



planning, monitoring & evaluation

Department:
Planning, Monitoring and Evaluation
REPUBLIC OF SOUTH AFRICA

**SOCIO-ECONOMIC IMPACT ASSESSMENT SYSTEM
(SEIAS)**

FINAL IMPACT ASSESSMENT TEMPLATE (PHASE 2)

**DEPARTMENT OF LABOUR - REGULATION OF ERGONOMICS
SEPTEMBER 2018**

The Final Impact Assessment: Regulations of Ergonomics

The Final Impact Assessment provides a more detailed assessment of the ultimately policy/legislative/ regulations/ other proposal. In addition, it identifies **(a)** mechanisms for monitoring, evaluation and modification as required; and **(b)** a system for managing appeals that could emerge around the implementation process.

1. The problem Statement/ Theory of Change

1.1. Give summary of the proposal, identifying the problem to be addressed and the root (causes) of the problem that will be addressed by the new rule.

- i. Summary of the proposal (Summary Background of the proposed policy/bill/ regulations/ other)

The Department of Labour's Compensation Fund has promulgated a list of compensable occupational diseases through the Compensation for Occupational Injuries and Diseases Act, Act 130 of 1993. This list is based on the list of occupational diseases established by the International Labour Organisation in 2010. This list includes a number of occupational diseases related to exposure to ergonomic risks in the workplace.

The occupational diseases relating to ergonomic risk included;

- Diseases caused by vibration, including;
 - o disorders of the muscles, tendon, bones, joints and peripheral blood vessels or peripheral nerves;
- Musculoskeletal disorders (MSD) including;
 - o Radial Styloid and Chronic tenosynovitis due to repetitive movements, forceful exertions and extreme postures
 - o Olecranon bursitis
 - o Prepatellar bursitis
 - o Epicondylitis
 - o Meniscus lesions
 - o Carpal Tunnel Syndrome
 - o Other MDS not listed, but where exposure to risk factors arising from the workplace and the contract of a MSD

- Mental and behavioural disorders, including;
 - o Post-traumatic stress disorder
 - o Other mental or behavioural disorder not listed, but where exposure to risk factors arising from the workplace and the contract of a mental or behavioural disorder

According to the International Labour Organisation (ILO), 2.34 million people die annually of work-related accidents and diseases. Of the 2.34 million deaths, 86% or just over 2 million resulted from occupational diseases. The ILO also estimates 160 million non-fatal occupational diseases are diagnosed each year. Occupational diseases also result in significant costs as employees and their families become impoverished, there is an increased burden on health systems and reduction of employee capability and productivity. The ILO estimates that 4% or 2.8 trillion USD of the global gross domestic product (GDP) is lost annually due to direct or indirect costs related to occupational diseases and injuries.

In South Africa, the Compensation Commissioner, who is for the compensation of occupational injuries and diseases through the Compensation for Occupational Injuries and Diseases Act, has accepted a total of 140 790 occupational injuries and diseases for the first six months of the 2018/2019 year alone. One of the registered associations which compensates occupational injuries and diseases for the iron and steel sector has accepted 70 178 claims for the three years of 2015, 2016 and 2017, which equates to more than R 900 000 000.

The current working environment is not only faced with the existing hazards of chemicals and noise exposure, but there has been an emergence of Musculoskeletal (MSD) and Mental Health Disorders. In the European Union, Musculoskeletal Disorders are the most common occurring work-related adverse health effect and in 2009, the World Health Organisation (WHO) reported that MSDs are responsible for more than 10% of all years lost to employee disability. Diseases relating to work-related stress have emerged in recent years. Exposure to occupational stress may result in employees turning to unhealthy lifestyle behaviours which have an impact on the workplace. It has also been proven that there is a link between occupational stress and other conditions such as MDSs and serious cardiovascular disorders.

