

Risk management tips brought to you by:
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DID YOU KNOW?

According to the 2015 Business Risk Index, 60 percent of manufacturers named medical-cost inflation and cyber risks as a source of worry, making those risks the largest areas of concern in the sector.

About half of those surveyed were worried about supply chain risks—either not being able to get materials from suppliers or not being able to deliver products to their customers. A business continuity plan can mitigate some of that risk, which is probably why 57 percent of the manufacturers surveyed have written plans in place.

OSHA Offers Guidance on HCS Compliance

Chemical manufacturers, distributors and importers must be in compliance with OSHA's Hazard Communication Standard (HCS) by June 1, 2015, but the agency has offered some guidance for manufacturers who might not be able to meet that deadline.

OSHA might exercise enforcement discretion on a case-by-case basis if the manufacturers, distributors and importers **could not** do the following:

- Obtain classification information and safety data sheets (SDSs) from upstream suppliers
- Find hazard information from alternative sources
- Classify the hazard information themselves

However, businesses seeking enforcement discretion will have to demonstrate their "reasonable diligence" and "good faith efforts" to become compliant.

In practical terms, that means that manufacturers need to produce documentation that they attempted to gather the necessary information from upstream suppliers and other sources, provide a written account of a continued dialogue with upstream suppliers and distributors, and show they developed a plan for making the necessary changes to SDSs and labels.



Proposed Integrated Health and Safety Index

A paper recently published in the Journal of Occupational and Environmental Medicine recommends that employers should integrate health and safety programs in order to evaluate their impacts on businesses.

The proposed Integrated Health and Safety Index reframes the traditionally separate areas into a single "health and safety continuum" and offers guidance for integration and implementation.

The index would evaluate both specific programs and broad practices, as well as determine numerical values for metrics like workers' compensation claims, absenteeism and accidents.