for achieving this objectives. This program includes the designation of the responsibility and authority for achieving the objectives and the time frame by which the objectives are to be achieved.

Applicable documents: OH&S objectives and programmes
4.4 Implementation and Operation

4.4.1 Resources, roles, responsibilities, accountability and authority.
Top management of The Recycling Company has taken the ultimate responsibility for OH&S and the OH&S management system.

Top management demonstrate its commitment by:

- ensuring the availability of resources essential to establish, implement, maintain and improve the OH&S management system
- defining roles, allocating responsibilities and accountabilities, and delegating authorities, to facilitate effective OH&S management; roles, responsibilities, accountabilities, and authorities shall be documented and communicated.

The Recycling Company has appointed a member of its top management with specific responsibility for OH&S, irrespective of other responsibilities, and with defined roles and authority for:

- ensuring that the OH&S management system is established, implemented and maintained in accordance with this OHSAS Standard;
- ensuring that reports on the performance of the OH&S management system are presented to top management for review and used as a basis for improvement of the OH&S management system.

The identity of the top management appointee has been made available to all persons working under the control of The Recycling Company. All those with management responsibility will demonstrate their commitment to the continual improvement of OH&S performance. The Recycling Company will ensure that persons in the workplace take responsibility for aspects of OH&S over which they have control, including adherence to The Recycling Company’s applicable OH&S requirements.

Appoint Management Representative and communicate with all the organisational levels.

4.4.2 Competence, training and awareness
In order to assures that all personnel and people under control of The Recycling Company are competent, The Recycling Company has established, implemented and maintained a procedure to:

- Identify training needs
- Provide training
- Evaluate the effectiveness of training
- Retain records of experience and training

The Recycling Company has established, implemented and maintained a procedure to make persons working under its control aware of the OH&S consequences, actual or potential,

- of their work activities, their behaviour, and the OH&S benefits of improved personal performance;
- their roles and responsibilities and importance in achieving conformity to the OH&S policy and procedures and to the requirements of the OH&S management system, including emergency preparedness and response requirements
- the potential consequences of departure from specified procedures

The training module of the procedure takes into account differing levels of:

- responsibility, ability, language skills and literacy
- risk

Applicable documents: Procedure roles and responsibilities
4.4.3 Communication, participation and consultation
4.4.3.1 Communication
With regard to its OH&S hazards and OH&S management system, *The Recycling Company* has established, implemented and maintained a Procedure for:

- internal communication among the various levels and functions of *The Recycling Company*;
- communication with contractors and other visitors to the workplace;
- receiving, documenting and responding to relevant communications from external interested parties.

4.4.3.2 Participation and consultation
*The Recycling Company* has established, implemented and maintained a procedure for:

a) the participation of workers by their:
   - appropriate involvement in hazard identification, risk assessments and determination of controls;
   - appropriate involvement in incident investigation;
   - involvement in the development and review of OH&S policies and objectives;
   - consultation where there are any changes that affect their OH&S;
   - representation on OH&S matters.

Workers will be informed about their participation arrangements, including who is their representative on OH&S matters.

b) consultation with contractors where there are changes that affect their OH&S.

*The Recycling Company* will ensure that, when appropriate, relevant external interested parties are consulted about pertinent OH&S matters.

Applicable documents: Procedure communication, participation and consultation

4.4.4 Documentation
*The Recycling Company*’s OH&S management system documentation includes:

- the OH&S policy and objectives
- description of the scope of the OH&S management system
- description of the main elements of the OH&S management system and their interaction, and reference to related documents
- documents, including records, required by the OHSAS Standard
- documents, including records, determined by *The Recycling Company* to be necessary to ensure the effective planning, operation and control of processes that relate to the management of its OH&S risks

4.4.5 Control of Documents
*The Recycling Company* controls the documents required by the OH&S management system and by the OHSAS Standard.

*The Recycling Company* has established, implemented and maintained a procedure to:

- approve documents for adequacy prior to issue
- review and update as necessary and re-approve documents
- ensure that changes and the current revision status of documents are identified
- ensure that relevant versions of applicable documents are available at points of use
- ensure that documents remain legible and readily identifiable
- ensure that documents of external origin determined by *The Recycling Company* to be necessary for the planning and operation
4.4.6 Operational Control
The Recycling Company has determined those operations and activities that are associated with the identified hazards where the implementation of controls is necessary to manage the OH&S risks. This is included in the management of change.

For those operations and activities, the organisation has implemented and maintained:

- operational controls, as applicable to the organisation and its activities; the organisation has integrated those operational controls into its overall OH&S management system
- controls related to purchased goods, equipment and services;
- controls related to contractors and other visitors to the workplace;
- documented procedures, to cover situations where their absence could lead to deviations from the OH&S policy and the objectives
- stipulated operating criteria where their absence could lead to deviations from the OH&S policy and objectives

Applicable documents: Procedure operational control

4.4.7 Emergency preparedness and response
The Recycling Company has established, implemented and maintained a procedure:

a) to identify the potential for emergency situations;
b) to respond to such emergency situations.