The ILO has set out steps in order to prevent occupational diseases. For effective prevention, a country would need to incorporate national Occupational Health and Safety systems, inspection and prevention programmes and compensation system. The Department of Labour has already established inspection programmes and a

compensation system for occupational diseases and injuries. However, one of the requirements for an effective national Occupational Health and Safety system is the establishment of appropriate laws and regulations to prevent occupational diseases and injuries. The Department of Labour has already established the Occupational Health and Safety Act, Act 85 of 1993. This Act, under Section 43, allows for the Minister of the Department to make any regulation in the interest of health and safety of any persons at the workplace. In light of this, the Advisory Council for Occupational Health and Safety, established under Section 2 of the Occupational Health and Safety Act, advised the Minister to promulgate a Regulation relating to Ergonomics in the workplace.

ii. Problem/s and root causes that the proposal is trying to address

Identified Problem	Root causes
<p>A large number of claims for occupational injuries and diseases are submitted the Compensation Commissioner and mutual associations on a daily basis, as indicated above. Individual studies has indicated that in the last twelve months, at least 69% of employees working in factories suffer from lower back pain, while 76% of employees in the financial sector are affected by any pain and discomfort to the body in a workplace. Other studies have shown a prevalence of between 76 to 84% of ergonomics related pain and discomfort in health care workers.</p>	<p>Employers have failed to implement ergonomics preventative actions in the work place. Such preventative actions would be the introduction of an ergonomics programme, which will include the following aspects; an ergonomics risk assessments, ergonomics surveys, medical surveillance, training of employees, implementing control measures and designing out hazards and maintenance.</p>

1.2. Describe the intended outcomes of the proposal

Ergonomics plays a crucial role in the management of occupational health and safety in the workplace. One of the intended outcomes is to reduce the risk of exposure to ergonomics related disorders and enhancing the quality of employees lives. The number of people claiming from the Compensation Fund due to ergonomic conditions should be

reduced with the ultimate goal of clearing the claims out completely. The benefits of ergonomics may have a positive direct and indirect on the personnel at the workplace, productivity and design of products.

The personnel benefits include;

- Reduced accidents, injuries and diseases
- Reduced absenteeism and turnover of employees
- Reduced training costs
- Improved skills of employees
- Increased output of employees
- Reduced error rate

The benefits relating to productivity include;

- Reduction in scrap, equipment parts and materials
- Reduction in overhead rate

The benefits to product design include;

- Reduce time spent on maintenance
- Savings from modifications to equipment
- Savings from underused equipment
- Net savings in material and supply costs
- Improvement in quality and quantity of products
- Reduction in litigation costs
- Increased sales and value of stock

The indirect, positive benefits of ergonomics in the workplace include;

- The conveyance of concern to employees by the employer
- Greater loyalty and commitment and better behaviour from the employee
- An improvement in the corporate image of the employer, including better relationships with the surrounding communities.

1.3. Describe the groups that will benefit from the proposal, and the groups that will face the cost. These groups could be described by their role in the economy or in society. As a minimum, consider if there will be specific benefits or costs for the

poorest households (earning R 7000 a month or less); for black people, youth or women; for small and emerging enterprise; and /or for rural development. Add more rows if required:

Groups that will benefit	How will they benefit?
Employer	<ul style="list-style-type: none"> • They will have fewer injuries and diseases at the work place. • They will have less absenteeism and staff turnover. • They will have fewer claims for compensation, resulting in a decrease in annual fees which, like any insurance, increase because of claiming patterns. • A healthy employee will perform better for their employer, thus becoming more productive and producing a better quality of product. The employer will benefit from an increase in revenue, as a result from increased productivity and quality of work.
Employees	<ul style="list-style-type: none"> • They will work in environment which is safer and healthier. • They will have less or no injuries and diseases. • They will lead healthy lives, better living standards with less ailments, sicknesses and full employment.
Government	The Department of Labour's entity, the Compensation Fund and the Department of Health will benefit in that less employees will be injured or sick, resulting in less burden on health systems at local and provincial level.
Occupational health and safety professionals	Occupational health and safety professionals will benefit in that they will be able to provide additional services to employers, thus increasing revenue and more employment opportunities.
Training institutions	Training centres, such as universities, colleges and short course providers will establish degrees, diploma and certificates for individuals interested in becoming professionals in the field

Groups that will benefit	How will they benefit?
	of ergonomics.
Groups that will bear the cost or lose	How will they incur the costs or lose?
Employers	They will be required conduct a risk assessment, implement control measures and maintain such measures and conduct medical surveillance on affected employees.

1.4. Describe the behaviour that must be changed, main mechanisms to achieve the necessary changes. These mechanisms may include modifications in decision making process systems; changes in procedures; educational work; sanctions; and or incentives. Also identify groups inside or outside government whose behaviour will have to change to implement the proposal. Add more rows if required.

