Stay safe!

From the Director

ISHM 2015 Referral Program

Safety Challenges in Commercial Cattle Feedlots

Support for EHS

Board of Director Thoughts - This month Jan Rosenberg

Making Commitments
From the Director

The holidays always bring about reflection on days long gone. Some we would like to relive, some keep buried forever. Either way it’s always good to go back and learn from our history.

Personally I am thinking about all the years I struggled keeping folks safe, feeling that I alone was responsible for the entire organization. Finally, when I realized there was a better way, my professional life became much better.

There are some great articles in this edition that should help in our professional pursuits.

Temp workers is an awakening, I never knew we could also be responsible for the worker.

Safety in a commercial feed lot teaches me that there are folks with a lot more issues than I face.

The article on commitment is thought provoking and reminds me:

At the breakfast table the chicken is involved, the pig is committed - where do you stand?

Support for EHS goes back to my reflections and reminds us that we need a lot of folks involved to have the very best program for the organization.

ISHM would like pictures of you at work doing EHS activities that we could use in a promotional campaign. If you have some and would like to share we would really be appreciative.

The ISHM staff joins me in wishing you a safe and enjoyable holiday season.

Live - Laugh - Love - Be Safe

ISHM 2015 Referral Program

The New Year will soon be upon us!!!

What better way to start the new year than to find ways to help others and get a little something for yourself in return.

ISHM is here to help you do just that... Our 2015 promotions offer savings and other goodies for our
current valued certificants!

Cost Savings #1- Refer one person to our certification programs who successfully complete the application process and become approved certificant or approved to take the exam and receive an ISHM logo shirt of your choice or $25 off your annual renewal fee.

Cost Savings #2- Refer three people to our certification program who successfully complete the application process and become approved certificant or approved to take the exam will receive a free Kindle Fire tablet or one (1) year free membership.

Recommendations can be done electronically using a form found on our website www.ishm.org beginning January 1, 2015 thru December 30, 2015.

"The secret of change is to focus all of your energy not on fighting the old, but on building the new" - Socrates

*Restrictions may apply and terms subject to change without notification* *Limit one upper level award per year*

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**Safety Challenges in Commercial Cattle Feeding**

Like many industries we have the usual hazards; electrical, energy control, machine guarding, fall hazards, confined spaces, equipment operation, material handling, etc, but we also have to deal with large animals (cattle and horses). We operate 365 days a year, regardless of weather, storms, or holidays; the animals in our care must be fed, and cared for every day.

A cattle feeding operation has at least nine departments; Administration, Feed Milling, Feed Delivery, Equipment Maintenance, Yard Repair & Maintenance, Pen Cleaning, Cattle Processing, Cattle Doctoring, Pen Riders (Cowboys), and Security.

Administration is basically the same as in any other industry, management, accounting, and HR.

Feed Milling is the process where grain, roughage, liquids, and grain byproducts are received, stored, processed into feed. We make feed fresh every day.

Feed Delivery is the process of loading feed at the mill and then delivering it to the cattle.

Equipment Maintenance is done in large shops where our equipment is maintained.

Yard Repair & Maintenance is maintaining the fences, gates, water tubs, work alleys, feed bunks, and facilities.

Pen Cleaning is the process of harvesting manure left in the pens by the cattle. We use
front end loaders, motor graders, paddle scrapers, and tractors with speed movers to gather, pile, and remove the manure.

Cattle processing is the process of receiving new cattle, giving them their identification tags, vaccinations for prevention of illness, and parasite control. They are trained in low stress cattle handling, and the proper use of their equipment. Cattle Doctors are trained in medical treatment of sick or injured cattle. Cattle needing attention are brought to the hospitals by Pen Riders and left to be diagnosed and treated. Computers are used to determine the treatment regimen needed, and administer the proper medications.

Pen Riders have the largest number of incidents of any department on a feed yard. They are required to ride through the cattle in each pen everyday to check the health of the cattle, and move animals needing attention to the hospital. They also move cattle around in the yard as needed.

Security or night watchmen are required to patrol the yard at night, check on the facilities, and receive and pen new cattle received during the night.

