

# **Occupational Health & Safety in Small-to-Medium Meat plants in the West of Ireland**

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## **Abstract**

Health & Safety legislation is relatively new in Ireland. This paper describes a study of Occupational Health and Safety (OHS) in Meat plants in the West of Ireland. Selected plants were subjected to direct observation and OHS system reviews. The research also employed semi-structured interviews with company personnel, while checklists were used to capture relevant data.

Medium-size plants were aware of legal requirements but OH&S wasn't a priority. In smaller plants, management were unaware, while systems were non-existent and both safety culture and work practices were poor. Fundamentally, OH&S gets 'lost' in smaller plants, being inadequately resourced and compromised by the employment of non-English speaking operatives, poorly educated supervisors and inadequate enforcement. Employees end up without a voice and employers without the required knowledge. OH&S in smaller plants must be innovatively promoted. The authors suggest some means whereby this can be achieved.

## **Key words:**

**Culture, semi-structured interviews, checklists, enforcement, inductive approach**

## **Introduction**

Occupational Health & Safety (OHS) and the challenges it faces have been commanding increasing attention. This can be seen in the extent of the legislation and guidelines now in force compared with the situation twenty, or even ten years ago. Globally, OHS is now well legislated for, but there are many country-to-country variations, with some having more comprehensive systems than others, and some putting a greater emphasis on compliance and enforcement. Health & Safety legislation is relatively new in Ireland; the first occupational safety act, *THE SAFETY, HEALTH AND WELFARE AT WORK ACT, 1989* was passed into law only twenty years ago, and there are gaps in OH&S awareness, culture, etc. The authors believed this was true for small & medium sized Meat plants; having worked in Food Safety, one author had knowledge of Meat-plant operations. It is widely perceived that OH&S legislation is not user friendly and smaller enterprises can't always afford professional expertise. Such factors, particularly when combined patchy enforcement can mean 'avoidance' of the area, with serious repercussions – see, for example, [www.dol.govt.nz/consultation/interface-project/interface-project.asp](http://www.dol.govt.nz/consultation/interface-project/interface-project.asp)<sup>1</sup>.

This research paper is drawn from an OH&S study in Meat plants in the West of Ireland (Jordan, 2008), whose purpose was to establish a baseline for deeper research which will inform the development of a 'best practice model' for smaller operations.

### ***SMEs***

In 2005, there were almost 20 million enterprises within the 27 member countries of the European Union (EU) that were active in non-financial sectors of the economy. The overwhelming majority of these (99.8%) were small to medium sized enterprises (SMEs), with fewer than 250 employees (Schiemann, 2008). Daly (2009) reports that, in Ireland, more than 90% of the approximately 700 food manufacturers are SMEs and that their futures will

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<sup>1</sup> website accessed 16-8-2009

depend on their capacity to innovate on the basis of new knowledge and skills. Due to the complex nature of SMEs and pressures on time and resources, the level of OHS awareness can be low and the economic advantages of good occupational health practice may not be realised. Ensuring safety costs money but being unsafe in the workplace is also costly; in the European Union in the year 2000, the direct cost of workplace accidents amounted to €55 billion, while an estimated 1,250 million working days are being lost each year due to work-related health problems. In Ireland the cost was estimated as 3.6 billion or approximately 2.5% of GNP (Gervais et al, 2009). Inadequate knowledge in SMEs concerning the link between good safety systems and related economic benefits (reductions in accident rates, sick days, etc.) is hindering OHS interventions.

There is a popular misconception that equates small enterprise size with low risk. Accident rates in small businesses can be higher than in larger operations: for instance, the fatality rate in SME manufacturers in England was noted to be twice that of larger ones (Fairman & Yapp, 2005). In a European study, incident rates for non-fatal accidents in the period 2000 to 2005 were highest in units with 50-249 employees (European Commission, 2008).