Groups inside Government	Behaviour that must be changed (Current Behaviour)	Main mechanism to achieve the necessary changes
National, Provincial Departments, Local Government Authorities and Municipalities	Currently, ergonomics is not regarded as a high priority as it is not one of the traditional, historical occupational hazards. However, due to increased stress in the workplace and outside the workplace, the poor design of equipment and different characteristics of individuals, there has been an increase in ergonomics related injuries and diseases. Government behaviour and attitude towards	Awareness (through advocacy amongst other modes) needs to be created inside of government about the hazards and adverse health effects related to exposure to ergonomic risks. Development of strategies and implementation plans to reduce adverse health effects from ergonomics.

Groups inside Government	Behaviour that must be changed (Current Behaviour)	Main mechanism to achieve the necessary changes
	these should be changed to recognize the need to have safe equipment for employees to do their work and still be free from ergonomics.	

Groups outside Government	Behaviour that must be changed (Current Behaviour)	Main mechanism to achieve the necessary changes
Employers and employer organisations	Employers' behaviour of not providing equipment and working environment that will not cause ergonomics. Employers are always aware of increased legislation and the costs associated with it, such as training fees, consultant fees and equipment costs. They avoid the cost associated with healthy working environment even though the ultimate cost is more as it affects them and the workers' health and this is also supposed to change. They should change from aiming to complying only with the minimum standard.	The creation of awareness and actual examples from industry on how improving an employee's working circumstances may result in increased production and better quality of work, thus increasing the profit of the employer. Awareness can be created through advocacy, which is in line with the Inspectorate of the Department's current mandate.
Employees and Trade Unions	Employees sometimes expect the employer to be responsible for everything in the workplace and do not take responsibility for themselves and their fellow employees. This behaviour results in ergonomic conditions	Awareness campaigns and training will be used to capacitate employees. Employees also need to cooperate with the employer in order to achieve a workplace which has reduced risk and

Groups outside Government	Behaviour that must be changed (Current Behaviour)	Main mechanism to achieve the necessary changes
	which could have been avoided if employees took responsibility.	facilitates an improvement in working conditions.
Professional bodies of Occupational Health and Training institutions-	Ergonomics is regarded by professional not in the field of ergonomics as an inferior discipline. This is again due to the fact that ergonomics is a relatively new discipline in terms of other occupational stressors and therefore become undervalued.	Through the incorporation of ergonomics based courses and lecturers in other occupational disciplines such as occupational hygiene and occupational medicine, all professionals will ascertain the knowledge and understanding of the important of addressing ergonomic risks in the workplace.

1.5. Report on consultations on the proposal with the affected government agencies, business and other groupings. What do they see as the main benefits, costs and risks? Do they support or oppose the proposal? What amendments do they propose? And have these amendments been incorporated in your proposal?

Table on consultations:

Affected Stakeholders	What do they see as main <u>benefits, costs and risks?</u>	Do they <u>support</u> or <u>oppose</u> the proposal?	What <u>amendments</u> do they propose?	Have these amendments been <u>incorporated</u> in your proposal?
1. Government Departments and Agencies - Dept. of Health - Rail Safety Regulator - Transnet - Road Accident Fund - National Institute for Occupational Health	<p>The costs mentioned were of the fees to be paid to consultants to implement the Regulation.</p> <p>The benefits mentioned were the improved working conditions of employees and increased productivity.</p>	<p>It was supported by the departments and agencies</p>	<p>The following amendments were proposed;</p> <ul style="list-style-type: none"> - Changes to definitions used in the regulation - Re-wording of phrases to be more in line with internationally used terms 	<p>The proposed amendments were discussed by the technical committee and changes were made to the Regulation from the proposals.</p>
2. Business - KFC - Standard Bank - Tristar - SASOL - Business Unity South Africa	<p>The costs highlighted were relating to the fees to be paid to consultants to implement the Regulation.</p> <p>There was also a concern with the number of qualified professionals in South Africa to assist employers with</p>	<p>Business was in support of the Regulations</p>	<p>The following amendments were proposed;</p> <ul style="list-style-type: none"> - Limiting the scope of the Regulations - Providing more clarity on the type of work to assessed - Provide specific 	<p>All the submitted comments were discussed in the technical committee and alterations were made to the final Regulation.</p>

