



Health, Safety and Environment (HSE) Plan 		Document Number: MWAHSE001- PLN
Revision: 04	Discipline : HSE	Rev. Date : 18-10-12

HEALTH, SAFETY & ENVIRONMENT (HSE)

PLAN

<i>04</i>	<i>18/10/12</i>	Revision of Document		
<i>03</i>	<i>10/05/11</i>	Sections 3.0, 7.1 & 7.2.4.2 were amended.		
<i>02</i>	<i>21/01/10</i>	The code MWAHSE-PLN for the Plan was change to MWAHSE001-PLN, Sections 7.1, 7.2.3 & 7.4.1 were modified,		
<i>01</i>	<i>27/08/09</i>	HRM change to HR, Duties of HSE Reps were included in Section 7.2.4.2. Sections 7.8.3, 7.10.1, 7.11.1 & 7.12.4 were modified, Section 7.13 was removed.		
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STATEMENT FROM THE MANAGING DIRECTOR

At Metec West Africa Limited, we are conscious of the risks inherent in our work place. Therefore we are committed to eliminate or protect against situations that could lead to personal injury, occupational illness or damage to the environment:

- Adopt a policy for **“ZERO tolerance”** on accident and Incident.
- Clearly define HSE line management responsibilities and objectives.
- Identify and assess all significant HSE risks and place measures which eliminate or minimize these risks to a level, which is feasibly as low as reasonably practicable.
- Employ trained and qualified people; provide effective supervision, personnel performance appraisals and supplementary training as necessary to enable all employees to work safely.
- Take action when safety concerns are raised and to support anyone who stops the work if they believe it is unsafe.
- Visibly imbibe safety through our behavior, implement regular HSE tours, and communicate effectively all HSE messages.
- Promote open dialogue with personnel, and everyone working with Metec WA Limited with a view to achieving continuous improvement.

Everyone working for Metec WA Limited is encouraged to conduct himself/herself responsibly, respecting established rules and procedures, performing his/her job in a right and safe way, using personal protective equipment, stopping any work he/she considers as being carried out in an unsafe manner, reporting occurrence of incidents/accidents or unsafe act/ conditions and in so doing, ensuring that we continually strive for better HSE performance and help to shape an Injury and Incident Free Culture and Environment.

Yours,



Vassily Barberopoulos
Managing Director



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1. PURPOSE

Metec WA has the responsibility on behalf of its employees and its clientele to meet the minimum requirements of HSE management and its performance expectations.

All work is carried out in accordance to the minimum requirements contained in this document and will be measured by specific Key Performance Indicators (KPI) set to measure success of compliance.

2. FIELD OF APPLICATION

The present document describes how the Company implements its HSE program for the production of Client Orders in line with their HSE requirements. As a “living document”, the HSE Plan gets revised to reflect any improvement changes, both internal and external. By external changes, we mean changes in client’s minimum HSE requirements, new legislation and all other pertinent issues.


3. HSE REFERENCE DOCUMENTS

This refers to all HSE related documents submitted by clients and considered in making amendments to the HSE plan.

4. DEFINITIONS AND ABBREVIATIONS

4.1 Definitions

- **Accident** **An unplanned event or chain of events which results in loss (with harm) to people, damage to environment and/or loss to property/ production.**
- **Anomalies** **Any unsafe condition or act that could lead to an incident. Anomalies are incident factors.**
- **Company** **Metec West Africa Ltd.**
- **Client** **Any legal entity issuing a Purchase Order to the Company to produce goods and services.**
- **Incident** **An event induced by a combination of anomalies which results in something wrong taking place. An incident can be a “near miss” (no harm/damage) or an “Accident”.**
- **Sub-Contractor** **Any legal entity providing services to the Company.**
- **Supplier** **Any legal entity or individual who provides the Company**

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with items it has ordered.

- **Vendor** **Any legal entity identified in the Purchase Order as supplying goods to the Company.**
- **Job Safety Analysis (JSA)** **studying and recording each step of a job, identifying existing or potential job hazards (both safety and health), and determining the best way to perform the job to reduce or eliminate these hazards.**

4.2 Abbreviations

HSE:	Health, Safety and Environment
JSA	Job Safety Analysis
KPI	Key Performance Indicators
LTIF	Lost Time Injury Frequency Rate
NFL	Nigerian Foundries Limited.
MWA	Metec West Africa Limited
MSDS	Material Safety Data Sheet
PPE	Personal Protective Equipment
TRIR	Total Recordable Incident Rate.
COSHH	Control of Substances Hazardous to Health.

