

Noise at Work

The Noise at Work Regulations 1989 lay down a framework of duties covering the assessment and control of noise hazards, and set two action levels, at 85 dB(A) and 90 dB(A) for continuous daily personal noise exposure.

Assessment

Where noise exposures are likely to be 85 dB(A) or above, employers must carry out an adequate noise assessment or they will be in breach of the law. The assessment must be recorded and carried out by a competent person. It must be adequate for the purposes of identifying which employees are exposed, and provide enough information about the noise for the employer to decide what action is needed. As a rough guide, an assessment will be needed wherever people have to shout or have difficulty being heard by someone two metres away.

Work involving web presses and refiners will generate noise levels far in excess of 85 dB(A) and most sheet-fed machines and pulpers are likely to reach at least 85 dB(A). The assessment must be reviewed when it is no longer valid or there has been a significant change in the work such as changes in work pattern, machine speed and machine layout.

Reduction of Risk of Hearing Damage

Employers have a general duty to reduce risk of damage to hearing to the lowest level reasonably practicable. The GPMU policy is that 90 dB(A) is not a safe level of exposure and that levels should be reduced to at least 85 dB(A) and preferably lower. Employers will have to consider carefully what action they take in order to protect against future legal action, particularly where employees exposed to noise levels between 85 dB(A) and 90 dB(A) could suffer hearing damage.

Reduction of Noise Exposure

This puts a more specific duty on employers to reduce, as far as is reasonably practicable, exposure to levels below 90 dB(A) by means **other than provision of personal ear protectors**. To comply with this, employers should reduce the noise level itself and have an effective programme which will:-

- identify the source of noise
- identify noise reduction measures
- establish priorities for action and ensure it is taken
- reassess the noise exposure

Ear Protection

Where levels are likely to be at 85 dB(A) or above, employers must provide hearing protection where employees request it. If levels are likely to be at 90 dB(A) or

above, employers are legally obliged to provide ear protection and have a formal programme for the issue, use and maintenance of ear protectors which should include:-

- information on why ear protectors are being issued, where and how they should be used, how they can be replaced and looked after
- ready availability of protectors and replacements when needed
- personal choice of ear protectors
- personal issue so that individual ear protectors are not worn by more than one person.

Employees' Duties

Employees are legally required to wear ear protection where levels are at or above 90 dB(A) and in areas marked as ear protection zones. The GPMU's advice is that members should wear ear protection wherever noise levels reach 85 dB(A) or above, because of the proven risks of hearing damage. However, ear protection schemes should form only **part** of an agreed overall noise control programme, and there must be a commitment from the employer to find ways of reducing noise levels. The safety representative should use their rights to be consulted on the noise reduction programme, and where employers are relying only on ear protection to keep exposure below 90 dB(A) safety reps should request clear evidence including feasibility studies and costings to prove that all reasonably practicable steps have been taken to control exposure by other means.

As far as wearing ear protection is concerned, many people are reluctant to wear them because of discomfort or communication problems, for example. It is not the sole responsibility of the safety rep to ensure that members wear ear protection. A joint programme of action to encourage their use through information, instruction and training, and through example by supervisors and managers should be established.

The company's noise policy should be in the safety policy. The safety representative should be consulted particularly where disciplinary procedures are introduced for not wearing ear protection.

Maintenance and Use of Equipment

Employers must ensure that the equipment provided under the regulations is properly used and maintained. This involves regular checks and maintenance on equipment, such as silencers and periodic spot checks of noise levels at locations agreed with the safety rep.

A proper reporting system should be established which identifies problems and control measures to be implemented.

