

Safety in the U.K.

An International Perspective

VIC RODDA IS GROUP HEALTH, SAFETY AND ENVIRONMENTAL (HSE) MANAGER FOR GERMAIN'S TECHNOLOGY GROUP IN THE U.K.

In this interview, Rodda explains how HSE practices and standards in the U.K. differ from those in the U.S. and discusses how corporate social responsibility (CSR) and the green movement have impacted international HSE practices.



IPS: Please provide a brief description of your professional background and of your position as group HSE manager for Germain's Technology Group.

VR: I joined Germain's Technology Group in June 2009 as the group HSE manager and have worked in health and safety for more than 17 years. Prior to this, I served 25 years in the military (Army), during which I constantly dealt with situations and scenarios where safety was critical to the consequences of failure or non-compliance.

After leaving the military life and being far too young to retire, I identified that I had a good, sound base to seek opportunities to increase my knowledge and experience in this field.

My first position was working within manufacturing for a modern soft drinks producer who holds a global position in the market and is respected in the area of manufacturing processes. This was where I gained my chartered health and safety status and became a member of the Institute of Occupational Health. I also took on the added role of planning supervisor/coordinator for all construction projects that fell within

the scope of the construction design management regulations (CDM), which are a requirement for compliance in the U.K.

However, CDM regulations continually develop and change, incorporating increasing stringent management controls on clients and principal contractors involved with registered projects. This role delivered an immense challenge but also gave me the opportunity to work with international contractors who had been awarded contracts integral to the project deliveries. Contractors varied depending on the project but included Italy, France and Germany, each requiring many visits to their locations to ensure that HSE compliance standards for the U.K. were met, including machinery and working practices to be upheld when the contractors visited and worked within the site.

I decided to leave the soft drinks industry to branch out into another area of health and safety away from manufacturing. This move took me to the head of HSE for First Group (service transport buses), covering the East of England, including 22 depots and bus terminals, 740 vehicles, 2,500 employees and the movement of 4 million passengers a month!

In this position, I interacted with many people and law enforcement agencies involved in public transport. During this time with First Group, my links with American safety organizations evolved. I participated in the delivery of a successful safety initiative set up by First Group called

the Injury Prevention Program. I was part of the U.K. team that supported the delivery of this initiative to Greyhound and yellow school buses in the U.S., and I participated in weekly teleconference calls to ensure clear communication channels and support to my First Group colleagues in the U.S.

I was then appointed head of HSE for Germain's Technology Group. Germain's is a global organization with production facilities in Gilroy, CA, Fargo, ND, Aalten, Netherlands, Bugaj, Poland, Castelloli, Spain and two manufacturing sites and a research and development site in the U.K.

Germain's is the world's largest independent coater and enhancer of seeds. They are an exciting company to work for and have a positive and proactive approach toward HSE issues. They have a full employee engagement program and emphasize people accepting their responsibility to each other.

IPS: How do HSE practices and standards in the U.K. differ from those in the U.S.? What are the major differences?

VR: The standards applied between the U.K. and the U.S. are similar, although they vary in their application. Descriptive differences are not a barrier, but it may occasionally mean taking more time to ensure clear communication and understanding. However, since the standards are similar, this is not usually a problem.

I identify best practices at the U.K. and U.S. manufacturing sites. I

have found that U.S. sites are willing to adopt a best practice without hesitation. This may mean that they are more used to this style of working whereas other sites may challenge or feel they are the leaders in proactive delivery of HSE practices.

It takes influence and strong leadership to engage the U.K. in the positives of adopting alternative best practices. However, when it comes to environmental practices, my opinion is that the U.K. applies a much higher level of knowledge and application to environmental practices than the U.S.

The U.K. works to ISO 14001 standards whereas the U.S. is affected by federal and differing state laws. For example, I have noticed that California and North Dakota demonstrate varying levels of compliance.