Affected Stakeholders	What do they see as main <u>benefits, costs and risks?</u>	Do they <u>support or oppose</u> the proposal?	What <u>amendments</u> do they propose?	Have these amendments been <u>incorporated</u> in your proposal?
	<p>implementing the Regulation. The scope of the Regulation was also very wide and it was suggested to be more specific.</p> <p>The benefits mentioned were the improved working conditions of employees and increased productivity.</p>		<p>information of training needs</p>	
<p>3. Organised Labour</p> <ul style="list-style-type: none"> - COSATU - Nactu - Fedusa 	<p>No costs and risks were raised by organised labour. The benefits they mentioned included an improved working environment and healthier employees.</p>	<p>Organised labour was in support of the Regulations</p>	<p>No comments were received by organised labour, however, they formed part of the technical committee and their comments were incorporated at all stages of the development of the</p>	<p>Yes, their comments were incorporated in at all stages of the development of the Regulations.</p>

Affected Stakeholders	What do they see as main <u>benefits, costs and risks?</u>	Do they <u>support or oppose</u> the proposal?	What <u>amendments</u> do they propose?	Have these amendments been <u>incorporated</u> in your proposal?
			Regulation.	
4. Civil Society/Institutions - Rhodes University - University of KZN - University of Cape Town - Stellenbosch University - North West University	The costs highlighted were to the implementation of the Regulations. However, the benefits would include an improved working environment, healthier employees and increased productivity which may lead to development and more employment options.	All the institutions were in favour of the Regulations.	Comments were received relating to the definitions of terms used in the Regulations, the requirements of medical surveillance in the Regulations and who will be determined as a competent person in terms of the Regulation.	Yes, the comments received were incorporated into the final Regulations.
5. Professional bodies - Ergonomics Society of South Africa - Southern Africa Institute of Occupational Hygiene - South African Society of Occupational Health Nursing	The costs and benefits raised by the professional bodies were similar to those mentioned by the institutions in the above cell. The main costs will be on the employers, however the benefits include improved working	All the professional bodies were in favour of the Regulations.	The proposed amendments to the Regulations included changes to the definition of a competent person. The different professional bodies provided different alternatives which favoured their field of	The technical committee assessed all the comments received and altered the definition to one that does not exclude some professions

Affected Stakeholders	What do they see as main <u>benefits, costs and risks?</u>	Do they <u>support or oppose</u> the proposal?	What <u>amendments</u> do they propose?	Have these amendments been <u>incorporated</u> in your proposal?
<ul style="list-style-type: none"> - South African Society of Occupational Medicine - South African Petroleum Industry - Occupational Therapy in Occupational Health 	<p>conditions, less injuries and diseases and an increase in productivity.</p>		<p>speciality. Other proposals were made to definitions of terms used in the Regulation</p>	
<p>6. The Public</p>	<p>The costs of the Regulations will be mainly on the employer. The employees and consultants will benefit from the implementation of the Regulations.</p>	<p>The comments received were not against the implementation of the Regulations.</p>	<p>Comments were made on definitions and grammar.</p>	<p>Yes, the comments were taken into account and the Regulation was amended.</p>

1.6. Describe possible disputes arising out of the implementation of the proposal, and system for settling and appealing them. How onerous will it likely be for members of the public to lodge a complaint and how burdensome and expeditious is the proposed dispute-settlement procedure?

The Technical Committee is positive that all disputes were addressed when incorporating the public comments into the draft Regulation. The only other foreseen disputes with the implementation of the Ergonomics Regulations are the time-frame given to employers to implement the Regulation. Even though a time-frame will be provided, some employers might need additional time in order to implement the Regulations due to constraints applicable to their workplace.

The Occupational Health and Safety Act, Act 85 of 1993, under which these regulations will be promulgated, include a section for appeals, Section 35. This section allows for any person to appeal any decision taken by an inspector of the Department of Labour to the Chief Inspector. The Chief Inspector then has the obligation to investigate the appeal and provide the individual with feedback on the appeal.

All appeals must be submitted in writing and may be sent electronically, by post or hand delivered to a Department of Labour 127 offices throughout the country. The appeal must be handled and finalised by the Department of Labour within the time-frame stipulated in the Standard Operating Procedure.