The Recycling Company will respond to actual emergency situations and prevent or mitigate associated adverse OH&S consequences.

In planning its emergency response The Recycling Company will take account of the needs of relevant interested.

The Recycling Company will also periodically test its procedure to respond to emergency situations, where practicable, involving relevant interested parties as appropriate.

The Recycling Company will periodically review and, where necessary, revise its emergency preparedness and response procedure, in particular, after periodical testing and after the occurrence of emergency situations.

Applicable documents: Procedure emergency preparedness and response

4.5 Checking
4.5.1 Performance measurement and monitoring
The Recycling Company has established, implemented and maintained a procedure to monitor and measure OH&S performance on a regular basis.

This procedure shall provide for:

- both qualitative and quantitative measures, appropriate to the needs of the organisation
- monitoring of the extent to which the organisation’s OH&S objectives are met
- monitoring the effectiveness of controls (for health as well as for safety)
- proactive measures of performance that monitor conformance with the OH&S programme, controls and operational criteria
- reactive measures of performance that monitor ill health, incidents (including accidents, near-misses, etc.), and other historical evidence of deficient OH&S performance
- recording of data and results of monitoring and measurement sufficient to facilitate subsequent corrective action and preventive action analysis
For equipment that is required to monitor or measure performance, has established and maintained a procedure for the calibration and maintenance of such equipment, as appropriate. Records of calibration and maintenance activities and results will be retained.

Applicable documents: Procedure performance measurement and checking  
Procedure calibration  
Records of monitoring and measurement

4.5.2 Evaluation of compliance

4.5.2.1 Consistent with its commitment to compliance The Recycling Company has established, implemented and maintained a procedure for periodically evaluating compliance with applicable legal requirements. The organisation will keep records of the results of the periodic evaluations.

Applicable documents: Procedure periodic evaluation compliance  
Records of periodic evaluations

4.5.2.2 The Recycling Company will evaluate compliance with other requirements to which it subscribes. The organisation will combine this evaluation with the evaluation of legal compliance referred to in 4.5.2.1.

The organisation will keep records of the results of the periodic evaluations.

4.5.3 Incident investigation, nonconformity, corrective action and preventive action.

4.5.3.1 Incident investigation The Recycling Company has established, implemented and maintained a procedure to record, investigate and analyse incidents in order to:

- determine underlying OH&S deficiencies and other factors that might be causing or contributing to the occurrence of incidents;
- identify the need for corrective action;
- identify opportunities for preventive action;
- identify opportunities for continual improvement;
- communicate the results of such investigations.

The investigations will be performed in a timely manner. Any identified need for corrective action or opportunities for preventive action will be dealt with in accordance with the relevant parts of 4.5.3.2.

The results of incident investigations will be documented and maintained.

Applicable documents: Procedure Incident investigation  
Incident reports

4.5.3.2 Nonconformity, corrective action and preventive action The Recycling Company has established, implemented and maintained a procedure for dealing with actual and potential nonconformities and for taking corrective action and preventive action. This procedure will define requirements for:

- identifying and correcting nonconformities and taking action to mitigate their OH&S consequences;
- investigating nonconformities, determining their cause and taking actions in order to avoid their recurrence;
- evaluating the need for action to prevent nonconformities and implementing appropriate actions.
• designed to avoid their occurrence
• recording and communicating the results of corrective action and preventive action taken
• reviewing the effectiveness of corrective action and preventive action taken.

In case the corrective action and preventive action identifies new or changed hazards or the need for new or changed controls, the procedure will require that the proposed actions shall be taken through a risk assessment prior to implementation.

Any corrective action or preventive action taken to eliminate the causes of actual and potential nonconformities will be appropriate to the magnitude of problems and commensurate with the OH&S risks encountered.

_The Recycling Company_ will ensure that any necessary changes arising from corrective action and preventive action are made to the OH&S management system documentation.

Applicable documents: Procedure Nonconformity, corrective action and preventive action

- Nonconformity reports
- Documented corrective actions
- Documented preventive actions

### 4.5.4 Control of records

_The Recycling Company_ has established and maintained records as necessary to demonstrate conformity to the requirements of its OH&S management system and of this OHSAS Standard, and the results achieved.

_The Recycling Company_ has established, implemented and maintained a procedure for the identification, storage, protection, retrieval, retention and disposal of records.

Records will be and remain legible, identifiable and traceable.

Applicable documents: Procedure control of records

- Records

### 4.5.5 Internal audit

_The Recycling Company_ will ensure that internal audits of the OH&S management system are conducted at planned intervals to:

a) determine whether the OH&S management system:
   - conforms to planned arrangements for OH&S management
   - including the requirements of this OHSAS Standard
   - has been properly implemented and is maintained
   - is effective in meeting the organisation's policy and objectives;

b) provide information on the results of audits to management.