### ***Regulation and Enforcement***

The very characteristics that identify SMEs are themselves a challenge to regulation and OHS intervention. SMEs have a lack of specialist skills, low cash flow, limited workforces, are predominantly non-unionised and operate under continuous competitive marketplace pressures. This translates into a lack of funding for specialist skills, multitasking employees who don't have the time to give to implementation of systems, and a lack of communication with regulatory authorities. A review conducted by one of the authors concluded that, in general, OHS in SMEs does not get the required attention. It is very well legislated for, but it was found that the legislation was not user friendly, enforcement of regulation was poor and

directed more towards the larger enterprises, while channels for communication of legislation were found to be dysfunctional (Jordan, 2008).

Australia, New Zealand and the UK are seen to have more comprehensive systems of enforcement and communication, than apply in Ireland. Most of the Australian OHS inspectorates are unified, and there are large numbers of multi-skilled generalist OHS inspectors, with a small number of specialists in areas such as Construction and Dangerous Goods. The inspectorates have largely migrated from a central control model to a regionalised one with regional managers and inspectorates divided along industry-sector lines (<http://ohs.anu.edu.au><sup>2</sup>). Similarly, in the UK individual local authorities enforce OHS, while coming together under the aegis of the Local Authority Unit (LAU) and liaising with the Health Service Executive (HSE) through the HSE/Local Authority Enforcement Liaison Committee (HELA). By comparison, Ireland has one regulatory authority, the Health & Safety Authority (HSA). With respect to communication of the OHS message, the Australian & UK systems are again more advanced and more effective. In Australia, in addition to the regulatory authorities there are also national associations specific to the different industry types. For example, in the Meat sector alone there is the National Meat Association of Australia, the Australian Meat Processor Corporation, Meat & Livestock Australia, etc. This is also true for the UK where numbers of associations deal with specific areas of industry, for example the British Meat Processors Association. These associations inform their member organisations of relevant Health & Safety matters via their websites and direct mailings; <http://www.bmpa.uk.com><sup>3</sup>, for instance. In Ireland, this does not appear to be the case. For instance, ISME (Irish Small and Medium Enterprises Association), while offering assistance to members on OHS matters, apparently does so on a 'request' rather than on a proactive

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<sup>2</sup> website accessed 17-08-2009

<sup>3</sup> website accessed 21-08-2009

basis. The Craft Butcher Association website does have a link to the Health & Safety Authority website. However, it's listed under 'links & downloads' which only appears when the 'employment law' option is opened by the user. There isn't any section of the home page dedicated to Health & Safety, never mind to considerations peculiar to association members.

### **Approach and Methods**

The fieldwork set out to capture early data and evidence on the existence and efficacy of OHS initiatives in Meat plants in West of Ireland SMEs. While there is no clear definition of OHS performance, there are 'indicators'. For example, the level of OHS documentation in existence can demonstrate whether or not there is an operational Health & Safety system in place, while statistics such as accident rates, absences, etc. can demonstrate if a system is relevant to the organisation and whether or not it is working.

Whereas this paper focuses on SMEs, the fieldwork also incorporated larger businesses. This allows for some commentary on the relative influence of size on OHS practice in the sector. Health & Safety was found to be a topic that meat plant directors were not very willing to talk about and it was definitely not an area of research that they encouraged. Consequently, a 'convenience sampling'<sup>4</sup> approach was used, which was largely predicated on one author's access to individuals in the selected companies. The authors have no reason to believe that these companies differed in any material way from their peers. Nevertheless, from a scientific viewpoint, the possible existence of a resultant bias is acknowledged. In total, 6 companies participated, of which there were two in each of the three categories of Large, Medium and Small. Where relevant, these are referred to hereafter as Companies A, B, C, D, E and F, respectively.

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<sup>4</sup> [http://en.wikipedia.org/wiki/Sampling\\_\(statistics\)](http://en.wikipedia.org/wiki/Sampling_(statistics)) – accessed 20-08-2009

The overall research project was ‘exploratory’ in nature - Patton (1987) defines work as being exploratory “if the program is at a pre-evaluation stage where goals and program content are still being developed”. As the goal was to maximise the breadth of the information captured, qualitative methods were employed for data collection (and analysis). Three methods were used to gather data: direct observation, open-ended interviews and Checklists. Checklists were chosen rather than questionnaires in order to minimise the obtrusiveness of the data collection activity on subject’s time. The checklists included questions posed to the person responsible for the running of the Health & Safety office, questions posed to Management, areas observed during the floor inspection and questions posed to general operatives. Figure 1 below, provides an example of such a checklist, in this case to capture relevant data during walkthroughs of the companies. Checklists, and questions posed during interviews were developed by reference to the OHS management standards BS8800:2004, OHSAS18001:2007, OHSAS18002:Nov.2007 (draft) and the FAQ section of the HSA website (<http://www.hsa.ie/eng/FAQs/>).

