EHS Plan for Contractor, Sub –Contractor, AMC Vendor & Visitor Process Management System in Manufacturing Industry

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Abstract:
Pfizer is committed to protect Pfizer employees (including contractors, subcontractors and vendors (hereafter referred to as “subcontractors”), visitors, and clients that may be affected by our performed work activities. This process is created to describe the mandatory Pfizer HSE requirements and provide the necessary framework to ensure effective Pfizer HSE management before and throughout the duration of the contract for subcontractors working with Pfizer. This is to ensure that subcontractors have full awareness of, and are clear as to Pfizer expectations that they will meet all HSE standards as defined by Pfizer and/or its Clients. This shall be used by Segment Operations, Supply Management, HSE, Licensing and Legal departments (as well as personnel requesting technical services) when assessing, selecting, engaging and monitoring subcontractors who deliver services to, or on behalf of, Pfizer.

1. INTRODUCTION

Welcome to Pfizer Global Manufacturing. This Contractor EHS manual has been prepared for Contractors, their subcontractors, and visitors servicing Pfizer Puerto Rico facilities. Contractors shall ensure that all employees have reviewed the sections of this document that are Applicable to the work they perform. This document does not relieve the Contractor of their Responsibility to comply with all applicable local, state and federal regulations, laws, ordinances, or Statutes, and Pfizer Global Manufacturing requirements. Pfizer seeks to engage Contractors who dedicate themselves each day to maintaining an accident-free work place. Pharmaceutical manufacturing operations are potentially hazardous. Many of these activities involve the Use of known hazardous, flammable, or toxic substances, intermediate drug compounds, and a broad range of biological materials, each with its own set of hazards and risks. Contractors must be aware that numerous hazards exist throughout our Sites, and that the hazards vary widely from lab bench to Lab bench, from floor to floor, and from building to building. As evidenced by the thousands of Pfizer colleagues safely working at our sites, these hazards can be effectively managed by following a few standard safety procedures. What is key to remember, is that whether working at an active production facility, in a laboratory, or even an office, it is every Contractor’ Responsibility to seek out and understand workplace safety precautions, and to take those actions that Will allow them to work safely in their assigned work areas. Each Contractor’s individual responsibility is to exercise educated, sound judgment and use their own experience and expertise to incorporate EHS Considerations into everything they do.

The goals of this Pfizer Contractor EHS Manual are to:

- Assist Contractors in meeting their responsibilities to provide a safe work environment for their employees, subcontractors, visitors and Pfizer employees at all times;
- Provide a safety program to prevent accidents, injuries, and property damage;
- Provide general guidance for Pfizer specific issues, and identify additional policies and resources for reference and support.

Pfizer is committed to achieving full compliance with all federal, state, and local regulations, as well as Pfizer Corporate Standards. These standards apply to:

- All construction and demolition Contractors,
- All personnel of Consultant Firms, and
- All site support service contractors and subcontractors (including: food service, production support, administrative, security and maintenance).

1.1. COMPANY OVERVIEW

Pfizer Limited is an India-based pharmaceutical company. The Company has a portfolio of approximately 140 products across over 15 therapeutic areas. The Company is engaged in manufacturing, marketing, trading and exporting pharmaceutical products. The Company offers a range of products for Anti-Allergic, Anti-Diabetic, Antihistamine, Anti-Infectives, Cardiovascular, Dermatology, Erectile Dysfunction, gastrointestinal (GI), Multivitamins, Pain/Inflammation+GI, Respiratory, Urology and Vitamin/Minerals, among others. Its products include LC-OD Plus, Bidia, Voglibose, Histerz, Isokin, Jetex Suspension, Nebasulf Ointment, Trulimax, Combantrin A, Newsta, Selsun, Agarol, Oxtileptin, Poonstan, Daxid, Tricorex, Citrosoda and Cognisules, among others. The Company has its own manufacturing facility at Thane and Goa. The Company has various independent contract/third party manufacturers based across the country. The Company sells its products through independent distributors primarily in India.