5. RESPONSIBILITIES

The Managing Director is responsible for:


- Approving and endorsing the HSE Plan,
- Ensuring that resources are available to execute the HSE Plan,
- Monitoring and adjusting the HSE Plan.

The HSE Manager, as custodian of the HSE Plan has the responsibility for:

- Developing the HSE Plan.
- Monitoring the HSE Plan and reporting its status, deviations and any need for adjustments.
- Enforcing & coordinating the overall workings of the HSE Plan.
- Training all HSE Representatives and Plant Managers on the HSE Plan, procedures & notifying all changes.
- Keeping the Managing Director immediately informed at all times on the occurrence of all accidents and anomalies together with all other HSE matters.

The Technical Manager has the responsibility for:

- Enforcing an accident free work environment.
- Enforcing the overall workings of the HSE Plan.
- Ensuring that the HSE Manager follows his/her responsibilities.
- Calling with immediate effect of an accident an HSE investigation meeting with all personnel involved.

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All Employees are responsible in the implementation of the HSE Plan as required within their areas of work.

6. KEY HSE RISKS

KEY HSE RISKS	MANAGEMENT STRATEGY
Failure to manage HSE risks associated with manufacturing in Nigeria.	<ul style="list-style-type: none"> - Work place preparation upfront. - HSE representation at work place. - Approved HSE plans in place - JSA and toolbox talks covering sectional activities.

7. ACTIVITIES

7.1 Compliance with Law and Regulations

Following are the requirements applicable:

- National laws and regulations in force.
- International laws and regulations when and where applicable.
- Industry guidelines, codes of practice, etc.

In all cases, the requirements of good business practices must be observed.

The Company complies with the following Nigerian laws and regulations, including but not limited to:


- Labour Act, 1971
- Workmen Compensation Act, 1987
- Factories Act, 1987
- The National Environmental Protection Regulations, 1991.

7.2 Management Responsibilities

7.2.1 Leadership and Commitment

HSE matters are a line management responsibility requiring the active participation of all levels of management and supervision. Management provides visible, strong and pro-active leadership and commitment to develop, implement, measure and improve the HSE Management System.

This is achieved through active participation in safety practices such as Management HSE walkthroughs, Safety Toolbox meetings, Accident / Incident investigation, risk assessment and work site training etc.

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The Management ensures availability of sufficient resources; competent personnel and HSE advisors who demonstrate this commitment and leadership as and when necessary.

7.2.2 Policy

The Company's HSE Policy meets the following objectives:


- Develops and pursues, through all stages of production, a systematic approach to risk reduction.
- Co-ordinates all health / safety/environment objectives taking into account economical constraints.
- Includes all activities within the general Sustainable Development Objectives of the Company's HSE.
- Ensures that all requirements are fully met, all hazards associated with each employee's job description is systematically identified and evaluated, as well as any related risk reducing measures. The overall goal is to reduce residual risks to a level that is As Low as Reasonably Practicably with respect to:
 - (i) Protection of human life
 - (ii) environmental impacts
 - (iii) safeguarding of assets.

7.2.3 Performance Measurement

The Company has developed measurable HSE targets to monitor the performance of improvement of the HSE System.

HSE TARGETS

Lagging Indicators		Unit	Target
Lost Time Injury Frequency	Number of LTI x1000/Number man hrs worked (Nhw)		0.45
Total Recordable Incident Rate	Total number recordable injuries x 1000/ Nhw		1.25
High Potential Incident Frequency	Near misses of serious injury/fatality nature Number of HPI x 1000/ Nhw		0.02
Number of Anomalies reported	Any unsafe acts/situations Number of Anomalies x 1000/ Nhw		0.04

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Leading Indicators	Unit	Target	Responsibility
Management HSE Tours	% actual vs planned	>70%	ME100
HSE Walkthrough	Actual vs planned	1 per 2 weeks	HSE Manager
HSE Trainings	% actual vs planned	>70%	HSE Manager, HRM
HSE Monthly Meetings	% actual vs planned	90%	HSE Manager
HSE Executive Meetings	% actual vs planned	90%	ME 100

7.2.4 Organisation and Responsibilities

7.2.4.1 General

HSE responsibility is placed at all levels of the Company's organisation. The HSE Executive Committee is the top most body responsible for the design, change, application and implementation of the HSE Plan.