<u>Company</u>	A		B		C		D		E		F	
	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N
PPE – Is PPE provided, in use / used correctly and in good condition?												
Ergonomic best practice seen in offices/ VDU / Postures?												
Visible location of First Aid boxes?												
Is Chemical Storage separate and under lock and key?												
Good workplace conditions – environment, canteen, locker rooms, and amenity areas?												
Are there controls for lone workers, confined spaces, flammables and explosives?												
COMMENTS:												

**FIGURE 1:** Sample Checklist - Shopfloor Inspection

Open ended interviews were conducted with members of staff and management as both were thought to be key informants. The interviews employed predetermined short sets of questions which were administered in an informal conversational manner. Again, a convenience sampling approach was employed – individuals encountered at random during shop floor observation of OHS practice in each of the meat plants were invited to participate.

The ‘direct observation’ element involved walkthroughs of the plants during which the workplace, workers and their activities were assessed from an OHS perspective, and pertinent records and documentation were sought out and examined. Relevant observations were recorded in real-time, in the form of field notes.

A process known as ‘triangulation’ (Patton, 1987) was used to strengthen the analysis. Triangulation involves using multiple methods to study a program. It means checking the consistency of what people say over time, comparing observational data with interview data, as well as validating information obtained through interviews by checking program documentation. In this study, the qualitative data sources were triangulated in order to validate the information gathered from the interviews by checking system documentation and observing work practices.

The use of observational fieldwork suggested the adoption of an inductive approach to analysis of the data collected, as the researcher had directly experienced the levels of OHS awareness, implementation and practice in the field. Inductive analysis is appropriate here, as:

- (i) it allows findings to emerge from field data without the constraints imposed by more structured ‘deductive’ methods that have clear, pre-defined and measurable goals.
- (ii) the inductive approach aids the researcher in condensing data, establishing links between research objectives and findings, and allows for the proposition of a theory.

As the data collected varied from one company to another – because their OHS systems/practice are essentially independent – the (qualitative) inductive approach adopted consisted of a Case Analysis ([http://en.wikipedia.org/wiki/Case\\_analysis](http://en.wikipedia.org/wiki/Case_analysis)<sup>5</sup>) of each plant's data, followed by a Content Analysis (GAO, 1996) to integrate the findings by seeking themes and patterns in the data obtained from the case analyses, field notes and interviews.

## **Results**

This section of the paper presents a selection of summarised results from the field study.

### ***Field Notes***

The following are extracts from field notes produced for two of the companies visited.

#### Company D – Medium Size Enterprise

- There was a manual handling instructor and the majority of staff had completed a manual handling course.
- All forklift drivers had completed a training course.
- There was very old health and safety system documentation, which was not in use.
- The OHS system had been developed for insurance purposes.
- There was one health and safety inspection on file. This inspection arose from a complaint made by the Department of Agriculture to the HSA. The complaint concerned a manual handling hazard for vets. The HSA visited the plant, concentrated their inspection to the kill line, left the responsibility for sorting the reported problem with the vets and departed. There has not been a follow up visit by the HSA and the rest of the meat plant was never inspected.

#### Company F – Small Enterprise

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<sup>5</sup> website accessed 18-08-2009

- Health and safety had never been mentioned at this plant prior to the authors visit.
- A food safety system was in place, but most of it had not been reviewed for two years.
- There were obvious accidents waiting to happen, as well as the normal hazards present in meat plants: frayed wiring near a wash area, blunt and old knives being used to bone out, large sides of beef being received through an entrance leading directly into the main boning hall.
- There was a climate of ‘why fix it when it’s not broken’.
- Senior management rarely visited the plant and did not have resources allocated for necessary structural improvements.
- The food safety system was the responsibility an under-qualified non-National who admitted to being lost due to the language barrier and lack of knowledge.