2. EMERGENCIES

All Contractor personnel must know the location of the nearest phone, fire alarm pull station, fire extinguisher, emergency eyewash station, emergency shower, and exits from the building. In the event of an emergency, the Contractors in the Sites must immediately report the emergency by calling the above extensions and/ or activating the nearest visible pull box station in the area.
Emergency situations may include, but are not limited to:
1. Accidents and Injuries;
2. Observed smoke or fire and explosions;
3. Chemical or hazardous material spills;
4. Property damage;
5. Severe weather impacts, and
6. Security threats
7. Medical (non occupational event)

When reporting an emergency, please provide the following:
1. Your name, phone number and location:
2. The location of the incident (building number, floor and room number).
3. Nature and extent of the incident (injury, accident, spill, smoke/fire, damage, etc.), The name and amount of the material spilled (if applicable)

3. USE OF OCCUPATIONAL HEALTH SERVICES

3.1 Work-Related Injuries / Illnesses
Emergencies or injuries are to be reported to the Pfizer sponsor. For other than minor first aid cases, the injured person should remain at the place of injury to avoid any hazardous conditions, and await emergency response personnel. Employees who are injured or become ill on-site may be seen at Occupational Health & Wellness Area (OHW) providing their medical condition does not require immediate transportation to a hospital. Under most circumstances, and by arrangement with contract and temporary agencies, definitive medical care for contract and temporary workers are rendered by an outside (non-Pfizer) medical facility. When applicable, construction contractors are to provide first aid equipment and emergency personnel for his employees, as defined in the OSHA Standards. At least one on-site First Aid/CPR certified personnel will be provided in each project. Certifications must be provided to the company upon request. In the event of an accident during normal working hours, contractor personnel shall report to their supervisor and go to Pfizer OHW area for evaluation and first aid. When not in normal working hours (weekend and 3rd shift), contractor personnel shall report to their supervisor or First Aid certified person. If the accident is serious, or the injury beyond first aid, they shall immediately notify using the emergency notification system. Equipment involved in the accident will not be allowed to be removed from company property without approval.

4. REPORTING ACCIDENTS / INCIDENTS / UNSAFE ACTS OR CONDITIONS
The following reporting guidelines apply to all accidents, injuries, and unsafe conditions:

4.1 Verbal Reporting Requirements
All types of incident/accident (such as fatality, severe or multiple injuries, first aid injury, property damage, unsafe conditions, environmental releases, etc) must be reported immediately to the Pfizer sponsor. The notification could be to any Pfizer colleague or by the use of the emergency notification system.

4.2 Written Reporting Requirements
The highest-ranking Contractor representative on-site must complete a Preliminary Incident Investigation Report or the Contractor’s standard injury reporting form within the next 24 hours following the incident. A final report must follow as soon as possible but not later than 10 days of incident, depending on the complexity of the event. The incident review may require the participation of the following persons: Project Manager or Safety Manager, Site Supervisor or Foreman, On-site Safety Representative (if applicable), injured employee if available (if the injured employee is unavailable, other employee(s) familiar with the events leading up to accident). If requested by the PCSM, the Contractor’s vice president, project executive, or another principal of the company shall also attend. All work related incidents must be reported to manager and investigate all Near Miss(NM), First Aid Case(FAC), Restricted work Case(RWC), Medical Treatment Case(MTC), Lost Time Injury(LTI) subsequently into SALUS

5. EMERGENCY ACTION PLAN
Pfizer has an Emergency Action Plans (EAP) specific for each Site. Contractors will be required to comply with the provisions of the site specific EAP. The Pfizer sponsor shall provide details of the Emergency Action Plan for the assigned work area, including a review of evacuation routes and assembly. Worker orientation relating to the EAP is required upon initial assignment and/or when the EAP changes. This is accomplished through the contractor safety orientation.

