



## Occupational Hygiene

### Purpose

To systematically identify *Health Hazards*<sup>1</sup> and assess and control *Health Risks* in the workplace, and to encourage healthy and productive lives of employees.

### Who is this for?

- *Site Managers*;
- *Managers and Supervisors, Employees* involved in the activities potentially hazardous for health;
- *Contract Holders, Contract Engineers and Contractors* where the Contract Scope includes activities potentially hazardous to health;
- *HSE Professionals*.

### What situations are covered?

This document applies to all *Sakhalin Energy Assets, Facilities, Operations, Projects and Activities*, including activities undertaken by any *Contractor* on behalf of the *Company*.

### Requirements – General

**Site Managers, Department Managers and Supervisors are *Accountable* for requirements 1 to 3 in their own organization:**

1. Manage health and occupational hygiene in compliance with requirements of:
  - a. Russian Federation legislation (overview provided in Legal Requirements for Health and Hygiene<sup>2</sup>), or the law of the territory in which work is conducted if outside RF,
  - b. Lenders and Shareholders as defined in International Requirements for Health and Hygiene.
2. Implement accountabilities and responsibilities defined in Competencies and Responsibilities for Health and Hygiene, Sanitary Monitoring Program and Health Risk Assessment.
3. Monitor hazards, report, review and follow up deviations in accordance with:
  - a. Sanitary Monitoring Program (SMP)
  - b. Incident Reporting and Follow-up Standard,
  - c. HSE Monitoring and Reporting Standard,
  - d. Health Risk Assessment Specification.

**Contract Holders are *Responsible* for requirement 4 and Contract Engineers are Responsible for requirement 4b.**

4. Require Contractors to comply with this Specification.
  - a. For existing Contracts, this is limited to compliance required within the existing Contract.
  - b. For new Contracts, compliance with this Specification is required with particular reference to the Medical Conditions of Contract specification.

**Employees are Responsible for requirement 5:**

5. Comply with Company health and hygiene requirements, instructions and procedures.
  - a. Cooperate with Company measures, including reporting of health incidents and unwell conditions.
  - b. Participate in occupational health and hygiene trainings and activities.

<sup>1</sup> Italicized terms in this document are included in the Sakhalin Energy HSE Glossary.

<sup>2</sup> Underlined items in this document refer to Sakhalin Energy Controlled Documents.

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**Specific Requirements**

**Site Managers, Department Managers and Supervisors are Accountable for requirements 6 to 10, 12 to 25.**

- 6. Implement Health Risk Assessment (HRA) in accordance with industry Health Risk Assessment methodology (defined by OGP) and RF legal requirements with support from the Company Health Manager.
  - a. Review the HRA recommendations.
  - b. Approve and implement HRA Remedial Action Plans to completion.
  - c. Review HRA in case of Change to operations, work places or working practices.
  
- 7. Reduce exposure to Health Risks which were identified within HRA in the workplace to *As Low As Reasonably Practicable* using the following Hierarchy Of Controls:
  - a. **First:** Eliminate the health Hazard.
  - b. **Second:** Substitute the health Hazard with a less harmful type or form.
  - c. **Third:** Use engineering Controls.
  - d. **Fourth:** Use operational/procedural controls.
  - e. **Fifth:** Use Personal Protective Equipment.
  
- 8. Implement the requirements of Occupational Hygiene Specification.
  - a. Implement and maintain HRA specified Controls and Recovery Measures, including following categories of Risks, for example:
    - Chemicals.
    - Biological, including infectious diseases, food and drinking water.
    - Physical, including vibration, noise, illumination, microclimate, electromagnetic fields, ionizing radiation, and work in extreme climate & adverse weather.
    - Ergonomic and Psychological, including Human Factors Engineering, manual handling, visual display unit work, organizational factors and stress.
  - b. Manage chemicals at worksites in accordance with Sakhalin Energy Chemicals Management Standard (doc.N 0000-S-90-04-O-0252-00)
  - c. Implement controls as required by Sanitary Monitoring Program (SMP) for Assets.
  - d. Communicate Health Risks and Controls to impacted employees.
  - e. Provide appropriate PPE as defined in Sakhalin Energy Personal Protective Equipment Standard.(doc.N 0000-S-90-04-O-0262-00)
  
- 9. Apply Permit To Work (ISSOW) for the activities hazardous for health as per “Permit to Work Manual: ISSoW” (doc.N 1000-S-90-04-P-0031-02),
  
- 10. Manage Occupational Exposure Limits of hazardous factors in accordance to the limits set by RF legislative authorities and/or International limits, whichever is more stringent.