***Feedback from Health & Safety Coordinators***

Questions posed to company Health & Safety coordinators were formulated in checklists; one for each of the elements that should be in place as part of an OHS Management system. The main elements are shown in Table 1, below:

OHS Planning	Chemical Storage & Control
Safety Statement	Control of Physical Hazards
Health & Safety Policy	Training Programme
Document Control	Absenteeism Investigation
Emergency Procedures	Resources
Maintenance Programme	Equipment Design, Procurement
Management Reviews	Management Commitment
Continuous Monitoring	Calibration
Communication	Health Programmes
Contractors	Hazardous Substances
Documented Roles & Responsibilities	PPE
Accident/Near Miss Reporting	Internal Audits
Accident/Near Miss Log Book	Corrective Action Protocols

**TABLE 1:** OHS Management System Elements

In each case, it was normal practice to ask follow-up questions and/or for clarification/comment to be provided by the interviewee. Figure 2 provides the reader with a sense of this process, by displaying the outcome with respect to the ‘Document Control’ element. ‘Yes’ (Y) boxes were ticked wherever the preponderance of the answer/evidence was in the affirmative

<u>Company</u>	A		B		C		D		E		F	
	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N
Procedures for controlling documents?	√		√			√		√		√		√
Can documents be located?	√		√			√		√		√		√
Are they periodically reviewed and approved by authorised personnel?	√		√			√		√		√		√
Current versions of relevant documents available as/where required?	√		√			√		√		√		√
No obsolete documents in circulation?	√		√			√		√		√		√
Archival documents retained and identified for legal purposes?	√		√		√		√			√		√
COMMENTS: .....												

**FIGURE 2:** Populated Document Control Checklist

The following are indicative of additional notes/comments recorded in the course of completion of the open-ended interviews with the six OHS company coordinators:

- There are procedures documented but they are not always enforced.
- Health & Safety is next on the list, but we are just so busy.
- As long as the documentation is in place and up to date, everyone is happy.
- There aren’t even resources in place to change the broken light never mind to put towards Health & Safety systems.
- Senior management are only interested in the bottom line, how many animals were slaughtered, how many carcasses were deboned, etc.
- Health & Safety would only be considered if management thought they might be inspected by the HSA, even then it would be a system on paper and not in practice.

- The company only employ me as the Safety co-ordinator because it is a legal requirement to do so.
- I haven't had Health & Safety training, never mind the operatives on the factory floor.

***Feedback from Company Management and Operatives***

Figure 3 summarises the Case Analysis outcomes from interviews with company management

<u>Company</u>	<b>A</b>		<b>B</b>		<b>C</b>		<b>D</b>		<b>E</b>		<b>F</b>	
	<b>Y</b>	<b>N</b>	<b>Y</b>	<b>N</b>	<b>Y</b>	<b>N</b>	<b>Y</b>	<b>N</b>	<b>Y</b>	<b>N</b>	<b>Y</b>	<b>N</b>
Were Management aware of their obligations with regard to workplace health & safety?	√		√		√			√		√		√
Were Management aware of employee obligations regarding workplace health & safety	√			√		√		√		√		√
Were Management aware of the location of the First Aid boxes?	√		√		√		√		√		√	
Were Management aware of location of first aiders?	√			√	√		√		√		√	
Were Management aware of emergency procedures?	√			√		√		√		√		√
Were Management aware of the location of the assembly points?	√		√			√		√		√		√

**FIGURE 3:** Management Interview Results

Similarly, the outcomes of open-ended interviews with general operatives are presented in Figure 4. Here again, the various boxes were ticked on the basis of the preponderance of responses from the operatives interviewed in the company concerned. The comments listed below Figure 4 are again typical of those recorded during the interviews. These comments, when considered with Figure 4, provide clear evidence of a poor Health & Safety culture, a lack of communication and lack of safety training in SMEs in the Meat Industry. They quantify the extent of the challenge to be faced by those charged with OHS

regulation on the one hand, and those responsible for its promotion within smaller meat plants, on the other.

