

General Product Safety-Risk Assessment

Description: <i>Product Group Perfect Bound, Case bound, Jacketed Case Bound Books</i>	Assessed by: <i>Richard Casserley</i>
Manufacturing Location(s): Ingram POD Printing Facilities.	Date: November 2024
Generic/Specific: <i>Regulatory</i>	Review date: November 2025
Reference: Regulation (EU) 2023/988 on general product safety	RA Ref: RA-HS-GPSR-2024 Rev.1

Definitions:

- **Hazard** can be defined as the potential of an activity, process, or substance to cause harm. Harm includes ill-health, injury, damage to property, plant, product, or the environment.
- **Risk** can be defined as the likelihood of something to cause harm and the severity of that harm.

Hierarchy of Risk Control

1) Eliminate	Redesign the job or substitute a substance so that the hazard is removed or eliminated. For example, duty holders must avoid working at height where they can.
2) Substitution	Replace the material or process with a less hazardous one. For example, use a small MEWP to access work at height instead of step ladders. Care should be taken to ensure the alternative is safer than the original.
3) Engineering control	Use work equipment or other measures to prevent accidents for example falls where you cannot avoid working at height. Install or use additional machinery such as local exhaust ventilation to control risks from dust or fume. Separate the hazard from operators by methods such as enclosing or guarding dangerous items of machinery/equipment. Give priority to measures which protect collectively over individual measures.
4) Administrative control	Identify and implement safe systems of work. For example, reducing the time workers are exposed to hazards (e.g., by job rotation), mobile phone use policy, use of safety signage. Providing people with training, information and supervision.
5) Personnel protective equipment and respiratory protective equipment	Only after all the above measures have been tried and found ineffective in controlling risks to a reasonably practicable level should PPE & RPE be used. PPE & RPE should be suitable for the hazard and activity. RPE may need to be fit tested. Workers must be aware of the function and limitation of each item of PPE or RPE.

Risk Levels:

The table below will be used to calculate the level of risk.

Likelihood	Severity				
	1 Minor injury (1 st aid on site)	2 Minor injury (treatment off site)	3 Over 7-day injury	4 Major Injury	5 Death
Unlikely 1	1	2	3	4	5
May happen 2	2	4	6	8	10
Likely 3	3	6	9	12	15
Very Likely 4	4	8	12	16	20
Certain 5	5	10	15	20	25

Low Risk	Control measures must be maintained
Medium Risk	Can control measures be improved?
High Risk	Urgent action to further control risks

Any risk assessed as being 10 or higher shall be deemed unacceptable. Suitable and sufficient controls shall be implemented ensuring that the residual risk is reduced to a level that is as low as reasonably practicable.

Product and Hazard	Who might be harmed and how?	What are the current control measures?	Risk Level			What further control measures are required?
			S	L	R	
<p>Hazard: Characteristics of the Product</p> <p>Risk: Design</p>	<p>Who: End Users Retailers Distribution Staff Manufacturing Staff</p>	<p>Book Types: Perfect Bound, Case Bound, Jacketed Case Bound are characterised as “Ordinary Books”</p> <p>Ordinary books are an historically proven design and production methodology.</p> <p>No current harmonised standard for book design has been issued by the EU.</p>	1	1	1	None.
<p>Hazard: Characteristics of the Product</p> <p>Risk: Technical features</p> <p>Area: Entanglement, entrapment, sheering, pinch points.</p>	<p>Who: End Users Retailers Distribution Staff Manufacturing Staff</p> <p>How: Muscular & Skeletal injuries</p>	<p>Product has no mechanical properties or incorporated metallic elements, the product is not expected to cause issues of entanglement, entrapment, sheering or pinch points.</p>	1	1	1	None.
<p>Hazard: Characteristics of the Product</p> <p>Risk: Technical features</p> <p>Area:</p>	<p>Who: End Users Retailers Distribution Staff Manufacturing Staff</p> <p>How: Cuts.</p>	<p>Ordinary books do not contain any external projects, sharp points or abrasive surfaces.</p> <p>The mechanical properties of paper in sheet form do form a sharp edge due to the thickness of the paper, where the sheet is cut/trimmed. This area is historically known to generate paper cuts.</p>	1	3	3	None.