The internal audit programme has been planned, established, implemented and maintained by the organisation, based on the results of risk assessments of the organisation's activities, and the results of previous audits.

The Audit procedure has been established, implemented and maintained and address:

- the responsibilities, competencies, and requirements for planning and conducting audits, reporting results and retaining associated records
- the determination of audit criteria, scope, frequency and methods.

Selection of auditors and conduct of audits will ensure objectivity and the impartiality of the audit process.

Applicable documents: Procedure Internal audit
4.6 Management review

Top management of The Recycling Company will review the organisation’s OH&S management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. Reviews will include assessing opportunities for improvement and the need for changes to the OH&S management system, including the OH&S policy and OH&S objectives.

Records of the management reviews will be retained.

Input to management reviews will include:
- results of internal audits and evaluations of compliance with applicable legal requirements and with other requirements to which the organisation subscribes
- the results of participation and consultation (see 4.4.3)
- relevant communication(s) from external interested parties, including complaints
- the OH&S performance of the organisation
- the extent to which objectives have been met
- status of incident investigations, corrective actions and preventive actions
- follow-up actions from previous management reviews
- changing circumstances, including developments in legal and other requirements related to OH&S
- recommendations for improvement

The outputs from management reviews will be consistent with the organisation’s commitment to continual improvement and will include any decisions and actions related to possible changes to:
- OH&S performance
- OH&S policy and objectives
- resources
- other elements of the OH&S management system.

Relevant outputs from management review will be made available for communication and consultation (see 4.4.3)

Applicable documents: Internal audit reports
- Relevant communication from external interested parties
- Complaints
- Objectives
- Incident reports
- Reports from previous Management reviews

Prepare the required Occupational Health & Safety procedures

To assure that the procedure is the latest issue, these documents are usually marked with a revision number (paper versions) as pre-described by the Procedure Control of Documents. Check always that you have the latest revision.

Nowadays most companies use monitors and digital displays where the procedures and job instructions can be displayed. This guarantees that the latest or current version is always available.
4.3.1 Procedure for hazard risk identification and risk assessment

**Purpose:** To provide a method for the identification of hazards and control of risks arising from the workplace and the introduction of new plant, processes and substances to the facility and the means by which these risk shall be eliminated or minimised.

**Scope:** This procedure is essentially concerned with the risks to people in the workplace.

**Responsibility:** The Management Representative and the Department Managers are responsible for the execution and maintenance of this procedure.

**References:**
- OHSAS 18001:2007
- Procedure incident investigation
- Procedure control of records
- Procedure internal audit
- Procedure control of documents
- Procedure communication, participation and consultation
- Procedure communication, participation and consultation

---

**Flowchart Diagram:**
- Start
- Identify work activities (Step 1 of Risk Assessment)
- Identify hazards (Step 2 of Risk Assessment)
- Determine risks (Step 3 of Risk Assessment)
- Identify consequences (Step 4 of Risk Assessment)
- Prepare risk control of action plan (Step 5 of Risk Assessment)
- Review if adequate (Step 6)
- Record findings (Step 7 of Risk Assessment)
- Communicate to people involved
- Is action needed?
  - Yes: Carry out needed action in procedures, job instructions and other
  - No
- Finish
4.3.2 Procedure identifying and assessing legal and other OH&S requirements

Number of the Procedure: 
Revision number: Date of first issue: Issued by: 
Prepared by: Date of revision: Approved by: 

Purpose:
This procedure outlines the process used to access and evaluate laws, regulations and internal company requirements that apply to environmental aspects of its mission, activities, products and services.

Scope:
Environmental Management System legal requirements encompass all the constraints imposed on the company to control its environmental aspects and operations. These constraints include international and national laws, regulations, environmental permits, registrations and local requirements.

Responsibilities:
The Operations Manager is responsible for identifying and analysing occupational health and safety regulations and other legal requirements relevant to the operation and the activities and services.

The Operations Manager is responsible for communicating this information to the management, staff and the Management Representative.

References: OHSAS 18001:2007
4.4.2 Procedure competence, training and awareness

Purpose:
The purpose of this procedure is to make people working under control of the Recycling Company aware of:

- the OH&S consequences, actual and potential, of their work activities, their behaviour and the H&S benefits of improved personal performance.
- their roles and responsibilities and importance in achieving conformity to the OH&S policy and procedures and to the requirements of the OH&S management system, including emergency preparedness and response requirements.
- the potential consequences of departure from specific procedures and job instructions.

Scope:
This procedure applies to all relevant levels of the company.

Responsibility:
The Management Representative identifies the training needs for all personnel whose work may create a significant impact on OH&S.

Each Operations Manager shall identify the training needs within their responsibility.

Operations Managers shall, through OH&S training, train all the employees to be aware of the importance of compliance with the environmental policy, procedures, work instructions and the OH&S Management System, including OH&S awareness and individual coaching.

The OH&S steering committee is responsible for maintaining OH&S training requirements.

The Human Resources Manager is responsible for planning and organising the actual training.