**Corporate Health Manager is Responsible for requirement 11.**

- 11. Coordinate the following activities:
  - a. Conduct HRA, recommend Controls, and Remedial Action Plans.
  - b. Support Assets in development and implementation of Sanitary Monitoring Programs (in support of requirement 3).

**Specific Requirements Acute Toxic Substances**

12. Acute toxic substances produce serious harm to health as a result of a single or short-term exposure. The following substances shall be considered acute toxic:

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- a. Substances defined as "lethal" in American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel Code (BPVC)
- b. Streams containing H<sub>2</sub>S level at the 1000 ppm-mole and
- c. Streams in which the mass fraction of the following substances (in total) exceeds 5 per cent.

Such streams include:

Group 1 carcinogens (e.g. benzene) as classified by International Agency for Research on Cancer (IARC) and

Substances characterised in Table 1 (below) with toxicological properties based on the harmonised integrated hazard classification system for human health and environmental effects.

**Table 1: Toxicological Properties**

IF SWALLOWED	IF CONTACTED WITH SKIN	IF INHALED
LD50 oral, rat at 5 mg/kg	LD50 dermal, rat or rabbit at 50 mg/kg	LC50 inhalation, rat, for gases at 100 ppm-mole/4 h LC50 inhalation, rat, for vapors at 0.5 mg/liter/4 h LC50 inhalation, rat, for particulates or aerosols at 0.05 mg/liter/4 h

**Specific health management requirements for a number of key toxic chemicals are defined in Sections 12.1 to 12.4 of this Specification.**

### 12.1 Benzene

- 12.1.1 Benzene is a component of many crude oils and has been detected as well in condensates. Prolonged and repeated exposure to benzene has been associated with the development of leukemia.

Limits of exposure to Benzene under Occupational Exposure Limits required by Shell HSSE & SP Control Framework.

**Table 2: Recognized Industry Limit for Benzene in the ambient air**

Exposure	Time Weighted Average (TWA)	Short Term Exposure Limit (STEL).	Immediately Dangerous to Life Or Health (IDLH)
	The airborne concentrations averaged over 8 hours	The airborne concentration averaged over any 15 minute period	
Limit mg/m <sup>3</sup>	1.6 mg/m <sup>3</sup>	8 mg/m <sup>3</sup>	326 mg/m <sup>3</sup>
Equivalent ppm*	0.5	2.5	100

- 12.1.2 If recommended benzene exposure limits are exceeded and recognised, personnel shall:

- a. Ensure the benzene content of process streams is measured and registered;



- b. Use respiratory protective equipment (with organic vapor protection) when concentrations of benzene vapor exceed limits.

## 12.2 Hydrogen Sulphide

12.2.1 Hydrogen Sulphide (H<sub>2</sub>S) is a highly toxic gas. Brief exposure to high concentrations of H<sub>2</sub>S can cause rapid unconsciousness without warning symptoms. Death due to respiratory paralysis may follow within a few minutes. At low concentrations H<sub>2</sub>S has the odour of rotten eggs. At high concentrations, however, the odour is not detectable due to rapid paralysis of the sense of smell.

**Table 3: Recognized Industry limits for Hydrogen Sulphide**

<b>8-hour time Weighted average</b>	<b>Short term exposure limit</b>	<b>Immediately Dangerous to Life Or Health</b>
10 ppm	15 ppm	100 ppm

12.2.2 Engineering and work practice control measures shall be used, to the feasible extent, to reduce and maintain staff exposure within the exposure limits.

Personal alarm monitors or similar H<sub>2</sub>S detection devices shall be used to supplement well-established work practices and gas detectors, to provide timely respiratory protection. Personal alarm monitors shall not be used instead of other more reliable exposure control measures for the tasks involving H<sub>2</sub>S containing sources that have the potential for rapid increase of H<sub>2</sub>S above the maximum limit.

The need for stationary alarm monitors shall be considered where there is a potential for a large volume uncontrolled release of hazardous concentrations of H<sub>2</sub>S.

## 12.3 Paints and Coatings

12.3.1 Many paints, solvents, thinners and stripping fluids contain hazardous chemicals which give off toxic vapors which will cause dizziness, nausea, eye and nose irritation, and if allowed to become concentrated by inadequate ventilation, may lead to more severe symptoms such as unconsciousness, vomiting or bronchitis.