2. Impact Assessment

2.1. Describe the costs and benefits of implementing the proposal to the groups identified **in point 1.5 above**, using the following chart. Add more rows if required:

Group	Implementation Costs	Costs of changing behaviour	Costs/Benefits from achieving desired outcome	Comments
Employers	Implementation of	Training and	The long term benefits	As will all

Group	Implementation Costs	Costs of changing behaviour	Costs/Benefits from achieving desired outcome	Comments
	costs relating to assessing, monitoring, medical surveillance, control measures and maintenance	workshop costs	of having a healthy workforce will benefit the employers. Costs relating to the implementation costs will be an initial investment, but will reduce in time as programmes will need to be maintained and not started from new.	occupational health and safety programmes, they require an initial investment of capital and resources, which reduce in time as maintaining is not as costly as implementing
Employees		Trade Unions will host workshops and seminar for their members Trade Unions will be required to advocate the Ergonomics Regulations to their members. This will include disseminating information received from Government	Improved working conditions will result in decent work. Decent work will result in employees working harder for employers, which can result in increased productivity. Increased productivity results in increased employment and investment.	
Department of Labour	Additional Inspectors	Government will carry the costs for implementing the Ergonomics Regulations. This includes the meetings held to develop the Regulations, costs relating to publishing and advocating the Regulations and training of inspectors to enforce and advocate the Regulations. The Department of	Occupational Health and Safety's aim is to reduce occupational injuries and diseases, thus reducing the burden on the households, communities and country, which results from occupational injuries and diseases.	

Group	Implementation Costs	Costs of changing behaviour	Costs/Benefits from achieving desired outcome	Comments
		Labour hosted workshops to business, organised labour and professions throughout the progress of producing the Regulation.		
Occupational Health and Safety Professionals		Professionals will need to develop programmes and tools to use in the assessing and monitoring for ergonomic risks.	The professional will be better equipped to provide a full range of services to an employer, thus decreasing the cost of obtaining more than one professional.	
Training Centres		Training standards and degrees will need to be developed and accreditation obtained.	More students will enrol into the training centre or institution, thus increasing the income.	

2.2. Describe the changes required in budgets and staffing in government in order to implement the proposal. Identify where additional resources would be required for implementation. It is assumed that existing staff are fully employed and cannot simply absorb extra work without relinquishing other tasks:

The Department of Labour already has inspectors who focus on occupational health and safety. Additional inspectors are required, but not only for implementing the ergonomics regulations. The capacity of new and existing inspectors will need to be increased through additional trainings, but this is already in place for all occupational health and safety related hazards.

2.3. Describe how the proposal minimises implementation and compliance costs.

Many employers are already implementing systems and programmes of occupational health and safety. Systems and programmes relating to ergonomics can therefore be incorporated into the existing systems and programmes, thus minimising the costs of implementing the regulations and complying with the regulations. The Department of

Labour has already trained thirty of its inspectors throughout the country in ergonomics, therefore already reducing the costs relating to training of inspectors.

3. Managing Risk

3.1. Describe the main risks to the achievement of the desired ends of the policy/bill/regulations/other and/ or to the national priorities (aims) that could arise from adoption of the proposal. Also describe the measures taken to manage the identified risks. Add more rows if necessary:

The main risk of this regulation is the lack of implementation from the employers.

In order for the Regulation to be implemented correctly, the Department of Labour has planned and will plan country-wide workshops to employers, employees and organised labour, professional bodies and institutions once the Regulations have been promulgated. Employers and employees not complying with the Regulation may result in the employer, employee and government not getting the full benefits of a workplace that is safe and free from a risk to health.

Identified Risk	Mitigation Measures
Non-implementation of the Ergonomics Regulations in the workplaces	<ul style="list-style-type: none"> - The Department of Labour has advocated the Ergonomics Regulations to employers and employees, with 6 workshops being held across the country. - Future workshops will be held around the country once the Regulations are promulgated in order to advocate the Regulations - Once the Regulation has been promulgated, there will be a phase-in period for employers and employees to comply with the regulation. The length of the phase-in period will be recommended by the technical committee to the Minister's Advisory Council for Occupational health and Safety. The Advisory Council will then evaluate the socio and economic environment in the country and either extend or reduce the phase-in period. - During the phase-in period, Inspections will be conducted at employers to advocate Regulations - Once the phase-in period has ended, Inspectors will be able to enforce the regulations on employers and employees. If after the inspection, the Inspector has determined a non-compliance to the regulation, the employer or employee will be given a period of 60 days to comply with the non-compliance. Should there still be no compliance after the 60 days, the Inspector shall recommend prosecution to employers and employees

	who do not comply.
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3.2. Describe the mechanisms **included in your proposal** for monitoring implementation, evaluating the outcomes, and modifying the implementation process if required. Estimate the minimum amount of time it would take from the start of the implementation process to identify a major problem and remedy it:

