Action Plan for Prevention of Industrial Accidents

1. Background of Development of the Plan

(1) Recognition of issues as Japan Paper Association

In 1962, when Japan Paper Association started to tabulate the safety statistics, the number of accidents requiring lost workdays in the member companies was 708, and that of accidents without lost workdays was as many as 1,498. As a result of continuous efforts toward the safety for more than half a century, the number of accidents requiring lost workdays was 19 and that of accidents without lost workdays was 28 in the year before last, showing a dramatic improvement. (See Graph 1.)

In the last year, however, both the number of accidents with lost workdays and that of accidents without workdays increased by eight, respectively. While the rate of lost-worktime accidents (= frequency of accident occurrence) in our industry was almost at the same level as the average of the manufacturing industry, the accident severity rate (= severity level of accidents) was much worse than the average because of a large number of fatal accidents. (See Graphs 2 and 3.)

Since the start of tabulation of safety statistics in 1962, there has not been a single year without any fatal accident in both of the member companies and cooperating corporations. (See Graph 4.)

In the first half of 2016, two fatal accidents to be included in the statistics of our Association occurred. In total, four fatal accidents, including those not tabulated in the statistics, occurred in a short period of time, and we were strongly required by the Ministry of Economy, Trade and Industry and the Ministry of Health, Labour and Welfare to ensure the thorough safety management as the industry, which brought us to unprecedented circumstances. Furthermore, in last year, five fatal accidents in total occurred consecutively after June, which were one fatal accident in a member company and four fatal accidents of persons who temporarily entered the premises although the latter cases were not included in the safety statistics.

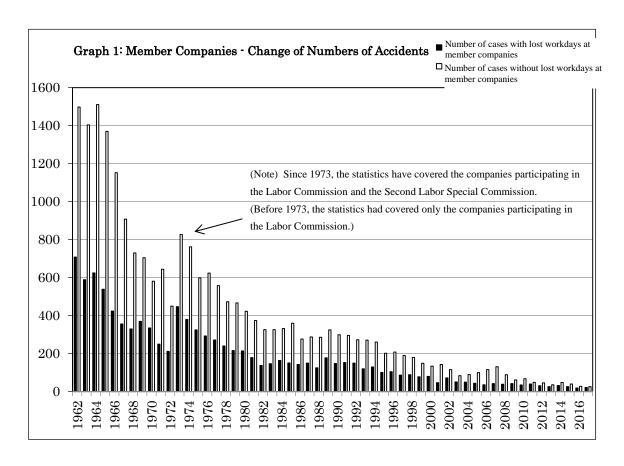
Since 2016, all the member companies and cooperating corporations have clarified specific risk sources in each worksite and process, and have newly developed activities focusing on the "elimination of fatal accidents" by sharing the risk sources among member companies. Nevertheless, the reality of situation has not been improved, therefore, to break the cycle of accidents is the most important issue at the present.

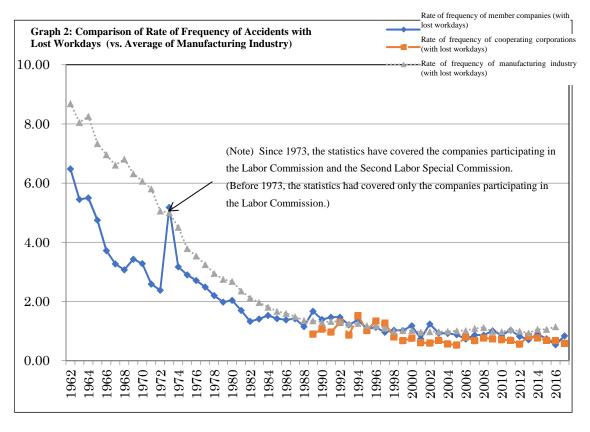
We take special note of the accidents of persons who entered the premises temporarily which occurred last year, and we take "emergency countermeasures", which should be positioned as a part of our activities for the "elimination of fatal accidents". To clarify the direction of our efforts, we hereby develop this Action Plan.