7.2.4.2 HSE Job Responsibilities

In addition to the general job descriptions outlined in the Company's Quality Management Manual, the following specific HSE responsibilities apply:

Managing Director has the overall responsibility for the implementation of the HSE Plan. He/she utilizes the HSE Executive Committee to enforce implementation, make changes to the plan, policies and rules. The HSE Manager provides the necessary assistance and guidance.

Technical Manager is responsible for all HSE activities in the Plant.


Production Manager deputizes for the Technical Manager when he is not present.

Administrative Manager is responsible for the procurement of HSE consumables as requested by the HSE Manager. He/she informs the HSE Manager whenever sub contractors/visitors are within the factory.

Foundry Manager is accountable for all HSE foundry activities related to production which include raw material preparation, die mould preparation, melting, pouring of metal, knocking out, fettling shake out, heat treatment.

Quality Control Manager deputises for the Foundry Manager when he is not present.

HSE Manager provides assistance and guidance to all matters relating to HSE issues. He/she ensures a consistency of approach across all areas and phases of work and is responsible for ensuring that the design and operation of the Work facilities achieves the necessary levels of safety and environmental control. He/she is responsible for keeping all HSE representatives trained and up-dated

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on HSE matters on a collective basis. He/she review effectiveness of the HSE measures. Also he/she is responsible for the HSE Management System and ensures it complies with requirements of the HSE Plan. He/she is further accountable for the development and implementation of the HSE procedures and ensures that the Managing Director, Technical Manager are advised on all HSE risks and their implementation / control measures. The HSE Manager reports directly to the Managing Director and works with the Technical Manager.

HSE Representatives are the HSE Manager’s lieutenants who are responsible to enforce the HSE Plan. They attend HSE meetings, identify and report hazards in the workplace through regular inspections, advice to employees on matters affecting HSE, causes of accidents/incidents, assist in HSE training and participate in any HSE audit. HSE Representatives report to the HSE Manager and have the responsibility of issuing to erring employees Disciplinary cards.

As an encouragement to HSE Representatives to carry out their responsibilities, a tri-monthly bonus system is set. The bonus depends on a score sheet of points earned based on how each Representative’s faces his/her responsibilities.

HR Manager is responsible for assisting the HSE Manager in setting up all the required training courses both planned and extraordinary.

Commercial Manager is accountable for all contract reviews with vendors and Sub-contractors. He/she is responsible to inform the Managing Director about all new HSE requirements by the Vendor and through the support of the HSE Manager.

Supervisors will provide the day-to-day HSE enforcement in their respective work sections. They will report via the HSE Representative(s).

All Personnel irrespective of function or role are responsible for HSE implementation commensurate to their expertise, work tasks and areas of activity. These responsibilities apply to all levels of the organization not only to Metec WA personnel but also to Sub-contractors and Vendors personnel who provide support and other services.

7.3 Communication and Awareness


An effective and open communication/reporting system is established and maintained in order to ensure the correct implementation and constant improvement of the HSE Management System.

7.3.1 Safety Signs

All safety signs of an internationally recognised pictorial standard are posted in the appropriate areas.

7.3.2 Notice Boards

Notice boards show as a minimum:

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- Facility layouts with escape routes, muster locations, locations of firefighting equipment.
- Emergency response names and phone numbers.
- List of first aid officers with their location on site.

7.3.3 Awards

An HSE award system is implemented to motivate the workforce to work safely and in an environmentally friendly manner, to raise HSE awareness and promote pro-active attitudes towards HSE Awards will be presented to those meeting/exceeding their HSE related objectives.

7.4 Meetings

7.4.1 HSE Executive Committee

The Managing Director or any of the ME100 follows his/her commitment to the Health, Safety and Environment Policy through the HSE Executive Committee. This Committee comprises of the following:


- ❖ Any one of the Management Executives(Managing Director,Management Representative (ISO9000),Technical Manager
- ❖ HSE Manager
- ❖ Human Resources Manager
- ❖ Admin Manager (where applicable)
- ❖ Any other person invited.