References:
OHSAS 18001:2007
Employee training records
4.4.3.2 Procedure communication, participation and consultation

Number of the Procedure:

Revision number: Date of first issue: Issued by:
Prepared by: Date of revision: Approved by:

Purpose:
Regarding the Recycling Company's OH&S management system, this procedure describes the:
- process for internal communication
- communication with contractors and visitors and external interested parties
- communication with external interested parties
- worker participation
- consultation with contractors and external interested parties

Scope:
This procedure applies to all internal and external OH&S communications relating to the company’s OH&S aspects, and the OH&S management system.
This procedure covers the method for addressing communications as required by OHSAS 18001:2007.

Responsibility:
All communication about OH&S matters is co-ordinated by the Management Representative. Without the needed authority, employees are not allowed to address this matter.
The Management Representative is responsible for ensuring that this procedure is communicated to all employees.
The Management Representative is responsible for maintaining this procedure.
This procedure consists of 5 separate procedures.
Process for Internal communication

Start

Urgent?

Yes

No

Communicate immediately with contractors and visitors

Incident reports

Hazards and risks

Operational control

Consider target audience and needs

OH&S briefings, meetings

Notice boards

Check effectiveness communication

Yes

No

OHSAS policy and objectives

Legal & other requirements

Previous experience

Staffing for OH&S activities

Emergency response

Alignment contractor’s OHSAS policy

Additional consultation

Requirements assessment

Conformance

Process and reporting

Incident investigation

Non-conformities and corrective action

day-to-day communication

Progress eliminating hazards and risks

Communicate, before actual work of visit takes place

Newsletters, posters, websites, dedicated meetings

Check effectiveness communication

Yes

No

Monitor and report effectiveness communication

LAN

Finish
Process communication with contractors and visitors and external interested parties

1. **Start**

2. **Identifying the need for contractor and external interested party participation**
   - New or unfamiliar hazards
   - Reorganisations
   - New or amended controls
   - Changes in materials, equipment, exposures etc.
   - Changes in legal or other requirements

3. **Structured consulting**

4. **Formulate recommendations**

5. **Implement recommendations**

6. **Check effectiveness**
   - Yes
   - No
     - Monitor and report effectiveness
     - Finish

7. **Changes in emergency arrangements**

8. **Hazard that can impact neighbours**
Process for external communication:

1. Start
2. Receiving and registering external communications
3. Initial review
4. Distributed to Management and related staff
5. Formulate response by assignee
6. Distribute response
7. Check effectiveness of communication
   - Yes
     - Monitor and report effectiveness of external communication
     - Finish
   - No

Other OHSAS related communication
Legal documents
External communication
Legal and other requirements
Process worker participation

Start

Urgent?

Communicate internally immediately

Consider target audience and needs

Check effectiveness communication

Communicate, consider target audience and needs

Check effectiveness communication

Monitor and report effectiveness internal communication

Finish

Yes

No

Yes

No

Incident reports

Hazards and risks

Changes that can impact OH&S

OH&S briefings, meetings

Notice boards

OHSAS policy and objectives

Progress eliminating hazards and risks

Newsletters, posters, websites, dedicated meetings

LAN
Process consultation with contractors and external interested parties

Start

- Identifying the need for worker participation
- Selecting specialist or experts among workers
- Structured consulting
- Formulate recommendations
- Implement recommendations
- Check effectiveness
- Monitor and report effectiveness
- Finish

Yes

No

References:
OHSAS 18001:2007
4.4.5 Procedure Control of Documents

Number of the Procedure:
Revision number:
Prepared by:
Date of first issue:
Date of revision:
Issued by:
Approved by:

Purpose:
The purpose of this procedure is to establish a process for the review, distribution, and implementation of documents that describe and control the OH&S Management System at the Recycling Company.

Scope:
This procedure applies to all elements of OHSAS 18001:2007 and the OH&S Management System.

Responsibilities:
The Management representative is responsible for the maintenance and execution of this procedure.

References: OHSAS 18001:2007
4.4.6 Procedure operational control

Number of the Procedure: [8]
Revision number: [8]
Prepared by: [8]
Date of first issue: [8]
Issued by: [8]
Date of revision: [8]
Approved by: [8]

Purpose:
The Recycling Company has identified those operations and activities that are associated with identified risks where control measures need to be applied.

Scope:
Establishing and maintaining a documented procedure to cover situations where their absence could lead to deviations from the company’s OH&S policy and its objectives.