<u>Company</u>	<b>A</b>		<b>B</b>		<b>C</b>		<b>D</b>		<b>E</b>		<b>F</b>	
	<b>Y</b>	<b>N</b>	<b>Y</b>	<b>N</b>	<b>Y</b>	<b>N</b>	<b>Y</b>	<b>N</b>	<b>Y</b>	<b>N</b>	<b>Y</b>	<b>N</b>
Were operatives aware of the Safety Statement?			√			√		√		√		√
Have operatives seen the Safety System?				√		√		√		√		√
Were operatives aware of their legal obligations regarding to workplace health & safety?				√		√		√		√		√
Were operatives aware of the employer obligations regarding workplace health & safety?				√		√		√		√		√
Were operatives given job specific training and made aware of hazards in their work?			√			√		√		√		√
Were operatives trained in the correct use of PPE?				√		√		√		√		√
Were operatives aware of the location of First Aid boxes?			√		√		√			√		√
Were operatives aware of the location of the first aiders?			√		√		√			√		√
Were operatives aware of the emergency procedures?				√		√		√		√		√
Were operatives aware of the location of the assembly points?			√			√		√		√		√

**FIGURE 4:** Operative Interview Results

In the course of their interviews, individual operatives provided some telling answers and comments, of which the following is an indicative sample:

- Our Health & Safety is not high on the list of concerns around here.
- What does Health & Safety involve?
- How would Health & Safety benefit us anyway?
- We have Health & Safety; sure the vets are here all the time testing the meat!
- There will always be accidents, its part and parcel of this job.
- We don't have time for Health & Safety, the faster we work the more we get.
- Health & Safety was never mentioned around here.

- It would be like everything else, we'd sign up for it and never hear about it again.
- Health & Safety will never work in this industry.

**‘Direct Observations’**

The final set of aggregated results presented here relates to notes taken during the company walkthroughs - they are summarised in Figure 5, below.

<u>Company</u>	A		B		C		D		E		F	
	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N
Do Management lead by example?				√		√		√		√		√
Is the Safety Policy displayed?			√			√		√		√		√
Are there any hazards observed on the floor not risk assessed in Safety Statement?			√		√		√		√		√	
Are there procedures/equipment not accounted for in the risk assessments?			√		√		√		√		√	
Manual Handling – is the hazard controlled?				√		√	√			√		√
Repetitive Injury – is the hazard controlled?				√		√		√		√		√
Forklift – Is the hazard controlled?			√			√	√			√		√
Are there administrative controls?			√			√	√			√		√
Are Engineering Controls: machine guards, ventilation, equipment isolation in place?			√		√		√		√		√	
PPE – Is PPE provided, in use/used correctly and in good condition?			√		√		√		√			√
Are ergonomic best practices observed in offices/ VDU / Postures?				√		√		√		√		√
Visible location of First Aid boxes?			√			√		√		√		√
Chemical Storage – Is storage separate and under lock and key?			√		√		√			√	√	
Good workplace conditions – environment, canteen, locker rooms, and amenity areas?			√		√		√			√		√
Controls in place for lone workers, confined spaces, flammables, explosives?			√			√		√		√		√
<p>COMMENTS:</p> <ul style="list-style-type: none"> <li>○ Incomplete walkthrough in Company A</li> <li>○ Operatives lifting, stretching and bending incorrectly.</li> <li>○ A forklift with a broken warning light.</li> <li>○ Operatives and a supervisor without a reflective jacket in the dispatch area</li> <li>○ A number of overalls were torn, with the pieces of material hanging off the sleeve and dragging off the floor.</li> <li>○ The canteen and amenities in the smaller companies were very cold and damp.</li> <li>○ A number of first aid boxes were damaged and dirty</li> </ul>												

**FIGURE 5:** Observations on Plant Walkthroughs

## **Discussion of Field Study Results**

The tables in the results section above, although just a sample of the data gathered, show that Health & Safety in the SMEs companies (C, D, E & F) is not a priority and is sometimes disregarded altogether. Even the most basic requirement of having appropriately maintained and prominently displayed first aid boxes is unfulfilled.