The U.K. is governed by U.K. environmental law, and companies use the ISO 14001 management system standards to demonstrate compliance management. Failure can expose a company to large financial penalties whereas in the U.S., it is addressed at the local or municipal level rather than at the state or federal level. This may indicate that the U.S. has a much more structured approach than the U.K. where a breach is addressed from the government enforcement level with higher penalties if prosecution is sought.

IPS: *How has the green movement impacted HSE practices in the U.K.? Has the creation of more green jobs created new HSE hazards and exposures? If so, how are these hazards and exposures addressed?*

VR: Scientists finally agree on the threat to the planet posed by rising temperatures. The U.K.'s Green Party has just been recognized with their first-ever member of Parliament, which shows an increased acceptance of the green movement.

This increased interest in the green movement has brought a wide variety of jobs into the U.K. market, such as specialists/advisors in environmental protection and specifically

in green waste collection/recycling. Local waste disposal companies are becoming more critical in what they accept to ensure that compliance is met on arrival at landfill sites.

With the increasing commitment to legislation, smaller waste disposal companies are being bought out and integrated into larger waste stream leaders. This delivers benefits in that standards are met and companies are able to reduce their disposal costs by using a national-size disposal company. When negotiating with national waste providers, it is feasible to have large waste containers (not the domestic size) free of charge. This is an obvious financial benefit to companies, although correct segregation of materials must be met.

However, for companies, it is not just simply a matter of waste segregation. Documentation is important, and waste disposal notes must be held to demonstrate environmental compliance has been met. This results in an increased workload. There is also an increase of disposable materials held on premises for a longer duration due to the inability for mixed disposed waste to be accepted.

I would not say there were increased hazards as such, apart from manual handling activities when separating/disposing of materials to the correct stream. Waste occasionally remains on site for longer periods awaiting the specific collection. Deteriorating waste, such as food, causes nuisance smells as it decays and can lead to rodent and insect infestation. However, this would be encompassed under waste protection legislation.

IPS: *How is CSR viewed in the U.K., and what role do HSE practitioners play in promoting CSR objectives within organizations?*

VR: CSR is about understanding your business impact on the wider world and considering how you can use this impact in a positive way. CSR means having a responsible attitude, going beyond the minimum legal requirements and following straightforward principles that apply;

whatever the size of your business. This area is developing within the U.K. and is increasingly accepted.

Working with your local community brings a wide range of benefits. For many businesses, local customers are an important source of sales, and by improving your reputation, you may find it easier to recruit employees. Local authorities appear to prefer to award contracts to businesses with a record of community involvement.

In today's business environment where change is constant and can be unpredictable, sound systems of risk management and control are critical prerequisites. If financial, environmental, social and ethical risks and opportunities are managed effectively, then:

1) the ability to achieve the company's objectives can be enhanced.

2) the volatility of future earnings and cashflows can be reduced.

3) shareholder value is likely to improve.

4) worldwide environmental and ethical issues are likely to reduce.

Many companies use their lead person responsible for HSE as the identifier for CSR. Since CSR links into so many areas under the remit of HSE, it seems the natural and most preferred choice.

IPS: *What challenges do HSE practitioners in both the U.K. and Europe face when trying to incorporate standards series, such as OHSAS 18001 and ISO 14001, into HSE practices?*

VR: HSE practitioners in the

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U.K. and Europe face many challenges because it has become increasingly important and necessary for companies to hold one or both accreditations if they wish to give themselves the maximum opportunity for gaining a contract or standard worldwide evidence of an excellent reputation. Gaining accreditation is one step; the next is maintaining gained accreditation and standards.

In these ever-changing fiscal times, companies are pressured to streamline their workforce and to dual-hat already loaded practitioners. This becomes a challenge as does

finding a practitioner who has the experience and knowledge to fully undertake the role confidently.

The company's size is crucial in how the management system is structured in rollout. In my experience, the smaller company will gain accreditation more easily than a large one.