Responsibilities:
Management Representative and Operations Manager

Information to be considered:
- OH&S Policy
- Results of Hazard Risk Identification
- Results of Risk Assessment
- Evaluation of existing controls
- Determination of new controls
- Management of change processes
- Existing operating procedures
- Product supply chain controls
- Feedback from participation
- Feedback from contractors and others
- Access to the workplace and 3rd parties

Examples of areas in which OH&S risks typically arise and examples of their associated control measures include:
- General control measures
- Performance of hazardous tasks
- Use of hazardous materials
- Facilities and equipment
- Purchase of goods/equipment and services
- Contractors
- Other external personnel or visitors in the workplace
The Recycling Company has established operational controls to eliminate, or reduce and control, the OH&S risks that could be introduced into the workplace by employees, contractors, other external personnel, members of the public and/or visitors. Operational controls shall also need to take into account situations where OH&S risks extend into public areas or areas controlled by other parties (e.g. when employees of The Recycling Company are working at a client’s site). It will be sometimes necessary to consult with external parties in such circumstances. Examples of areas in which OH&S risks typically arise, and examples of their associated control measures, include:

**General control measures**
- regular maintenance and repair of facilities, machinery and equipment to prevent unsafe conditions from developing
- housekeeping and maintenance of clear walkways, traffic management (i.e. the management of the separation of vehicle and pedestrian movements)
- provision and maintenance of workstations
- maintenance of the thermal environment (temperature, air quality) and maintenance of the ventilation systems and electrical safety systems
- maintenance of emergency plans
- policies related to travel, bullying, sexual harassment, drug and alcohol abuse, etc.
- health programmes (medical surveillance programmes)
- training and awareness programmes relating to the use of particular controls (e.g. permit-to-work systems)
- access controls

**Performance of hazardous tasks**
- use of procedures, job instructions, or approved working methods and use of appropriate equipment
- pre-qualification and/or training of personnel or contractors for hazardous tasks
- use of permit-to-work systems, pre-approvals, or authorizations
- procedures controlling the entry and exit of personnel to hazardous work sites and controls to prevent ill health

**Use of hazardous materials**
- established inventory levels, storage locations and storage conditions
- conditions of use for hazardous materials
- limitations of areas where hazardous materials can be used
- secure and safe storage provisions and control of access
- provision of and access to material safety data and other relevant information
- shielding of radiation sources and isolation of biological contaminants
- knowledge in the use of and availability of emergency equipment

**Facilities and equipment**
- regular maintenance and repair of facilities, machinery and equipment to prevent unsafe conditions from developing,
- housekeeping and maintenance of clear walkways, and traffic management
- provision, control and maintenance of personal protective equipment (PPE)
- inspection and testing of OH&S equipment, such as guarding, fall arrest systems, shutdown systems, rescue equipment for confined spaces, lock-out systems, fire detection and suppression equipment, exposure monitoring devices
- ventilation systems and electrical safety systems
- inspection and testing of material handling equipment (cranes, forklifts, hoists and other lifting devices)
**Purchase of goods, equipment and services**
- establishment of OH&S requirements for goods, equipment and services to be purchased
- communication of the organization’s own OH&S requirements to suppliers
- pre-approval requirements for the purchase or transport/transfer of hazardous chemicals, materials and substances
- pre-approval requirements and specifications for the purchase of new machinery and equipment
- pre-approval of procedures for the safe operation of machinery, equipment, and/or the safe handling of materials prior to their use
- selection and monitoring of suppliers
- inspection of received goods, equipment and services, and (periodic) verification of their OH&S performance
- approval of the design of OH&S provisions for new facilities

**Contractors**
- establish criteria for the selection of contractors
- communication of the organization’s own OH&S requirements to contractors
- evaluation, monitoring and periodic re-evaluation, of the OH&S performance of contractors

**Other external personnel or visitors in the workplace.**
As the knowledge and capabilities of visitors or other external personnel vary greatly, this should be considered when developing controls. Examples can include:
- entry controls,
- establishing their knowledge and capabilities prior to permitting the use of equipment,
- provision of advice and training as necessary,
- warning signage/administrative controls,
- methods for monitoring visitor behaviour and supervising their activities

**References:**
OHSAS 18001:2007
4.4.7 Procedure emergency preparedness and response

Number of the Procedure: 
Revision number: 
Prepared by: 
Date of first issue: 
Date of revision: 
Issued by: 
Approved by: 

Purpose: To identify the potential for emergency situations and to respond to such emergency situations.

Scope: Procedure to identify potential emergency situations that could impact on OH&S.

Responsibilities: The operations manager is responsible for the execution of this procedure.

Examples of possible emergencies which vary in scale, can include: incidents leading to serious injuries or ill health, fires and explosions, release of hazardous material, gases, natural disasters, bad weather, loss of utility supply (e.g., loss of electric power), pandemic, epidemic, outbreak of communicable disease, civil disturbance, terrorism, sabotage, workplace violence, failure of critical equipment, traffic accidents.

Consideration should be given to the existence and/or capability of the following in developing emergency response procedure(s): inventory and location of hazardous materials storage, numbers and locations of people critical systems that can be impacted on OH&S, the provision of emergency training, the direction and emergency control measures: medical equipment, first aid kits, control systems and any supporting secondary or parallel/multiple control systems, monitoring systems for hazardous materials, fire detection and suppression systems, emergency power sources, availability of local emergency services and details of any emergency response arrangements currently in place, legal and other requirements, previous emergency response experience.