<p>External Projections, sharp points, sharp edges, abrasive surfaces</p>		<p>Books are bound compacting the pages, holding the pages in position reducing the potential for cuts.</p> <p>Paper cuts a known risk, are low severity, and overall risk is low.</p>				
<p>Hazard: Characteristics of the Product</p> <p>Risk: Composition</p> <p>Area: Ingestion</p>	<p>Who: End Users Retailers Distribution Staff Manufacturing Staff</p> <p>How: Ingestion</p>	<p>Ordinary books are not intended to be consumed or ingested. General book size prevents accidental ingestion. Ordinary books do not have detachable parts that would cause risk of ingestion.</p> <p>Although ordinary books not intended for under 3 age group. Books are intended for use in a domestic environment, making it likely that they are accessible to younger age children.</p> <p>Product is compliant with CPSIA Section 101 requirements for lead.</p> <p>Product is compliant with Californian Safe drinking water and toxic enforcement act (Proposition 65)</p> <p>Books are compliant with EN 71-3</p> <p>All substances used are compliant with REACH regulations and subject to COSHH assessment.</p>	1	2	2	None.
<p>Hazard: Characteristics of the Product</p> <p>Risk:</p>	<p>Who: End Users Retailers Distribution Staff</p>	<p>All substances used in the manufacture of the product are compliant with REACH regulations.</p>	1	1	1	None.

<p>Composition</p> <p>Area: Element migration</p>	<p>Manufacturing Staff</p> <p>How: Contamination</p>	<p>Our inks do not contain restricted metals or mineral oils.</p> <p>Product is compliant with CPSIA Section 101 requirements for lead</p> <p>Product is compliant with Californian Safe drinking water and toxic enforcement act (Proposition 65)</p> <p>Product is compliant with EN 71-3 migration of certain elements.</p>				
<p>Hazard: Characteristics of the Product</p> <p>Risk: Composition</p> <p>Area: Product Failure</p>	<p>Who: End Users Retailers Distribution Staff Manufacturing Staff</p> <p>How: Exposure to internal elements.</p>	<p>In the event that a book deteriorates or is damaged exposing enclosed elements.</p> <p>All substances used in the manufacture of the product are compliant with REACH regulations.</p> <p>Any exposed glued areas will be in solid form.</p> <p>Product is compliant with CPSIA Section 101 requirements for lead</p> <p>Product is compliant with Californian Safe drinking water and toxic enforcement act (Proposition 65)</p>	1	2	2	None.
<p>Hazard: Characteristics of the Product</p> <p>Risk: Packaging</p> <p>Area:</p>	<p>Who: End Users Retailers Distribution Staff Manufacturing Staff</p> <p>How:</p>	<p>Books are supplied to users without further packaging.</p> <p>Packing used in the distribution of the product is either made from recycled material, recyclable or reusable.</p>	1	1	1	None.

Compliance	Environmental Consideration	Company is compliant with all applicable packaging regulations.				
Hazard: Characteristics of the Product Risk: Instructions for Assembly, installation, use and maintenance	Who: End Users Retailers Distribution Staff Manufacturing Staff How:	No Assembly Required No installation is required No specific maintenance is required for the use of the product.	1	1	1	None.
Hazard: Effect on other products Risk: Product will be used with other products	Who: End Users Retailers Distribution Staff Manufacturing Staff How: Products classification changes, further testing for compliance required.	Ordinary books are intended to be used separately and not with other products. Books maybe placed with other products as a set at a later stage of manufacture. The type of product the book is matched with may change the safety considerations of the set. The safety considerations of the set are the responsibility of the second stage manufacturer.	2	1	2	Publishers or second stage manufacture that supply a book with another product are responsible to ensure that the additional product is safe. Are required to assess if the status of the ordinary books has changed due to the product it is supplied with such as a toy.
Hazard: Effect on other products Risk: Interconnection of those products	Who: End Users Retailers Distribution Staff Manufacturing Staff How:	Ordinary books are not intended to be interconnected with other products, no facility for interconnection has been included in the design.	1	1	1	None.
Hazard: Effect that other products might	Who: End Users Retailers	Ordinary books do not have design characteristics that would be affected by the functionality of another product.	1	1	1	None.

<p>have on product to be assessed</p> <p>Risk: Other products used with that product, Effect non-embedded items</p>	<p>Distribution Staff Manufacturing Staff</p> <p>How:</p>	<p>Books have no EMC functionality or compatibility.</p> <p>Other associated products such as Reading aids do not directly affect the physical working characteristics of the book.</p>				
<p>Hazard: Presentation of the Product:</p> <p>Risk: Labelling, including labelling regarding age suitability for children,</p>	<p>Who: End Users Retailers Distribution Staff Manufacturing Staff</p> <p>How: Hazard awareness Inappropriate content for age groups, offence to interested parties</p>	<p>The requirement for labelling does not apply as the product as it can be used safely and as intended by the manufacturer without such instructions and safety information.</p> <p>POD books content is the responsibility of the publisher.</p> <p>As a POD printer Age suitability for children & adults is determined by the intellectual property owner and is the responsibility of the publisher</p>	2	2	4	<p>Publishers to ensure that POD content is appropriately labelled regarding age suitability for children.</p> <p>Publisher should also ensure content suitability for older people, person with disabilities and impact on gender differences are clearly identified</p>
<p>Hazard: Presentation of the Product:</p> <p>Risk: Warnings, instructions for its safe use and disposal</p>	<p>Who: End Users Retailers Distribution Staff Manufacturing Staff</p> <p>How: Hazard awareness Environmental considerations</p>	<p>The requirement for labelling does not apply as the product can be used safely and as intended by the manufacturer without such instructions and safety information.</p> <p>Books are widely recyclable and reusable and are intended for long term use. Books can be resold, retaining the original intended functionality.</p>	1	1	1	None.