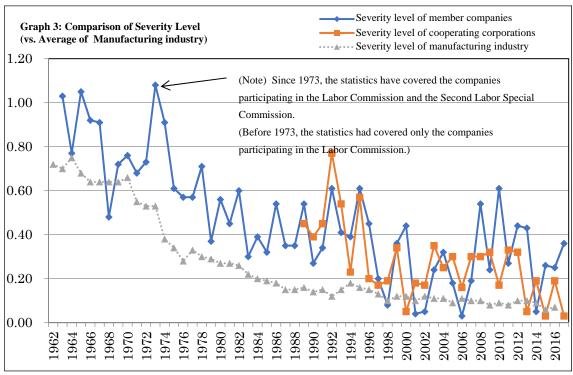
(2) Participation to the Public-Private Council for Safety Measures in the Manufacturing Industry

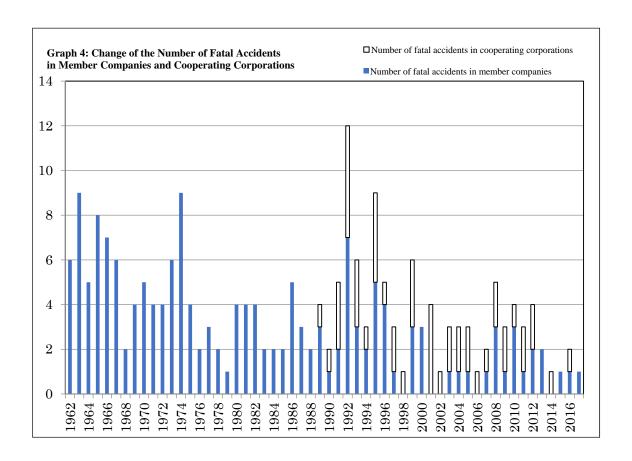
On March 6, 2017, the Ministry of Health, Labour and Industry, the Ministry of Economy, Trade and Industry, and Japan Industrial Safety and Health Association established the Public-Private Council for Safety Measures in the Manufacturing Industry with the management of major industries of the manufacturing business, in the purposes of further strengthening of safety measures and the information transmission of the manufacturing industry. It was the first time for us to examine and promote dissemination activities in a cross-industrial manner as a joint public-private council, and our Association is positively participating in different activities of the Council as its first acting presidential organization.

In the "the Public-Private Council for Safety Measures in the Manufacturing Industry – Kobe Declaration" announced on November 9, 2017, a direction of plan development of "Efforts along the 'Four Management Principles'" was indicated, therefore, this Action Plan has also a role to show such a direction.









2. Goal of our Association concerning Industrial Accidents

"Zero Fatal Accident in the Worksites of Member Companies and Group Companies"

Based on the concept that "it is the responsibility of the site manager and the top management to ensure everyone once accepted in the worksite shall achieve their purpose of entering the premises and go out therefrom in safe", the ultimate goal of the Japan Paper Association is to ensure the thorough safety management of not only the employees of the company and cooperating corporations, but also other persons who are not residents of the worksites, and to eliminate fatal accidents from the worksites of member companies.

3. Permanent Efforts

(1) Efforts for elimination of fatal accidents

On the occasion of being required by the Ministry of Economy, Trade and Industry and the Ministry of Health, Labour and Welfare in writing in 2016, the Association will more strongly continue the "efforts for elimination of fatal accidents" which had already been promoted. As the direction of countermeasures, we will promote the activities focused on elimination of fatal accidents, instead of overall safety activities so far conducted.

Specifically, each worksite and process, with full participation, shall clarify the operations and places that may directly lead to a fatal accident (= to identify the potential risks of fatal accidents due to operations or places), and will ensure to take countermeasures one by one.

As the industrial organization, we will ensure to share the awareness that "improvement of severity rate, which is equal to the elimination of fatal accident, is the most important issue of safety", and to develop the conditions and environment to enable all the member companies to smoothly promote the activities focusing on the elimination of fatal accidents.

- 1) Approach to the top management (implementation of safety seminars at the board of directors)
- 2) Approach to trade unions (Collaboration with industrial unions and Japanese Federation of Pulp and Paper Workers' Unions)
- 3) Approach to member companies and members
- 4) Approach to other organizations of the industry

(2) Operation of Safety and Health Committee

The purpose of Safety and Health Committee is to facilitate the communication among members and to share information concerning the safety and health, thereby to contribute to the improvement of safety and health level of member companies. For the achievement of this purpose, the Committee shall develop the plans, verify the progress and confirm the results of different activities.