References: OHSAS 18001:2007

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4.5.1 Procedure performance measurement and checking

Number of the Procedure:

Revision number:
Prepared by:

Date of first issue:
Date of revision:
Issued by:
Approved by:

Purpose:
To measure and check the performance in order to continually improve.

Scope
Using a uniform method to measure and check the performance of the Recycling company with regards to OH&S.

Responsibilities
The Management representative is responsible for the execution of this procedure.

Examples of proactive measures include assessments of compliance with legal and other requirements effective use of the results of the workplace safety four inspections evaluation of the effectiveness of OH&S training use of the OH&S behaviour based observations use of perception surveys to evaluate OH&S structure and relate employee satisfaction effective use of the results of internal and external audits completion of legally required and other inspections scheduled the extent to which programmes have been implemented the effectiveness of the employee participation programs the use of health screening exposure modelling and monitoring benchmarking against good OH&S practices work activity assessments.

Examples of reactive measures include monitoring ill health occurrences and rates of incidents and ill health lost time incident rate, best time ill health rates actions required following a assessment by regular action following receipt of comments from interest parties.

References: OHSAS 18001:2007
4.5.1 Procedure calibration

Number of the Procedure: 
Revision number: 
Prepared by: 

Date of first issue: 
Date of revision: 
Issued by: 
Approved by: 

Purpose 
To assure correct measuring of performance

Scope 
To develop a uniform method for measuring the performance with regards to OH&S within the recycling company.

Responsibilities 
The Management representative is responsible for the execution of this procedure.

References: OHSAS 18001:2007
4.5.2.1 Procedure periodic evaluation compliance

Number of the Procedure:
Revision number:
Date of first issue:
Prepared by:
Date of revision:
Issued by:
Purpose
Scope
Responsibilities

Start

Replan evaluation

Determine objectives for periodic evaluation of compliance with legal and other requirements

Procedure Internal Audit

Procedure identifying and assessing legal and other OH&S requirements

Objectives

Audits
Results of periodic inspection
Analysis of legal requirements
Analysis of other requirements
Review of incident reports
Review of risk assessments
Interviews
Facility inspection
Project and/or work reviews
Analysis of test results from monitoring and testing
Facility tours
Observations

Determine method for periodic evaluation

Review and interpret information

Plan the periodic evaluation and put team together

Carry out periodic evaluation according to objectives

Adequate

Yes

No

Finish

Data

Document measuring methods and calibration interval

Document evaluation results

LAN

References:
OHSAS 18001:2007
Procedure Internal audit

Procedure Identifying and assessing legal and other OH&S requirements

The Easy Implementation of a Dedicated Occupational Health & Safety Management System for The Recycling Industry
4.5.3.1 Procedure incident investigation, nonconformity, corrective action and preventive action

Number of the Procedure:

Revision number: Prepared by: Date of first issue: Issued by:

Purpose
To assure correct measuring of performance. To find and eliminate causes for incidents

Scope
To investigate root causes of incidents and nonconformities and eliminate these of reoccurrence by corrective action and preventive action

Responsibilities
The Management Representative is responsible for the execution of this procedure.

References: OHSAS 18001:2007

Finish
4.5.4 Procedure Control of Records

Purpose
This procedure outlines the requirements and responsibilities for handling, identifying, collecting, filing and retaining environmental records.

Scope
This procedure applies to all records generated by and for the Environmental Management System and the responsibilities involved.

Responsibilities
The Management Representative is responsible for the execution of this procedure.

References: OHSAS 18001:2007
4.5.5 Procedure Internal Audit

Number of the Procedure: 
Revision number: Date of first issue: 
Prepared by: Date of revision: Issued by: 
Approved by:

Purpose
The purpose of this procedure is to define the quality audit practices at the company.

Scope
The purpose of auditing is to ensure conformance with the company's OH&S policies, systems and procedures, assess the effectiveness of the occupational health & safety activities, evaluate the effectiveness of the OH&SMS implementation, promote understanding among management, staff and employees, and communicate information to the company's management.

In order to achieve maximum improvement, the audit must: be planned; establish facts; be based on objective evidence; be executed competently; and be reported constructively.

Responsibilities
The Management Representative is responsible for the execution of this procedure.

References:
OHSAS 18001:2007
Continual improvement

The Easy Implementation of a Dedicated Occupational Health & Safety Management System for The Recycling Industry
Continual Improvement

Continual improvement is an ongoing effort to improve material / products, services or processes. These efforts can seek “incremental” improvement over time or “breakthrough” improvement all at once.

Among the most widely used tools for continuous improvement is a four-step quality model, the plan-do-check-act (PDCA) cycle, also known as Deming Cycle or Shewhart Cycle:

**Plan:** Identify an opportunity and plan for change.

**Do:** Implement the change on a small scale.

**Check:** Use data to analyze the results of the change and determine whether it made a difference.

**Act:** If the change was successful, implement it on a wider scale and continuously assess your results. If the change did not work, begin the cycle again.