Safety training is given to each employee for the job they are assigned to including safety orientation, Return to Work Policy, introduction to the hazards of their department, proper use of PPE, reporting of hazards, unsafe conditions, locations of exits, and fire extinguishers, emergency action plans for fires, explosions, or weather events. We use a computer based learning system that contains courses that are related to our industry. We use a behavioral safety system to train our employees in accident avoidance by being aware of their states of mind, and critical errors. We hold weekly toolbox meetings, and bring in safety experts in various fields to do hands on training. We send employees to schools in electrical safety, mill maintenance, and equipment operation. Our Texas Cattle Feeders Association has a "Safety Trailer" that comes to our locations and does training on the use fire extinguishers, lockout/tagout, welding safety, etc.

We use outside safety specialists to do inspections; these include insurance carriers, OSHCON programs, and retired OSHA Compliance Officers. We have a peer review program where our line managers are grouped in threes, each one from a separate location and sent to a fourth location to do a complete safety review, including a walk through looking for hazards, safety training documentation, review of tool box meetings, and employee interviews.

Falls are our most frequent and expensive incidents. The combination of cattle, horses, slick pen conditions, confined areas and weather challenge us on a daily basis. We work hard to promote the "Cactus Safety Culture"; our senior management is very much involved with safety, and our location managers are held accountable for safety at their locations. As an ESOP company, with 100% ownership by our employees, we value every employee and strive to give them the safest workplace possible.

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**Power and Support for EHS**

Many environmental health and safety professionals complain about lack of power or support. Perhaps they do not understand real power or do not know how to engage the support they need. It is not complicated. It starts with the right vision of EHS's role in the organization. I like to quote Maxwell Halsey's 1949 book on traffic safety (*Traffic Accidents and Congestion*) that started with principle No. 1: "Efficient Automotive Transportation, not accident reduction, is the fundamental problem. Accidents, like congestion, are only indices of inefficiency." Using the traffic safety analogy, EHS managers too often view their role in terms of speed limits and stop signs - knee-jerk rule-based approaches. Using Halsey's principle, traffic safety may better be served by an expressway. Certainly, most people seeking safe travel would opt for that solution.

Working with and through others can pay off with much better results. Take ergonomics for example. Many EHS professionals focus on force, frequency and posture as keys to better ergonomics (think stop lights and speed limits in Halsey's world). However, focusing on improved productivity and teaming up with the institutional power of a lean manufacturing program to identify and reduce waste (including things that cause musculoskeletal disorders) may bring solutions that the EHS function would never have imagined.

As brilliant as EHS professionals may be, they are unlikely to arrive at the best solutions by themselves. They need to engage the best minds in their organization to solve EHS problems. One way to build such involvement is with a management system such as ANSI Z10 that uses a plan-do-check-act approach to continually improve EHS. A management system is a formal method to get the entire organization on the same page. And there is no need to wait for a sign from on high to get started. The process may begin with management support and planning, but it does not have to. It can also start by improving any of the other elements of an EHS management system, including incident investigation, employee involvement, risk assessment, improved performance metrics or feedback to management. Every aspect of the improvement process should build on itself and lead to more engagement. A management system also helps hold onto those gains already made. The goal should be to get more people involved in improving EHS. This may mean letting go and stepping out of our comfort zone.

Many people, including senior managers will embrace the responsibility and challenge of improving safety if called upon to do so. Others may need more help and time. The EHS function is to provide the tools (e.g. meaningful metrics, risk
The process should be viewed as an evolutionary one that does not occur overnight. It begins with viewing the EHS role as supporting business improvement, not ruling an EHS empire. The power to force a site-wide stand down after a safety infraction may be self-satisfying to some EHS managers, but a truly effective EHS manager should take more pleasure as a bystander while an operation manager is being recognized for a safety achievement. Real EHS leadership does not come from a title or reporting relationship; it is the ability to enlist the talent and energy of others for EHS improvement.

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Temporary Worker Safety and Health—Who Is Responsible?

Both host employers and staffing agencies have roles in complying with workplace health and safety requirements and they share responsibility for ensuring worker safety and health. Host employers should never presume that they are not responsible for the safety and health of temporary workers and should always treat temporary workers the same as they treat the safety and health responsibility for employees of their own company.

OSHA is emphasizing the safety and health of temporary workers. OSHA requirements for temporary workers are as follows:

- Establishment of responsibilities. OSHA recommends that before entering into a staffing agreement that host companies and temporary staffing agencies outline the requirements in their initial contracts. This will set the stage for their long term working relationship and not allow for an ambiguity in the responsibility for temporary worker safety and health.