The Committee shall be positioned as the upper organization of the Safety and Health Sectional Committee of the paragraph (4) below, and shall organize regular meetings twice a year, and extraordinary meetings as necessary.

(3) Horizontal deployment of accident cases

For the purpose of prevention of similar accidents, industrial accidents (requiring and not requiring lost workdays) that occurred in the member companies shall be reported to the Association by using "Accident Report Sheet", and the information shall be provided (horizontally deployed) to each member company and the Japanese Federation of Pulp and Paper Workers' Unions without delay.

(4) Preparation of safety statistics

The safety statistics of member companies have been tabulated since 1962. (Since 1989 for the cooperating corporations)

*Those subject to the statistics are the same as those of the "Report of Worker's Death, Injury or Disease" to the competent Labor Standards Office.

The Association receives the "Accident Statistic Sheets" monthly submitted from the member companies, aggregates them for each month, and sends back the result to the member companies.

Furthermore, the Association summarizes the "Accident Report Sheet" and the "Analysis Sheet of Major Causes of Accident" stated in the paragraph (1) into the following booklets, and distributes them to all the member companies.

1) "Analysis of Situation and Causes of Accident Occurrence"

This is a summary of situations and causes of occurrence of each accident, the countermeasures for, and other matters of the accident concerning all the accidents that occurred in the year, including the accidents without lost workdays.

2) "Accident Statistic File"

This is a summary of safety performance results and comparison with the average of manufacturing industry of each worksite of the member companies and cooperating corporations, and analysis of factors of the accidents that occurred in the year.

(5) Operation of Safety and Health Sectional Committee

In 2009, the "Safety and Health Sectional Committee" was established by the persons in charge of safety of the major member companies (13 companies at the present) for the purpose of improving the information exchange among the member companies concerning the safety and health management, and improving the safety capability of member companies and the entire industry. It holds five meetings annually (including visits to plants of other industries).

The activities include explanation and opinion exchange of the safety and health activities of each company. In case of occurrence of fatal accident, the person responsible for safety of the company concerned explains the situation, causes, countermeasures and other matters of the case. All the members discuss the problem points and countermeasures and share the awareness.

(6) Organization of National Conference of the Paper and Pulp Industry on Safety and Health The Conference has been annually held continuously since 1961. This year, we hold the 58th

Conference.

The total number of participants from the member companies and cooperating corporations is approximately 350-360 every year.

The schedule is three days and two nights, composed of the safety and health award ceremony, lecture, workshops and plant visit. The participants spend the whole of the second day for workshop sessions (in small groups of less than ten people). The workshop sessions are held in a form similar to education/training; for example, the participants are required to examine the theme of discussion before joining the discussion of workshop sessions. The discussion of workshop sessions by participants characterizes the Conference, together with the schedule of three days and two nights.

The workshop sessions are planned and operated by the "Safety and Health Sub-Committee" composed of the persons in charge of safety of ten major member companies.

(7) Transmission of information to the inside and outside of the industry

Taking the opportunity of establishing the Safety and Health Committee, we started to utilize the official website and a members-only website of the Japan Paper Association. We will gradually improve the contents of these websites.

- (8) Utilization of knowledge of the inside and outside of the industry and the industry-wide efforts
 - 1) Active participation in the Public-Private Safety and Health Council of the Manufacturing Industry
 - 2) Industry-wide efforts in the paper and pulp industry

We provide the Japan Corrugated Case Association, the Japanese Traditional Paper Mechanical Manufacturers' Association, the Paper Recycling Promotion Center, and other organizations in the industry with the accident statistics, information of the Public-Private Council, good practices of activities and others.

We will further improve the activities to make them bi-directional.

