

British Frozen Food Federation

You can be sure it's fresh - if it's frozen



JH/eh

30th August 2006

Ms. C. Spence
Health and Safety Executive
8NW Rose Court
2 Southwark Bridge
London
SE1 9HS

Dear Carol,

PROPOSALS FOR MANAGING WORKPLACE TRANSPORT RISK – A ROUTE MAP

The British Frozen Food Federation is grateful to be afforded the opportunity to make a submission on the Health and Safety Executive consultative document 'Proposals for managing workplace transport risk- a route map'.

The British Frozen Food Federation (BFFF) represents the interests of around 260 companies in the frozen food supply chain. Our membership includes companies from the food manufacturing, retail and wholesale sectors and as such represent a significant business sector interested in workplace transport safety.

We are also active members of the Health and Safety Executive Warehousing Health and Safety Forum chaired by Iain Brodie. As you may be aware this forum is currently reviewing the health and safety executive guidance document HSG76 - Health and Safety in Retail and Wholesale Warehouses.

We are overall in favour of the implementation of 'the route map' and feel that it will be an effective tool for industry as general guidance relating to workplace transport risks. However there is one element that we would like to comment on.

Within section 1 of the consultation document it states within the site layout and design section:

'Where vehicles and pedestrians use the same routes they should be separated, with appropriate crossing points clearly marked and signposted where necessary'

Our concern is that in practical terms within the warehousing industry full segregation cannot always be achieved.

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For your information I have stated below two relevant examples where full segregation is currently not possible:

1. **Manual Checks-** The majority of pallets received into stores require manual checks. This includes checks for quality and quantity. Pallets can often be segregated for this purpose however, due to the logistical layout of most stores this cannot always be within a designated segregated area.
2. **Stock checking-** This is a vital part of the day-to-day operation of all warehousing operations. This includes planned stock checks and daily random checks due to product issues. In this case pedestrians will need access to the whole area of the store particularly when random checks are required.

Although we have provided examples above where full segregation cannot always be achieved, we recognise that effective communication, safe systems of work and measures to control the risks are paramount.

The issue that full segregation cannot be achieved has been raised within the Warehousing Safety Forum and the current draft of the new guidelines reflects this to include advise on the necessary control measures. Therefore, we feel that it is necessary to bring forward this relevant point for your consideration for the contents of 'the route map'. May we also suggest that you discuss the detail in this area with your HSE colleague Iain Brodie who has been so deeply involved with the industry.

The BFFF will not be supplying a non-sensitive version of our submission as we are content for it to be publicised through any medium you should decide is relevant.

Once again, thank you for the opportunity to be able to comment on 'the route map'. Please do not hesitate to contact us if you would wish us to elaborate on any of the points that we have made.

Best regards,

Yours sincerely,

Joanna Hancock
Trade Analyst/Project Co-ordinator

cc. Iain Brodie, Health and Safety Executive