Other widely used methods of continuous improvement, such as Six Sigma, Lean, and Total Quality Management, emphasize employee involvement and teamwork; measuring and systematizing processes; and reducing variation, defects and cycle times.

**Continuous or Continual?**

The terms continuous improvement and continual improvement are frequently used interchangeably. But some quality practitioners make the following distinction:

Continual improvement: a broader term preferred by W. Edwards Deming to refer to general processes of improvement and encompassing “discontinuous” improvements, that is, many different approaches, covering different areas.

Continuous improvement: a subset of continual improvement, with a more specific focus on linear, incremental improvement within an existing process. Some practitioners also associate continuous improvement more closely with techniques of statistical process control.
Typical drivers for continual improvement are the internal audit reports, customers complaints and the results of the management review. But it is important to listen also to improvements that are suggested by the operators. They are the experts in their processes and know usually very well what is failing, why and what can be improved. Unfortunately many companies do not recognize this and let valuable knowledge go unused.

**Why Continual Improvement?**

To make certain that there is an active plan for continual QMS improvements, and that causes of non-conforming material / product are investigated, specifically to eliminate these non-conformance. Also attempts should be made to detect and eliminate potential causes of non-conforming material / product before they occur. These actions contribute to the continually improvement of the system.

Continual Improvement is a constant search for ways to improve the functioning of the QMS by investigation and elimination of causes of non-conforming material / product, at any point in the process, distribution and storing. Also, it is the procedure in use to prevent occurrence of non-conforming material / product in the first place.
The implementation of OHSAS 18001

Before implementing the QMS, make sure that the company is ready for it, that there is top management commitment and clear communication about the objectives. The ten most common mistakes made when implementing a QMS are:

1. Undertaking the process for the wrong reason. Occasionally business owners have visions of grandeur derived from potentially displaying the certificate or attending the awards ceremony rather than focusing on the long term benefits to their business.

2. Total senior management commitment to the process of implementing and maintaining is missing.

3. Dedicating insufficient resource to the process.

4. Failing to accept the change is an on-going process not a project with an end date.

5. Setting unrealistic target dates and objectives.

6. Failing to implement the OH&SMS throughout the organization, instead believing it is only applicable to the operational functions such as processing. A OH&SMS is influencing the whole organization.

7. Failing to train staff adequately in how to implement change.

8. Documenting the OH&SMS before it has been properly designed. Design the organisation first and document after.

9. Believing the implementation is to document procedures rather than to generate improved results on a continual base.

10. Implementing the OH&SMS before robust checks and updates, if required, have been carried out.

Make sure that you purchase an original document of the ISO 9001:2008 standard from your national standards office or from www.iso.org; and if your company is within EU jurisdiction, that you have a relevant copy of the European Regulation regarding End-of-Waste quality criteria for the material you intend to be classified as a product.

The OH&SMS Implementation Planner consists of the Planning Calendar below and the dedicated flow chart.

The Planning Calendar below identifies a typical sequence of steps that Recycling Companies should take when implementing a Occupational Health & Safety Management System according to OHSAS 18001:2007.

It provides an illustration indicating a number of important steps, but is not an exhaustive list of activities necessary to develop an effective Occupational Health & Safety Management System.

Since this Implementation Planner is a guide line, it is very important to follow the implementation very close. React immediately on unexpected situations, unexpected reactions of personnel. If personnel does not understand certain measures, take the time to explain it and get them involved.

Make sure that every step is completed.
### The QMS Implementation Planner

<table>
<thead>
<tr>
<th>Step</th>
<th>Preparation stage</th>
<th>QMS Implementation Planner</th>
<th>Status/Date</th>
</tr>
</thead>
</table>
|      | **Understand your Customer Needs and improve if necessary** | • Become familiar with the OH&S SMS requirements and provide training as needed within the organisation.  
• Communicate the goals and objectives through all layers in the organisation.  
• Identify the gaps you have in your OH&S management system.  
• Demonstrate understanding of the new approach  
• Ensure top management involvement and full support  
• Form implementation teams of capable people from various levels.  
• Develop your project plan  
• Get information about potential certification bodies | |

<table>
<thead>
<tr>
<th></th>
<th><strong>Step 1</strong></th>
<th>Analyze the company</th>
<th></th>
</tr>
</thead>
</table>
|      | **Understand your Customer Needs and improve if necessary** | • Identify the risks and safety hazards at your company. Measure, monitor, analyze and determine the processes and the opportunities to improve them and minimize risks.  
• Use flow charts to visualize the key processes.  
• Top Management to determine the OH&S Policy  
• Top management to launch the project | |
### Step 2
Define the system based on the results from step 1

Say what you do and how you do it.

- Flow charts
- Value stream maps
- Existing procedures
- Job Instructions
- Check what is already available in your company
- Determine the gaps between what you have and what you need
- Select internal auditors and train them
- Modify existing procedures and Job Instructions
- Write new procedures and Job Instructions

### Step 3
Define the support and Management Processes

Say what you do and how you do it.