<p>Hazard: Categories of consumers using the product:</p> <p>Risk: Children, older people and persons with disabilities, as well as the impact of gender difference on health & safety</p>	<p>Who: End Users Retailers Distribution Staff Manufacturing Staff</p> <p>How: Inappropriate content to vulnerable groups.</p>	<p>POD books content is the responsibility of the publisher.</p> <p>As a POD printer the suitability of the content of books for children, older people and persons with disabilities, as well as the impact of gender difference is determined by the intellectual property owner and is the responsibility publisher.</p> <p>Books with larger printed text are provided for those with visual impairment.</p> <p>Product group does not include brail books due to the specialised nature of manufacture.</p>	2	2	4	Publishers to ensure that POD content is appropriately labelled and any warning labels or consideration for children, older people, persons with a disability and gender difference should be incorporated into the products cover design or applied to the product at a secondary stage of manufacture.
<p>Hazard: Appearance of the product where it is likely to lead consumers to use the product in a different way</p> <p>Risk: Where product although not food stuff, resembles food stuff and likely to be confused with food stuff</p>	<p>Who: End Users Retailers Distribution Staff Manufacturing Staff</p> <p>How: Ingestion Element migration</p>	<p>Ordinary Books although may have food stuff on the cover design is unlikely to resemble food stuff in form, odour, colour, appearance, packaging, labelling.</p> <p>Books are used in a domestic environment so are accessible to children.</p> <p>Product is compliant with CPSIA Section 101 requirements for lead</p> <p>Product is compliant with Californian Safe drinking water and toxic enforcement act (Proposition 65)</p> <p>Product is compliant with EN 71-3 migration of certain elements.</p>	2	1	2	None.
<p>Hazard:</p>	<p>Who:</p>		1	2	2	None.

<p>Appearance of the product where it is likely to lead consumers to use the product in a different way</p> <p>Risk: Although neither designed nor intended for use by children, is likely to be used by children or resembles an object commonly recognised to or intended for use by children.</p>	<p>End Users Retailers Distribution Staff Manufacturing Staff</p> <p>How: Ingestion Element migration</p>	<p>Books are used in a domestic environment and public environment where they are accessible to children. Ordinary books have the same basic characteristics of books intended for young children.</p> <p>Ordinary books would not be categorised as toys.</p> <p>Product is compliant with CPSIA Section 101 requirements for lead</p> <p>Product is compliant with Californian Safe drinking water and toxic enforcement act (Proposition 65)</p> <p>Product is compliant with EN 71-3 migration of certain elements.</p>				
<p>Hazard: Appropriate Cybersecurity features necessary to protect the product.</p> <p>Risk: Protect product against external influences.</p>	<p>Who: End Users Retailers Distribution Staff Manufacturing Staff</p> <p>How:</p>	<p>Ordinary Books have no interconnectivity</p> <p>This risk assessment is for physical printed books</p>	1	1	1	None.
<p>Hazard: Nature of the product</p> <p>Risk:</p>	<p>Who: End Users Retailers Distribution Staff Manufacturing Staff</p>	<p>Ordinary book has no evolving, learning or predictive functionalities.</p>	1	1	1	None.

Evolving, learning and predictive functionalities of the product.	How:					
Hazard: Feasibility of obtaining higher levels of safety Risk: Other products presenting a lesser degree of risk shall not constitute grounds for considering a product to be a dangerous product.	Who: End Users Retailers Distribution Staff Manufacturing Staff How: Product Safety, Continual improvement	<p>The product conforms to relevant national and international statutory & regulatory standards or parts thereof as far as the risk and risk categories covered by those standards are concerned.</p> <p>Ordinary books are considered a 'safe product' as under normal or reasonably foreseeable conditions of use, including the actual duration of use, do not present any risk or only the minimum risks compatible with the product's use, considered acceptable and consistent with a high level of protection of the health and safety of consumers.</p> <p>Obtaining higher levels of safety will be an ongoing development through the continuous improvement in the safety of the materials and substances used in manufacture.</p>	1	1	1	None.

Approved by:	Richard Casserley	Signature:	<i>RJ Casserley</i>	Date:	December 2024
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Document Control					
Version	Date	Author	Role	Status	Changes
1.0	December 2024	Richard Casserley	Manager	New	Original

This risk assessment shall be reviewed:

- Biennially
- Following any change in any aspect of the method of work
- Following any modification to machinery or plant
- Following any incident/accident