Added to this is the company's risk category.

For example, if a petrochemical plant (PCP) is taken to a small manufacturing firm, the PCP is high-risk and would be registered as a Control of Major Accident Hazards site with the complexities in controls that are applied to work activities, as opposed to a small manufacturing company whose controls would be less rigorous.

Under resourcing, maintenance of management systems will expose a company to be in breach of the standards and will risk the exposure of having the standard withdrawn from them, which would be looked upon as a company failure.

When applying the standards within Europe, the main obstacle I have identified is the culture. It is

more evident on the European mainland, HSE practices are applied at different levels. Risk is viewed more easily with the expectation that employees will comply once told without evidence of policies and guidance.

However, evidence is paramount in meeting accreditation standards. The installation of sometimes lengthy policies and guidance may be viewed as unnecessary and therefore builds barriers from the onset. The practitioner needs to implement the standards as positively as possible from the outset and should ensure that they are accepted as best practices by all staff.

IPS: *How do you predict the proposed ISO 26000 standard for social responsibility will affect the duties of HSE practitioners in the U.K.?*

VR: For HSE practitioners, this will mean increased consultation across the whole business from the shop floor to the boardroom and ensuring everyone understands what ISO 26000 means to them.

It will also require more assurance to third parties when visiting sites and customers, gaining confidence that ISO 26000 will draw on best practices developed in both the public and private sector and ensuring that the best social responsibility initiatives are followed.

I personally feel ISO 26000 will be a powerful CSR tool to help organizations move from good intentions to good actions.

IPS: *Based on your experience, which industry sectors in both the U.K. and Europe could benefit from further HSE management?*

VR: In my experience, all industry sectors in the small to mid-size business range would benefit from further HSE management. There are positives and negatives for holding an accreditation, but every business should have access to HSE advice/management. At the very least, all companies should have an appointed person who is able to give advice and support in HSE matters. Free

advice is available on government websites, but it can be open to misinterpretation. A qualified HSE representative should be available for advice and support.

There is no excuse for misunderstanding or incorrect interpretation of compliance.

IPS: *In what ways has the UN's Globally Harmonized System of Classification and Labeling of Chemicals (GHS) affected HSE practices in the U.K. and Europe?*

VR: In the U.K. and Europe, GHS has brought about a detailed look at what is introduced into the European economical area, with the requirement to have all chemicals registered. Failure to have a substance/chemical held on the register will prevent manufacture of the chemical/substance allowed for sale.

A chemical that has been classed and removed from the REACH register will receive a 2-year timeline for use and disposal from the date of classification. After that date, it will be illegal to hold or use the chemical.

Unfortunately, there appears to be some initial difficulty in the interpretation of the REACH directive, so additional clarification is required at the downstream or upstream user level in regard to responsibilities met when using a chemical. However, once everything is complied with, I see GHS as a benefit to all companies.

Benefits to companies include:

- a safer work environment and improved relations with employees;
- an increase in efficiency and reduced costs from compliance with hazard communication regulations;
- Application of expert systems resulting in maximizing expert resources and minimizing labor and costs;
- facilitation of electronic transmission systems with an international scope;
- expanded use of training programs on health and safety;
- reduced costs due to fewer accidents and illnesses;
- improved corporate image and credibility.

Benefits to employees and members of the public include:

- improved safety for employees and others through consistent and simplified communications on chemical hazards and practices to follow for safe handling and use;

- greater awareness of hazards, resulting in safer use of chemicals in the workplace and in the home.

IPS: Does GHS influence your job duties with Germain's Technology Group?

GHS affects my duties within the company, as a manufacturer of a product that uses chemicals in part of the process application. It is the company's responsibility, in compliance with the REACH directive, to pass on information as an upstream or downstream user.

With the manufactured product, I must ensure that the end user is identified so chemical use is clearly identified and correct disposal is followed, i.e., must it go to a waste treatment plant or is the chemical naturally dissolving and safe to land and aquatic life if used, for example, in disposal at a landfill site?