Certain paints may contain heavy metals which are highly toxic (e.g. lead, mercuric oxides). These are now not common, but may be encountered when stripping old equipment. Some other paints and thinners contain substances which are directly toxic, such as:

- Solvents containing benzene (confirmed carcinogen) and
- Lacquers based on tetrachloroethane (suspected human carcinogen).

12.3.2 Sakhalin Energy shall:

- Select water-based paints/coatings in preference to solvent-based paints/coatings, whenever practicable to do so and
- Avoid the purchase and use of paints that contain heavy metals, which are highly toxic (e.g. lead, mercuric oxides). Use PPE when these paints may be encountered when stripping old equipment.

12.3.3. The following additional safety precautions shall apply to all painting operations:

- Self-contained breathing apparatus shall be worn when painting in confined spaces

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- Respiratory protection shall be worn when spray painting, unless specific exhaust ventilation systems are in place
- Goggles, overalls and impermeable gloves shall be worn when handling or mixing products
- Long-sleeved shirts and full-length trousers shall be worn
- The airflow from behind the operator shall be maintained at a minimum of 1.5 m/s
- Paint spray equipment shall be regularly maintained, and users trained to use it correctly
- Solvents shall not be used for cleaning the skin and
- Appropriate skin cleansers shall be provided.

**12.4 Hydrofluoric Acid**

12.4.1 Hydrofluoric Acid (HF acid) is used in the exploration and production industry as a stimulant for downhole applications in wells. In its concentrated form the acid is a corrosive liquid that evaporates quickly at atmospheric pressure and temperature (above 20°C) releasing a white, steam-like vapour which has a pungent, irritating odour. Both the liquid and its vapour are extremely dangerous when improperly handled.

Concentrated liquid HF acid will react immediately with skin upon contact causing serious burns. The vapours are irritating to the eyes and respiratory tract. The onset of burns from skin contact with diluted acid may be delayed several hours, eventually resulting in severe burns and blisters. The acid is absorbed through the skin into the bloodstream, where it reacts with calcium ions. The resulting calcium deficiency may result in death from a heart attack.

**Table 2: Recognized Industry Limit for HF acid in the ambient air**

Exposure	Time Weighted Average (TWA)	Short Term Exposure Limit (STEL)	Immediately Dangerous to Life Or Health (IDLH)
	The airborne concentrations averaged over 8 hours	The airborne concentration averaged over any 15 minute period	
Limit mg/m <sup>3</sup>	2.5 mg/m <sup>3</sup>	5 mg/m <sup>3</sup>	25 mg/m <sup>3</sup>
Equivalent ppm*	3	6	30

Health risk due to exposure to HF acid shall be controlled, as appropriate to the environmental conditions, by applying the following:

Only staff instructed in the hazard and correct handling of HF acid shall be authorized to use the chemical

**12.5 Mitigation actions to prevent health impact shall be organized:**

- 12.5.1 Identify areas where Toxic Substances may occur in concentrations that are immediately or Chronically Dangerous To Life Or Health and conduct regular monitoring.
- 12.5.2 Install warning signs for areas where Toxic Substances may be present and maintain a system of the controlled access to the designated areas.
- 12.5.3 Personnel entering an area where Toxic Substances may be present shall be provided with personal protective equipment, with systems that monitor Toxic Substances and by arrangements that enable people to escape in the event of a release:
  - a. Maintain communication with the personnel working in the area with Toxic Substances
  - b. Assess the need for people to carry a Gas Monitor and to have an Emergency Escape Respirator readily available.
  - c. If the concentration of the Toxic Substances is greater than the Occupational Exposure Limit, non-essential personnel shall be evacuated to a safe location.



- 12.5.4 Personnel involved in activities where Toxic Substances may be present shall be aware of the following:
- where Toxic Substances may be present
  - how personnel can be exposed
  - how Toxic Substances can be detected
  - the use and limitations of PPE
  - the usage of gas monitors
  - alarms and emergency procedures

### 13. Exposure to Dust and Man Made Mineral Fibres (MMMMF)

13.1 Dust is of three basic types:

- a. Nuisance dust which are inert and not respirable (TWA 10mg/m<sup>3</sup>)
- b. Biologically active dusts which are not respirable and
- c. Biologically active dusts which are respirable.

13.2 Man Made Mineral Fibres include those fibres that are manufactured from natural rock or other materials (such as silica), readily melted slags, glass or metallic oxide fibres. They can be classed into four groups:

- i. Insulation wools
- ii. Refractory or ceramic fibres
- iii. Continuous filament fibres and
- iv. Special purpose fibres.