The results of the study reveal a consistent difference between the larger enterprises and SMEs with respect to most quantifiable aspects of OHS systems. In general, there was also greater awareness of Health & Safety legislation in companies A and B than in the medium and small companies and they had made real progress towards OHS systems implementation. 'Progress' is the operative word here, because whereas the two larger companies had documented Health & Safety systems and it was claimed by management that these OHS systems were implemented, triangulation of the separate elements of the studies revealed a contradictory finding, as evidenced by operative responses and certain walkthrough observations (Company B).

The two medium sized companies had old and very basic Health & Safety systems that had been developed for insurance purposes. These systems were not being formally implemented, although many physical hazards were recognised and controlled. Management were aware of OHS requirements but OHS was not a priority for them. This was reflected in generally poor awareness and behaviour amongst operatives.

Finally, and shockingly, it was found that operatives in the two smallest plants had never heard mention of Health & Safety (within their companies), until the author's visit. It was very obvious that there was a complete lack of awareness regarding OHS legislation and management systems. The managements were found to be just as ignorant on all matters pertaining to Health & Safety, as were the workforces. It was also found that senior and even middle management were unaware of the governing Food Safety legislation but were

knowledgeable of requirements concerning the operation of the ‘business’. After comparing the comments made by operatives, the Health & Safety coordinators and the management at each meat plant and having observed methods of work and documentation, it was found that OHS is not just ignored, it is treated with scorn.

### **Final Observations and Recommendations**

A limited workforce, the educational level of employees and their expectations, the need for multi-tasking and pressures to operate at full capacity, often leave both SME management and employees ‘too busy’ to implement Health & Safety regulations. In the SMEs visited it was found that the management were a major obstacle to OHS regulation and intervention. In smaller enterprises, in particular, the proprietor is the person responsible for the implementation of systems, and is likely to have a cost focus. A British report on OHS in SMEs (Stephens et al, 2004) found that the management/proprietor is a key influence on the success of any intervention and further described the manager as “the gatekeeper to controlling change”, in this regard. The methodology employed in capturing and collating the field data exposed an air of disregard towards OHS and the Health & Safety of their employees by the majority of the managers and employers in the meat plants visited. Production and quality of product were the priority. Smaller meat plants typically have informal management systems with a lack of resources, awareness, communication and management commitment to Health & Safety. In this study, these companies had a lax attitude towards safety management and a most alarming culture of ‘if it’s safe enough, it’s good enough’.

In Ireland there has already been years of research on/in SMEs and such research is on-going. However this research concentrates mainly on the economic position of the SMEs. Wherever safety features, it tends to be Food Safety requirements in Food production. The

recent introduction by Teagasc of a new support service for Small & Medium sized Food Enterprises (<http://www.teagasc.ie/news/2009/200905-15.asp><sup>6</sup>) that does not incorporate or even mention OHS is further proof of the divide that exists between the emphasis placed on Food Safety and on Occupational Health & Safety. Food safety, although of course extremely important in its own right is being prioritized over the safety and health of those employed in Irish SMEs in the Food sector. A food business cannot start processing until it has been registered with the Food Safety Authority, has implemented the basic Food Safety requirements and has been inspected and approved by the authority. Food Safety & Food Safety Legislation is taken much more seriously by both the authorities enforcing it and by the Food SMEs themselves.

The importance of OHS in smaller enterprises is, however, becoming more topical and is beginning to receive more attention internationally. For instance, in New Zealand the National Occupational Safety and Health Committee project ‘Occupational Health & Safety In Small & Medium Enterprises’ (<http://www.nohsac.govt.nz/workpogrmeohsinsmes.shtml><sup>7</sup>) was due to be reported upon in June 2009. A stated project objective is to “clearly identify the strategic issues associated with efforts to improve occupational health and safety in SMEs”. It is refreshing to see this type of research being carried out, but it also interesting to note that while a number of business sectors are identified for specific attention, including Agriculture, Horticulture and Fishing, the meat sector is not among them?