This necessitates communication with end users to seek confirmation that compliance has been met. However, even a declaration does not give total unaccountability if a breach is identified from within the HSE enforcement agency. A company would need to defend itself if this came about. Therefore, it is important to adhere to and retain the correct documentation, which certainly adds time to the HSE professional's workload.

IPS: What HSE research projects or standards initiatives are currently underway in the U.K. and/or Europe?

VR: Current topics and programs listed on the [Health and Safety Executive website](#) include the following:

- The Control of Artificial Optical Radiation at Work Regulations meets a European Union directive to ensure that standards are set and harmonized across Europe to protect workers from harm arising from exposure

to hazardous sources of artificial light.

Some sources of artificial light, particularly UV radiation and light from lasers, can harm workers' eyes and skin and must be properly managed.

Workers in Great Britain are generally well protected from dangerous sources of light, and the majority of businesses know how to manage the risks effectively. Therefore, the regulations will mean few practical changes for most businesses, including those who already manage the risks.

To help those businesses who do not already manage the risks understand what is required and what they must do, Health and Safety Executive is producing guidance to ensure that workers remain appropriately protected.

Common sources of light in the workplace, such as office lights, photocopiers and computers, are not affected by the regulations.

- The Shattered Lives initiative is a major approach to reduce and eliminate slip, trips and falls in the workplace. It provides an e-tool presentation and graphic images that can be used in posters and presentations to influence people's behavior in slips, trips and falls. ☉

Vic Rodda is group health, safety and environmental (HSE) manager for Germain's Technology Group in the U.K. In this role, he is responsible for manufacturing sites in the U.K., Europe and North America. He served in the military from 1968 to 1993, and upon his retirement, he joined Britvic Soft Drinks Ltd as a team leader and health, safety and environmental (HSE) advisor. In 2007, he joined First Group Bus Division as the HSE manager covering Eastern England.

Rodda holds a Nebosh Diploma (Parts 1 and 2), a Nebosh Certificate, a British Safety Council Environmental Diploma and a Planning Supervisors Certificate. He is a member of the Institute of Occupational Safety and Health, the International Institute of Health and Safety, the American Society of Safety Engineers, Project Safety and the Institute of Leadership and Management.



100th Anniversary Contests: Help Tell Safety's Story

GREATEST SH&E CHALLENGE ESSAY CONTEST

What do you think is the greatest challenge facing the SH&E profession in the 21st century? Share your thoughts by entering ASSE's [100th anniversary essay contest](#). Submit an original 1,000- to 2,000-word persuasive essay that outlines a specific challenge and highlights possible solutions/strategies.

Entries must be written by a single individual and must be submitted by Feb. 28, 2011. The top entry, to be selected by a panel of ASSE judges, will receive \$1,500. The winning essay will be announced April 1, 2011. It will be highlighted during Safety 2011 and on ASSE's website. In addition, the top 10 ranked entries will be compiled into a digital publication for distribution to ASSE members and interested parties.

LIGHTS, CAMERA, VIDEO

Not a writer? Then enter [ASSE's 100th anniversary video essay contest](#), "Why the World Needs More SH&E Professionals." At work, at home and places in between, safety touches everyone. Help show the world that SH&E professionals play a vital role in keeping the world safe. Create a short video (no more than 2 minutes in length) that explains the importance of occupational safety and health, and highlights the professionals who safeguard it each day. Whether it's a testimonial, performance art, a comedy routine or one clever sentence recorded with a web cam, as long as it is original, it can be entered.

Submissions are due Feb. 28, 2011, and judging will occur throughout the month of March. The grand-prize entry, which will be announced in April 2011, will win \$1,500. This video will be featured on ASSE's website and will be showcased at Safety 2011 in Chicago. In addition, the entry identified by the most visitors to the ASSE website as their favorite wins \$1,000. ☉