13.3 Staff shall not be exposed to levels of biological dust or Man Made Mineral Fibres in air in excess of limits.

13.4 Exposure to dust shall be controlled using the following hierarchy:

- Use engineering principles of enclosure, isolation, local exhaust ventilation and wet techniques and
- Provision of respiratory and other appropriate PPE (for additional information refer to the Standard for Personal Protective Equipment).

13.5 Exposure to airborne asbestos fibre

13.5.1 Asbestos is carcinogenic with no known safe exposure limits.

Health hazards generally arise when existing asbestos is disturbed and fibres are released during repair work, removal, or through accidental damage.

Repeated and prolonged inhalation of any form of airborne asbestos fibers may cause irreversible diseases such as asbestosis, lung cancer, pleural and peritoneal mesothelioma, other sites cancer. These diseases may not appear until many years after the contributory exposure.

13.5.2 In general, health risk due to exposure to asbestos shall be controlled by applying the following minimum requirements:

- a. No new asbestos products shall be introduced into Sakhalin Energy operations
- b. Staff shall not be exposed to levels of asbestos dust
- c. Exposure to dust, asbestos and MMMF shall be controlled using:
  - Enclosure, isolation, exhaust ventilation and wetting techniques, and
  - Respiratory and other appropriate PPE.

Detailed information on additional controls and management of asbestos shall be specified in the Procedure.

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**Specific Requirements – Hearing Conservation**

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14. Exposure to excessive levels of noise can cause permanent damage to hearing known as “Noise Induced Hearing Loss” (NIHL). To manage the noise levels within the established limits the system of controls shall be implemented according to Asset’s SMP.

14.2 14.1 Identify and assess through Health Risk Assessment those tasks and areas where noise levels could result in NIHL and update noise assessments when equipment or condition change in a way that may increase the exposure of personnel to noise.

14.3 Develop Noise Map and specify areas where noise levels exceed the limits (80dBA), install warning signs in these areas.

Using of hearing protection is mandatory in all workplaces where noise level exceeds 80 dBA.

- a. Workers shall not be exposed to steady noise levels in excess of 110 dBA irrespective of duration or hearing protection;
- b. Workers shall not be exposed to impulse noise in excess of 125 dB (A) irrespective of duration or hearing protection.

14.4 Where possible noise at source shall be controlled by:

- defining noise limits before the design and purchase of new equipment and tools
- maintaining equipment and tools correctly in line with the design criteria
- reducing the number of exposed staff by separation noisy from non-noisy work areas
- reducing exposure times by job sharing and automation

14.5 Personnel entering the areas with the noise exposure shall be trained on the following:

- how to identify areas where hearing protection is required
- the correct use and maintenance of hearing protection
- the effect of noise on hearing
- how to prevent Noise Induced Hearing Loss

14.6 Personnel exposed to noise shall be provided periodic medical surveillance (Audiometry) to prevent Noise Induced Hearing Loss.

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**Specific Requirements – Food and Drinking Water Safety**

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15. Hygienic requirements shall be applied to prevent contamination or spoilage of food and drinks, including drinking water during storage, preparation, handling, selection:

15.1. Company employees and Contractors involved in provision of catering services and potable water supply at the assets should implement and maintain the Food and water safety management system based on 7 HACCP principles:

- conduct a hazard analysis
- determine the critical control points (CCP)
- establish critical limit(s) for each CCP
- establish a system to effectively monitor the CCP(s)
- establish the corrective action to be taken when monitoring indicates that a particular CCP is not under control
- establish procedures for verification to confirm that the HACCP system is working as intended
- establish documentation concerning all procedures and records appropriate to these principles and their application

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- 15.2. Foodstuff/potable water as well as conditions for food/potable water production should comply with RF and International hygienic requirements
- 15.3. All Company employees and Contractors involved in food handling/catering services, household services for workers accommodated at the assets, water treatment and water supply systems maintenance should be declared medically fit for work and should complete official hygienic training and assessment what should be marked in the personal blue medical book by training provider.
- 15.4. Control over the food production conditions and food/potable water safety should be conducted in accordance with SMP. All asset SMPs should be approved by Health department.
- 15.5. Regular inspections shall be conducted to verify compliance of catering and household services to hygienic requirements. The scope of inspection is described in Check List “Minimum requirements for Accommodation and Catering”.
- 15.6. Clean eating areas shall be provided at every Company asset. It is recommended to avoid eating at workplace.
- 15.7. Home-made meals are prohibited for eating at the Company assets to prevent food-born diseases.
- 15.8. Water used for personal hygiene, drinking and food preparation should comply at least with the requirements of SanPiN 2.1.4.1074-01 “Potable water. Hygienic requirements to water quality in centralized systems of potable water supply” in all specified parameters.
- 15.9. Cleaning and disinfection of potable water tanks should be conducted annually to routinely maintain an adequate level of potable water system equipment.