After the promulgation of the regulation, provincial offices will be required to report to the Directorate: Occupational Health and Hygiene on the number of inspections conducted per month in relation to ergonomics. In addition to the number of inspections conducted, the province will also have to report back on the specific noticed which were issued in terms of the regulation. The submitting of the reports will be monitored by the Deputy-Director for Physical Stressors in the Directorate: Occupational Health and Hygiene.

The Deputy-Director for Physical Stressors will also be responsible for evaluating the data submitted by the provinces in their reports. The data collected from the provincial reports will be tabled at the Ergonomics Technical Committee meeting for discussion by the technical committee. From the data collected, the technical committee will evaluate the information to determine if there are any issues with the regulation which must be addressed through an amendment. Once a decision is taken by the technical committee, it will be presented to the Minister's Advisory Council for Occupational health and Safety.

The feedback from the inspections conducted by the Inspectors in the provinces will ensure that the implementation of the regulation is monitored and evaluated on a monthly basis.

4. Summary

4.1. Summarise the impact of the proposal on the main national priorities

National Priority	Impact
1. Social Cohesion	N/A
2. Security (Safety, Financial, Food, Energy and etc.)	Savings to government and employer due to reduced injuries and diseases in the work place.
3. Economic Growth	A healthy and safe working environment results in Improved working conditions. Improved working conditions may result in employees working harder for employers, which can result in increased productivity. Increased productivity results in increased employment and investment.
4. Economic Inclusion (Job Creation and Equality)	Both occupational health professionals and training centres will benefit from the implementation of the Ergonomics Regulations. Increased demand for professionals will result in a high demand for occupational health professionals, resulting in an increased demand for training of occupational health professionals. The training centres will require more lecturers to provide the degree, diploma or course and administrative staff to assist with the running of the qualification.
5. Environmental Sustainability	N/A

4.2. Identify the social and economic groups that would **benefit most** and that would **bear the most cost**. Add more rows if required.

Main Beneficiaries	Main Cost bearers
1. Employees (improved working conditions, improved quality of life and worker morale)	1. Employers
2. Employers (improved productivity)	2. Government
3. Government (inclusive and efficient implementation of occupational health and safety management systems)	

4.3. In conclusion, summarise what should be done to reduce the costs, maximise the benefits, and mitigate the risks associated with the policy/bill/regulations/other. Note supplementary measures (such as educational campaigns or provision of financing) as well as amendments to the draft itself, if appropriate. Add more lines if required.

a) In order to reduce costs, maximise the benefits and mitigate the risk associated with the regulations, the Department of Labour will facilitate the following measures:

- i. To reduce the costs on employers, particularly small, medium and micro enterprises, the Department will capacitate their inspectorate to become fully professionalised and provide training and equipment for the inspectorate to enable them to conduct monitoring and assessments. Entities approved by the Department will also be requested to provide services at a reduced rate, with additional expenses being financed by other Department of Labour stakeholders.
- ii. In order to maximise the benefits and minimise the risk associated with the regulation, the Department of Labour will require the buy-in from all stakeholders in occupational health and safety. The buy-in will be facilitated through the Department of Labour in the form of workshops with stakeholders i.e. employers and business representatives, labour unions and employees and professionals in the field of occupational health and safety. In addition to the six workshops already held throughout the country, more workshops are planned after the promulgation of the regulation. The aim of the workshop is to advocate the regulation and to dispel any misunderstanding with regard to the regulation.

4.4. Please identify areas where additional research would improve understanding of the costs, benefits and/ or risks of the policy/bill/regulations/other

Once the Ergonomics Regulations have implemented, the Department of Labour may consider conducting research into the success of implementing the Regulations. This could include the reduction in the amount of occupational disease and injury claims submitted for compensation.

For the purpose of building SEIAS body of knowledge please complete the following:

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