- Identify and define the support processes
- Identify and define the management processes
- Identify the sequence and interaction of support and management processes
- Determine risks and safety hazards
- Plan internal auditing and execution
- Use flow charts to study existing processes and their risks
- Continue implementation plan
- Keep people involved and informed

### Step 4
Adequately define and communicate the QMS

Do what you say.

- Confirm that the OH&SMS is focused on performance of the system
- Confirm that the OH&SMS is focused on compliance
- Confirm that the OH&SMS is focused on reducing health and safety hazards.
- Standardize communication of information
- Identify over existence of documentation
- Keep it simple
- Capture simplified processes in concise documentation and flow charts
- Ensure that the implementation of the OH&SMS meets requirements of your customers, OHSAS 18001:2007.
- Management Review
### Step 5

**Carry out internal and third party audits.**

**Prove it.**

- Provide for internal auditing of all processes, with a focus on performance, while checking for compliance and continual improvement.
- Establish a standard process for planning, executing and reporting the results of all audits.
- Go for third party registration of the OH&SMS.

### Follow-up Stage

**Continually improve.**

- Demonstrate assurance, organizational efficiency, effectiveness and continual improvement from the OH&SMS.
- Continually enhance top management support and commitment to provide the needed resources such as competent people and a safe work environment.
- Evaluate changes resulting from continual improvement efforts.
- Repeat comprehensive analysis of all activities periodically to continue improvement in occupational health and safety.
- Identify requirements that your recycling company must meet by statutory and regulatory requirements.
- Monitor and measure, as appropriate, the processes to ensure that they are under control.
- Keep people involved and informed.

Please find on the next page the flow diagram that supports the QMS implementation planner.
Flow Chart for the OH&SMS Implementation Planner

Understand your risks and improve if necessary

Start

Identify your safety hazards

Are you meeting OHSAS18001 requirements? No Perform Gap Analysis and improve process

Say what you do

Are your risks identified? No Perform Risk Assessment

Yes

Rework into your Standard Format

Need outside help? Yes Use Consultant

No

Do what you say

Follow your procedures and documentation

Prove it

Conduct Registration Audit

Pass? No Perform Corrective Action

Yes

Conduct Surveillance Audits

Pass? No Perform Corrective Action

Yes

Continually improve

Continue to follow and improve
Design the OHSAS 18001 Management System

The OHSAS 18001 Specification follows the Plan-Do-Check-Review cycle, with a concurrent emphasis on continual improvement. This model fits in neatly with the structure of other management system documents such as ISO 14001. This alignment of the management system documents helps in the facilitation of Integrated Management Systems.

The following steps help form the basic structure of the management system and link into the structure of OHSAS 18001.

**Plan:** During the planning stage you should:

1. Ensure you have the commitment of top management.
2. Define, with the authorization of top management, the company’s occupational health and safety policy.
3. Planning must be completed to establish a framework for identifying hazards, the assessment of risks and the implementation of necessary control measures.
4. Legal obligations must be identified and understood, objectives set and a management program for achieving them implemented. This entire process should be documented.

**Do:** Implement your Health and Safety Management System

At this point you should:

1. Establish roles and responsibilities.
2. Develop procedures for the consultation and communication of OHS information to employees and other interested parties.
3. Document your processes and develop a system of document and data control.
4. Apply a system of operational control.
5. Establish plans and procedures for emergencies.

**Check:** Your management system and take any necessary corrective action

You should aim to continually improve your management system by:

1. Introducing performance, measuring and monitoring practices.
2. Establishing and documenting responsibility and authority for accidents, incidents, non-conformities and corrective & preventative action.
3. Establishing a procedure for records and records management.
4. Auditing and assessing the performance of the management system.
5. Performing management reviews of the system at identified and defined intervals.

**Act:** Gain registration
References


OHSAS 18002:2008, Occupational health and safety management systems - Guidelines for the implementation of OHSAS 18001:2007

OHSAS 18001:2007, Occupational health and safety management systems - Requirements
Notes
The Bureau of International Recycling (BIR) was created in 1948 as the international trade federation representing the world's recycling industries. BIR members' interests cover in particular ferrous and non-ferrous metals, paper and textiles, represented by the four commodity divisions. BIR committees deal with amongst other topics: stainless steel and special alloys; plastics; and tyres which are also studied and traded by some BIR members. About 800 companies and national federations from over 70 countries are affiliated to BIR. BIR's primary goals are to promote materials recycling and recyclability, thereby conserving natural resources, protecting the environment, and facilitating free trade of recyclables in an environmentally sound manner.

BIR – REPRESENTING THE FUTURE LEADING RAW MATERIAL SUPPLIERS

Bureau of International Recycling (AISBL)
Avenue Franklin Roosevelt 24,
B-1050 Brussels,
Belgium

Tel: +32 2 627 57 70
Fax: +32 2 627 57 73

bir@bir.org
www.bir.org