In 2007, the European Commission launched ‘Improving Quality and Productivity at Work: Community Strategy 2007-2012 on Health & Safety at Work’. This document, among other suggestions, encourages the establishment of national objectives and strategies: “The National strategies should therefore give priority to implementing a package of instruments

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<sup>6</sup> website accessed 23-08-2009

<sup>7</sup> website accessed 23-08-2009

which guarantee a high level of compliance with the legislation, in particular in SMEs and high-risk sectors.” It goes on to recommended some specific instruments, for example: “economic incentives .... for micro-enterprises and SMEs.” The EU strategy is featured on the Health & Safety Authority of Ireland (HSA) website (<http://www.hsa.ie>) and the site also states that “the distribution of simple, clear guidelines and economic incentives for micro-enterprises and SMEs will form a cornerstone of the HSA’s approaches”. However, it can be concluded from the research completed here that there haven’t been either guidelines or incentives offered to SMEs in the Meat Industry. Further, the website of ISME, which represents Irish SMEs, is also devoid of references to incentives on offer from the HSA or of any future plans to offer such incentives.

Management commitment and example lead the way in raising awareness of OHS, in the development and adoption of OHS systems, and in good Health & Safety behaviour. A recommendation for future OHS intervention and regulation in SMEs is to tackle the current deficits in awareness and practice, at senior management/director level. This should be done by highlighting the benefits achievable from the improved performance of operatives working in an organisation with a positive safety culture, while also emphasising duty-of-care and other ‘moral’ considerations. Health & Safety must be sold to senior management in order for it to be taken seriously by middle management and operatives.

The development of a safe system of work plan (SSWP) for the sector might also be considered. The SSWP is a simple description of a safe system of work for very hazardous activities which is included in the health and safety plan. It can be developed in written form or in a series of pictograms depicting each task, the hazards associated with it and the controls that must be implemented, e.g. Personal Protective Equipment to be used. Pictograms are particularly appropriate here, because of the significant numbers of non-English speaking operatives employed in SMEs in the Irish Food sector.

In Ireland a Nationwide campaign needs to be put in place to increase people's awareness of Health & Safety Legislation and OHS management systems. Such a campaign should develop and promote clearer channels of communication of OHS concerns and responsibilities to those of all educational and socio-economic levels. Such information will help transform the current OHS culture and climate of "its safe enough" and raise the expectations of individuals in the workplace with regard to Health & Safety. Raised expectations and increased awareness would mean that employers would have to take a proactive approach to OHS. Raised expectations may even have a positive effect on the culture and current behaviours witnessed in the SMEs in the Meat Industry in the West of Ireland? To witness an improvement in Health and Safety management in the SMEs, there is a need to have all of those involved in OHS working together, including the employers, employees, the meat associations, the regulatory authorities and the government.

Proportionate enforcement and communication is vital to the success of Health & Safety legislation (Jordan, 2008). The regulatory and enforcement agencies are faced with the same challenges as the SMEs themselves when it comes to intervention. Intervention costs money, takes time and consumes resources that are not available at the present time. SMEs will not inform themselves in OHS. SMEs have limited resources and will avoid where possible and for as long as possible any interventions that are going to interfere with production and/or cost money. A viable approach to reduce the current challenges both internally and externally is to give the SMEs a voice. The Minister for Labour Affairs appoints members of the board of the Health & Safety Authority - the board determines authority policy. Board members are nominated by organisations representing the social partners and other interests associated with occupational safety and health. A further recommendation for the future is that associations such as ISME be invited to nominate board members, thereby giving SMEs a vested interest in the development of policy, with the added

bonus of developing clearer avenues of communication of Health & Safety issues and regulations. Giving the SMEs a voice would reduce both the internal and external challenges for OHS regulation and intervention. Garavan (2002) wrote that safety should be internally and not externally driven. However, as he also noted: ‘Reality demands that attention must move more towards safety attitudes, climate and culture within and outside the organisation in attempting to solve the Health & Safety problems in the workplace’.

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