The HSE Executive Committee is the highest body that enforces the implementation of the HSE program and meets not less than once every six months and/or when there is an emergency. It:

- Formulates amends and reviews HSE plan and the HSE Manual.
- Reviews the enforcement of the HSE plan.
- Reviews all legal and statutory matters of HSE plan.
- Reviews training and performance of HSE representatives and workforce.
- Reviews investigations of occupational accidents/incident, injuries.
- Looks into employee safety suggestions.
- Appoints new HSE Representatives.
- Appoints HSE Officer when necessary.
- Any other matters.

7.4.2 HSE Monthly Meeting

The HSE Manager carries out his/her responsibilities through appointed HSE Reps. Every end of the month, he/she convenes the HSE Monthly Meeting with the HSE Reps and a staff member representative with the Technical Manager or his nominated deputy in attendance. This meeting can coincide with the weekly HSE Reps meeting. During the meeting the following are discussed:

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- Highlights of HSE activities within the month.
- Discussion on accidents/injuries/near misses.
- New HSE rules & regulations (if any).
- Training program schedule (actual vs. planned)
- Performance of HSE Reps.
- Extraordinary training requirements.
- Matters arising from the HSE Executive Committee.
- Any other matters.

7.4.3 Weekly HSE Representative Meetings

The Weekly HSE Representatives meeting holds once a week under the chairmanship of the HSE Manager. The Agenda includes the following:

- Minutes of last meeting;
- Verbal report of each HSE Representative on the past week.
- Review walkthrough report
- Discussion on Accidents/injury, near misses
- Status of HSE trainings (where necessary).
- Announcement on changes of HSE Policy (if any).
- Any other business.

7.4.4 Daily Tool Box Meetings

Daily HSE meetings are held with the objective to ensure HSE awareness and teamwork at the work place. HSE Representatives hold daily a “tool box” meeting with staff of their respective sections at 7.55 am for a maximum of 10 minutes. The agenda includes the following:

- Review of previous day’s activities.
- Discussion of “special safety topic”.
- PPE Audit.
- Warnings against unsafe conditions and acts.
- Announcement of any new directives.
- Carry out work place safety inspection.


7.5 Documentation

The Company has an established system to control all documents and HSE relevant data based on ISO9000:2008 Management Quality System. This allows for easy tracking and correct document availability.

7.6 Safety Risk Evaluation and Management

7.6.1 Overview

Safety risk management for the workplace focuses on risk assessment as best adapted to identify, analyse and evaluate the risks as depicted in the MWAHSE001-PR (Risk Management Procedure). Wherever possible, management controls will be used to eliminate risks at source but

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failing this; risks will be reduced and/or mitigated to acceptable levels that are considered to be as low as reasonably practicable.

7.6.2 Personnel Involvement (Job Safety Analysis, etc)

Workplace activities are covered by qualitative risk assessment i.e Job Safety Analysis (JSA) for routine while non routine / special activities are covered by a permit to work.

The permit to work system is outsourced by Nigerian Foundries Limited-NFL which is approved by the Plant Manager and HSE Manager. Other techniques may also be used (Last minutes risk assessment, Learn to Listen, etc) where these are considered to provide further safety incentive or improvement to safe working practices.

7.7 Respect for the Environment

7.7.1 General

All activities shall be carried out in accordance with HSE Plan. Environmental protection objectives shall be set and the means of compliance identified, to ensure that the Company meets the objectives, legislation and good practice.

The overall goal of the company's environmental plan is to progressively reduce the impact of the company's activity on the environment with the ultimate aim of recovering, reusing and/or recycling of wastes generated from the operation. The wastes generated shall be segregated according to the waste types: process and domestic wastes. The process wastes shall be recycled while the domestic shall be disposed of by an approved/accredited waste contractor.

7.8 Safeguarding of Health

7.8.1 Personal Protective Equipment (PPE)

A list of PPE requirements is placed on the notice boards. Enforcement of PPE procedure is done by the HSE Manager and the HSE Reps.

The procedure is enforced by a color card system as depicted in the HSE Violation Chart.

- 3 yellow cards = 1 blue card
- 2 blue cards = 1 red card


The blue card results to suspension from work, while the Red card is a referral to the Executive Committee for more severe disciplinary action which can include dismissal from work.