4. Efforts in Consideration of Fatal Accidents that Occurred Last Year

- (1) Emergency countermeasures
 - 1) Measures by documents to call attention: We completed to collect the result reports on the efforts from all the member companies by January.
 - 2) Thorough off-limits designation

[Examples of specific countermeasure]

- In consideration of the recent fatal accident, clearly designate the passable and operable areas to the people entering the premises temporarily, and thoroughly inform all the people entering the premises of such areas.
- At the same time, clearly indicate the off-limits areas with black-yellow hazard warning and posters calling attention, and take physical measures to prohibit the personnel from entering the designated areas to the maximum extent.
- 3) Thorough holding of pre-work meeting

[Examples of specific countermeasures]

- Before starting the work of the first day in the premises, all the workers, including the manager/supervisor of the relevant worksite, shall hold a meeting and confirm the precautions for the operations, including the announcement of off-limits areas as stated in the paragraph 2) above.
- If the manager/supervisor or the equivalent of the relevant worksite is not able to participate in the meeting, take measures, for example, by delivering written precautions personally in advance to have all the workers informed of such precautions.
- 4) Preventive measures of recurrence of accident by contact with hazardous substances (statutory controlled poisonous or deleterious substances, specified chemical substances,

etc.)

[Examples of specific countermeasures]

- •Operation procedures and compliance status of statutory matters are reconfirmed for the worksites where harmful substances are used or stored. Points to be improved, if any, are thoroughly and promptly informed to all the related parties of the relevant worksite.
- *The progress of efforts stated in 2), 3), and 4) of each company was reported to the board of directors in December 2017.

(2) Matters to be examined for the time being

1) Thorough operation concerning the entrance permission

[Direction of examination]

- · Acquisition of entrance permission is required if the contractors or the like enter the premises.
- Entrance permission is given only to those who attended the "Safety Training for Those who Enter the Premises for the First Time".
- •In the future, we will establish the period of validity to the entrance permission, and the renewal of the permission shall be subject to attending the "Safety Training for Those who Enter the Premises for the First Time".
- 2) Thorough training for those who enter the premises

[Direction of examination]

- We thoroughly conduct the above "Safety Training for Those who Enter the Premises for the First Time".
- At the same time, we request the contractors employing the workers who temporarily enter the premises to conduct "Pre-dispatch Training".
- In the future, we will require such contractors to submit "Pre-Dispatch Training Report".

5. Future Efforts to be Aimed at

- (1) Examination and establishment of facility safety standards as the industry
- (2) Examination and establishment of safety and health education system as the industry

6. Relationship of the Action Plan and Public-Private Council on Safety and Health Measures in Manufacturing Industry – "Four Management Principles"

The relationship between this Action Plan and the "Four Management Principles" is as shown below:

[Four Management Principles]

- 1. Strengthening of system to enable the management to show the leadership, to contact with the persons in charge of safety or manufacturing, and to always reflect the voice of the worksites;
- 2. Promotion of investment in safety based on the advancement of new efforts by utilizing technological innovation while there are the actual severe conditions such as deterioration of facilities over time, and;
- 3. Development of human resources to take charge of safety and fulfillment of safety education for each level of workers, including the workers of cooperating corporations, based on the change of environment, such as reduction of experienced personnel and increase of business outsourcing; and
- 4. Selection of issues to be addressed in priority, examination of the causes and countermeasures and sharing of the results of examination with the inside and outside of the industry.

Items of Efforts		Applicable Management Principle				Remarks
		1	2	3	4	
3. Permanent Efforts	Efforts for elimination of fatal accidents					Results obtained
	Approach to the top management	0	0			through the Public
	2) Approach to trade unions			0	0	 Private Council
	Approach to member companies and				0	for Safety
	cooperating corporations			0	U	Measures in the
	Approach to other organizations of the				0	Manufacturing
	industry					Industry shall be
	Operation of Safety and Health Committee	0		0		reflected in the
	Horizontal deployment of accident cases			0		efforts
	Preparation of safety statistics			0		successively.
	Operation of Safety and Health Sectional Committee			0		
	Organization of National Conference of the Paper and Pulp Industry on Safety and Health	0	0	0	0	
	Transmission of information to the inside and outside of the industry				0	
	Utilization of knowledge of the inside and outside of the industry and the industry-wide efforts	0	0	0	0	
4. Efforts in consideration of frequent occurrence of fatal accidents of last year	Emergency countermeasures			0	0	
	Matters to be examined for the time being			0	0	
5. Future efforts	Examination and establishment of facility safety standards as the industry		0	0	0	
	Examination and establishment of safety and health education system as the industry	0		0	0	