- Joint responsibility. While each individual case will be determined by its own merits, staffing companies and their clients are considered equally responsible for
the safety and health of temporary workers on the job. This means that even though the staffing administrators cannot be onsite to directly supervise safety and health procedures, they need to be aware and comfortable with the environment.

- Assessing hazards of the job. According to OSHA, failure to understand the potential hazards of the job is not a proper defense in avoiding responsibility. While a staffing agency does not need to become an expert in the business of the host employer, they need to assess the potential safety and health risks to their employees before consenting to placement.

The following are recommended best practices that should be considered regarding the safety and health of temporary workers:

1) Prior to entering into an employment relationship, staffing agencies and host employers should jointly review all worksites, tasks, and job hazard analyses in order to identify and eliminate potential safety and health hazards and identify necessary training and protective measures.

2) Staffing agency representatives should be trained to recognize safety and health hazards which will better equip them to discover hazards and work with the host employer to eliminate or lessen identified hazards commonly faced by its temporary workers.

3) When feasible, OSHA recommends joint employers share and review each other's injury and illness prevention program.

4) When feasible, the agency/host contract should clearly state which employer is responsible for specific safety and health duties.

5) The parties should discuss a procedure to share injury and illness information between the employers, ideally specifying that procedure contractually. Both the host employer and staffing agency should track and, where possible, investigate the cause of workplace injuries. However, for statistical purposes, OSHA requires that injury and illness records be kept by the employer who is providing day to day supervision.

6) OSHA standards require site and task specific safety and health training in a language the workers understand. Training temporary workers is a shared responsibility between the staffing agency and the host employer.

7) OSHA and NIOSH recommend that staffing agencies and host employers each have a safety and health program and ensure that their temporary workers understand it and participate in it.
8) It is critical that both the staffing agency and host employer jointly conduct thorough investigations of injuries and illnesses, including incidents of close calls, in order to determine what the root causes were, what immediate corrective actions are necessary, and what opportunities exist to improve injury and illness prevention programs.

9) The staffing agency should establish methods to maintain contact with temporary workers. The staffing agency has the duty to inquire and, to the extent feasible, verify that the host has fulfilled its responsibilities for a safe workplace.

The short answer to the question of who is responsible for temporary worker safety and health is that it is a joint responsibility of both the staffing agency and the host employer. OSHA could hold both the host and the temporary employer responsible for safety and health deficiencies such as lack of adequate training regarding workplace hazards. Staffing agencies might provide general safety and health training, while host employers provide specific training tailored to the particular workplace equipment/hazards. However, the bottom line is that both the staffing agency and the host employer are responsible.

Jan Rosenberg, Deputy Administrator
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Making commitments
The last few weeks I have been focused on the difficult task of drafting and analyzing comments on the draft ISO 14001 and ISO 45001 standards.

This has caused me to focus on the issue of making commitments.

Central to all of the ISO management system standards is the requirement to establish a policy. This policy is to serve as the framework for establishing, implementing and maintaining the organization’s management system. A policy sets out guiding principles regarding the intentions of an organization related to the achievement of
A key part of a policy is the inclusion of commitments. For example, the ISO 14001:2004 standard requires that a commitment be made to prevention of pollution. The OHSAS 18001 standard requires that a commitment be made to prevention of injury and ill health. Both requirements include a commitment to compliance.

What is not necessarily clear is what "making a commitment" means. Does it mean -

- Including "magic words" in a written policy signed by someone in senior management?
- Developing plans to achieve the policy commitments - someday?
- Ensuring that everyone in the organization knows the commitments?
- Establishing processes to achieve the commitments?
- Being accountable for achieving the commitments?

Different organizations and third-party registrars have interpreted the requirement "to make a commitment" differently.

It struck me that this is also an issue in the development and use of professional Codes of Ethics.

Statements in Codes of Ethics, like those in policy statements, are often commitments.

Like policy commitments, the commitments set out in Codes of Ethics are often interpreted differently by different people. Some statements are viewed to be aspirational - a goal to strive for but not necessarily always achieve. In fact, some Codes of Ethics explicitly state that they are intended to be viewed as aspirational. Other times, statements in a Code of Ethics are intended to be requirements that must be met. In these instances, the Code of Ethics is a code of conduct that is not to be violated.

The challenge can be in deciding which is which.


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