7.8.2 Medical Facilities.

The Company maintains close by medical facilities that meet or exceed local reference standards.

7.8.3 Medical Fitness.

To maintain a healthy and productive work force, every prospective employee must undergo a pre-employment medical check to ascertain state of health and medical fitness prior to employment. Periodic medical checks will also be carried out on old employees. In both

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categories a certified employee shall be issued with a certificate of fitness which must be stamped and signed by a certified Doctor.

7.8.4 First Aid

The company maintains First Aid trained representatives at ratio 1 to 30 employees. Their responsibility is to carry out any first aid procedure. (MWAHSE009-W). For severe cases, while the First Aid treatment is administered the medical facility is notified and transportation is provided.

7.8.5 Drug & Alcohol Abuse

Use of alcohol and drugs is forbidden.

7.8.6 Smoking

Smoking is permitted only in designated smoking areas.

7.8.7 Malaria Control Program

The Company has a malaria control plan in place. It is the responsibility of the Company to ensure compliance to this Plan.

The malaria control awareness and education exercise will cover such areas as:

- Awareness or understanding of the risk
- Mosquito bite prevention
- Chemoprophylaxis and testing requirements
- Ability to recognise the major symptoms and seek early diagnosis and treatment.

7.8.8 Material Safety Data Sheet (MSDS)

All MSDS used for production are recorded into a Safety Data Sheet Register and made available to First Aiders for reference in the case of an emergency. MSDS sheets are pasted on the HSE Notice board in the Foundry. It is the responsibility of the HSE department to collate and keep MSDS sheets up to date and conduct a COSHH Assessment for each material used.


7.9 Competence and Training of Personnel

Training is one of the most important ways of enforcing HSE in the Company. All internal/external trainings are conducted at the training school or where applicable either through presentations and handouts or conducted practically on site. All HSE trainings are conducted in association with the HR Department who is the custodian of the latest training plan and presentations.

The competence is defined in terms of the adequate skill, training and/or experience.

It is the responsibility of the HSE Manager in conjunction with the HR Manager “to train the trainer”. It is then an employee is certified capable to train and get recorded in the personnel file and trainers log book.

All new employees pass through an HSE induction training that also gets recorded.

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On the job training is carried out by experienced supervisors until the worker is familiar with his job.

7.9.1 Annual Training Plan

This plan is prepared yearly and is divided into three categories:

- General HSE knowledge. i.e. PPE enforcement.
- Procedural training. i.e. How to carry out investigations.
- Specific training. i.e. firefighting, training for welders etc.

7.9.2 Extraordinary Training Requests

These are requests made during the Monthly HSE meeting by the HSE Reps who have observed a particular area where training is needed to be re-emphasized.

7.9.3 Induction Training for new employees.

All new employees undergo an induction training which includes:

- General Company matters
- HSE
- Basic Management courses.

7.9.4 Safety Induction for external visitors/contractors

A small HSE presentation is done to all external visitors/contractors who are visiting/working in the factory premises. The training is recorded in a log book.

7.10 Sub-contractors

The provisions of the HSE Plan apply to all Sub-contractor performing jobs on company premises. A minimum training in form of a HSE induction is done for all Sub- contractors and their personnel. At the end of the induction the Sub-contractor and each of his personnel sign the safety log book. Any of the Sub contractors and his/her employees who fail to follows HSE regulations shall be evicted from the factory and may have his/her contract terminated.


7.11 Emergency Responses

7.11.1 Emergency System

During the induction safety training all personnel familiarize themselves with emergency exits, assembly points (muster points), emergency equipment and exit ways as stated in the Emergency/Fire Plan (See MWAHSE002-PL). It is the responsibility of each employee to respond during such an alarm. Failure to do so results in disciplinary action.

7.11.2 Drills

Drills are conducted on a regular basis and are considered an essential part of the overall safety program to ensure that everyone fully understands their role in case of an emergency.

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7.12 Incident Analysis

7.12.1 Incident Investigation

The Company operates a “No Blame” HSE culture and all personnel must report all incidents / accidents and near misses, however minor they are. All reported incidents get investigated as per company procedure. (MWAHSE002-PR) The identification of causes of incidents / accidents and implementation of corrective actions enables the Company HSE performance to be improved.

