

Coronavirus – open letter to the food industry

Note: This addresses concerns raised by bakeries but is of relevance to the whole of the food industry.

As you will appreciate this is a fast moving and unprecedented situation. In these extraordinary times, we are constantly reviewing how we can support the national effort to tackle COVID-19 and continue to protect Britain's workforce.

In support of the Government and to help businesses and workers, we are clarifying and promoting guidance for those continuing to work away from the home.

In bakeries, breathing in flour dust can be a significant risk as it can cause occupational asthma. We are aware that currently there is a restricted supply of dust masks (PPE) across many parts of the food industry and that many employers still rely on them to control exposure to hazardous substances. However, suitable control can often be achieved using good working practices and local exhaust ventilation (engineering controls) which then means that employees do not need to wear dust masks; reducing overall pressure on the supply chain. **To advise bakeries on what they can do we have produced the guidelines in Annex 1.**

During the COVID-19 outbreak we do not anticipate an increase in cases of occupational asthma. Employers that effectively control exposure to flour dust using good working practices, engineering controls and PPE will not see an increase in cases. However, whenever cases are reported, in line with our publicly available Incident Selection Criteria, we will investigate them to understand the circumstances.

<https://www.hse.gov.uk/enforce/incidselcrits.pdf>

Guidance on what to report to HSE under the Reporting of Injuries, Disease and Dangerous Occurrences Regulations (RIDDOR) is available on our website. The guidance includes the restricted circumstances under which cases of COVID-19 amongst employees are reportable:

<https://www.hse.gov.uk/riddor/index.htm>

Following an investigation HSE cannot give a guarantee that, regardless of the circumstances, we would not prosecute, or take one of the other enforcement actions open to us. We will, however, continue to take decisions on enforcement action in accordance with our publicly available Enforcement Policy Statement, which requires that prosecution, must be both proportionate to the seriousness of the breach and in the public interest – it is a course of action used for the most serious breaches of legislation. Employers that can demonstrate effective control of risks with the appropriate combination

of good working practices, engineering control and PPE are not likely to face enforcement action.

HSE is doing everything we can to support the nation at this time of crisis. We are working across government and with industry on the response to COVID-19 by agreeing sensible and pragmatic approaches to workplace safety that ensure essential services continue.

Addressing the Temporary Unavailability of PPE in the Food Industry due to COVID-19

Options for using PPE with an APF of 10

1. If dust masks (PPE) are necessary to assist in reducing exposure to flour dust to a level as low as is reasonably practicable (ALARP), HSE guidance is that it should have an assigned protection factor (APF) of at least 20 (e.g. FFP3, re-useable respirator with a P3 filter or a TH2/3 powered air respirator).
2. HSE recognises however that the availability of PPE with an APF of 20 may be reduced due to COVID-19. Where an employer is anticipating that their supplies of PPE with an APF of at least 20 will be exhausted and they are unable to source another supply, then they must carry out a COSHH risk assessment. This should identify the combination of additional dust exposure minimising measures in place to maintain adequate protection and ensure that the risk to workers is not increased by providing PPE with an APF of 10 (e.g. FFP2, re-useable respirator with a P2 filter). The additional measures should include:
 - Using non-stick coatings on conveyor belts and greaseproof paper on trays instead of flouring the surfaces.
 - Using low-dust flours as a lubricant and for dusting.
 - Using flour improvers in paste or liquid form instead of powder to reduce the airborne dust generated when adding ingredients.
 - Separating the weighing and dispensing of flour and powdered ingredients from the remainder of the production area using enclosures to contain the flour dust within the enclosure to minimise flour dust spreading.
 - Using mixers with lids to contain the dust at the start of mixing cycles.
 - Using effective, adequately designed and maintained local exhaust ventilation for dusty tasks such as bulk flour sieving, dispensing, weighing, tipping powdered ingredients.
 - Ensuring all workers have been provided with information, instruction and training on careful flour handling techniques, including:
 - Safe working practices to minimise flour dust:
 - Ensuring ingredients in powder form are not tipped from a height into mixing bowls.
 - Minimising airborne dust when folding and disposing of empty bags i.e. rolling the bag from the bottom while tipping avoiding the need to flatten or fold empty bags.
 - Starting-up mixers on slow speed until wet and dry ingredients are combined.
 - Avoiding hand dusting; using a sieve / dredger with minimal drop

- height.
- Using high efficiency industrial vacuum cleaners and avoid dry sweeping with a brush.
- Not using compressed airlines for cleaning off dust from equipment.
- Ensuring supervision to ensure all workers carry out the careful flour working techniques to minimise their exposure to flour dust, and they raise any concerns or defects immediately.

Note: When sourcing alternative PPE and choosing; disposable, reusable or powered air respirators, a fit test is required for any tight-fitting PPE provided as a control measure unless you can source the same mask, in the same size, for which the worker has been fit tested before. Inadequate fit can reduce the protection provided to the wearer. Further guidance on fit-testing can be found at <https://www.hse.gov.uk/pubns/indg479.pdf>. Advice on undertaking face fit testing to avoid transmission of COVID-19 can be found at <https://www.hse.gov.uk/news/face-mask-ppe-PPE-coronavirus.htm>.

Alternatively, devices such as loose-fitting powered helmets or hoods, which do not require face-fitting, could be selected for the affected workers. Further information on these types of devices can be found in the guidance document HSG 53 (Respiratory protective equipment at work – A practical guide), available at the following link:
<https://www.hse.gov.uk/pubns/priced/hsg53.pdf>.

Complying with COSHH

3. All control measures must be determined through risk assessment and applied to the extent where they are reasonably practicable. Exposed workers should wear the most practical PPE with the highest APF, necessary to control exposure to flour dust. If PPE with an APF of at least 20 cannot be sourced, PPE with an APF of 10 used in a combination of the above measures may control exposure to ALARP, achieving compliance with Regulation 7 of COSHH.

Conserve the stocks of suitable PPE

4. In order to optimise the stocks of suitable PPE, employers are encouraged to take steps which will help preserve them. These could include:
 - Only providing PPE to those workers who need it.
 - Issuing PPE specific to the level of risk for specific tasks i.e. use lower APF PPE, that of an APF of 10, where the level of personal flour dust exposure is lower.
 - Providing instruction on maximising the use life of all PPE, by ensuring adequate user checks, cleaning and storage.

Note: This guidance will be temporary and limited to the duration of this COVID-19 crisis – HSE is responding to the current challenges faced by the baking industry, in respect of the potential for temporary unavailability of PPE used to protect workers from food ingredient dusts.

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