### **Specific Requirements – Legionella**

16. Assess the risk of Legionella presence in water systems and water supply equipment in line with Health Risk Assessment methodology:
  - At least assess the risks for hot water supply systems;
  - Reassess the risk of Legionella presence for each water system affected by an organizational, design or operational change in line with Management of Change.
- 16.1. Determine a monitoring and control program for Legionella presence in water supply systems at the facility and equipment which are at risk; and document the results:
  - a. Apply controls to minimize water misting, stagnant water and dead zones and manage water temperature (maximum 20°C for cold water, minimum 60°C for hot water);
  - b. Implement a preventive maintenance and inspection program to monitor equipment and manage water treatment;
  - c. Conduct Legionella testing of hot water supply systems at the facility and equipment, which are at risk, using sampling and analysis protocols in accordance with established RF requirements or/and Internationally Recognized Standards. Legionella tests should be organized according to SMP;
  - d. Restrict access and apply corrective actions to clean and disinfect Legionella contaminated facilities;
  - e. Provide appropriate training and PPE for work activities on Legionella contaminated facilities;
  - f. Establish alerts to inform employees about the presence of Legionella contamination and the measures to be taken.

### **Specific Requirements – Lighting**

17. Good lighting, whether natural or artificial, reduces health and safety risks as it allows hazards to be seen and minimizes visual fatigue.
- 17.1. The required illumination levels depend on specific type of tasks and measured at the working place shall comply with the RF and International requirements (Appendixes 2-3)
- 17.2. Control of Lighting should be organized according to SMP.

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### **Specific Requirements – Vibration**

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- 18. Identify and assess through Health Risk Assessment those tasks and areas where whole body vibration or hand arm vibration impact exists and update assessments when equipment or condition change in a way that may increase the exposure on personnel.
- 18.1. Control and measurement of Vibration should be organized according to SMP
- 18.2. Reduce whole body vibration or hand arm vibration exposure to As Low As Reasonably Practicable in the workplace and Accommodation.

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### **Specific Requirements – Microclimate**

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- 19. Unsatisfactory microclimate parameters lead to lower productivity and efficiency of personnel performance. Especially it is important for office work activities with high intensity.

Unsatisfactory microclimate parameters are usually resulted from poor work of Heating, Ventilation, Air Conditioning Systems.

- 19.1. Control of microclimate parameters (temperature, humidity, air velocity) and evaluation of ventilation systems should be organized according to SMP.
- 19.2. Evaluate results of measurements in accordance with work activities and SanPin 2.2.4.548-96 "Hygienic requirements for indoor climate at Work Places".

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### **Specific Requirements – Electromagnetic fields**

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- 20. Electromagnetic radiation is the propagation or transfer of energy through space and matter by time-varying electric and magnetic fields. It can be identified:
  - a. in the offices, when working with office equipment and computers;
  - b. in the industrial area, where radio transmitting equipment, high-voltage lines, open distribution systems are installed.In order to reduce harmful effect of electromagnetic radiation, all sources should be recognized and monitored.
- 20.1. Work with equipment generating electromagnetic radiation should be provided in compliance with RF and International legislation (Appendixes 2-3).
- 20.2. Measurements of electromagnetic radiation should be included in SMP and provided at least annually.

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### **Specific Requirements – Ionizing Radiation**

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- 21. The main sources of ionizing radiation met during industrial activities are:
  - a. Naturally Occurring Radioactive Material (NORM);
  - b. Artificial sources of ionizing radiation, such as defectoscopes.
- 21.1. Handling of ionizing radiation sources should be conducted in line with Handling of Ionizing radiation sources Specification (18).
- 21.2. Work with equipment which is in contact with NORM should be conducted in compliance with RF and International legislation (Specifications 1-2).
- 21.3. Control of ionizing radiation should be included in SMP and provided at least once per year.