7.12.2 Analysis and Corrective Actions

Analysis of the immediate and root causes of an accident and incident is done immediately after an accident or anomaly has occurred. Corrective actions implemented get evaluated and recommendations made. Specific accident cases are used as daily tool box topics.

7.12.3 Monthly & Weekly Reporting

The HSE weekly representative meeting minutes are submitted electronically to the Managing Director. While the monthly HSE meeting includes statistical data for HSE performance over the period under review.

7.13 Audits and Inspections

Metec WA provides all assistance for external audit inspections by Vendors and other agencies. The Company keeps an open door policy as its aim is always to improve.

7.13.1 HSE Walkthroughs

HSE Walkthroughs are conducted regularly and is a leading indicator for HSE performance.

Each walkthrough is recorded in a report format followed by observations and action nominees who are to effect the changes. The report gets reviewed during the Weekly HSE meetings.

7.13.2 Planned Maintenance and Inspection.

Assets are operated, maintained and inspected according to laid down procedures.

7.13.3 Anomaly (Unsafe act/situation) reporting system.


HSE Reps are issued forms to document any anomalies. Both Anomalies/ HSE Suggestion forms are available at the HSE Suggestion boxes to be filled out by and put in the box.

7.13.4 Records / Corrective Actions

HSE actions implemented are registered in the Corrective action register (MWAHSE043-F) which is maintained by the HSE Manager.

7.13.4 Performance Improvement

The HSE Plan is reviewed once a year or whenever found necessary by the HSE Executive Committee to ensure effectiveness, improvement and updating of the whole system.

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Based upon these reviews, an HSE Improvement Plan is established and the documentation gets updated in line with the findings.

8.0 APPENDICES

Appendix 1: HSE Organizational Chart

Appendix 2: Audit Program

9.0 ADDENDUMS

Work Instructions


- Induction Training For New Employees (MWA 323-W)
- Emergency Evacuation Drill(MWAHSE001-W)
- Daily Tool Box Meeting (MWAHSE002-W)
- Weekly HSE Representative Meeting (MWA HSE003-W)
- HSE Executive Meeting (MWAHSE004-W)
- HSE Monthly Meeting (MWAHSE005-W)
- HSE Briefing For Visitors/ Contractors (MWAHSE007-W)
- First Aid Treatment (MWAHSE009-W)
- Enforcement of HSE Card System (MWAHSE008-W)

Forms

- HSE Executive Committee Meeting (MWAHSE001-F)
- HSE Personal Training Record (MWAHSE002-F)
- Accident / Incident Report Form (MWAHSE006-F)
- Weekly HSE Representative (MWAHSE013-F)
- Monthly HSE Representative (MWAHSE014-F)
- Daily Tool Box Meeting (MWAHSE016-F)
- Investigation Form (MWAHSE019-F)
- Witness Reporting Form (MWAHSE020-F)
- Anomalies /Nearmiss Reporting Form (MWAHSE021-F)
- HSE Training Plan (MWAHSE057-F)
- Induction Training Schedule For Senior Staff (MWA 114-F)
- Induction Training Schedule For Junior Staff (MWA 216-F)
- Induction Training Schedule For Casual Workers (MWA217-F)
- Job Safety Analysis(JSA) (MWAHSE041-F)
- Corrective Action Register (MWAHSE043-F)
- Weekly Safety Statistics (MWAHSE053-F)

Document

- PPE Application List (MWAHSE001-D)

Health, Safety and Environment (HSE) Plan 		Document Number: MWAHSE001- PLN
Revision: 04	Discipline : HSE	Rev. Date : 18-10-12

- Violations Charts (MWAHSE004-D)
- Emergency Evacuation Plan (MWAHSE006-D)
- Emergency Hospital Contact (MWAHSE008-D)
- Smoke Free Policy Statement (MWAHSE017-D)
- Drug And Alcohol Policy Statement (MWAHSE019-D)
- Government Regulatory Requirement on HSE (MWAHSE021-D)

Procedure

- Health, Safety & Environment: (MWA 016-P)
- HSE Risk Assessment: (MWAHSE001-PR)
- Human Resources Development (MWA 015-P, Section 4.4)
- Accident/Incident Investigation Procedure (MWAHSE002-PR)

Plan

- Emergency & Fire Plan: (MWAHSE002-PLN)