Noise at Work Regs

Actions required where $L_{EP,d}$ is likely to be: (see note 1 below)	below 85 dB(A)	85 dB(A) First AL	90 dB(A) Second AL
EMPLOYERS' DUTIES (2)			
General duty to reduce risk			
Risk of hearing damage to be reduced to the lowest level reasonably practicable (Reg 6)	■	■	■
Assessment of noise exposure			
Noise assessments to be made by a Competent Person (Reg 4)		■	■
Record of assessments to be kept until a new one is made (Reg 5)		■	■
Noise reduction			
Reduce exposure to noise as far as is reasonably practicable by means other than ear protectors (Reg 7)			■
Provision of information to workers			
Provide adequate information, instruction and training about risks to hearing, what employees should do to minimise risk, how they can obtain ear protectors if they are exposed to between 85 and 90 dB(A), and their obligations under the Regulations (Reg 11)		■	■
Mark ear protection zones with notices, so far as reasonably practicable (Reg 9)			■
Ear protectors			
Ensure so far as practicable that protectors are:			
- provided to employees who ask for them (Reg 8(1))		■	
- provided to all exposed (Reg 8(2))			■
- maintained and repaired (Reg 10(1)(b))		■	■
- used by all exposed (Reg 10(1)(a))			■
Ensure so far as reasonably practicable that all who go into a marked ear protection zone use ear protectors (Reg 9(1)(b))			■ (3)
Maintenance and use of equipment			
Ensure so far as is practicable that:			
- all equipment provided under the Regulations is used, except for the ear protectors provided between 85 and 90 dB(A) (Reg 10(1)(a))		■	■
- ensure all equipment is maintained (Reg 10(1)(b))		■	■
EMPLOYEES' DUTIES			
Use of equipment			
So far as practicable			
- use ear protectors (Reg 10(2))			■
- use any other protective equipment (Reg 10(2))		■	■
- report any defects discovered to the employer (Reg 10(2))		■	■
MACHINE MAKERS' AND SUPPLIERS' DUTIES			
Provision of information			
Provide information on the noise likely to be generated (Reg 12)		■	■

NOTES:(1) The dB(A) action levels are values of daily personal exposure ($L_{EP,d}$).

(2) All the actions indicated at 90 dB(A) are also required where the peak sound pressure is at or above 200 Pa (140 dB re 20 μ Pa).

(3) This requirement applies to all who enter the zones, even if they do not stay long enough to receive an exposure of 90 dB(A) $L_{EP,d}$

Source: *Introducing the noise regulations at work HSE IND(G)75(L)*

Information for Employees

Manufacturers and suppliers of machines are required to provide information on the noise likely to be generated. Employers have to provide adequate information, instruction and training for their workers. This has to include information on the risk of damage to hearing, the employees' obligations under the Regs, and how to report defects in ear protectors and noise control equipment.

Hearing tests

Under the Management of Health and Safety at Work Regulations 1992, employees exposed to certain types of risk, eg high noise levels, must be provided with appropriate health surveillance. The aim of health surveillance is to:

- identify when employees might be beginning to suffer from ill health because of hazards at work;
- give an opportunity to take early steps to reduce harm; and
- act as a means of checking that control and protective measures against harm are working.

Health surveillance for employees in noisy jobs usually means:

- regular hearing checks in controlled conditions to measure the sensitivity of hearing over a range of sound frequencies;
- informing them about the results of their hearing checks;
- keeping records; and
- encouraging them to seek further advice from a doctor where hearing damage is suspected.

It is good practice for employers to carry out regular hearing checks on all employees whose daily personal noise exposures equal or exceed 90 dB(A), NOT taking hearing protection into account. 90 dB(A) is the same as the 'second action level' - the level at which hearing protection must be worn. The risk of hearing damage rises significantly at exposures above this level. Therefore, even allowing for the use of hearing protection, employers should normally provide hearing checks when noise levels reach or exceed 95 dB(A), except where that exposure is likely to be only temporary, for example for only a few weeks in a year.

Health surveillance is not a substitute for measures to control noise and to inform and protect employees, as required by the Noise at Work Regulations 1989 (NAWRregs) (see above). However, it can be a very useful part of a hearing conservation programme and a trigger for putting into place further measures to reduce noise.

Action Points

1. Ensure you are involved in the assessment of noise levels to check they are kept below the legal limit, in line with GPMU policy.
2. Obtain copies of the assessment and use your inspections to ensure that employers are meeting their duties under the Noise at Work Regs.
3. Ensure you are consulted **before** any new equipment is brought in, so that the equipment does not exceed an agreed value of 85 dB(A).
4. Request a copy of the employer's noise reduction programme and obtain copies of the results of any

noise monitoring the employer should be carrying out.

5. Ensure that the employer provides suitable ear protection and that there is a formal programme for the issue, use and maintenance of ear protection.
6. Ensure that records of noise levels and assessment are kept for as long as possible as they will help where claims are made for noise induced deafness.
7. Safety reps should ensure that their employers are taking the correct approach to audiometry, and fully consulting with chapels about its introduction and use.