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### **Specific Requirements – Manual Handling**

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- 22. Sakhalin Energy shall implement the following control measures to control health risks due to manual handling in both industrial and office work environment:
  - 22.1 Avoid the need of manual handling as far as reasonably practicable

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22.2 Use a lifting device or seek assistance to lift loads greater than 25 kg in weight. Loads greater than 5-10 kg shall not be lifted during pregnancy and three months after delivery.

22.3 If manual handling is avoidless injury risk shall be assessed by identifying:

- a. work tasks involving twisting, stooping, reaching, strenuous pushing or pulling, or repetitive handling;
- a. if any loads that are heavy, bulky or unstable;
- b. working environments that constraint posture, restrict movement or have physical obstructions

22.4 Assess and implement options to reduce the risk of injury including consideration of:

- b. Design factors (e.g. altering the design of the physical working environment through automation, mechanization or changing the workplace layout)
- c. Work organizational factors (e.g. reducing physical strain through job rotation, adequate group working)
- d. Educate and train staff to identify manual handling hazards and good handling techniques.

**Specific Requirements – Ergonomics**

23 Ergonomics is a multi-disciplinary science that considers the interaction between humans and their working environment to improve the design of work systems, workplaces and products. Ergonomics aim is to establish a well designed work environment by achieving a practical balance between design functionality and ease of use. Health hazards resulting from poor ergonomic design are mainly musculo-skeletal disorders (e.g. injuries to the back, neck, hands, arms and feet).

23.1 Health risks due to poor ergonomic design shall be addressed considering ergonomic controls throughout the full lifecycle of all projects, especially at definition phase and execution phase as in many situations the hazards are not easily identified, because many of these injuries build up over a period of time, rather than being caused by a single incident.

**Specific Requirements – Visual Display Units (VDU)**

24 Extensive researches have found no scientific evidence that VDUs can damage health. Users of VDUs may however, experience visual fatigue (resulting in headaches, pain behind the eyes or blurred vision), and postural fatigue (resulting in aches and pains in the hands, wrists, arms, neck, shoulders or back), especially after long periods of VDU work.

Where health problems do occur, they are generally caused by the way in which VDUs are being used and the working environment (e.g. work posture, furniture design, equipment set-up or the effects of bad lighting), rather than the VDUs themselves. Problems can be avoided by good workplace and job design, and by the way the VDU workstation is used.

24.1 The following factors shall be considered in developing and implementing appropriate controls for managing ergonomic issues associated with the use of VDUs:

- a. Task design (e.g. anticipated duration and intensity of VDU use)
- b. Work organization (e.g. job rotation, adequate breaks and changes in work routine)
- c. VDU requirements (e.g. flexibility and adjustability, display color and maintenance)
- d. Workstation requirements (e.g. chair, desk and furniture design, adjustability and set-up).
- e. Staff shall be given appropriate training to enable them to set up their workstation for optimal user comfort

**Specific Requirements – Organizational Factors and Stress**

25 Stress is a person's, or group of people's adverse reaction to excessive pressure. If stress is excessive and goes on for some time, it may lead to mental and physical ill health (e.g. depression,

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nervous breakdown, heart disease) and considerable reduction in workplace productivity. People have differing thresholds of pressure that will cause stress symptoms but everyone is vulnerable to stress, depending on the particular pressures at any given time. Stress is usually caused by a sequence of events that may be related to a person's work, personal circumstances, or a combination of these. Stress is rarely caused entirely by work-related factors, but work may be a major factor.

- 25.1 To minimize the exposure of the personnel to potential stress due to Organizational Factors the following controls shall be implemented.

Organizational Factors shall be identified to the extent possible in case of any major organizational change that can include downsizing, rightsizing, divestment and organizational restructuring which significantly changes job challenge.

- 25.2 Managers shall implement mitigation measures to minimize the potential for work-related stress by:
- Training Supervisors to identify stress signs among staff and intervene promptly with a referral to Corporate Health Manager, and assessing opportunities for working conditions regulation and flexibility.
  - Ensuring that staff has the skills, training and resources they need to be confident and able to carry out their work tasks.
  - Ensuring that people are treated fairly and that bullying/harassment in the workplace is not tolerated.
  - Maintaining positive two-way communication with staff, especially in case of changes.

- 25.3 If the person complains about work-related stress the following measures shall be implemented:

- Listen to and be understand of their concerns;
- Act promptly to resolve the problem if practicable;
- Involve the person concerned in how to deal with the problem;
- Encourage and assist the person to seek additional support, if required (e.g. stress counseling).

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