6. CONTRACTOR ROLES AND RESPONSIBILITIES
At a minimum, all Contractors must:
1. Comply with the most current version of the OSHA standards;
2. Plan their work to avoid personal injury, property damage, and disruptions to on-going Pfizer activities.
3. Establish, conduct, and document Environmental Health & Safety (EHS) education programs for their employees that ensure safe work practices;
4. Provide all necessary procedures, controls and/or equipment
to protect safety, property and the environment;

5. Immediately report releases, incidents, accidents, and injuries, and as appropriate, take or participate in corrective actions and investigations;

6. Use proper waste disposal and emissions controls procedures;

7. Develop a Safe Work Plan (SWP) and Job Safety Analysis as appropriate for work activities;

8. Continually inspect to ensure that safe work practices are employed;

9. Implement immediate corrective action for any deficiencies;

10. Provide written documentation prior to mobilization that all required certifications, licenses, training, etc. are current for all personal and equipment,

11. Effectively manage their staff to ensure full compliance with EHS requirements.

5.1 Contractor Employee Responsibilities

1. Use the required PPE, tools and equipment to perform each job;

2. Review all applicable Pfizer requirements relative to their scope of work prior to beginning any activity;

3. Review and understand all project work plans and permits prior to beginning any activity;

4. Refrain from beginning any activity until they have a full understanding of how to complete the task safely and after obtaining applicable work permits;

5. Continually observe their co-workers and surroundings and take immediate action to correct problems, including non-compliance with PPE, permitting, or policy requirements;

6. Stop work and notify their supervisor when conditions or activities become unsafe;

7. Take full responsibility for their own safety, and the safety of their co-workers;

8. Immediately correct any unsafe act or condition;

9. Immediately notify any incident or emergency situation.

6. FIRE SAFETY

6.1 Introduction

To ensure that employees are knowledgeable in fire prevention and emergency response in the workplace.

Objective

Employees should be able to:

- Describe the emergency procedures for their facility in case of fire.
- Identify common fire hazards in the workplace and how to prevent them.
- Identify special situations or individuals in the workplace that may require an emergency response different than the standard response.

- Demonstrate how to correctly use a fire extinguisher, take part in a company fire drill and demonstrate the correct emergency response.

6.2 Fire Extinguisher

- Pfizer has installed fire extinguishers throughout the facilities.
- Your first actions when you encounter a fire should be to evacuate the area and report the emergency.
- There is no expectation for you to extinguish a fire.
- Remember if you are acting as fire watch you must be trained to use a fire extinguisher.

[Figure 6.1 Fire Extinguisher]

[Figure 6.2 Types of fire classes]

[Figure 6.3 Types of fire classes]

7. COVID-19 GUIDANCE TO REDUCE/PREVENT THE RISK OF EXPOSURE TO THE CORONAVIRUS

- Submit Self declaration as per the format provided by Pfizer for all workman to work at Pfizer premises
- All employees to provide health declaration at the security gates and undergo temperature screening on daily basis before entering the premises
• Train workers on preventive measures of Covid-19 and how to properly use/wear and take-off protective clothing and equipment and disposal when soiled.

• Workers to wear 3 ply masks covering their nose and mouth to prevent them from spreading the virus.

• Worker shall wash their hands at least once in two hours with soap and water

• Follow respiratory etiquette, including covering nose and mouth during coughing and sneezing.

• Continue to follow safety practices/control measures associated to the job/activity, including use of personal protective equipment (PPE), necessary to protect workers from job hazards.

• Advise workers to avoid physical contact with fellow workman and direct employees/contractors /visitor. Maintain at least six feet distance as far as possible at all places.

• Promote personal hygiene.

• Restrict movement inside the premises to the place and not enter into any of the unauthorized areas.

• To the extent tools or equipment shared should be sanitized with alcohol-based wipes/sanitizing liquid before and after use. When cleaning tools and equipment, workers should consult manufacturer recommendations for proper cleaning techniques and restrictions.

• Keep in-person meetings (including toolbox talks and safety meetings) as short as possible, limit the number of workers in attendance, and use social distancing practices.

• Report any safety and health concerns immediately to the supervisor and the Doctor.

• Workers to stay at home if they are sick.

• Standard approved Mask shall be provided by the contractor company to their workman at their expense

• All expenses associated with the movement/ testing/ treatment to address the health concern of the contract workman shall be borne by the contractor company and RBEI shall not be responsible for the same.

over the safety in Contract & subcontract management which highly shown an improvement in the sites safety performance, The same will be physically followed and monitored in the second phase of the project and the HSE performance of the site will be Statistically graphed.

9. REFERENCES

[1]. Factory act 1948


Figure.7.1 Covid-19 Guidance to Reduce/Prevent the Risk

8. CONCLUSION

Thus these been submitted to the organization by collating all the documents which they follow at present to have a control